

Industry/TSTF Standard Technical Specification Change Traveler

Use of generic titles for utility positions

Priority/Classification 3) Improve Specifications

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

On November 10, 1994, the NRC responded to a request by the BWR/6 owners to change the Section 2.0 "Safety Limits" and Section 5.0 "Administrative Controls" to allow the use of generic personnel titles as provided by ANSI/ANS 3.1 in lieu of plant-specific personnel titles [Letter from C. I. Grimes (NRC) to Lee Bush (WOG), Brian Mann (CEOG), Clinton Szabo (B&WOG) and Andrew Maron (BWROG), attached]. The NRC approved that request and provided example marked pages to the Rev. 0 Improved Technical Specifications. This change was not incorporated into Revision 1 of the ITS and is being proposed as a generic change for incorporation into the ITS. There is one difference between the NRC's proposed ITS changes and this change. The November 10, 1994 letter suggested using the bracketed phrase "a specified corporate executive position" to identify the utility corporate officer to be notified in case of a Safety Limit violation. This change proposes to use the phrase "the corporate officer with direct responsibility for the plant" (not bracketed) in lieu of inserting a plant-specific title.

Justification:

The attached letter from the NRC describes the justification for the change.

Note that TSTF-05 deletes the portions of the Safety Limits affected by this change.

Revision History

OG Revision 0

Revision Status: Closed

Revision Proposed by: Calvert Cliffs

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 23-Jan-96

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 24-Jan-96

TSTF Review Information

TSTF Received Date: 05-Mar-96 Date Distributed for Review 07-Mar-96

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:
(No Comments)

TSTF Resolution: Approved Date: 16-Apr-96

4/2/98

NRC Review Information

NRC Received Date: 12-Jun-96 NRC Reviewer: R. Tjader

NRC Comments:

- 6/18/96 - recommend approval. Comment: Reviewers must be consistent in the use of brackets (Section 2.0). Why aren't brackets used in the Bases?
- 6/20/96 - pkg to C. Grimes to review.
- 9/18/96 - no change in status
- 3/18/97 - no change in status
- 4/17/97 - C. Grimes agreed to resolve
- 9/22/97 - Modify to be consistent in the use of brackets in the Bases, as well as in the Specifications.
- 10/2/97 - TSTF provided R.1.

Final Resolution: Superseded by Revision Final Resolution Date: 02-Oct-97

TSTF Revision 1

Revision Status: Active

Next Action:

Revision Proposed by: NRC

Revision Description:

Created Rev. 1 to address NRC comments regarding the use of brackets.

TSTF Review Information

TSTF Received Date: 01-Oct-97 Date Distributed for Review 01-Oct-97

OG Review Completed: BWO WOG CEOG BWROG

TSTF Comments:

(No Comments)

TSTF Resolution: Approved Date: 02-Oct-97

NRC Review Information

NRC Received Date: 02-Oct-97 NRC Reviewer: R. Tjader

NRC Comments:

10/2/97 - Reviewer recommended approval and provided to W. Beckner for disposition.

Final Resolution. NRC Approves Final Resolution Date: 02-Dec-97

Incorporation Into the NUREGs

File to BBS/LAN Date:

TSTF Informed Date:

