

DO NOT REMOVE

LICENSE AUTHORITY FILE COP



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

July 24, 1992

Docket Nos. 50-237, 50-249
and 50-254, 50-265

Posted
Amdt. 113 to DPR-25

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company-Suite 300
OPUS West III
1400 OPUS Place
Downers Grove, Illinois 60515

Dear Mr. Kovach:

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M83369, M83370, M83373, AND M83374)

The Commission has issued the enclosed Amendment No. 116 to Facility Operating License No. DPR-19 for Dresden Unit 2, Amendment No. 113 to Facility Operating License No. DPR-25 for Dresden Unit 3, Amendment No. 135 to Facility Operating License No. DPR-29 for Quad Cities Unit 1, and Amendment No. 131 to Facility Operating License No. DPR-30 for Quad Cities Unit 2. The amendments are in response to your application dated May 7, 1992, as supplemented by your July 1, 1992, submittal.

The amendments consist of administrative changes which revise the types of procedures that require review by the Onsite Review and Investigative Function (OnSR&IF), specifies the level of review and approval for procedures governed by the proposed Technical Review and Control process, clarifies the authority assigned to the OnSR&IF, and incorporates editorial changes to provide conforming changes to the proposed administrative changes.

A title change related to the Assistant Vice President Quality Programs and Assessment proposed for Dresden Station in this submittal was also proposed as a miscellaneous administrative change in your August 9, 1991, submittal. This request has been addressed in this submittal since it is the staff's decision that it is more appropriate and timely to proceed in this manner.

Mr. Thomas J. Kovach

- 2 -

July 24, 1992

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by:

Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 116 to DPR-19
- 2. Amendment No. 113 to DPR-25
- 3. Amendment No. 135 to DPR-29
- 4. Amendment No. 131 to DPR-30
- 5. Safety Evaluation

cc w/enclosures:
See next page

DISTRIBUTION:

PDIII-2 r/f (2)	B. Clayton, RIII
NRC & Local PDRs	PDIII-2 p/f (2)
J. Zwolinski	B. Boger
B. Siegel	R. Barrett
C. Moore (2)	L. Olshan
D. Hagan	OGC
W. Jones	G. Hill (16)
ACRS (10)	C. Grimes
OC/LFMB	OPA
	Docket Files

OFC	LA:PDIII-2	PM:PDIII-2	PM:PDIII-2	LFMB	D:PDIII-2	OGC
AME	CMOORE	BSIEGEL	LOLSHAN	GZECH	RBARRETT	CPW
DATE	7/21/92	7/21/92	7/21/92	7/21/92	7/24/92	7/28/92

OFFICIAL RECORD COPY

Mr. Thomas J. Kovach
Commonwealth Edison Company

Dresden Nuclear Power Station
Unit Nos. 2 and 3

cc:

Michael I. Miller, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60690

Mr. C. Schroeder
Plant Manager
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
6500 North Dresden Road
Morris, Illinois 60450-9766

Chairman
Board of Supervisors of
Grundy County
Grundy County Courthouse
Morris, Illinois 60450

Regional Administrator
Nuclear Regulatory Commission, Region III
799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Robert Neumann
Office of Public Counsel
State of Illinois Center
100 W. Randolph
Suite 11-300
Chicago, Illinois 60601

Mr. Thomas J. Kovach
Commonwealth

Quad Cities Nuclear Power Station
Unit Nos. 1 and 2

cc:

Mr. Stephen E. Shelton
Vice President
Iowa-Illinois Gas and
Electric Company
P. O. Box 4350
Davenport, Iowa 52808

Michael I. Miller, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60690

Mr. Richard Bax
Station Manager
Quad Cities Nuclear Power Station
22710 206th Avenue North
Cordova, Illinois 61242

Resident Inspector
U. S. Nuclear Regulatory Commission
22712 206th Avenue North
Cordova, Illinois 61242

Chairman
Rock Island County Board
of Supervisors
1504 3rd Avenue
Rock Island County Office Bldg.
Rock Island, Illinois 61201

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

Robert Neumann
Office of Public Counsel
State of Illinois Center
100 W. Randolph
Suite 11-300
Chicago, Illinois 60601



