

10 CFR 50.90

5928-03-20118
2130-03-20148
March 23, 2004

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

Subject: Three Mile Island, Unit 1 (TMI Unit 1)
Facility Operating License No. DPR-50
Docket No. 50-289

Oyster Creek Generating Station (OCGS)
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Technical Specification Change Request No. 304/320 (TSCR) - Relocation of Independent Onsite Safety Review Group function to the Quality Assurance Topical Report for Oyster Creek Generating Station (OCGS) and Three Mile Island (TMI) Unit 1.

Reference: 1) Administrative Letter 95-06, Relocation of Technical Specifications
Administrative Controls Related to Quality Assurance

Pursuant to 10 CFR 50.90, AmerGen Energy Company, LLC, hereby requests changes to the Technical Specifications included in the Oyster Creek Operating License No. DPR-16 and the Three Mile Island Unit 1 Operating License No. DPR-50. These changes relocate, intact, the Independent Onsite Safety Review Group (IOSRG) requirements from the Administrative Controls in Section 6 of the Technical Specifications to the Exelon Generation Company, LLC (EGC)/AmerGen Energy Company, LLC (AmerGen) Quality Assurance Topical Report (QATR). In addition, administrative corrections are included, which update references to the EGC/AmerGen QATR, which has replaced the OCGS and TMI Operational Quality Assurance Plans.

As stated in Reference 1, the existing Technical Specification requirements related to an Independent Onsite Safety Review Group may be relocated to the quality assurance plan. Any subsequent changes to the Independent Onsite Safety Review Group provisions incorporated into the quality assurance plan would then be controlled in accordance with 10 CFR 50.54 (a).

A001
Q004

Enclosure 1 contains the evaluation of the proposed changes and No Significant Hazards Consideration.

Enclosures 2 and 3 contain the proposed Technical Specification changes, while Enclosure 4 provides the proposed corresponding changes to the EGC/AmerGen QATR.

It is requested that the NRC approve this change by March 23, 2005, in order to facilitate AmerGen implementing changes, which will align TMI and OCGS with the EGC/AmerGen nuclear fleet.

The proposed change to the Technical Specifications has undergone a review in accordance with Section 6.5 of the OCGS and TMI Technical Specifications. No new regulatory commitments are established by this letter.

Pursuant to 10 CFR 50.91(b)(1), a copy of this request is being provided to the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection and to the State of New Jersey, Environmental Protection, Bureau of Nuclear Engineering. In addition, copies are being provided to the executives of the township and county in which the facility is located.

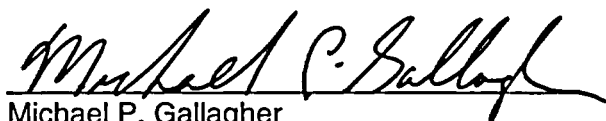
If any additional information is needed, please contact Dave Robillard at (610) 765-5952.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

03-23-04

Executed On



Michael P. Gallagher
Director, Licensing and Regulatory Affairs
AmerGen Energy Company, LLC

- Enclosures:
- 1) Oyster Creek Generating Station (OCGS)/Three Mile Island, (TMI) Unit 1 Technical Specification Change Request No. 304/320, Evaluation of Proposed Changes
 - 2) Oyster Creek Generating Station (OCGS) Technical Specification Change Request No. 304, Proposed Changes to the OCGS Technical Specifications Pages (Markup and camera ready)
 - 3) Three Mile Island, (TMI) Unit 1 Technical Specification Change Request No. 320, Proposed Change to the TMI Unit 1 Technical Specification Pages (Markup and camera ready)
 - 4) Oyster Creek Generating Station (OCGS) License Amendment No. 304, Three Mile Island (TMI) Unit 1 License Amendment Request No. 320, Proposed Changes to the EGC/AmerGen Quality Assurance Topical Report, (Markup) Conforming to this Proposed Amendment

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cc: H. J. Miller, USNRC, Regional Administrator, Region I
D. M. Skay, USNRC, Senior Project Manager, TMI Unit 1
D. M. Kern, USNRC, Senior Resident Inspector, TMI Unit 1
P. S. Tam, USNRC, Senior Project Manager, Oyster Creek Generating Station
R. J. Summers, USNRC, Senior Resident Inspector, OCGS
D. Allard, Director, Bureau of Radiation Protection – PA Department of
Environmental Resources
Chairman, Board of County Commissioners of Dauphin County
Chairman, Board of Supervisors of Londonderry Township
K. Tosch, Manager, Bureau of Nuclear Engineering, NJ Department of
Environmental Protection
File No. 03047 TMI-1
File No. 02027 OCGS

ENCLOSURE 1

**Oyster Creek Generating Station (OCGS) /
Three Mile Island, (TMI) Unit 1**

Technical Specification Change Request No. 304/320

Evaluation of Proposed Changes and

No Significant Hazards Consideration

1.0 INTRODUCTION

AmerGen Energy Company, LLC (AmerGen) is requesting changes to Technical Specification (TS), Appendix A of the facility operating license No. DPR-16 for Oyster Creek Generating Station (OCGS) and facility operating license No. DPR-50 for Three Mile Island, Unit 1 (TMI Unit 1).

