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10 CFR 50.90

April 8, 2004

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

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

SUBJECT: License Amendment Request
Proposed Change to Relocate Administrative Control Requirements

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (Exelon), hereby requests the following amendment to the Technical Specifications (TS), Appendix A of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively.

The proposed changes would relocate several TS Section 6, Administrative Control requirements to the Exelon Generation Company, LLC/AmerGen Energy Company, LLC, Quality Assurance Topical Report, the document controlling the Company's quality assurance program. Specifically, the amendment would relocate (1) the Plant Operations Review Committee and Nuclear Review Board requirements, (2) the program/procedure review and approval requirements, and (3) the record retention requirements.

The proposed changes are consistent with the recommendations of NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995. Additionally, the proposed changes conform to an improved standard TS presented in the NRC document titled: "Standard Technical Specifications – General Electric Plants, BWR/4," NUREG-1433, Rev. 2.

Exelon has concluded that the proposed changes present no significant hazards consideration under the standards set forth in 10CFR 50.92.

Exelon requests approval of the proposed amendment by April 8, 2005. Upon NRC approval, the amendment shall be implemented within 60 days of issuance.

A001

These proposed changes have been reviewed by the Plant Operations Review Committee, and approved by the Nuclear Safety Review Board.

We are notifying the State of Pennsylvania of this application for changes to the TS License by transmitting a copy of this letter and its attachments to the designated State Official.

If you have any questions or require additional information, please contact Doug Walker at (610) 765-5726.

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

Respectfully,

Executed on 04-08-04

Michael P. Gallagher
Director, Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachments:
1. Evaluation of Proposed Changes
2. Technical Specifications Marked-Up Pages
3. Technical Specifications Typed Pages

cc: H. J. Miller, Administrator, Region I, USNRC (w/enc)
A. L. Burritt, USNRC Senior Resident Inspector, LGS "
S. Wall, Project Manager, NRR USNRC "
R. R. Janati, Pennsylvania Department of Environmental Resources "

ATTACHMENT 1

License Amendment Request

Limerick Generating Station, Units 1 and 2

Docket Nos. 50-352 and 50-353

Evaluation of Proposed Changes to Relocate Administrative Control Requirements

ATTACHMENT 1

EVALUATION OF PROPOSED CHANGES TO
RELOCATE ADMINISTRATIVE CONTROL REQUIREMENTS

CONTENTS

1.0 DESCRIPTION

2.0 PROPOSED CHANGES

3.0 BACKGROUND

4.0 TECHNICAL ANALYSIS

5.0 REGULATORY ANALYSIS

- 5.1 No Significant Hazards Consideration
- 5.2 Applicable Regulatory Requirements/Criteria

6.0 ENVIRONMENTAL CONSIDERATION

7.0 REFERENCES

EVALUATION OF PROPOSED CHANGES

1.0 DESCRIPTION

The proposed changes would revise the Facility Operating Licenses Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. The changes would relocate the requirements of Technical Specification (TS) section 6.5, "Review and Audit," sections 6.8.2 and 6.8.3, "Procedures and Programs," and section 6.10, "Record Retention," to the Exelon Generation Company, LLC (EGC)/AmerGen Energy Company, LLC, (AmerGen) Quality Assurance Topical Report (QATR), the highest tiered document controlling the Company's quality assurance program. 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 reduce the implementation time and resources spent by Exelon and NRC staff in the preparation and review of license amendment requests associated with these types of changes.

The proposed changes are consistent with the recommendations of NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995. Additionally, the proposed changes conform to an improved TS presented in the NRC document titled: "Standard Technical Specifications – General Electric Plants, BWR/4", NUREG-1433, Rev. 2.

2.0 PROPOSED CHANGE

Changes requested by this amendment application are:

1. Delete TS section 6.5.1, "Plant Operations Review Committee (PORC)." Licensee will relocate deleted requirements to the EGC/AmerGen Quality Assurance Topical Report (QATR). Specifically, sections 6.5.1.1 through 6.5.1.8, which are titled Function, Composition, Alternates, Meeting Frequency, Quorum, Responsibilities, and Records, will be relocated.

2. Delete TS section 6.5.2, "Nuclear Review Board (NRB)." Licensee will relocate deleted requirements to the EGC/Amer Gen QATR. Specifically, sections 6.5.2.1 through 6.5.2.6, and 6.5.2.9, which are titled Function, Composition, Alternates, Consultants, Meeting Frequency, Quorum, and Records, will be relocated.

3. Delete TS section 6.5.3, "Program/Procedure Review and Approval." Licensee will relocate deleted requirements to the EGC/AmerGen QATR. This section describes the review and approval requirements for procedures and programs identified in TS section 6.8.1 (no changes to TS section 6.8.1 are proposed).

4. Delete TS section 6.8.2. This section references the procedure review and approval requirements described in the TS sections 6.5.1 and 6.5.3, proposed for deletion in changes 1 and 3 above. Licensee will relocate the deleted requirements to the EGC/AmerGen QATR.