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 116 TO FACILITY OPERATING LICENSE NO. DPR-19,
AMENDMENT NO. 113 TO FACILITY OPERATING LICENSE NO. DPR-25,
AMENDMENT NO. 135 TO FACILITY OPERATING LICENSE NO. DPR-29,
AND AMENDMENT NO. 131 TO FACILITY OPERATING LICENSE NO. DPR-30

COMMONWEALTH EDISON COMPANY

AND

IOWA-ILLINOIS GAS AND ELECTRIC COMPANY

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. 50-237, 50-249, 50-254, AND 50-265

1.0 INTRODUCTION

By letter dated May 7, 1992, Commonwealth Edison Company (the licensee, CECO) proposed changes to the Technical Specifications (TS) for all twelve CECO operating units (six nuclear stations). As a result of the staff's review, in a letter dated July 1, 1992, CECO provided clarifications to information provided in the original submittal. The proposed amendments consist of administrative changes which revise the types of procedures that require review by the Onsite Review and Investigative Function (OnSR&IF), specifies the level of review and approval for procedures governed by the proposed Technical Review and Control process, and clarifies the authority assigned to the OnSR&IF. In addition, editorial changes have been proposed to provide clarity, eliminate extraneous references to specific organizational titles and provide conforming changes to the proposed administrative changes. Among the editorial changes is the relocation of report distributions to station procedures. All six of the stations' Section 6 OnSR&IF descriptions are being standardized to the current Byron and Braidwood descriptions, as modified by the licensee's submittal. The staff's review of the acceptability of these proposed changes for Dresden Units 2 and 3 and Quad Cities Units 1 and 2 is addressed in this Safety Evaluation.

2.0 EVALUATION

The OnSR&IF primary responsibility is to conduct a critical and thorough review of the items identified in Section 6 of the TS under the OnSR&IF. Procedures review is one of the OnSR&IF areas of responsibility identified,

and one of the TS changes proposed by CECO would limit the review of procedures by the OnSR&IF to the applicable administrative procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, and the Emergency Operating Procedures. In addition, those procedure revisions which are determined to require a safety evaluation (10 CFR 50.59 review) would also be reviewed by the OnSR&IF. RG 1.33, Revision 2, Appendix A, provides a listing of the typical safety related activities that should be covered by written procedures for pressurized water reactors and boiling water reactors. The major categories identified in Appendix A which require procedures are: (1) administrative, (2) general plant operations, (3) startup, operation, and shutdown of safety related PWR and BWR systems, (4) abnormal, offnormal, or alarm conditions, (5) combating emergencies and other significant events, (6) control of radioactivity, (7) for control of measuring and test equipment and for surveillance tests, procedures and calibrations, (8) maintenance performance, and (9) chemical and radiochemical control procedures. Under each category specific types of equipment, instrumentation, systems, programs, and events are identified for which procedures are required. CECO has stated that limiting the scope of procedures reviewed by the OnSR&IF will result in: (1) key station personnel assigned to perform OnSR&IF having additional time to conduct review of issues that affect nuclear safety; (2) expediting of the procedure review process; (3) procedural enhancements being implemented sooner than is achievable under the current process; (4) a reduced man power burden to effect changes to procedures while maintaining adequate controls to assure an acceptable level of independent review is conducted, and (5) senior management having more time to devote to overseeing station operation and emergency issues that potentially could impact nuclear safety.

Procedures that do not require review by the OnSR&IF shall be subjected to review and approval under the proposed Technical Review and Control process. The Technical Review and Control process consists of an independent review conducted by a qualified individual knowledgeable in the area affected other than the individual who prepared the procedure. In addition to ensuring the procedure is technically correct, the technical reviewer will be responsible for determining if a cross-disciplinary review is required. The technical reviewer has the ability to increase discipline review requirements as necessary to assure an adequate review is performed.

The requirements for a cross-disciplinary review ensures a comprehensive review is provided by qualified technical reviewers from other disciplines while not burdening these personnel with review requirements for which they can provide no added expertise. To assist the technical reviewer, CECO has stated administrative controls will be established for determining if a cross-disciplinary review is required.

Qualified reviewers to be used in the Technical Review and Control process will be designated by the Station Manager and will include the disciplines or procedure category for which the individuals are qualified. Each individual designated to perform these reviews will meet the appropriate experience qualifications of ANSI N18.1-1971, Sections 4.2 and 4.4. CECO has also stated

that records will be maintained for procedure review performed in accordance with the Technical Review and Control Process that are consistent with those established for existing procedure reviews. In its July 1, 1992 submittal, CECO stated that the overview of the Technical Review function will be provided through the Nuclear Quality Programs Function and that the initial evaluation will be incorporated into the 1993 audit schedules.