This proposed change relocates the Independent Onsite Safety Review Group (IOSRG) from the Administrative Controls in Section 6 of the Technical Specifications to the Quality Assurance Topical Report (QATR), the highest tiered document controlling the Company's quality assurance program.

AmerGen fully intends to continue to implement the independent review functions required by NUREG-0737. However, in the future, the independent review functions may not be performed by a distinct, separate group of engineers. Future changes to these administrative requirements will be subject to the regulatory controls of 10 CFR 50.54(a). Accordingly, administrative improvements and clarifications, spelling errors, organizational title changes, as well as other changes that do not reduce the quality assurance program commitments, as described in 10 CFR 50.54(a), could be implemented without prior NRC approval. This will result in a burden reduction associated with the implementation time and resources spent by AmerGen and NRC staff in the preparation and review of license amendment requests associated with these types of changes.

In addition, administrative corrections are included, which update references to the Exelon/AmerGen Quality Assurance Topical Report, which has replaced the OCGS and TMI Operational Quality Assurance Plans.

2.0 DESCRIPTION OF PROPOSED AMENDMENT

AmerGen Energy Company, LLC (AmerGen) requests that the following changed replacement pages be inserted into the existing Technical Specification:

Revised OCGS Technical Specification Pages: 6-7, 6-8, 6-9, 6-10, 6-17 and 6-18.

Marked up and camera ready Technical Specification pages showing the requested changes are provided in Enclosure 2.

The proposed changed pages to the current QATR, Revision 71, are provided as Enclosure 4 conforming to this proposed amendment. The revised QATR section is Chapter 1, Section 2.3.7 and Appendix C, Sections 14 and 15.

The following lists the changes proposed for each of the pages affected by OCGS TSCR No. 304.

Page 6-7:

TS 6.5.3.1 currently states that audits of facility activities shall be performed in accordance with the Oyster Creek Operational Quality Assurance Plan. Change "Operational Quality Assurance Plan" to "Quality Assurance Topical Report (QATR)."

TS 6.5.3.1.g currently makes reference to the Operational Quality Assurance Plan. Change "Operational Quality Assurance Plan" to "QATR."

TS 6.5.3.1.k. currently includes any other area of facility operation considered appropriate by the IOSRG or the Chief Nuclear Officer. The words "the IOSRG or" are being deleted and this responsibility is being relocated to the QATR.

Page 6-8:

TS 6.5.3.3 currently states that upper management shall be informed per the Operation Quality Assurance Plan. Change "Operational Quality Assurance Plan" to "QATR."

TS 6.5.4 "Independent Onsite Safety Review Group (IOSRG)," is deleted. These requirements are being relocated to the QATR.

Page 6-9:

The balance of TS 6.5.4 as continued on this page is deleted. These requirements are being relocated to the QATR.

Page 6-10:

TS 6.8.1.a currently refers to applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 as referenced in the Oyster Creek Operational Quality Assurance Program. Change "Oyster Creek Operational Quality Assurance Program" to "QATR."

Page 6-17:

TS 6.10.2.J currently states that records of reviews by the Independent Onsite Safety Review Group shall be retained for the duration of the Facility Operating License. These words are being deleted and relocated to the QATR.

Page 6-18:

TS 6.10.3 currently states that Quality Assurance Records shall be retained as specified by the Quality Assurance Plan. Change "Quality Assurance Plan" to "QATR."

Revised TMI-1 Technical Specification Pages: v, 6-7, 6-8, 6-9 and 6-21.

Marked up and camera ready Technical Specification pages showing the requested changes are provided in Enclosure 3.

The proposed changed pages to the current QATR, Revision 71, are provided as Enclosure 4 conforming to this proposed amendment. The revised QATR sections/pages is Section 2.3.7 on page 11.

The following lists the changes proposed for each of the pages affected by TMI TSCR No. 320.

Page v:

The table of contents is revised to show that TS 6.5.4; Independent Onsite Safety Review Group (IOSRG) is being deleted.

Page 6-7:

TS 6.5.3.1 currently states that audits of the unit shall be performed in accordance with the TMI-1 Operational Quality Assurance Plan. Change "TMI-1 Operational Quality Assurance Plan" to "Quality Assurance Topical Report (QATR)."

TS 6.5.3.1.d currently states that audits of the unit shall be performed in accordance with the performance required by the Operational Quality Assurance Plan to meet the criteria of Appendix "B" 10 CFR 50. Change "Operational Quality Assurance Plan" to "QATR."

Page 6-8:

TS 6.5.3.1.k currently includes any other area of unit operation considered appropriate by the IOSRG or the Chief Nuclear Officer. The words "the IOSRG or" are being deleted and this responsibility is being relocated to the QATR.

