



**FPL Energy**  
**Seabrook Station**

FPL Energy Seabrook Station  
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December 23, 2002

Docket No. 50-443

NYN-02126

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

**Seabrook Station**  
**License Amendment Request 02-10**  
**"Administrative Changes To Technical Specification Section 6"**

FPL Energy Seabrook, LLC (FPLE Seabrook) has enclosed herein License Amendment Request (LAR) 02-10. LAR 02-10 is submitted pursuant to the requirements of 10 CFR 50.90 and 10 CFR 50.4.

LAR 02-10 proposes changes to the Seabrook Station Technical Specifications (TS) Index and TS 6.0, Administrative Controls. The purpose of LAR 02-10 is to update the Technical Specifications to adopt portions of NUREG-1431, Revision 2 ("Standard Technical Specifications, Westinghouse Plants"). In addition, changes are also proposed in accordance with the guidance in Administrative Letter 95-06 ("Relocation Of Technical Specification Administrative Controls Related To Quality Assurance") and the requirements of 10 CFR 50.36(c)(2)(ii) and 10 CFR 20. Section I of the LAR provides details of these changes.

The Station Operation Review Committee and the Nuclear Safety Audit Review Committee have reviewed LAR 02-10.

As discussed in the enclosed LAR Section IV, the proposed change does not involve a significant hazard consideration pursuant to 10 CFR 50.92. A copy of this letter and the enclosed LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b). FPLE Seabrook requests NRC Staff review of LAR 02-10, and issuance of a license amendment by April 30, 2003 (see Section V enclosed). FPLE Seabrook requests these changes in less than the one year normally afforded for NRC review because the changes are administrative in nature and will afford increased organizational flexibility and efficiency at an earlier date.

A001

FPLE Seabrook has determined that LAR 02-10 meets the criterion of 10 CFR 51.22(c)(10) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section VI enclosed).

Should you have any questions regarding this letter, please contact Mr. James M. Peschel, Regulatory Programs Manager, at (603) 773-7194.

Very truly yours,

FPL Energy Seabrook, LLC.



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Mark E. Warner  
Site Vice President  
Seabrook Station

cc:

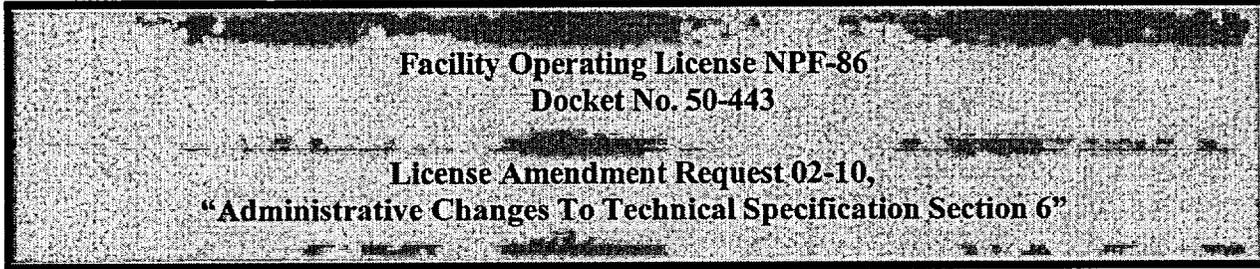
H. J. Miller, NRC Regional Administrator  
R. D. Starkey, NRC Project Manager, Project Directorate I-2  
G. T. Dentel, NRC Senior Resident Inspector

Mr. Donald Bliss, Director  
New Hampshire Office of Emergency Management  
State Office Park South  
107 Pleasant Street  
Concord, NH 03301



**FPL Energy**  
**Seabrook Station**

**SEABROOK STATION UNIT 1**



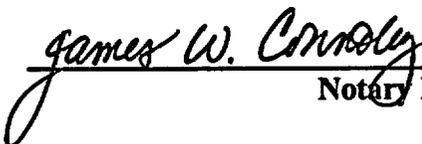
**FPL Energy Seabrook, LLC submits this License Amendment Request pursuant to 10CFR50.90. The following information is enclosed in support of this License Amendment Request:**

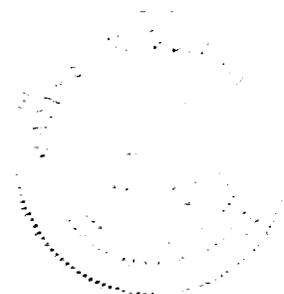
- **Section I - Introduction and Safety Assessment for Proposed Changes**
- **Section II - Markup of Proposed Changes**
- **Section III - Retype of Proposed Changes**
- **Section IV - Determination of Significant Hazards for Proposed Changes**
- **Section V - Proposed Schedule for License Amendment Issuance And Effectiveness**
- **Section VI - Environmental Impact Assessment**