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

5.1.1 Administrative Controls - Responsibility

5.2.1 Administrative Controls - Onsite and Offsite Organizations

5.2.2.d Administrative Controls - Unit Staff

5.2.2.e	Administrative Controls - Unit Staff	
5.2.2.f	Administrative Controls - Unit Staff	
5.5.1	Administrative Controls - Programs and Manuals	
5.7.1	Administrative Controls - High Radiation Area	
SL 2.2.6	Safety Limits	NUREG(s)- 1430 Only
SL 2.2.7	Safety Limits	NUREG(s)- 1430 Only
SL 2.2.7 Bases	Safety Limits	NUREG(s)- 1430 Only
SL 2.2.4	Safety Limits	NUREG(s)- 1431 Only
SL 2.2.4 Bases	Safety Limits	NUREG(s)- 1431 Only
SL 2.2.5	Safety Limits	NUREG(s)- 1431 Only
SL 2.2.5 Bases	Safety Limits	NUREG(s)- 1431 Only
SL Vio 2.2.4	Safety Limits (Analog)	NUREG(s)- 1432 Only
SL Vio 2.2.4	Safety Limits (Digital)	NUREG(s)- 1432 Only
SL Vio 2.2.5	Safety Limits (Analog)	NUREG(s)- 1432 Only
SL Vio 2.2.5	Safety Limits (Digital)	NUREG(s)- 1432 Only
SL Vio 2.2.5 Bases	RCS Pressure Safety Limits (Analog)	NUREG(s)- 1432 Only
SL Vio 2.2.5 Bases	RCS Pressure Safety Limits (Digital)	NUREG(s)- 1432 Only
SL Vio 2.2.5 Bases	Reactor Core Safety Limits (Analog)	NUREG(s)- 1432 Only
SL Vio 2.2.5 Bases	Reactor Core Safety Limits (Digital)	NUREG(s)- 1432 Only
SL 2.2.3	Safety Limits	NUREG(s)- 1433 1434 Only
SL 2.2.3 Bases	Safety Limits	NUREG(s)- 1433 1434 Only
SL 2.2.4	Safety Limits	NUREG(s)- 1433 1434 Only
SL 2.2.4 Bases	Safety Limits	NUREG(s)- 1433 1434 Only

4/2/98



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TSTF-65 Rev 1

November 10, 1994

Mr. Lee Bush
Westinghouse Owners Group
c/o Commonwealth Edison Company
Zion Nuclear Power Station
101 Shiloh Boulevard
Zion, Illinois 60099

Mr. Brian Mann
Combustion Engineering Owners Group
c/o Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657-4702

Mr. Clinton Szabo
Babcock & Wilcox Owners Group
c/o Entergy Operations
Arkansas Nuclear One
Route 3, Box 137G
Russelville, Arkansas 72801

Mr. Andrew Maron
BWR Owners Group
c/o Pennsylvania Power and Light
Company
Two North Ninth Street, A2-4
Allentown, Pennsylvania 18101-1179

Gentlemen:

The BWR/6 Owners recently proposed a change to Section 2.0 "Safety Limits" and Section 5.0 "Administrative Controls" of the improved STS. The proposed change would allow the use of generic personnel titles as provided by ANSI/ANS 3.1 in lieu of plant specific personnel titles. This change does not eliminate any of the qualifications, responsibilities or requirements for these positions, since the plant-specific personnel titles are currently identified in licensee controlled documents such as the Final Safety Analysis Report (FSAR) or the Quality Assurance (QA) Plan. In addition, the improved STS require that these positions meet the qualifications of Regulatory Guide (RG) 1.8 or an ANSI Standard acceptable to the NRC staff. The proposal provides a more direct link between the personnel qualifications as identified in the STS and STS-required responsibilities by utilizing the same ANSI/ANS Standard position title. With the plant-specific personnel titles specified in the TS, a utility could utilize a person meeting the ANSI/ANS Standard qualifications to fulfill the TS qualification requirements while utilizing a separate person with the TS-identified title to perform the TS-required responsibilities. This is clearly not the intent of the TS requirements. The proposal will preclude this by utilizing the same generic position title for the responsibilities as contained in the qualifications requirements by reference to ANSI/ANS Standard or RG 1.8. ←

The staff has reviewed the proposal and finds that lower case titles for all titles in the improved STS are acceptable. The titles selected by the licensee should agree with those titles in the ANSI Standard committed to in improved STS Section 5.3. The relationship between the titles in the ANSI standard and the titles used by the licensee should be described in Section 17 of the FSAR or QA Plan as appropriate. Changes to titles in the FSAR/QA Plan should be handled using normal FSAR/QA Plan change procedures (10 CFR 50.54(a)). ←

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Titles have been identified in improved STS Section 2.0 and 5.0. Appropriately de-capitalized and bracketed titles for the positions in improved STS Section 2.0 and 5.0 are included as Enclosures 1 through 5. In addition, a Reviewer's Note should be placed at the beginning of improved STS Chapter 5.0 detailing the use of generic titles and title changes, and Specification 5.2.1.a should be modified as shown to provide the link between the generic titles in the improved STS and the FSAR/QA Plan.