TS 6.5.3.3 currently states that upper management shall be informed per the Operational Quality Assurance Plan. Change "Operational Quality Assurance Plan" to "QATR."

TS 6.5.4, "Independent Onsite Safety Review Group (IOSRG) Structure," is being deleted. These requirements are being relocated to the QATR.

Page 6-9:

The balance of TS 6.5.4 as continued on this page is being deleted. These requirements are being relocated to the QATR.

Page 6-21:

TS 6.10.2.i currently makes reference to the Operational Quality Assurance Plan. Change "Operational Quality Assurance Plan" to "QATR."

TS 6.10.2.k currently states that "records of reviews by the Independent Onsite Safety Review Group" shall be retained for the duration of Operating License. These words are being deleted and relocated to the QATR.

3.0 BACKGROUND

Following discussions with the NRC Staff, AmerGen Energy Company, LLC (AmerGen) decided to withdraw TMI Unit 1 TSCR No. 298, Revision 1, which was a proposal to eliminate the IOSRG and associated Technical Specification requirements for TMI Unit 1. In a letter dated April 30, 2003, AmerGen withdrew TSCR No. 298, Revision 1, and indicated the intent to make another submittal to relocate these requirements intact to a licensee-controlled document. This submittal, which proposes to change both OCGS and TMI Unit 1 Technical Specifications, is the result of those interactions.

Additionally, the QATR has replaced the Operational Quality Assurance Plan. Therefore, this Technical Specification Change Request is being used to accomplish several minor administrative changes, which are needed to reflect that change.

4.0 REGULATORY REQUIREMENTS

In response to NUREG-0737 "Clarification of TMI Action Plan Requirements," Technical Requirements 6.5.4 and its associated subsections describe the requirements and responsibilities of the IOSRG for oversight of plant activities. This administrative relocation is not affecting compliance with these requirements.

In accordance with Administrative Letter 95-06, "the existing technical specification requirements related to an independent safety engineering group function may be relocated". This proposed change relocates the Independent Onsite Safety Review Group (IOSRG) requirements from the Administrative Controls in Section 6 of the Technical Specifications to the QATR.

5.0 TECHNICAL ANALYSIS

This proposed change is purely administrative, has no effect on meeting NRC safety requirements and is consistent with the guidance of NRC Administrative Letter 95-06. Therefore, no technical analysis is required to justify this change.

6.0 REGULATORY ANALYSIS

In accordance with Administrative Letter 95-06, "The review process becomes simpler if the existing independent safety engineering group requirements presently in the technical specifications are relocated intact to the quality assurance plan."

As indicated in Administrative Letter 95-06, the staff has reviewed and approved many recent amendment requests that involved incorporating parts of the improved Standard Technical Specifications, relocating requirements that do not satisfy the criteria of 10 CFR 50.36 for inclusion as limiting conditions for operation, and relocating requirements that are controlled directly by regulations and related licensee programs. This proposed change constitutes such an amendment request.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

AmerGen has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

This proposed change involves the relocation of the Technical Specification (TS) requirements for the Independent Onsite Safety Review Group to the Quality Assurance Topical Report (QATR). This is an administrative change only in accordance with Administrative Letter 95-06.

This change also makes several administrative updates to the TS, to reflect the fact that the Exelon/AmerGen QATR has replaced the former Oyster Creek and TMI Unit 1 Operational Quality Assurance Plans (OQAP). These changes are purely administrative in nature.

This proposed change does not affect assumptions contained in the plant safety analyses, the physical design and/or operation of the plant, nor does it affect Technical Specifications that preserve safety analysis assumptions. No TS Limiting Condition of Operation, Action Statement, or Surveillance Requirement is affected by this change. The proposed change does not alter the design, function, operation, or reliability of any plant component. This change does not involve a physical modification to the plant, a mode of operation, or a change to the UFSAR transient analyses. Normal and accident dose to plant personnel or to the public are unaffected.

Therefore, the proposed change does not significantly increase the probability of occurrence or the consequences of any accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

This proposed change relocates the Independent Onsite Safety Review Group from the TS section 6.0 to the QATR and updates references to the Exelon/AmerGen QATR. It is administrative in nature and does not affect the assumptions contained in the plant safety analyses, nor does it affect the physical plant design or modes of plant operation defined in the plant operating license that preserve safety analysis assumptions.

This proposed change does not introduce a new mode of plant operation or surveillance requirement, nor involve a physical modification to the plant. The proposed change does not alter the design, function, or operation of any plant system or component.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

This proposed change only involves Technical Specification Section 6, "Administrative Controls," which does not include any margins of safety. The relocation of these administrative requirements will not reduce the quality assurance commitments as accepted by the NRC, nor reduce administrative controls essential to the safe operation of the plant. Future changes to these administrative requirements will be performed in accordance with NRC regulation 10 CFR 50.54(a). Accordingly, the relocation results in an acceptable level of regulatory control, as described in Administrative Letter 95-06.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, the proposed change meets the requirements of 10 CFR 50.92(c) and involves no significant hazards consideration.