The staff, as a result of its review of CECO's May 7, 1992 submittal, requested CECO to provide clarifying information to address the issues identified by the staff. Specifically, CECO was requested to: (1) identify in the TS the title of the individual that will receive copies of specified Onsite Reviews; (2) characterize the types of personnel involved in the investigation and review of TS violations; (3) clarify the approval authority for the Technical Review function; (4) identify what organization provides the overview of the Technical Review function; (5) confirm that procedural controls governing the Technical Review function will be in place prior to implementation; (6) not delete the TS requirement limiting staff overtime for Dresden and Quad Cities Stations; and (7) not delete the Station Security Plan implementation from the TS for Dresden Station. In its July 1, 1992 submittal, CECO provided responses to the above issues that addressed the staff concerns. CECO's response also modified the May 7, 1992, proposed TS submittal in areas the staff deemed were necessary to clarify the intent of the proposed TS change. In addition, some editorial changes were included based on staff comments. The staff has reviewed CECO's July 1, 1992, submittal and determined it adequately addresses the issues identified by the staff during its review of CECO's original submittal.

The NRC staff has evaluated the proposed changes contained in CECO's May 7, 1992 submittal and clarifications provided in its July 1, 1992 submittal, related to the OnSR&IF procedures review function and the utilization of a Technical Review and Control process to review the remaining procedures. The staff has determined, based on our review, that the proposed changes are: (1) consistent with the guidance contained in RG 1.33, Revision 2, Appendix A, (2) will decrease the workload of key station personnel assigned to the OnSR&IF, thus providing them more time to devote to safety related issues, (3) expedite the procedure review process which will be particularly beneficial for plants that have a significant procedures upgrade program backlog, (4) an acceptable method for the review of procedures that are not safety related that has been approved by the staff for other facilities (i.e. River Bend, Clinton), and (5) the supplemental information provided by CECO in its July 1, 1992, submittal adequately addresses the issues identified by the staff during its review and incorporates the appropriate changes into the proposed TS. On these bases the staff has determined these proposed changes are acceptable for the Dresden and Quad Cities Nuclear Stations.

The OnSR&IF descriptions in the TS are being standardized to the current Byron/Braidwood descriptions for all six nuclear stations. As a result, editorial changes have been proposed to provide clarity, eliminate erroneous references to specific organizational titles, and to provide consistency (i.e., numbering, punctuation, wording) with the Byron/Braidwood TS. Since

these are only editorial in nature, and do not result in substantive changes to the TS, the staff finds them acceptable for the Dresden and Quad Cities Nuclear Stations.

In addition, the following specific changes have been proposed by CECO to the Dresden and Quad Cities Stations' TS to achieve greater consistency with the Byron/Braidwood TS:

1. The requirement for offsite review of issues associated with noncompliance with NRC requirements is being expanded to include noncompliance with codes, regulations, orders, technical specifications, and license requirements. This is an increase in the TS requiring offsite review involvements.
2. A definition of Reportable Events is being included in Section 1.0 of the TS for Dresden that equates to Reportable Events associated with 10 CFR 50.73. This is being added to clarify that the involvement of the onsite and offsite review is limited to those events associated with 10 CFR 50.73. This is consistent with the current Onsite and Offsite Review and Investigation Function requirements.
3. The requirement for Offsite Review of "changes to the Fire Protection Program and implementing procedures" is unique to Dresden. The other five CECO stations do not have this requirement. Generic Letters 86-10 and 88-12, which provide guidance on the removal of fire protection requirements from the Technical Specifications, require independent review and audit of the station fire protection program. CECO has stated these elements are adequately covered in other Technical Specification requirements for Onsite Review (proposed Specification 6.2.G.2.b(5)), Nuclear Quality Program Audit (Specification 6.2.G.1.b(8)), and independent fire protection and loss prevention audit (Specification 6.2.H).
4. Part of the proposed TS revision for Quad Cities includes a provision which would allow the delegation of the approval of audit agendas, checklist and findings to corporate staff or supervision approved by the General Manager Quality Programs and Assessment. This provision is consistent with the current TS requirements at the other five stations.
5. In a submittal dated August 9, 1991, for Dresden Units 2 and 3, CECO proposed to revise Section 6.0 to incorporate a title change within CECO's organizational structure. The title of Assistant Vice President (AVP) Quality Programs and Assessment has been modified to General Manager (GM) Quality Programs and Assessment. CECO has stated this revision is necessary to insure that CECO's corporate organizational structure is properly reflected in the Technical Specifications and is only administrative in nature and does not affect the scope or responsibility of the position. A similar change for Quad Cities and Zion has been proposed by CECO in its May 7, 1992, submittal which is the subject of this Safety Evaluation. As a result, this proposed