In the letter dated October 25, 1993, from W. T. Russell to the chairpersons of the NSSS Owners Groups, the NRC staff provided its review of the Administrative Controls Chapter (5.0) of the improved STS. One of the comments provided changed 5.2.2.f to require that the Operations Manager or the Assistant Operations Manager hold an "active" senior reactor operator (SRO) license. Subsequently, the Owners Groups proposed in BWOG-09, change C.5 that this requirement be changed to read "active or inactive." During meetings with the BWR/6 Owners, the basis for the original staff position, the acceptability of the Owners Groups proposal, and the use of various adjectives such as active, inactive, current, and valid as they relate to NRC-licensed operators and senior operators were raised as issues.

Current ANSI Standard commitments require the Operations Manager to "hold at time of appointment..." or "Obtain and hold..." an SRO license. An individual licensed pursuant to 10 CFR Part 55 is considered to hold a license. This license can be valid, current, active or inactive.

When used to describe Part 55 licenses, valid and current are equivalent terms and simply mean that the license holder (1) has passed the NRC initial license examination, (2) is participating in and current in the facility licensee's licensed operator requalification program, and (3) has renewed or will renew the license in accordance with 10 CFR 55.57. An active license is a license that is not only current and valid, but one for which the individual has been standing the required proficiency watches of 10 CFR 55.53(e). An active license is only necessary if the individual will assume licensed operator watchstanding duties. Individuals not maintaining an active license in accordance with the requirements of 10 CFR 55.53(e) are considered to have an inactive license. An inactive license can still be current and valid.

In addition, it is necessary for the Operations Manager or Assistant Operations Manager to hold a senior operator license in order to effectively (1) interface with the day-to-day operational aspects of control room activities and (2) communicate operational issues to higher levels of plant and utility management. In order to fulfill the job requirements of the Operations Manager or Assistant Operations Manager positions, it is not necessary for these individuals to maintain the watchstanding proficiency necessary to be considered the shift supervisor or to be considered the operator at the controls.

In conclusion, stating in Section 5.2.2.f that the Operations Manager or Assistant Operations Manager holds an SRO license is sufficient. It is unnecessary to add to Section 5.2.2.f. the word "active" as proposed in the

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version sent to the Owners Groups or the Owners Groups language of "active or inactive." Further, requiring this level of operations management to hold a license is consistent with the requirements of most current TS. In some cases, current TS may specify a "valid" or "current" license of the individual in the senior operations management position. Finally, the use of "active" to describe the license status of individuals designated to assume the control room command function is correct. Enclosures 1 through 5 include proposed changes the improved STS to reflect this position.

We would appreciate your written response to the above staff positions or, if you prefer, we can meet with you to discuss this matter.

Sincerely,



Christopher I. Grimes, Chief
Technical Specifications Branch
Division of Project Support
Office of Nuclear Reactor Regulation

Enclosures: As stated (5)

cc w/enclosure:

J. Eaton, NEI

D. Hoffman, EXCEL

INSERT A

[Reviewer's Note: Titles for members of the unit staff shall be specified by use of an overall statement referencing an ANSI Standard acceptable to the NRC staff from which the titles were obtained, or an alternative title may be designated for this position. Generally, the first method is preferable; however, the second methods is adaptable to those unit staffs requiring special titles because of unique organizational structures.

The ANSI Standard shall be the same ANSI Standard referenced in Section 5.3, Unit Staff Qualifications. If alternative titles are used, all requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Unit staff titles shall be specified in the Final Safety Analysis Report or Quality Assurance Plan. Unit staff titles shall be maintained and revised using those procedures approved for modifying/revising the Final Safety Analysis Report or Quality Assurance Plan.]

INSERT B

including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications.