8.0 ENVIRONMENTAL CONSIDERATION

AmerGen Energy Company, LLC (AmerGen) has evaluated this proposed change against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." We have determined that this proposed change is a revision to an administrative requirement as described in 10 CFR 51.22(c)(10) and therefore meets the criteria for categorical exclusion. This determination is based on the fact that this change to the Technical Specifications, Section 6, "Administrative Controls," to relocate the requirements for an Independent Onsite Safety Review Group from the Technical Specification to the QATR, and to update references to the Exelon/AmerGen QATR, are purely administrative in nature.

Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

9.0 PRECEDENT

The NRC previously approved a similar amendment to relocate the Independent Safety Group (ISEG) from TS to the Operational Quality Assurance Plan for the V.C. Summer Nuclear Station (Amendment 151; approved 7/30/01).

ENCLOSURE 2

Oyster Creek Generating Station (OCGS)

Technical Specification Change Request No. 304

Proposed Changes to the OCGS Technical Specification Pages

(Markup and camera ready)

6.5.3 AUDITS

6.5.3.1 Audits of facility activities shall be performed in accordance with the Oyster Creek Operational Quality Assurance Plan. These audits shall encompass:

Quality Assurance
Topical Report
(QATR)

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.
- d. The Facility Emergency Plan and implementing procedures.
- e. The Facility Security Plan and implementing procedures.
- f. The Fire Protection Program and implementing procedures.
- g. The performance of activities required by the Operational Quality Assurance Plan to meet the criteria of Appendix 'B', 10 CFR 50.
- h. The radiological environmental monitoring program and the results thereof.
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for radioactive wastes.
- k. Any other area of facility operation considered appropriate by the IOSRG or the Chief Nuclear Officer.

6.5.3.2 Audits of the following shall be performed under the cognizance of the department director responsible for technical support.

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 30 days after completion of the audit. Upper management shall be informed per the ~~Operation Quality Assurance~~

~~QATK~~

~~QATK~~

6.5.4

~~INDEPENDENT ONSITE SAFETY REVIEW GROUP (IOSRG) Deleted~~

STRUCTURE

6.5.4.1 The IOSRG shall be a full-time group of engineers experienced in nuclear power plant engineering, operation and/or technology, independent of the facility staff, and located onsite.

ORGANIZATION

- 6.5.4.2 a. The IOSRG shall consist of a Manager responsible for Nuclear Safety Assessment and staff members who meet the qualifications of 6.5.4.5. Group expertise shall be multidisciplined.
- b. The IOSRG shall report to the Director responsible for nuclear quality assurance.

FUNCTION

6.5.4.3 The periodic review functions of the IOSRG shall include the following on a selective and overview basis:

- 1) Evaluation for technical adequacy and clarity of procedures important to the safe operation of the facility.
- 2) Evaluation of facility operations from a safety perspective.
- 3) Assessment of facility nuclear safety programs.
- 4) Assessment of the facility performance regarding conformance to requirements related to safety.
- 5) Any other matter involving safe operation of the nuclear power plant that the manager deems appropriate for consideration.

AUTHORITY

6.5.4.4 The IOSRG shall have access to the facility and facility records as necessary to perform its evaluations and assessments. Based on its reviews, the IOSRG shall provide recommendations to the management positions responsible for the areas reviewed.

DELETED

DELETED

QUALIFICATIONS

6.5.4.5 IOSRG engineers shall have either (1) a Bachelor's Degree in Engineering or appropriate Physical Science and three years of professional level experience in the nuclear power field which may include technical supporting functions or (2) eight years of appropriate experience in nuclear power plant operations and/or technology. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years.

RECORDS

6.5.4.6 Reports of evaluations and assessments encompassed in Section 6.5.4.3 shall be prepared, approved, and transmitted to the director responsible for nuclear quality assurance, Vice President - Oyster Creek, the Chief Nuclear Officer and the management positions responsible for the areas reviewed.

6.6 REPORTABLE EVENT ACTION

6.6.1 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 reported to the cognizant manager and the cognizant department director and the Vice President - Oyster Creek. The functionally cognizant department staff shall prepare a Licensee Event Report (LER) in accordance with the guidance outlined in 10 CFR 50.73(b). Copies of all such reports shall be submitted to the functionally cognizant department director and the Vice President - Oyster Creek.

6.7 SAFETY LIMIT VIOLATION

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

- a. If any Safety Limit is exceeded, the reactor shall be shut down immediately until the Commission authorizes the resumption of operation.
- b. The Safety Limit violation shall be reported to the Commission and the Vice President - Oyster Creek.
- c. A Safety Limit Violation Report shall be prepared. The report shall be submitted to the Vice President - Oyster Creek. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components systems or structures, (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission within ten days of the violation.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the items referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 as referenced in the ~~Oyster Creek Operational Quality Assurance Program~~ **QATR**
- b. Surveillance and test activities of equipment that affects nuclear safety and radioactive waste management equipment.
- c. Refueling Operations.
- d. Security Plan Implementation.
- e. Fire Protection Program Implementation.
- f. Emergency Plan Implementation.
- g. Process Control Plan Implementation.
- h. Offsite Dose Calculation Manual Implementation.
- i. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.15, Revision 1.
- j. Plant Staff Overtime pursuant to Technical Specification 6.2.2.2(i), above.