change for Dresden is being included in the staff's review of CECO's May 7, 1992, submittal which addresses Section 6.0 TS changes and more specifically similar changes for Quad Cities and Zion, rather than as part of CECO's August 9, 1992, submittal. CECO incorporated this change into its May 7, 1992, submittal since it had been previously requested and to maintain consistency with the submittals for the other stations.

The staff has reviewed these proposed changes and determined that Item 1 results in an increase in requirements as currently stated in the TS and is, therefore, acceptable for the Dresden and Quad Cities Stations. Item 2 results in no change to the requirements as currently stated in the TS and is, therefore, acceptable. Since Item 3 is adequately covered in other sections of the TS there is no need for Offsite Review and the proposed deletion of this requirement for Dresden Nuclear Station is acceptable. Item 4 will make the Quad Cities TS associated with this requirement consistent with the requirements currently in effect at the other CECO stations and is, therefore, acceptable. Item 5 is only administrative in nature since it results in no change to the function performed by the individual within the corporate organization and is, therefore, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Byron L. Siegel

Date: July 24, 1992



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 113
License No. DPR-25

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Commonwealth Edison Company (the licensee) dated May 7, 1992, as supplemented July 1, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B. of Facility Operating License No. DPR-25 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 113, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard J. Barrett, Director
Project Directorate III-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 24, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 113

FACILITY OPERATING LICENSE NO. DPR-25

DOCKET NO. 50-249

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

<u>REMOVE</u>	<u>INSERT</u>
vi	vi
1.0-6	1.0-6
6-1	6-1
6-2	6-2
6-3	6-3
6-5	6-5
6-6	6-6
6-7	6-7
6-8	6-8
6-9	6-9
6-10	6-10
6-11	6-11
6-12	6-12
6-13	6-13
6-14	6-14
6-15	6-15
6-16	6-16

(Table of Contents, Cont'd.)

	<u>Page</u>
4.9 Auxiliary Electrical Systems	3/4.9-1
4.9.A Station Batteries	3/4.9-1
4.9.B (N/A)	
4.9.C Diesel Fuel	3/4.9-5
4.9.D Diesel Generator Operability	3/4.9-5
4.10. Refueling	3/4.10-1
4.10.A Refueling Interlocks	3/4.10-1
4.10.B Core Monitoring	3/4.10-1
4.10.C Fuel Storage Pool Water Level	3/4.10-2
4.10.D Control Rod Drive and Control Rod Drive Maintenance	3/4.10-3
4.10.E Extended Core Maintenance	3/4.10-4
4.10.F Spent Fuel Cask Handling	3/4.10-5
4.10.G Fuel Storage Reactivity Limit	3/4.10-8
4.11 High Energy Piping Integrity	3/4.11-1
4.12 Fire Protection Systems - Sections 4.12.A through 4.12.H - Deleted per Generic Letters 86-10 and 88-12 (Amendment 101)	
5.0 Design Features	5-1
5.1 Site	5-1
5.2 Reactor	5-1
5.3 Reactor Vessel	5-1
5.4 Containment	5-1
5.5 Fuel Storage	5-1
5.6 Seismic Design	5-2
6.0 Administrative Controls	6-1
6.1 Organization, Review, Investigation and Audit	6-1
6.2 Procedures and Programs	6-13
6.3 Action to be Taken in the Event of a REPORTABLE EVENT in Plant Operation	6-15
6.4 Action to be taken in the Event a Safety Limit is Exceeded	6-15
6.5 Plant Operating Records	6-15
6.6 Reporting Requirements	6-17
6.7 Environmental Qualification	6-21
6.8 Offsite Dose Calculation Manual (ODCM)	6-23
6.9 Process Control Program (PCP)	6-24
6.10 Major Changes to Radioactive Waste Treatment Systems (Liquid, Gaseous, Solid)	6-24