**I, Mark E. Warner, Site Vice President of FPL Energy Seabrook, LLC hereby affirm that the information and statements contained within this License Amendment Request are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.**

  
 \_\_\_\_\_  
**Mark E. Warner**  
**Site Vice President**

**Sworn and Subscribed**  
**before me this**  
**23<sup>rd</sup> day of December, 2002**

  
 \_\_\_\_\_  
**Notary Public**



**SECTION I**

**INTRODUCTION AND SAFETY ASSESSMENT FOR PROPOSED CHANGES**

## **I. INTRODUCTION AND SAFETY ASSESSMENT OF PROPOSED CHANGES**

### **A. Introduction**

License Amendment Request (LAR) 02-10 proposes changes to the Seabrook Station Technical Specifications (TS) Index and TS 6.0, Administrative Controls.

The purpose of LAR 02-10 is to revise the Technical Specifications Section 6 to: (1) relocate administrative requirements discussed in Administrative Letter 95-06 "Relocation Of Technical Specification Administrative Controls Related To Quality Assurance" to a licensee controlled document, (2) change the title of the senior onsite official and (3) reflect changes in 10 CFR 20.

Utilizing the guidance in Administrative Letter 95-06, this LAR discusses the transfer of requirements from the Technical Specifications to the Operational Quality Assurance Program. The requirements being transferred are: Independent Technical Reviews, Review and Audit, specifics related to the review of procedures and programs, and Records Retention.

Changes in the title of the senior onsite official from "Senior Vice President and Chief Nuclear Officer" to "Site Vice President" does not affect the onsite reporting responsibility or chain of command. The responsibility of this individual remains unchanged.

Seabrook Station has been complying with the requirements in the revised 10 CFR 20, the references in the TS had not been updated. This change brings the TS into consistency with 10 CFR 20.

Table 1 provides a tabulation of and justification for the proposed changes.

### **B. Safety Assessment for Proposed Changes**

Utilizing the guidance in Administrative Letter 95-06, this LAR discusses the transfer of requirements from the Technical Specifications to the Operational Quality Assurance Program. The OQAP is incorporated into the Updated Final Safety Analysis Report (UFSAR) Chapter 17. Changes to the UFSAR are controlled in accordance with the requirements of 10 CFR 50.59 and 10 CFR 50.71(e). The OQAP change control process is contained in 10 CFR 50.54(a). The requirements are to be transferred intact simultaneously with implementation of the proposed changes to TS Section 6.0.

The relocated requirements are not required to be in TSs. 10 CFR 50.36c(2)(ii) contains the requirements for items that must be in TSs. This regulation provides criteria that can be used to determine the requirements that must be included in the TSs. Items not meeting the criteria can be relocated from TSs to a Licensee controlled document. The Licensee can then change the relocated requirements, if necessary, in accordance with 10 CFR 50.59. This will result in significant reductions in time and expense to modify requirements that have been relocated while not adversely affecting plant safety.

Criterion 1     Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

This criterion addresses instrumentation installed to detect excessive RCS leakage. TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention", do not cover installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the reactor coolant pressure boundary. The listed TSs do not satisfy Criterion 1.

**Criterion 2** A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The purpose of this criterion is to capture those process variables that have initial values assumed in the design basis accident and transient analyses, and which are monitored and controlled during power operation. This criterion also includes active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits) needed to preclude unanalyzed accidents and transients.

TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention", are not concerned with a plant system. They are administrative programs. Therefore, the TSs being relocated are not a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention" do not satisfy Criterion 2.

**Criterion 3** A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The purpose of this criterion is to capture only those structures, systems, and components that are part of the primary success path of the safety analysis (an examination of the actions required to mitigate the consequences of the design basis accidents and transients). The primary success path of a safety analysis consists of the combinations and sequences of equipment needed to operate, so that the plant response to the design basis accidents and transients limits the consequences of these events to within the appropriate acceptance criteria. Also captured by this criterion are those support and actuation systems that are necessary for items in the primary success path to successfully function.

TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention" are administrative programs. As a

result, they are not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention" do not satisfy Criterion 3.

**Criterion 4** A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

The purpose of this criterion is to capture only those structures, systems, and components that operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Requirements proposed for relocation do not contain constraints of prime importance in limiting the likelihood or severity of the accident sequences that are commonly found to dominate risk.

TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention" are not a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to the public health and safety. They have also not been modeled in the current Seabrook Station Probabilistic Safety Study (SSPSS). A review of industry operating experience did not produce any examples where the administrative programs in the commercial nuclear power industry has had a significant adverse affect on public health and safety.

TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention" do not meet Criterion 4.