6.8.2 Each procedure required by 6.8.1 above, and substantive changes thereto, shall be reviewed and approved as described in 6.5.1 prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1, above, may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the licensee's management staff qualified in accordance with 6.5.1.14 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision holding a Senior Reactor Operator's License on the unit.
- c. The change is documented, reviewed and approved as described in 6.5.1 within 14 days of implementation.

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principle maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All Licensee Event Reports.
- d. Records of surveillance activities, inspections and calibrations required by these technical specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to operating procedures.
- g. Deleted.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility 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 facility radiation and contamination surveys.
- d. Records of doses received by all individuals for whom monitoring was required entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these technical specifications.
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- j. ~~Records of reviews by the Independent Onsite Safety Review Group.~~ Deleted

- k. Records of Environmental Qualification which are covered under the provisions for paragraph 6.14.
- l. Records of the service lives of all snubbers, including the date which the service life commences, and associated installation and maintenance records.
- m. Records of results of analyses required by the Radiological Environmental Monitoring Program.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PLAN.
- o. Records of radioactive shipments

6.10.3 Quality Assurance Records shall be retained as specified by the ~~Quality Assurance Plan~~

QAPC

6.11 RADIATION PROTECTION PROGRAM

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

6.12 (Deleted)

6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by Section 20.1601 of 10 CFR 20, each high radiation area in which the intensity of radiation at 30 cm (11.8 in.) is greater than deep dose equivalent of 100 mRem/hr but less than 1,000 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).

NOTE: Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are following plant radiation protection procedures for entry into high radiation areas.

An individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a pre-set 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.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive exposure control over the activities within the area and who will perform periodic radiation surveillance at the frequency in the RWP. The surveillance frequency will be established by the management position responsible for radiological controls.

6.5.3 AUDITS

6.5.3.1 Audits of facility activities shall be performed in accordance with the Quality Assurance Topical Report (QATR). These audits shall encompass:

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.
- d. The Facility Emergency Plan and implementing procedures.
- e. The Facility Security Plan and implementing procedures.
- f. The Fire Protection Program and implementing procedures.
- g. The performance of activities required by the QATR to meet the criteria of Appendix 'B', 10 CFR 50.
- h. The radiological environmental monitoring program and the results thereof.
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for radioactive wastes.
- k. Any other area of facility operation considered appropriate by the Chief Nuclear Officer.

6.5.3.2 Audits of the following shall be performed under the cognizance of the department director responsible for technical support.

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 30 days after completion of the audit. Upper management shall be informed per the QATR.

6.5.4 DELETED

6.6 REPORTABLE EVENT ACTION

6.6.1 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 reported to the cognizant manager and the cognizant department director and the Vice President - Oyster Creek. The functionally cognizant department staff shall prepare a Licensee Event Report (LER) in accordance with the guidance outlined in 10 CFR 50.73(b). Copies of all such reports shall be submitted to the functionally cognizant department director and the Vice President - Oyster Creek.

6.7 SAFETY LIMIT VIOLATION

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

- a. If any Safety Limit is exceeded, the reactor shall be shut down immediately until the Commission authorizes the resumption of operation.
- b. The Safety Limit violation shall be reported to the Commission and the Vice President - Oyster Creek.
- c. A Safety Limit Violation Report shall be prepared. The report shall be submitted to the Vice President - Oyster Creek. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components systems or structures, (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission within ten days of the violation.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the items referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 as referenced in the QATR.
- b. Surveillance and test activities of equipment that affects nuclear safety and radioactive waste management equipment.
- c. Refueling Operations.
- d. Security Plan Implementation.
- e. Fire Protection Program Implementation.
- f. Emergency Plan Implementation.
- g. Process Control Plan Implementation.
- h. Offsite Dose Calculation Manual Implementation.
- i. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.15, Revision 1.
- j. Plant Staff Overtime pursuant to Technical Specification 6.2.2.2(i), above.

6.8.2 Each procedure required by 6.8.1 above, and substantive changes thereto, shall be reviewed and approved as described in 6.5.1 prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1, above, may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the licensee's management staff qualified in accordance with 6.5.1.14 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision holding a Senior Reactor Operator's License on the unit.
- c. The change is documented, reviewed and approved as described in 6.5.1 within 14 days of implementation.