1.0 DEFINITIONS (Cont'd.)

- HH. Process Control Program (PCP) - Contains the sampling, analysis, and formulation determination by which solidification of radioactive wastes from liquid systems is assured.
- II. Offsite Dose Calculation Manual (ODCM) - Contains the methodology and parameters used in the calculation of offsite doses due to radioactive gaseous and liquid effluents, and in the calculation of gaseous and liquid effluent monitor alarm/trip setpoints.
- JJ. Channel Functional Test (Radiation Monitor) - Shall be the injection of a simulated signal into the channel as close to the sensor as practicable to verify operability including alarm and/or trip functions.
- KK. Source Check - The qualitative assessment of instrument response when the sensor is exposed to a radioactive source.
- LL. Member(s) of the Public - Shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.
- MM. Rated Recirculation Pump Speed - is the recirculation pump speed that corresponds to rated core flow (98×10^6 lb/hr) when operating at rated thermal power (dual loop operation).
- NN. Dual Loop Operation - reactor power operation with both recirculation pumps running.
- OO. Single Loop Operation (SLO) - reactor power operation with one recirculation pump running.
- PP. Transient Linear Heat Generation Rate (TLHGR) - The transient linear heat generation rate limit protects against fuel centerline melting and 1% plastic cladding strain during transient conditions throughout the life of the fuel.
- QQ. Fuel Design Limiting Ratio for Centerline Melt (FDLRC) - The fuel design limiting ratio for centerline melt is the limit used to assure that the fuel will neither experience centerline melt nor exceed 1% plastic cladding strain for transient overpower events beginning at any power and terminating at 120% of rated thermal power.
- RR. Linear Heat Generation Rate (LHGR) - The linear heat generation rate is the operating fuel pin power level.
- SS. Reportable Event - A Reportable Event shall be any of those conditions specified in 10 CFR 50.73.

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review, Investigation and Audit

- A. Onsite and offsite organizations shall be established for the unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through the intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activity; Section 6 Interdepartmental Relationships.
 2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of plant.
 3. The Senior Vice President-Nuclear Operations shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
 4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operational pressures.
- B. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions, e.g., licensed Senior Operators, licensed Operators, health physics personnel, equipment operators, and key maintenance personnel. The amount of overtime worked by Unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).
- C. The shift manning for the station shall be as shown in Table 6.1.1. The Operating Assistant Superintendent, Operating Engineers, Shift Engineers, and Shift Foremen shall have a Senior Operating License. The Fuel Handling Foreman shall have a limited Senior Operating License. The Vice President BWR Operations on the corporate level has responsibility for the Fire Protection Program. An Operating Engineer at the station will be responsible for implementation of the Fire Protection Program.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- D. Qualifications of the station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, with the exception of the Health Physics Services Supervisor who shall meet or exceed the qualifications of Radiation Protection Manager of Regulatory Guide 1.8, September 1975, and the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents. The individual filling the position of Technical Superintendent shall meet the minimum acceptable level for "Technical Manager" as described in 4.2.4 of ANSI N18.1 - 1971.
- E. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.
- A training program for the fire brigade shall be maintained under the direction of the Operating Engineer and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975, except for fire brigade training sessions which shall be held at least quarterly.
- F. Retraining shall be conducted at intervals not exceeding two years.
- G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:
1. The Superintendent of the Offsite Review and Investigative Function shall be appointed by the Manager of Quality Assurance/ Nuclear Safety (QA/NS). The Corporate Audit Function shall be the responsibility of the Manager of QA/NS and shall be independent of operations. The Manager of QA/NS reports directly to the Chief Executive officer and has the responsibility to set Corporate Policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the Manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate department to determine that QA/NS policy is being carried out.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

a. Offsite Review and Investigative Function

The Superintendent of the Offsite Review and Investigative Function shall: (i) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (ii) select each participant for this function, (iii) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (iv) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (v) approve and report in a timely manner all findings of noncompliance with NRC requirements and provide recommendations to the Station Manager, Vice President BWR Operations, Manager QA/NS, General Manager of Quality Programs and Assessment and the Senior Vice President-Nuclear Operations. During periods when the Superintendent of the Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate who satisfies the formal training and experience requirements for the Superintendent of the Offsite Review and Investigative Function.