2.0 SLs

2.2 SL Violations (continued)

- 2.2.3 In MODE 1 or 2, if SL 2.1.2 is not met, restore compliance within limits and be in MODE 3 within 1 hour.
- 2.2.4 In MODES 3, 4, and 5, if SL 2.1.2 is not met, restore RCS pressure to \leq [2750] psig within 5 minutes.
- 2.2.5 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.
- 2.2.6 Within 24 hours, notify the ~~(Vice President - Nuclear Operations)~~.
- 2.2.7 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC and the ~~Plant Superintendent~~, and ~~Vice President - Nuclear Operations~~.
Manager
- 2.2.8 Operation of the plant shall not be resumed until authorized by the NRC.

the corporate officer with direct responsibility for the plant.

BASES

SAFETY LIMIT
VIOLATIONS

2.2.7 (continued)

management of the nuclear plant, and the utility Vice
~~President - Nuclear Operations.~~

2.2.8

*Corporate officer with direct responsibility
for the plant.*

If SL 2.1.1.1, SL 2.1.1.2, or SL 2.1.1.3 is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10.
 2. FSAR, Section [].
 3. 10 CFR 50.72.
 4. 10 CFR 50.73.
-
-

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1

The ~~Plant Superintendent~~ shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

manager

The ~~Plant Superintendent~~ or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2

The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

Insert A

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite 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 safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of 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];

Insert B

Manager

QA Plan

- b. The ~~Plant Superintendent~~ ^g shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;

- c. ~~The [a specified corporate executive position]~~ ^g 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; and

officer

- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

radiation protection

d. A ~~Health Physicist~~ Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an [8 or 12] hour day, nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;
2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized in advance by the Plant Superintendent or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Superintendent or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

OR

The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

- f. The Operations Manager or Assistant Operations Manager shall hold an SRO license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.2] and Specification [5.6.3].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;

b. Shall become effective after the approval of the ~~Plant Superintendent~~ ^{Plant Manager}; and

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the

(continued)

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5.0 ADMINISTRATIVE CONTROLS

[5.7 High Radiation Area]

5.7.1

radiation protection

Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, 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~~ technicians) 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 ≤ 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high 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.
- 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 are aware of them.
- 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 by the ~~Radiation Protection Manager~~ in the RWP.

5.7.2

In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Foreman on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel

(continued)

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

In MODES 1 and 2, the combination of THERMAL POWER, Reactor Coolant System (RCS) highest loop average temperature, and pressurizer pressure shall not exceed the SLs specified in Figure 2.1.1-1.

2.1.2 RCS Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained \leq [2735] psig.

2.2 SL Violations

2.2.1 If SL 2.1.1 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated: _

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.4 Within 24 hours, notify the ~~Plant Superintendent~~ ^{Manager} and ~~Vice President - Nuclear Operations~~ ^{Manager}.

2.2.5 Within 30 days a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the [offsite review function], and the ~~Plant Superintendent~~ ^{Manager}, and ~~Vice President - Nuclear Operations~~ ^{Manager}.

2.2.6 Operation of the unit shall not be resumed until authorized by the NRC.

the corporate officer with direct responsibility for the plant

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BASES

APPLICABILITY
(continued)

5, and 6, Applicability is not required since the reactor is not generating significant THERMAL POWER.

SAFETY LIMIT
VIOLATIONS

The following SL violation responses are applicable to the reactor core SLs.

2.2.1

If SL 2.1.1 is violated, the requirement to go to MODE 3 places the unit in a MODE in which this SL is not applicable.

The allowed Completion Time of 1 hour recognizes the importance of bringing the unit to a MODE of operation where this SL is not applicable, and reduces the probability of fuel damage.

2.2.3

If SL 2.1.1 is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 5).

2.2.4

If SL 2.1.1 is violated, the ~~Plant Superintendent~~ and the ~~Vice President - Nuclear Operations~~ shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to senior management.

Manager

2.2.5

If SL 2.1.1 is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 6). A copy of the report shall also be provided to the ~~Plant Superintendent~~ and the ~~Vice President - Nuclear Operations~~.