The requirements contained in TS 6.2.3, "Independent Technical Reviews", TS 6.4, "Review and Audit", TS 6.7.2 through 6.7.5 (specific descriptions of the procedure review and approval process), and TS 6.9, "Records Retention", do not meet the 10 CFR 50.36c(2)(ii) criteria for items that must be in TSs. Therefore, relocating these requirements from the Seabrook Station Technical Specifications to a licensee controlled document will not adversely affect public health and safety. The relocation of this information maintains the consistency with NUREG-1431. Any change to these requirements is made in accordance with 10 CFR 50.59 and 10 CFR 50.54(a).

Changes in the title of the senior onsite official from "Senior Vice President and Chief Nuclear Officer" to "Site Vice President" does not affect the onsite reporting responsibility or chain of command. The responsibility of this individual remains unchanged.

Seabrook Station has been complying with the requirements in the revised 10 CFR 20, the references in the TS had not been updated. This change brings the TS into consistency with 10 CFR 20.

The proposed changes discussed in this LAR are editorial and administrative in nature and reflect the current configuration of the plant. The proposed changes do not affect nor modify the physical configuration, the operation, maintenance and management of the facility nor the manner in which it responds to normal, transient or accident conditions. Thus, the changes are an enhancement and do not affect plant safety.

FPLE Seabrook concludes that based upon the justifications presented in Table 1 as well as the Determination of No Significant Hazards for Proposed Changes, presented in Section IV, that the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

**Table 1  
Tabulation of Proposed Changes**

<b>Item #</b>	<b>Marked-Up Page #</b>	<b>Description</b>	<b>Justification</b>
1	xiii, xiv, xv	TS Index modified to reflect the proposed changes herein or other minor corrections.	Editorial.
2	6-1, 6-11	Changed "Executive Vice President & Chief Nuclear Officer" to "Site Vice President"	Reflects change in position title. Wording is consistent with ANS Standard for use of generic titles in TS Section 6.
3	6-5, 6-6, 6-7, 6-8 and 6-8A	Relocated the requirements in TS 6.2.3, Independent Technical Reviews and TS 6.4, "Review and Audit" to a licensee-controlled document (Operational Quality Assurance Program (OQAP)). TS 6.4 includes TS 6.4.1, "Station Operation Review Committee (SORC)," and TS 6.4.2, "Station Qualified Reviewer Program."	Follows the guidance in AL 95-06 to relocate administrative requirements to a licensee-controlled document. The requirements will be relocated intact to the OQAP. Changes to the OQAP are documented and controlled in accordance with 10CFR50.59 and 10CFR50.54(a). Items being relocated are not required to be in TS based upon the criteria contained in 10 CFR 50.36.
4	6-12	Relocated the requirements in TS 6.7.2 through TS 6.7.5, which deal with specifics of the procedure review and approval process, to a licensee-controlled document (Operational Quality Assurance Program (OQAP)).	Follows the guidance in AL 95-06 to relocate administrative requirements to a licensee-controlled document. The requirements will be relocated intact to the OQAP. Changes to the OQAP are documented and controlled in accordance with 10CFR50.59 and 10CFR50.54(a). Items being relocated are not required to be in TS based upon the criteria contained in 10 CFR 50.36.
5	6-14A and 6.15	Revised TS 6.7.6g to reflect 10CFR20 references. Revise footnote to reflect 10CFR20 references.  Revise TS 6.7.6g.4) to reflect Seabrook Station as only one unit.	Seabrook Station has been complying with the requirements in the revised 10 CFR 20, the references in the TS had not been updated. This change brings the TS into consistency with 10CFR20.  Editorial.

**Table 1**  
**Tabulation of Proposed Changes**  
(continued)

Item #	Marked-Up Page #	Description	Justification
6	6-19 and 6-20	Relocated the requirements in TS 6.9, "Records Retention," to a licensee controlled document (Operational Quality Assurance Program (OQAP)).	Follows the guidance in AL 95-06 to relocate administrative requirements to a licensee-controlled document. The requirements will be relocated intact to the OQAP. Changes to the OQAP are documented and controlled in accordance with 10CFR50.59 and 10CFR50.54(a). Items being relocated are not required to be in TS based upon the criteria contained in 10 CFR 50.36.
7	6-20 and 6-21	TS 6.11, "High Radiation Area," changes to reflect current 10 CFR 20 references.	While Seabrook Station has been complying with the requirements in the revised 10CFR20, the references in the TS had not been updated. These changes bring the TS into consistency with 10CFR20.
8	6-21	Change "Shift Superintendent" to "Shift Manager"  Revise 6.12, "Process Control Program (PCP)" to reference the Operational Quality Assurance Program	Editorial change to reflect the actual position title at Seabrook Station.  The requirements in TS 6.9.3 have been relocated to the OQAP.
9	6-22	Revise 6.12.2 (Continued) to 6.12 (Continued)  Revise 6.13a, "Offsite Dose Calculation Manual (ODCM)" to reference the Operational Quality Assurance Program (OQAP)  Revised TS 6.13a.2) to reference 10 CFR 20.1302.	An editorial correction that should have been done for License Amendment 66, which revised TS 6.12.  The requirements in TS 6.9.3 have been relocated to the OQAP.  While Seabrook Station has been complying with the requirements in the revised 10CFR20, the references in the TS had not been updated. This change brings the TS into consistency with 10CFR20.