The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

- (1) The safety evaluations for 1) changes to procedures, equipment or systems as described in the safety analysis report and 2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute unreviewed safety questions. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of QA/NS;
- (2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
- (3) Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (4) Proposed changes in Technical Specifications or this Operating License;
- (5) Noncompliance with Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the Onsite Review and Investigative Function;
- (7) ALL REPORTABLE EVENTS;
- (8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems or components;
- (9) All changes to the Generating Stations Emergency Plan prior to implementation of such changes; and
- (10) All items referred by the Technical Staff Supervisor, Station Manager, Vice President BWR Operations and General Manager of Quality Program and Assessment.

b. Station Audit Function

The Station Audit Function shall be the responsibility of the General Manager of Quality Programs and Assessment independent of the Production Department. Such responsibility is delegated to the Nuclear Quality Programs Manager.

The Nuclear Quality Programs Manager, or designated Corporate Staff or Supervision approved by General Manager of Quality Programs and Assessment shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within the period designated below.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (1) The Conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year;
- (2) The adherence to procedures, training and qualification of the station staff at least once per year;
- (3) The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months;
- (4) The performance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B", 10 CFR 50;
- (5) The Facility Emergency Plan and implementing procedures at least one per 12 months;
- (6) The Facility Security Plan and implementing procedures at least once per 12 months;
- (7) Onsite and Offsite Reviews;
- (8) The Facility Fire Protection Program and implementing procedures at least once per 24 months;
- (9) The radiological environmental monitoring program and the results thereof at least once per 12 months;
- (10) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months; and
- (11) The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive waste at least once per 24 months.

All findings of noncompliance with NRC requirements and recommendations and results of each audit shall be reported to the Station Manager, Manager of QA/NS, the Vice president BWR Operations, General Manager of Quality Programs and Assessment, the Senior Vice President-Nuclear Operations and the Chief Operating Officer.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

c. Authority

The Manager of QA/NS reports to the Chief Executive Officer. The Manager of QA/NS has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

The General Manager of Quality Programs and Assessment reports to the Senior Vice President-Nuclear Operations. The General Manager of Quality Programs and Assessment has the authority to recommend unit shutdown or request any other which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operating Officer.

d. Records

- (1) Reviews, audits and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b.
- (2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the Offsite Reviews and Investigative Functions described in Specifications 6.1.G.1.a. These procedures shall cover the following:

- (1) Content and method of submission of presentations to the Superintendent of the Offsite Review and Investigative Function.
- (2) Use of committees and consultants.
- (3) Review and approval.
- (4) Detailed listing of items to be reviewed.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (5) Method of (a) appointing personnel, (b) performing reviews, investigations, (c) reporting findings and recommendations of reviews and investigations, (d) approving reports, and (e) distributing reports.
- (6) Determining satisfactory completion of action required based on approved findings and recommendations reported by personnel performing the Review and Investigative Function.

f. Personnel

- (1) The persons, including consultants, performing the Offsite Review and Investigative Function, in addition to the Superintendent of the Offsite Review and Investigative Function, shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated.
 - (a) nuclear power plant technology
 - (b) reactor operations
 - (c) utility operations
 - (d) power plant design
 - (e) reactor engineering
 - (f) radiological safety
 - (g) reactor safety analysis
 - (h) instrumentation and control
 - (i) metallurgy
 - (j) any other appropriate disciplines required by unique characteristics of the facility.
- (2) Individuals performing the Offsite Review and Investigative Function shall possess a minimum formal training and experience as listed below for each discipline.
 - (a) Nuclear Power Plant Technology

Engineering graduate or equivalent with 5 years experience in the nuclear power field design and/or operation.
 - (b) Reactor Operations

Engineering graduate or equivalent with 5 years experience in nuclear power plant operations.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

(c) Utility Operations

Engineering graduate or equivalent with at least 5 years of experience in utility operation and/or engineering.

(d) Power Plant Design

Engineering graduate or equivalent with at least 5 years of experience in power plant design and/or operation.

(e) Reactor Engineering

Engineering graduate or equivalent. In addition, at least 5 years of experience in nuclear plant engineering, operation, and/or graduate work in nuclear engineering or equivalent in reactor physics is required.