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principle maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All Licensee Event Reports.
- d. Records of surveillance activities, inspections and calibrations required by these technical specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to operating procedures.
- g. Deleted.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility 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 facility radiation and contamination surveys.
- d. Records of doses received by all individuals for whom monitoring was required entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these technical specifications.
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- j. Deleted. |

- k. Records of Environmental Qualification which are covered under the provisions for paragraph 6.14.
- l. Records of the service lives of all snubbers, including the date which the service life commences, and associated installation and maintenance records.
- m. Records of results of analyses required by the Radiological Environmental Monitoring Program.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PLAN.
- o. Records of radioactive shipments

6.10.3 Quality Assurance Records shall be retained as specified by the QATR. |

6.11 RADIATION PROTECTION PROGRAM

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

6.12 (Deleted)

6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by Section 20.1601 of 10 CFR 20, each high radiation area in which the intensity of radiation at 30 cm (11.8 in.) is greater than deep dose equivalent of 100 mRem/hr but less than 1,000 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).

NOTE: Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are following plant radiation protection procedures for entry into high radiation areas.

An individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a pre-set 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.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive exposure control over the activities within the area and who will perform periodic radiation surveillance at the frequency in the RWP. The surveillance frequency will be established by the management position responsible for radiological controls.

ENCLOSURE 3

Three Mile Island, (TMI) Unit 1

Technical Specification Change Request No. 320

Proposed Changes to the TMI Unit 1 Technical Specification Pages

(Markup and camera ready)

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- f Any other matters involving safe operation of the nuclear power plant which a reviewer deems appropriate for consideration, or which is referred to the independent reviewers

6.5.2.6 QUALIFICATIONS

The independent reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have 9 years of appropriate experience in the field of his specialty. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

RECORDS

- 6.5.2.7 Reports of reviews encompassed in Section 6.5.2.5 shall be prepared, maintained and transmitted to the cognizant department director and the Vice President-TMI Unit 1.

6.5.3 AUDITS

- 6.5.3.1 Audits of unit activities shall be performed in accordance with the ~~Unit Operational Quality Assurance Plan~~ These audits shall encompass:

Quality Assurance
Topical Report
(QATR).

- a. The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire unit staff.
- c. The verification of the non-conformances and corrective actions program to be properly implemented and documented as related to action taken to correct deficiencies occurring in unit equipment, structures, systems or methods of operation that affect nuclear safety.
- d. The performance of activities required by the ~~Operational Quality Assurance Plan~~ QATR to meet the criteria of Appendix "B" 10 CFR 50.
- e. The Emergency Plan and Implementing procedures.
- f. The Security Plan and implementing procedures.
- g. The Fire Protection Program and implementing procedures.
- h. The Offsite Dose Calculation Manual (ODCM) and implementing procedures

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- i. The Process Control Program and implementing procedures for solidification of radioactive wastes.
- j. The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977.
- k. Any other area of unit operation considered appropriate by ~~the IOSRG~~ the Chief Nuclear Officer

6.5.3.2 Audits of the following shall be performed under the cognizance of the department director responsible for technical support:

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 60 days after completion of the audit. Upper management shall be informed per the ~~Operation Quality Assurance Plan (OQAP)~~

~~6.5.4 INDEPENDENT ONSITE SAFETY REVIEW GROUP (IOSRG) STRUCTURE~~

~~6.5.4.1 The IOSRG shall be a full-time group of engineers, experienced in nuclear power-plant engineering, operations and/or technology, independent of the unit staff, and located on site.~~

~~ORGANIZATION~~

- ~~6.5.4.2~~
- ~~a. The IOSRG shall consist of a manager and a minimum staff of 3 members who meet the qualifications of 6.5.4.5. Group expertise shall be multi-disciplined.~~
 - ~~b. In the event of an unanticipated vacancy in the IOSRG staff, the number of staff can be two (2) members for a period of not to exceed six (6) months while the vacancy is being filled.~~
 - ~~c. The IOSRG shall report to the director responsible for nuclear quality assurance.~~

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FUNCTION

- ~~6.5.4.3 The periodic review functions of the IOSRG shall include the following on a selective and overview basis:~~
- ~~1) Evaluation for technical adequacy and clarity of procedures important to the safe operation of the unit.~~
 - ~~2) Evaluation of unit operations from a safety perspective.~~
 - ~~3) Assessment of unit nuclear safety programs.~~
 - ~~4) Assessment of the unit performance regarding conformance to requirements related to safety.~~
 - ~~5) Any other matter involving safe operations of the nuclear power plant that the onsite IOSRG manager deems appropriate for consideration.~~

AUTHORITY

- ~~6.5.4.4 The IOSRG shall have access to the unit and unit records as necessary to perform its evaluations and assessments. Based on its reviews, the IOSRG shall provide recommendations to the management positions responsible for the areas reviewed.~~

QUALIFICATIONS

- ~~6.5.4.5 The IOSRG engineers shall have either: (1) a Bachelor's Degree in Engineering or the Physical Sciences and three years of professional level experience in the nuclear power field including technical supporting functions, or (2) eight years of appropriate experience in nuclear power plant operations and/or technology. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years.~~