## **SECTION II**

### **MARKUP OF PROPOSED CHANGES**

Refer to the attached markup of the proposed changes to the Technical Specifications. The attached markup reflects the currently issued revision of the Technical Specifications listed below. Pending Technical Specifications or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed markup.

The following Operating License and Technical Specification changes are that are included in the attached markup are delineated in Table 1 in Section I

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**6.0 ADMINISTRATIVE CONTROLS**

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## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Station Director shall be responsible for overall station operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Manager (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the ~~Executive Vice President & Chief Nuclear Officer~~ shall be reissued to all station personnel on an annual basis. Site Vice President

### 6.2 ORGANIZATION

#### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for 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.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through 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 for departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR and updated in accordance with the requirements of 10 CFR 50.71.
- b. The Station Director shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant. Site Vice President
- c. The ~~Executive Vice President & Chief Nuclear Officer~~ shall have 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.
- d. 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 operating pressures.

## ADMINISTRATIVE CONTROLS

### 6.2.3 INDEPENDENT TECHNICAL REVIEWS (This Specification Number is NOT USED.)

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A Technical Review Program shall be established, implemented and maintained to encompass the following Technical Review responsibilities.

#### FUNCTION

6.2.3.1 The Technical Review Program responsibilities shall encompass:

- a. NRC issuances, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety;
- b. Internal and external operating experience information that may indicate areas for improving plant safety;
- c. Plant operating characteristics, plant operations, modifications, maintenance and surveillance to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical, and
- d. Making detailed recommendations to the Senior Site Official for procedure revisions, equipment modifications or other means of improving nuclear safety and plant reliability.

The Technical Review Program shall utilize several on-site personnel who are independent of the plant management chain to perform the reviews.

#### RECORDS

6.2.3.2 Written records of technical reviews shall be maintained. As a minimum these records shall include the results of the activities conducted, the status of recommendations made pursuant to Specification 6.2.3.1 and an assessment of company operations related to the reviews performed. A copy of the monthly Technical Review Program report shall be provided to the Senior Site Official.

#### QUALIFICATIONS

6.2.3.3 Personnel performing reviews pursuant to Technical Specification 6.2.3.1 shall have either a bachelor's degree in engineering or related science and at least 2 years professional level experience, at least 1 year of which shall be in the nuclear field, or equivalent education and experience as defined in ANSI/ANS 3.1, 1981, Section 4.1.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Control Room Commander in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the station.

### 6.3 TRAINING

6.3.1 (THIS SPECIFICATION NUMBER IS NOT USED)

1

ADMINISTRATIVE CONTROLS

All caps to sentence.

(This Specification Number is not used.)

6.4 REVIEW AND AUDIT

6.4.1 STATION OPERATION REVIEW COMMITTEE (SORC)

FUNCTION

6.4.1.1 The SORC shall function to advise the Station Director on all matters related to nuclear safety.

COMPOSITION

6.4.1.2 The SORC shall, as a minimum, be composed of the Chairman and nine individuals who collectively have experience and expertise in the following areas:

- Nuclear Power Plant Administrative Controls
- Mechanical Maintenance
- Electrical Maintenance
- Instrumentation & Control
- Chemistry
- Health Physics
- Operations
- Technical Support/Engineering
- Reactor Engineering

The Station Director shall serve as Chairman of the SORC and shall appoint the SORC members in writing. Members shall have a minimum of eight years power plant experience of which a minimum of three years shall be nuclear power experience. At least one member shall have an SRO license for Seabrook Station.

ALTERNATES

6.4.1.3 All alternate members shall be appointed in writing by the SORC Chairman to serve on a temporary basis and shall have qualifications equivalent to those of the members.

MEETING FREQUENCY

6.4.1.4 The SORC shall meet at least once per calendar month and as convened by the SORC Chairman or one of his designated alternate(s).

QUORUM

6.4.1.5 The quorum of the SORC necessary for the performance of the SORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or one of his designated alternate(s) and sufficient SORC members including alternates to equal at least 50 percent of the SORC composition.