(f) Radiological Safety

Engineering graduate or equivalent with at least 5 years of experience in radiation control and safety.

(g) Safety Analysis

Engineering graduate or equivalent with at least 5 years of experience in nuclear engineering.

(h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

(i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

- (3) The Superintendent of the Offsite Review and Investigative Function shall have experience and training which satisfy ANSI N18.1 - 1971 requirements for plant managers.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

2. The Onsite Review and Investigative Function shall be supervised by the Station Manager.

a. Onsite Review and Investigative Function

The Station Manager shall: (1) provide direction for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as the senior participant to provide appropriate direction; (2) approve participants for this function; (3) assure that at least two participants who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive interdisciplinary review coverage under this function; (4) independently review and approve the findings and recommendations developed by personnel performing the Onsite Review and Investigative Function; (5) report all findings of noncompliance with NRC requirements, and provide recommendations; and (6) submit to the Offsite Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the Onsite Review and Investigative Function.

b. Responsibility

The Onsite Review and Investigative Function shall be responsible for conducting the following:

- (1) Review of all applicable Plant Administrative Procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 and changes thereto;
- (2) Review of Emergency Operating Procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33 and changes thereto;
- (3) Review of all proposed tests and experiments that affect nuclear safety;
- (4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety;
- (5) Review of proposed changes to the Fire Protection Program;
- (6) Review of the Station Security Plan and submittal of recommended changes to the Station Security Plan in accordance with station procedures;
- (7) Review of Emergency Plan and identification of recommended changes;
- (8) Review of changes to the PROCESS CONTROL PROGRAM and OFFSITE DOSE CALCULATION MANUAL;

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (9) Review of all proposed changes to the Technical Specifications or Operating Licenses, and any proposed change which involves an unreviewed safety question that is to be submitted to the Commission for approval;
- (10) Review of investigation results for all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluations and recommendation to prevent recurrence;
- (11) Review of investigation results for all REPORTABLE EVENTS and other significant operating abnormalities, including the preparation and forwarding of reports covering evaluations and recommendation to prevent recurrence;
- (12) Review of investigation results for any accidental, unplanned, or uncontrolled radioactive release, including the preparation and forwarding of reports covering evaluations and recommendation to prevent recurrence;
- (13) Review of Unit operations to detect potential hazards to nuclear safety; and
- (14) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Offsite Review and Investigative Function.

c. Authority

The Onsite Review and Investigative Function shall:

- (1) Advise the Station Manager on all matters related to nuclear safety;
- (2) Recommend to the Station Manager disposition of items considered under Specification 6.1.G.2.b(1) through (9) prior to their implementation;
- (3) Include among its review conclusions for each item considered under Specifications 6.1.G.2.b(1) through (4), a determination of whether or not the item involves an unreviewed safety question; and
- (4) Provide prompt notification to the Vice-President BWR Operations and the Superintendent of the Offsite Review and Investigative Function of disagreement between the Onsite Review and Investigative Function and the Station Manager. The Station Manager shall follow the recommendations of the Onsite Review and Investigative Function or select a course of action that is more conservative regarding safe operation of the facility.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

d. Records

- (1) Reports, reviews, investigations, and recommendations prepared and performed for Specification 6.1.G.2.b shall be documented and forwarded to the Superintendent of the Offsite Review and Investigative Function unless otherwise specified.
- (2) Copies of all records and documentation shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the Onsite Review and Investigative Function. These procedures shall include the following:

- (1) Content and method of submission and presentation to the Station Manager, Vice President BWR Operations and the Superintendent of the Offsite Review and Investigative Function;
- (2) Use of committees;
- (3) Review and approval;
- (4) Detailed listing of items to be reviewed;
- (5) Procedures for administration of the quality control activities; and
- (6) Assignment of responsibilities.

f. Personnel

- (1) The personnel, including consultants, performing the Onsite Review and Investigative Function, in addition to the Station Manager, shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated:
 - (a) nuclear power plant technology;
 - (b) reactor operations;
 - (c) reactor engineering;
 - (d) radiological safety;
 - (e) chemistry;
 - (f) instrumentation and control; and
 - (g) mechanical and electric systems.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (2) Personnel performing the Onsite Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1-1971, Sections 4.2 and 4.4.