RECORDS

- ~~6.5.4.6 Reports of evaluations and assessments encompassed in Section 6.5.4.3 shall be prepared, approved, and transmitted to the director responsible for nuclear quality assurance, the Vice President-TMI Unit 1, the Chief Nuclear Officer and the management positions responsible for the areas reviewed.~~

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- 6.10.2 The following records shall be retained for the duration of Operating License DPR-50 unless otherwise specified in 6.10.1 above.
- a. Records and drawing changes reflecting facility 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. Routine unit radiation surveys and monitoring records.
 - d. Records of doses received by all individuals for whom monitoring was required.
 - e. Records of radioactive liquid and gaseous wastes released to the environment, and records of environmental monitoring surveys.
 - f. Records of transient or operational cycles for those facility components which affect nuclear safety for a limited number of transients or cycles as defined in the Final Safety Analysis Report.
 - g. Records of training and qualification for current members of the unit staff.
 - h. Records of in-service inspections performed pursuant to these Technical Specifications.
 - i. Records of Quality Assurance activities required by the ~~Operational Quality Assurance Plan~~ ^{QAPR}.
 - 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 reviews by the Independent Onsite Safety Review Group.~~ ^{Deleted}
 - l. Records of analyses required by the radiological environmental monitoring program.
 - m. Records of the service lives of all safety related hydraulic snubbers including the date at which the service life commences and associated installation and maintenance records.
 - n. Records of solid radioactive shipments.
 - o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

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- f. Any other matters involving safe operation of the nuclear power plant which a reviewer deems appropriate for consideration, or which is referred to the independent reviewers.

6.5.2.6 QUALIFICATIONS

The independent reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have 9 years of appropriate experience in the field of his specialty. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

RECORDS

6.5.2.7 Reports of reviews encompassed in Section 6.5.2.5 shall be prepared, maintained and transmitted to the cognizant department director and the Vice President-TMI Unit 1.

6.5.3 AUDITS

6.5.3.1 Audits of unit activities shall be performed in accordance with the Quality Assurance Topical Report (QATR). These audits shall encompass:

- a. The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire unit staff.
- c. The verification of the non-conformances and corrective actions program to be properly implemented and documented as related to action taken to correct deficiencies occurring in unit equipment, structures, systems or methods of operation that affect nuclear safety.
- d. The performance of activities required by the QATR to meet the criteria of Appendix "B" 10 CFR 50.
- e. The Emergency Plan and Implementing procedures.
- f. The Security Plan and implementing procedures.
- g. The Fire Protection Program and implementing procedures.
- h. The Offsite Dose Calculation Manual (ODCM) and implementing procedures.

- i. The Process Control Program and implementing procedures for solidification of radioactive wastes.
- j. The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977.
- k. Any other area of unit operation considered appropriate by the Chief Nuclear Officer.

6.5.3.2 Audits of the following shall be performed under the cognizance of the department director responsible for technical support:

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 60 days after completion of the audit. Upper management shall be informed per the QATR.

6.5.4 DELETED

DELETED

6.10.2 The following records shall be retained for the duration of Operating License DPR-50 unless otherwise specified in 6.10.1 above.

- a. Records and drawing changes reflecting facility 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. Routine unit radiation surveys and monitoring records.
- d. Records of doses received by all individuals for whom monitoring was required.
- e. Records of radioactive liquid and gaseous wastes released to the environment, and records of environmental monitoring surveys.
- f. Records of transient or operational cycles for those facility components which affect nuclear safety for a limited number of transients or cycles as defined in the Final Safety Analysis Report.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QATR.
- 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. Deleted.
- l. Records of analyses required by the radiological environmental monitoring program.
- m. Records of the service lives of all safety related hydraulic snubbers including the date at which the service life commences and associated installation and maintenance records.
- n. Records of solid radioactive shipments.
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

ENCLOSURE 4

OCGS License Amendment Request No. 304

TMI Unit 1 License Amendment Request No. 320

Proposed Changes to the Exelon/AmerGen QATR

(Markup) Conforming to this Proposed Amendment

- maintain a suitably trained and qualified staff.
- monitoring day-to-day station activities.
- provide NOS management periodic reports on the status and adequacy of the QAP.
- quality verification inspections.
- promptly communicate significant issues to ROG NOS and appropriate site management.
- stop work or request any other actions to avoid unsafe plant conditions.

2.3.7 The Company uses a three-tiered approach to accomplish the oversight of safety which are:

- A collection of program elements for implementing and/or reviewing areas of quality of plant operations and nuclear safety. These elements include system performance monitoring, review of operating experience information, operability evaluations, and reviews of changes to technical specifications and final safety analysis reports that affect design bases. Specific guidance is contained in applicable procedures and programs.
- A NOS staff who assesses and performs quality verification inspection aspects of Company activities within the scope of the QATR relating to safety. This provides for an overview of activities affecting or potentially affecting safety.
- A NSRB which is an off-site committee that reports to and advises the President and Chief Nuclear Officer, Exelon Nuclear, of the results of independent oversight of plant operation relative to nuclear safety.
- In lieu of the collection of program elements for implementing and/or reviewing areas of quality of plant operations and nuclear safety as described above, the Independent On-site Safety Review Group (IOSRG) at Oyster Creek and Three Mile Island Nuclear Stations perform the Independent Safety Engineering function required by NUREG 0737. A description of this function as implemented at Oyster Creek and Three Mile Island is described in Appendix C of this QATR.