RESPONSIBILITIES

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6.4.1.6 The SORC shall be responsible for:

- a. Review of: (1) all proposed procedures required by Specification 6.7 and changes thereto, (2) all proposed programs required by Specification 6.7 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Station Director to affect nuclear safety. Procedures and programs required by Specification 6.7 that are designated for review and approval by the Station Qualified Reviewer Program in accordance with Specification 6.4.2 do not require SORC review.
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix "A" Technical Specifications;
- d. Review of all proposed changes or modifications to station systems or equipment that affect nuclear safety;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Executive Vice President & Chief Nuclear officer and to the Nuclear Safety Audit Review Committee (NSARC);
- f. Review of all REPORTABLE EVENTS;
- g. Review of station operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Station Director or the NSARC;
- i. Not used;
- j. Not used;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Executive Vice President & Chief Nuclear Officer and to the NSARC;
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and the Radwaste Treatment System; and
- m. Review of the Fire Protection Program and implementing instructions and submittal of recommended Fire Protection Program changes to the NSARC.

**6.4.1.7 The SORC shall:**

- a. Recommend in writing to the Station Director approval or disapproval of items considered under Specification 6.4.1.6a. through d;
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.4.1.6a., b. and d. constitutes a need for a license amendment; and
- c. Provide written notification within 24 hours to the Executive Vice President & Chief Nuclear Officer and the NSARC of disagreement between the SORC and the Station Director however, the Station Director shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

**RECORDS**

6.4.1.8 The SORC shall maintain written minutes of each SORC meeting that, at a minimum, document the results of all SORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Executive Vice President & Chief Nuclear Officer and the NSARC.

**6.4.2 STATION QUALIFIED REVIEWER PROGRAM**

**FUNCTION**

6.4.2.1 The Station Director may establish a Station Qualified Reviewer Program whereby required reviews of designated procedures or classes of procedures required by Specification 6.4.1.6.a are performed by Station Qualified Reviewers and approved by the designated department heads. These reviews are in lieu of reviews by the SORC. However, procedures which require a 10 CFR 50.59 evaluation must be reviewed by the SORC.

**RESPONSIBILITIES**

6.4.2.2 The Station Qualified Reviewer Program shall:

- a. Provide for the review of designated procedures, programs, and changes thereto by a Qualified Reviewer(s) other than the individual who prepared the procedure, program, or change.
- b. Provide for cross-disciplinary review of procedures, programs, and changes thereto when organizations other than the preparing organization are affected by the procedure, program, or change.
- c. Ensure cross-disciplinary reviews are performed by a Qualified Reviewer(s) in affected disciplines, or by other persons designated by cognizant department heads as having specific expertise required to assess a particular procedure, program or change. Cross-disciplinary reviewers may function as a committee.

- d. Provide for a screening of designated procedures, programs and changes thereto to determine if an evaluation should be performed in accordance with the provisions of 10 CFR 50.59 to verify that a need for a license amendment does not exist. This screening will be performed by personnel trained and qualified in performing 10 CFR 50.59 screenings.
- e. Provide for written recommendation by the Qualified Reviewer(s) to the responsible department head for approval or disapproval of procedures and programs considered under Specification 6.4.1.6a and that the procedure or program was screened by a qualified individual and found not to require a 10 CFR 50.59 evaluation.

6.4.2.3 If the responsible department head determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 evaluation, that designated department head will ensure the required evaluation is performed to determine if the new procedure, program, or change involves a need for a license amendment. The new procedure, program, or change will then be forwarded with the 10 CFR 50.59 evaluation to SORC for review.

6.4.2.4 Personnel recommended to be Station Qualified Reviewers shall be designated in writing by the Station Director for each procedure, program, or class of procedure or program within the scope of the Station Qualified Reviewer Program.

6.4.2.5 Temporary procedure changes shall be made in accordance with Specification 6.7.3 with the exception that changes to procedures for which reviews are assigned to Qualified Reviewers will be reviewed and approved as described in Specification 6.4.2.2.

RECORDS

6.4.2.6 The review of procedures and programs performed under the Station Qualified Reviewer Program shall be documented in accordance with administrative procedures.

TRAINING AND QUALIFICATION

6.4.2.7 The training and qualification requirements of personnel designated as a Qualified Reviewer in accordance with the Station Qualified Reviewer Program shall be in accordance with administrative procedures. Qualified reviewers shall have:

- a. A Bachelors degree in engineering, related science, or technical discipline, and two years of nuclear power plant experience;

OR

- b. Six years of nuclear power plant experience;

OR

- c. An equivalent combination of education and experience as approved by the designated department head.