Corporate officer with direct responsibility for the plant

Manager

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The ~~Plant Superintendent~~ shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

Manager

The ~~Plant Superintendent~~ or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2 The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

Insert A

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

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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 safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of 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];

Insert B

ICQA Plan

- b. The ~~Plant Superintendent~~ ^{manager} shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The ~~specified corporate executive position~~ ^{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; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

radiation protection

d. A ~~Health Physics Technician~~ shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an [8 or 12] hour day, nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized in advance by the ~~Plant Superintendent~~ ^{Manager} or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Plant Superintendent~~ ^{Manager} or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

OR

The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

- f. The ~~Operations Manager~~ or ~~Assistant Operations Manager~~ shall hold an SRO license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.2] and Specification [5.6.3].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the ~~Plant~~ ^g ~~Superintendent~~; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the

Manager →

(continued)

5.0 ADMINISTRATIVE CONTROLS

[5.7 High Radiation Area]

5.7.1

radiation protection

Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, 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 Technicians~~) 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 ≤ 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high 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.
- 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 are aware of them.
- 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 by the ~~Radiation Protection Manager~~ in the RWP.

5.7.2

In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Foreman on duty 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

(continued)

2.0 SAFETY LIMITS (SLs) (Analog)

2.1 SLs

2.1.1 Reactor Core SLs

In MODES 1 and 2, the combination of THERMAL POWER, pressurizer pressure, and the highest operating loop cold leg coolant temperature shall not exceed the limits shown in Figure 2.1.1-1.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained \leq [2750] psia.

2.2 SL Violations

2.2.1 If SL 2.1.1 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.4 Within 24 hours, notify the ~~Plant Superintendent~~ and ~~Vice President Nuclear Operations~~.
Manager

2.2.5 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC and the ~~Plant Superintendent~~ and ~~Vice President Nuclear Operations~~.
Manager

2.2.6 Operation of the unit shall not be resumed until authorized by the NRC.

the corporate officer with direct responsibility for the plant

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BASES

SAFETY LIMIT
VIOLATIONS
(continued)

2.2.1

If SL 2.1.1 is violated, the requirement to go to MODE 3 places the unit in a MODE in which this SL is not applicable.

The allowed Completion Time of 1 hour recognizes the importance of bringing the unit to a MODE of operation where this SL is not applicable and reduces the probability of fuel damage.

2.2.3

If SL 2.1.1 is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 3).

2.2.4

If SL 2.1.1 is violated, the appropriate senior management of the nuclear plant and the utility shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to senior management.

2.2.5

If SL 2.1.1 is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 4). A copy of the report shall also be provided to the senior management of the nuclear plant, and the utility Vice President - Nuclear Operations.

2.2.6

If SL 2.1.1 is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and

Corporate officer with direct responsibility for the plant

(continued)

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BASES (continued)

SAFETY LIMIT
VIOLATIONS

2.2.2.2 (continued)

compound the problem by adding thermal gradient stresses to the existing pressure stress.

2.2.3

If the RCS pressure SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 7).

2.2.4

If the RCS pressure SL is violated, the appropriate senior management of the nuclear plant and the utility shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and to assess the condition of the unit before reporting to senior management.

2.2.5

If the RCS pressure SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 8). A copy of the report shall also be provided to the senior management of the nuclear plant, and the Utility Vice President - Nuclear Operations.

2.2.6

If the RCS pressure SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

corporate officer with direct responsibility for the plant

(continued)

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2.0 SAFETY LIMITS (SLs) (Digital)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, departure from nucleate boiling ratio (DNBR) shall be maintained at $\geq [1.19]$.

2.1.1.2 In MODES 1 and 2, the peak linear heat rate (LHR) (adjusted for fuel rod dynamics) shall be maintained at $\leq [21.0]$ kW/ft.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at $\leq [2750]$ psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.4 Within 24 hours, notify the ~~Plant Superintendent~~ and ~~Vice President Nuclear Operations~~.