2.3.8 Oyster Creek

The organizational structure at the Oyster Creek station is consistent with that described in section 2.3.1 through 2.3.7 with the following exceptions:

The management position responsible for plant operations described in section 2.3.1 includes the functional responsibility for coordination, administration, execution, and monitoring of on-line work schedules.

The management position responsible for training as described in section 2.3.4 includes the functional responsibility for emergency preparedness.

The management position responsible for plant outages includes the functional responsibility for coordination, administration, execution, and monitoring of

13. ASME Boiler and Pressure Vessel Code Section XI – The code year for the Section XI B&PV Inspection Code is found in the applicable site UFSAR.

14. NUREG 0737; Clarification of TMI Action Plan Requirements; Item No. 1.B.1.2; Independent Safety Engineering Group; (Oyster Creek Only)

A. The IOSRG shall be a full-time group of engineers experienced in nuclear power plant engineering, operation and/or technology, independent of the facility staff, and located onsite. The IOSRG shall consist of a Manager responsible for the Nuclear Safety Assessment and staff members who meet the qualifications specified in paragraph no. 14.A.1 below. Group expertise shall be multidisciplined. The IOSRG shall report to the Director responsible for nuclear quality assurance. The IOSRG shall have access to the facility and facility records as necessary to perform its evaluations and assessments. Based on its reviews, the IOSRG shall provide recommendations to the management positions responsible for the areas reviewed.

1. IOSRG engineers shall have either (1) a Bachelor's Degree in Engineering or appropriate Physical Science and three years of professional level experience in the nuclear power field which may include technical supporting functions or (2) eight years of appropriate experience in nuclear power plant operations and/or technology. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years.

2. Reports of evaluations and assessments that encompass the items listed in paragraph no. 14.B below shall be prepared, approved, and transmitted to the Director responsible for Nuclear Quality Assurance, Vice President – Oyster Creek, the Chief Nuclear Officer and the management positions responsible for the areas reviewed. Records of reviews by the Independent Onsite Safety Review Group will be retained for the duration of the Facility Operating License.

B. The periodic review functions of the IOSRG shall include the following on a selective and overview basis:

1. Evaluation for technical adequacy and clarity of procedures important to the safe operation of the facility

2. Evaluation of facility operations from a safety perspective

3. Assessment of facility nuclear safety programs

4. Assessment of the facility performance regarding conformance to requirements related to safety

5. Any other matter involving safe operation of the nuclear power plant that the manager deems appropriate for consideration

15. NUREG 0737; Clarification of TMI Action Plan Requirements; Item No. I.B.1.2; Independent Safety Engineering Group; (TMI Only)

A. The IOSRG shall be a full-time group of engineers experienced in nuclear power plant engineering, operations and/or technology, independent of the facility staff, and located onsite. The IOSRG shall consist of a Manager and a minimum staff of 3 members who meet the qualifications of paragraph 15.A.1 below. Group expertise shall be multi-disciplined. The IOSRG shall report to the Director responsible for nuclear quality assurance. In the event of an unanticipated vacancy in the IOSRG staff, the number of staff can be two (2) members for a period of not to exceed six (6) months while the vacancy is being filled. The IOSRG shall have access to the unit and unit records as necessary to perform its evaluation and assessments. Based on its reviews, the IOSRG shall provide recommendations to the management positions responsible for the areas reviewed.

1. IOSRG engineers shall have either (1) a Bachelor's Degree in Engineering or the Physical Sciences and three years of professional level experience in the nuclear power field including technical supporting functions, or (2) eight years of appropriate experience in nuclear power plant operations and/or technology. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years.

2. Reports of evaluations and assessments that encompass the items listed in paragraph no. 15.B below shall be prepared, approved, and transmitted to the Director responsible for Nuclear Quality Assurance, Vice President - TMI Unit 1, the Chief Nuclear Officer and the management positions responsible for the areas reviewed. Records of reviews by the Independent Onsite Safety Review Group will be retained for the duration of the Operating License.

B. The periodic review functions of the IOSRG shall include the following on a selective and overview basis:

1. Evaluation for technical adequacy and clarity of procedures important to the safe operation of the unit

2. Evaluation of unit operations from a safety perspective

3. Assessment of unit nuclear safety programs

4. Assessment of the unit performance regarding conformance to requirements related to safety

5. Any other matter involving safe operations of the nuclear power plant that the onsite IOSRG manager deems appropriate for consideration