6.0 ADMINISTRATIVE CONTROLS

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6.4.3 THIS SPECIFICATION NUMBER IS NOT USED

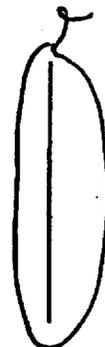
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## ADMINISTRATIVE CONTROLS

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### 6.5 REPORTABLE EVENT ACTION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC and the results of this review shall be submitted to the NSARC and the ~~Executive Vice President & Chief Nuclear Officer~~ <sup>Site</sup>

### 6.6 SAFETY LIMIT VIOLATION

The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The ~~Executive Vice President & Chief Nuclear Officer~~ and the NSARC shall be notified within 24 hours; <sup>Site</sup>
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe: (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence;
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSARC, and the ~~Executive Vice President & Chief Nuclear Officer~~ within 14 days of the violation; and <sup>Site</sup>
- d. Operation of the station shall not be resumed until authorized by the Commission.

## ADMINISTRATIVE CONTROLS

### 6.7 PROCEDURES AND PROGRAMS

6.7.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. Not used;
- d. Not used;
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance Program for effluent and environmental monitoring;
- h. Fire Protection Program implementation; and
- i. Technical Specification Improvement Program implementation.

6.7.2 The Station Director may designate specific procedures and programs or classes of procedures and programs to be reviewed in accordance with the Station Qualified Reviewer Program in lieu of review by the SORC. The review per the Qualified Reviewer Program shall be in accordance with Specification 6.4.2.

6.7.3 Procedures and programs listed in Specification 6.7.1, and changes thereto, shall be approved by the Station Director or by cognizant department head or Directors who are designated as the Approval Authority by the Station Director, as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

6.7.4 Each procedure of Specification 6.7.1, and changes thereto, shall be reviewed by the SORC and shall be approved by the Station Director, or be reviewed and approved in accordance with the Station Qualified Reviewer Program, prior to implementation. Each procedure of Specification 6.7.1 shall be reviewed periodically as set forth in administrative procedures.

6.7.5 Changes to procedures of Specification 6.7.1 may be made prior to SORC review provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license; and
- c. The change is documented, reviewed by the SORC and approved by the Station Director, or reviewed and approved in accordance with the Station Qualified Reviewer Program, within 14 days of implementation.

**ADMINISTRATIVE CONTROLS**

**PROCEDURES AND PROGRAMS**

6.7.6 (Continued)

g. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the instantaneous concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS, conforming to 10 CFR Part 20, Appendix B, Table 1, Column 2, to 10 CFR 20.1001 - 20.2402,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM, 1302
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of the cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,

Ten times the concentration values in

## ADMINISTRATIVE CONTROLS

The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

### ANNUAL REPORTS\*

6.8.1.2 Annual Reports covering the activities of the station as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions\*\* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions;
- b. The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration ( $\mu\text{Ci/gm}$ ) and one other radioiodine isotope concentration ( $\mu\text{Ci/gm}$ ) as a function of time for the

\*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

\*\*This tabulation supplements the requirements of ~~§20.407~~ of 10 CFR (Part 20, 20.220b, 1)

## ADMINISTRATIVE CONTROLS

### SPECIAL REPORTS

6.8.2 Special reports shall be submitted to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attn: Document Control Desk, with a copy to the NRC Regional Administrator within the time period specified for each report.

### 6.9 RECORD RETENTION

(This specification number is not used) *All caps for sentence.*

6.9.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.9.2 The following records shall be retained for at least 5 years:

- a. Records and logs of station operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;
- c. ALL REPORTABLE EVENTS;
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications;
- e. Records of changes made to the procedures required by Specification 6.7.1;
- f. Records of radioactive shipments;
- g. Records of sealed source and fission detector leak tests and results; and
- h. Records of annual physical inventory of all sealed source material of record.

6.9.3 The following records shall be retained for the duration of the station Operating License:

- a. Records and drawing changes reflecting station design modifications made to systems and equipment described in the Final Safety Analysis Report;
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- c. Records of radiation exposure for all individuals entering radiation control areas;
- d. Records of gaseous and liquid radioactive material released to the environs;
- e. Records of transient or operational cycles for those station components identified in Table 5.7-1;

## ADMINISTRATIVE CONTROLS

### RECORD RETENTION

#### 6.9.3 (Continued)

- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the station staff;
- h. Records of inservice inspections performed pursuant to these Technical Specifications;
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- k. Records of meetings of the SORC and the NSARC;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.7 including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality; and
- n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

### 6.10 RADIATION PROTECTION PROGRAM

6.10.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

### 6.11 HIGH RADIATION AREA

6.11.1 Pursuant to paragraph ~~20.203(c)(5)~~ <sup>20.1601(a) and (b)</sup> of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph ~~20.203(e)~~, each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at ~~45 cm (18 in.)~~ <sup>30 cm (12 in.)</sup> from the radiation source or from any surface that the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high

## ADMINISTRATIVE CONTROLS

### HIGH RADIATION AREA

#### 6.11.1 (Continued)

radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area; or
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the Radiation Work Permit.