2.2.5 Within 30 days of the violation, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC and the ~~Plant Superintendent~~ and ~~Vice President Nuclear Operations~~.

the corporate officer with direct responsibility for the plant

Manager

Manager

(continued)

Reactor Core SLs (Digital)
B 2.1.1

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BASES

SAFETY LIMIT VIOLATIONS

2.2.5 (continued)

report shall also be provided to the senior management of the nuclear plant, and the utility Vice President - Nuclear Operations.

2.2.6

If SL 2.1.1.1 or SL 2.1.1.2 is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10, 1988.
 2. FSAR, Section [].
 3. 10 CFR 50.72.
 4. 10 CFR 50.73.
-

corporate officer with direct responsibility for the plant

RCS Pressure SL (Digital)
B 2.1.2TSTF-65
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SAFETY LIMIT
VIOLATIONS2.2.2.2 (continued)

compound the problem by adding thermal gradient stresses to the existing pressure stress.

2.2.3

If the RCS pressure SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 7).

2.2.4

If the RCS pressure SL is violated, the appropriate senior management of the nuclear plant and the utility shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and to assess the condition of the unit before reporting to the senior management.

2.2.5

If the RCS pressure SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 8). A copy of the report shall also be provided to the senior management of the nuclear plant, and the Utility Vice President - Nuclear Operations.

2.2.6

If the RCS pressure SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

Corporate officer with direct responsibility for the plant.

(continued)

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5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1

The ~~[Plant Superintendent]~~ shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

Manager

The ~~[Plant Superintendent]~~ or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2

The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

Insert A

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5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite 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 safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of 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];

Insert B

Manager

QA Plan

- b. The ~~(Plant) Superintendent~~ shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The ~~specified corporate executive position~~ 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; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

officer

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

- b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A ~~Health Physics Technician~~ shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

radiation protection

- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an [8 or 12] hour day, nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

- 1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized in advance by the ~~Plant Superintendent~~ ^{Manager} or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

^{Manager} Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Plant Superintendent~~ ^{Plant} or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

OR

The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

- f. The ~~Operations Manager or Assistant Operations Manager~~ shall hold an SRO license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.2.] and Specification [5.6.3].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - 1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
 - 2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the Plant ~~Superintendent~~; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of

Manager →

Plant

(continued)

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5.0 ADMINISTRATIVE CONTROLS

[5.7 High Radiation Area]

5.7.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, 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 Technicians~~) 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 ≤ 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Radiation protection

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.
- 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 are aware of them.
- 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 by the ~~Radiation Protection Manager~~ in the RWP.

5.7.2 In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Foreman on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel

(continued)

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be \leq 25% RTP.

2.1.1.2 With the reactor steam dome pressure \geq 785 psig and core flow \geq 10% rated core flow:

MCPR shall be \geq [1.07] for two recirculation loop operation or \geq [1.08] for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

2.1.2 Reactor Coolant System Pressure SL

Reactor steam dome pressure shall be \leq 1325 psig.

2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the ~~General Manager~~ ^{plant} ~~Nuclear Plant~~ and ~~Vice President - Nuclear Operations~~.

the corporate officer with direct responsibility for the plant.

(continued)

2.0 SLs

2.2 SL Violations (continued)

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC and the ~~General Manager - Nuclear Plant~~ and ~~Vice President - Nuclear Operations~~ *plant*

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

the corporate officer with direct responsibility for the plant.

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SAFETY LIMIT
VIOLATIONS
(continued)

2.2.3

If any SL is violated, the senior management of the nuclear plant and the ~~Utility Vice President - Nuclear Operations~~ shall be notified within 24 hours. The 24 hour period provides time for plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to the appropriate utility management.

2.2.4

If any SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 6). A copy of the report shall also be provided to the senior management of the nuclear plant and the ~~Utility Vice President - Nuclear Operations~~.

2.2.5

If any SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10.
2. NEDE-24011-P-A (latest approved revision).
3. XN-NF524(A), Revision 1, November 1983.
4. 10 CFR 50.72.
5. 10 CFR 100.
6. 10 CFR 50.73.