H. Fire Protection

1. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.
2. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

6.2 Procedures and Programs

- A. Written procedures shall be established, implemented and maintained covering the activities referenced below:
1. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
 2. The Emergency Operating Procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33;
 3. Station Security Plan Implementation;
 4. Generating Station Emergency Response Plan implementation;
 5. PROCESS CONTROL PROGRAM implementation;
 6. OFFSITE DOSE CALCULATION MANUAL implementation; and
 7. Fire Protection Program implementation.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

B. Technical Review and Control

Procedures required by Specification 6.2.A and other procedures which affect nuclear safety, as determined by the Station Manager, and changes thereto, shall be reviewed as follows prior to implementation, except as noted in Specification 6.2.C:

1. Each procedure or procedure change shall be independently reviewed by a qualified individual knowledgeable in the area affected other than the individual who prepared the procedure or procedure change. This review shall include a determination of whether or not additional cross-disciplinary reviews are necessary. If deemed necessary, the reviews shall be performed by the review personnel of the appropriate discipline(s).
2. Individuals performing these reviews shall meet the applicable experience requirements of ANSI N18.1-1971, Sections 4.2 and 4.4, and be approved by the Station Manager.
3. Applicable Administrative Procedures recommended by Regulatory Guide 1.33, Plant Emergency Operating Procedures, and changes thereto shall be submitted to the Onsite Review and Investigative Function for review and approval prior to implementation in accordance with Specification 6.1.G.2.c(2).
4. Review of the procedure or procedure change will include a determination of whether or not an unreviewed safety question is involved. This determination will be based on the review of a written safety evaluation prepared by a qualified individual, or documentation that a safety evaluation is not required. Onsite Review, Offsite Review and Commission approval of items involving unreviewed safety questions shall be obtained prior to station approval for implementation.
5. The Department Head approval authority shall be as specified in station procedures.
6. Written records of reviews performed in accordance with this specification shall be prepared and maintained in accordance with Specification 6.5.A.
7. Editorial and typographical changes shall be made in accordance with station procedures.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

C. Temporary changes to procedures 6.2.A above may be made provided:

1. The intent of the original procedure is not altered;
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected; and
3. The change is documented, reviewed, and approved in accordance with Specification 6.2.B within 14 days of implementation.

D. Drills of the emergency procedures described in Specification 6.2.A.3 shall be conducted at the frequency specified in the Generating Station Emergency Plan. These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

6.3 Action to be Taken in the Event of a REPORTABLE EVENT in Plant Operation

Any REPORTABLE EVENT shall be promptly reported to the Vice President BWR Operations or his designated alternate. The incident shall be promptly reviewed pursuant to Specification 6.1.G.2.b(11) and a separate report for each reportable event shall be prepared in accordance with the requirements of Specification 6.6.B.

6.4 Action to be Taken in the Event a Safety Limit is Exceeded

If a safety limit is exceeded, the reactor shall be shut down immediately and reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the Vice President BWR Operations or his designated alternate. The incident shall be reviewed pursuant to Specification 6.1.G.1.a and 6.1.G.2.b(10) and a separate report for each event shall be prepared in accordance with Specification 6.6.B.

6.5 Plant Operating Records

A. Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least five years.

1. Records of normal plant operation, including power levels and periods of operation at each power level.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

2. Records of principal maintenance activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety.
 3. Records and reports of reportable and safety limit events.
 4. Records and periodic checks, inspection and/or calibrations performed to verify the Surveillance Requirements (See Section 4 of these Specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded.
 5. Records of changes made to the equipment or reviews of tests and experiments to comply with 10 CFR 50.59.
 6. Records of radioactive shipments.
 7. Records of physic tests and other tests pertaining to nuclear safety.
 8. Records of changes to procedures required by Specification 6.2.A and other procedures which affect nuclear safety, as determined by the Station Manager.
 9. Shift Engineers Logs.
 10. By-product material inventory records and source leak test results.
- B. Records and/or logs relative to the following items shall be recorded in a manner convenient for review and shall be retained for the life of the plant.
1. Substitution or replacement of principal items of equipment pertaining to nuclear safety.
 2. Changes made to the plant as it is described in the Safety Analysis Report.
 3. Records of new and spent fuel inventory and assembly histories.
 4. (Deleted)
 5. Updated, corrected, and as-built drawings of the plant.
 6. Records of plant radiation and contamination surveys.
 7. Records of off-site environmental monitoring surveys.