6.11.2 In addition to the requirements of Specification ~~6.11.1~~ <sup>30 cm (12 in.)</sup>, areas accessible to personnel with radiation levels greater than 1000 mR/h at ~~45 cm (18 in.)~~ from the radiation source or from any surface that the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Superintendent on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP that shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

#### 6.12 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by ~~Specification 6.9.3.6~~. This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

SEABROOK - UNIT 1

6-21

Amendment No. 22, 66,

The OPERATIONAL QUALITY ASSURANCE PROGRAM (OQAP).

## ADMINISTRATIVE CONTROLS

### PROCESS CONTROL PROGRAM (PCP)

6.12<sup>2</sup> (Continued)

- 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b.) Shall become effective after review and acceptance by the SORC and approval of the Station Director.

### 6.13 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

the OPERATIONAL QUALITY ASSURANCE PROGRAM (OQAP).

- a. Shall be documented and records of reviews performed shall be retained as required by ~~Specification 6.9.3.6~~ This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the SORC and the approval of the Station Director.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and each affected page shall indicate the revision number the change was implemented.

### **SECTION III**

#### **RETYPE OF PROPOSED CHANGES**

Refer to the attached retype of the proposed changes to the Technical Specifications. The attached retype reflects the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

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## **6.0 ADMINISTRATIVE CONTROLS**

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### **6.1 RESPONSIBILITY**

**6.1.1** The Station Director shall be responsible for overall station operation and shall delegate in writing the succession to this responsibility during his absence.

**6.1.2** The Shift Manager (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Site Vice President shall be reissued to all station personnel on an annual basis.

### **6.2 ORGANIZATION**

#### **6.2.1 OFFSITE AND ONSITE ORGANIZATIONS**

Onsite and offsite organizations shall be established for 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.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through 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 for departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR and updated in accordance with the requirements of 10 CFR 50.71.
- b. The Station Director shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Site Vice President shall have 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.
- d. 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 operating pressures.

## ADMINISTRATIVE CONTROLS

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### 6.2.3 (THIS SPECIFICATION NUMBER IS NOT USED)

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Control Room Commander in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the station.

### 6.3 TRAINING

#### 6.3.1 (THIS SPECIFICATION NUMBER IS NOT USED)

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## ADMINISTRATIVE CONTROLS

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### 6.5 REPORTABLE EVENT ACTION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC and the results of this review shall be submitted to the NSARC and the Site Vice President.

### 6.6 SAFETY LIMIT VIOLATION

The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Site Vice President and the NSARC shall be notified within 24 hours;
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe: (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence;
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSARC, and the Site Vice President within 14 days of the violation; and
- d. Operation of the station shall not be resumed until authorized by the Commission.

## ADMINISTRATIVE CONTROLS

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### 6.7 PROCEDURES AND PROGRAMS

6.7.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. Not used;
- d. Not used;
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFESITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance Program for effluent and environmental monitoring;
- h. Fire Protection Program implementation; and
- i. Technical Specification Improvement Program implementation.

## ADMINISTRATIVE CONTROLS

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### PROCEDURES AND PROGRAMS

#### 6.7.6 (Continued)

##### g. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS, conforming to ten times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001-20.2402,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from the unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,

## ADMINISTRATIVE CONTROLS

The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

### ANNUAL REPORTS\*

6.8.1.2 Annual Reports covering the activities of the station as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions\*\* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions;
- b. The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration ( $\mu\text{Ci/gm}$ ) and one other radioiodine isotope concentration ( $\mu\text{Ci/gm}$ ) as a function of time for the

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\*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

\*\*This tabulation supplements the requirements of 10 CFR 20.220b.

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### SPECIAL REPORTS

6.8.2 Special reports shall be submitted to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attn: Document Control Desk, with a copy to the NRC Regional Administrator within the time period specified for each report.

6.9 (THIS SPECIFICATION NUMBER IS NOT USED)

**6.10 RADIATION PROTECTION PROGRAM**

**6.10.1** Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

**6.11 HIGH RADIATION AREA**

**6.11.1** Pursuant to paragraph 20.1601(c) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a) and (b), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 30 cm (12 in.) from the radiation source or from any surface that the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high

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### HIGH RADIATION AREA

#### 6.11.1 (Continued)

radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area; or
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the Radiation Work Permit.

6.11.2 In addition to the requirements of Specification 6.11.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 30 cm (12 in.) from the radiation source or from any surface that the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP that shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

### 6.12 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by the Operational Quality Assurance Program (OQAP). This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

## ADMINISTRATIVE CONTROLS

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### PROCESS CONTROL PROGRAM (PCP)

#### 6.12 (Continued)

- 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b.) Shall become effective after review and acceptance by the SORC and approval of the Station Director.

#### 6.13 OFFSITE DOSE CALCULATION MANUAL (ODCM)

##### Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by the Operational Quality Assurance Program (OQAP). This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the SORC and the approval of the Station Director.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and each affected page shall indicate the revision number the change was implemented.