Corporate officer with direct responsibility for the plant.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1

The ~~Plant Superintendent~~ shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

Manager

The ~~Plant Superintendent~~ or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2

The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

Insert A

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite 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 safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of 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];

Insert B

Manager

IQA Plan

b. The ~~Plant Superintendent~~ shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;

c. ~~The [specified corporate executive position]~~ 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; and

officer

d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

radiation protection

d. A ~~Health Physics~~ Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an [8 or 12] hour day, nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized in advance by the ~~Plant Superintendent~~ ^{Manager} or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Plant Superintendent~~ ^{Manager} or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

OR

The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

- f. The ~~Operations Manager or Assistant Operations Manager~~ shall hold an SRO license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release, reports required by Specification [5.6.2] and Specification [5.6.3].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after review and acceptance by the [onsite review (action)] and the approval of the Plant ~~Superintendent~~ ^{Manager}; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in 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

(continued)

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5.0 ADMINISTRATIVE CONTROLS

[5.7 High Radiation Area]

5.7.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, 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 Technicians~~ *radiation protection*) 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 ≤ 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high 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.
- 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 are aware of them.
- 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 by the *d* [Radiation Protection Manager] in the RWP.

5.7.2 In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Foreman on duty 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

(continued)

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be \leq 25% RTP.

2.1.1.2 With the reactor steam dome pressure \geq 785 psig and core flow \geq 10% rated core flow:

MCPR shall be \geq [1.07] for two recirculation loop operation or \geq [1.08] for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

2.1.2 Reactor Coolant System Pressure SL

Reactor steam dome pressure shall be \leq 1325 psig.

2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the ~~General Manager Nuclear Plant~~ and ~~Vice President Nuclear Operations~~ ^{plant}

the corporate officer with direct responsibility for the plant

(continued)

2.0 SLs

2.2 SL Violations (continued)

2.2.4 Within ~~30~~ days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC and the ~~General Manager Nuclear Plant~~ and ~~Vice President Nuclear Operations~~.

plant

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

the corporate officer with direct responsibility for the plant.

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BASES

SAFETY LIMIT
VIOLATIONS
(continued)

2.2.3

If any SL is violated, the senior management of the nuclear plant and the ~~utility Vice President - Nuclear Operations~~ shall be notified within 24 hours. The 24 hour period provides time for plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to the appropriate utility management.

2.2.4

If any SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 [Ref. 6]. A copy of the report shall also be provided to the senior management of the nuclear plant and the ~~utility Vice President - Nuclear Operations~~.

2.2.5

If any SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10.
2. NEDE-24011-P-A, (latest approved revision).
3. XN-NF524(A), Revision 1, November 1983.
4. 10 CFR 50.72.
5. 10 CFR 100.
6. 10 CFR 50.73.

Corporate officer with direct responsibility for the plant.

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5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1

The [Plant Superintendent] shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

Manager

The [Plant Superintendent] or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2

The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

Insert A

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite 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 safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of 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]; *IOA Plan*

Insert B

Manager

- b. The *Plant Superintendent* shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. ~~The~~ *officer* specified corporate ~~executive position~~ 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; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

- b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A ~~Health Physics~~ Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

radiation protection

- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an [8 or 12] hour day, nominal 40 hour week, while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;
2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized in advance by the ~~Plant Superintendent~~ ^{Manager} or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Plant Superintendent~~ ^{Manager} or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

OR

The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

- f. The ~~Operations Manager~~ or ~~Assistant Operations Manager~~ shall hold an SRO license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.2] and Specification [5.6.3].

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain: -
 - 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after review and acceptance by the [onsite review function] and the approval of the ~~Plant~~ Manager ~~Superintendent~~; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made.

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5.0 ADMINISTRATIVE CONTROLS

[5.7 High Radiation Area]

5.7.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, 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). *radiation protection* Individuals qualified in radiation protection procedures (e.g., *Health Physics Technicians*) 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 ≤ 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high 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.
- 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 are aware of them.
- 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 by the *Radiation Protection Manager* in the RWP.

5.7.2 In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Foreman on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel

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