**SECTION IV**

**DETERMINATION OF NO SIGNIFICANT HAZARDS FOR PROPOSED CHANGES**

#### **IV. DETERMINATION OF NO SIGNIFICANT HAZARDS FOR PROPOSED CHANGES**

License Amendment Request (LAR) 02-10 proposes changes to the Seabrook Station Technical Specifications (TS) Index and TS 6.0, Administrative Controls.

The purpose of LAR 02-10 is to revise the Technical Specifications Section 6 to: (1) relocate administrative requirements discussed in Administrative Letter 95-06 "Relocation Of Technical Specification Administrative Controls Related To Quality Assurance" to a licensee controlled document, (2) change the title of the senior onsite official and (3) reflect changes in 10 CFR 20.

Utilizing the guidance in Administrative Letter 95-06, this LAR discusses the transfer of requirements from the Technical Specifications to the Operational Quality Assurance Program. The requirements being transferred are: Independent Technical Reviews, Review and Audit, specifics related to the review of procedures and programs and Records Retention.

Changes in the title of the senior onsite official from "Senior Vice President and Chief Nuclear Officer" to "Site Vice President" does not affect the onsite reporting responsibility or chain of command. The responsibility of this individual remains unchanged.

Seabrook Station has been complying with the requirements in the revised 10 CFR 20, the references in the TS had not been updated. This change brings the TS into consistency with 10 CFR 20.

In accordance with 10 CFR 50.92, FPLE Seabrook has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed changes do not involve a SHC is as follows:

- 1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The proposed changes to the Seabrook Station TS do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, and configuration of the facility or the manner in which the plant is operated and maintained. In addition, the proposed changes do not affect the manner in which the plant responds in normal operation, transient or accident conditions nor do they change any of the procedures related to operation of the plant. The proposed changes do not alter or prevent the ability of structures, systems and components (SSCs) to perform their intended function to mitigate the consequences of an initiating event within the acceptance limits assumed in the Updated Final Safety Analysis Report (UFSAR). The proposed changes are administrative and editorial for the purpose of correcting or updating TS to reflect current NRC and industry initiatives.

The proposed changes do not affect the source term, containment isolation or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated in the Seabrook Station UFSAR. Further, the proposed changes do not increase the types and amounts of radioactive effluent that may be released offsite,

nor significantly increase individual or cumulative occupational/public radiation exposures.

Therefore, it is concluded that these proposed revisions do not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. *The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.*

The proposed changes to the Seabrook Station TS do not change the operation or the design basis of any plant system or component during normal or accident conditions. The proposed changes do not include any physical changes to the plant. In addition, the proposed changes do not change the function or operation of plant equipment or introduce any new failure mechanisms. The plant equipment will continue to respond per the design and analyses and there will not be a malfunction of a new or different type introduced by the proposed changes.

The proposed changes are administrative in nature and only correct, update and clarify the Seabrook Station Technical Specifications to reflect NRC guidance, i.e., AL 95-06. The proposed changes do not modify the facility nor do they affect the plant's response to normal, transient or accident conditions. The changes do not introduce a new mode of plant operation. The changes are an enhancement and do not affect plant safety. The plant's design and design basis are not revised and the current safety analyses remains in effect.

Thus, these proposed revisions to the Seabrook Station TS do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *The proposed changes do not involve a significant reduction in the margin of safety.*

The proposed changes are administrative changes to the Seabrook Station Technical Specifications. The safety margins established through Limiting Conditions for Operation, Limiting Safety System Settings and Safety Limits as specified in the Technical Specifications are not revised nor is the plant design or its method of operation revised by the proposed changes.

Thus, it is concluded that these proposed revisions to the Seabrook Station TS do not involve a significant reduction in a margin of safety.

Based on the above evaluation, FPLE Seabrook concludes that the proposed changes to the Seabrook Station TS do not constitute a significant hazard.

**SECTIONS V AND VI**  
**PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE**  
**AND EFFECTIVENESS**  
**AND ENVIRONMENTAL IMPACT ASSESSMENT**

**V. PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS**

FPLE Seabrook requests NRC review of License Amendment Request 02-10, and issuance of a license amendment by April 30, 2003, having immediate effectiveness and implementation within 60 days. FPLE Seabrook requests these changes in less than the one year normally afforded for NRC review because the changes are administrative in nature and will afford increased organizational flexibility and efficiency at an earlier date.

**VI. ENVIRONMENTAL IMPACT ASSESSMENT**

FPLE Seabrook has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, FPLE Seabrook concludes that the proposed changes meet the criterion delineated in 10 CFR 51.22(c)(10) for a categorical exclusion from the requirements for an Environmental Impact Statement.