5. Delete TS section 6.8.3. This section describes the review and approval requirements for temporary changes to procedures. Licensee will relocate the deleted requirements to the EGC/AmerGen QATR.

6. Delete TS section 6.10, "Record Retention." This section describes the record retention requirements. Licensee will relocate the deleted requirements to the EGC/AmerGen QATR.

7. Delete the PCP record retention requirement in TS section 6.13.1, "Process Control Program." This requirement will be relocated to the EGC/AmerGen QATR as described in change 6 above.

8. Delete the ODCM record retention requirement in TS section 6.14.1.a, "Offsite Dose Calculation Manual." This requirement will be relocated to the EGC/AmerGen QATR as described in change 6 above.

The administrative control requirements identified above will be relocated intact to the QATR. Subsequent changes to these requirements will be controlled in accordance with 10 CFR 50.54(a). Implementation of the amendment will be performed within 60 days of NRC issuance of the amendment. Relocation of these requirements will be completed on or before the implementation of the NRC approved License Amendment. In the absence of a bases section for TS Section 6.0, Administrative Controls, there are no Bases section changes proposed by this amendment application.

3.0 BACKGROUND

NRC regulatory requirements related to the content of the Technical Specifications (TS) are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in the plant's Tech Specs.

The NRC provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors, 58 FR 39132, July 22, 1993. In particular, the NRC indicated that certain items could be relocated from the TS to licensee-controlled documents. The Final Policy Statement identified future criteria to be used in determining whether particular safety functions are required to be include in the TS, as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of, or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of, or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. The NRC adopted amendments to 10 CFR 50.36, (July 19, 1995) pursuant to which the rule was revised to codify and incorporate these criteria.

The NRC's policy statement provides that those existing TS Limiting Condition for Operation (LCOs) which do not satisfy these four specified criteria may be relocated to the Updated Final Safety Analysis Report (UFSAR), such that future changes could be made to these provisions pursuant to 10 CFR 50.59. Other requirements may be relocated to more appropriate documents (e.g., Security Plan, Quality Assurance Plan, and the Emergency Plan) and controlled by the applicable regulatory requirement. Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details of administrative controls may be relocated to licensee controlled documents where section 50.54, 50.59, or other regulations provide adequate regulatory control.

While the criteria specifically apply to LCOs, in adopting the revision of the rule, the NRC indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS. Addressing administrative controls, 10 CFR 50.36 states that they are "the provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is, therefore, that information which the Commission deems essential for the safe operation of the facility, and which is not already adequately covered by other regulations. Accordingly, the NRC has determined that requirements that are not specifically required under 50.36(c)(5), and are not otherwise necessary to obviate the possibility of an abnormal situation, or event, giving rise to an immediate threat to the public health and safety, can be removed from the administrative controls section of the Technical Specifications.

4.0 TECHNICAL ANALYSIS

The proposed license amendment requests the relocation of several administrative control requirements from Technical Specifications (TS), Section 6, to the Exelon Generation Company, LLC (EGC)/AmerGen Energy Company, LLC (AmerGen) Quality Assurance Topical Report (QATR). This relocation applies to the onsite and offsite organization's review and audit requirements, the procedural review and approval requirements, and the record retention requirements.

As presented in the Background section above, the NRC staff concluded that Technical Specifications not specifically required under 50.36(c)(5), and not otherwise necessary to obviate the possibility of an abnormal situation, or event, giving rise to an immediate threat to the public health and safety, can be removed from administrative controls section of the Technical Specifications. Consistent with this policy position, the NRC staff issued Administrative Letter (AL) 95-06, December 12, 1995, identifying TS administrative control requirements that qualify for relocation to licensee quality assurance control documents subject to the controls of 10 CFR 50.54(a). Requirements identified by AL 95-06 included review and audit, procedure review and approval, and record retention requirements. The changes proposed herein conform to the NRC staff position presented in AL 95-06.

NRC approved NUREG-1433, "Standard Technical Specifications – General Electric Plants, BWR/4," Revision 2, identifies an improved TS that was developed based on the criteria in the "Final Commission Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors," dated July 22, 1993, and subsequently codified in 10 CFR 50.36. The preface to this document encourages licensees to adopt some or all of the improved TS into

their existing TS. The TS sections proposed herein for relocation do not appear in the improved Standard Technical Specification (STS) presented in NUREG-1433, and accordingly, are not required to be in the TS.

Revisions to the administrative controls section of the LGS TS are currently subject to a no significance hazards consideration determination pursuant to 10 CFR 90.92. This determination is oriented to design and operational requirements described in the TS. The administrative controls selected for relocation are considered by the NRC in the above referenced AL 95-06 to be quality assurance requirements, and therefore qualify for incorporation into documents describing the licensee's quality assurance program. As stated in AL 95-06, 10 CFR 50.54(a) is the appropriate regulation for controlling changes to these and other quality assurance program requirements. Prior NRC approval is required of any changes to the quality assurance program that reduce the commitments in the program description as accepted by the NRC. Accordingly, the proposed license amendment relocating these administrative requirements from the TS to a document subject to the controls of 10 CFR 50.54(a), results in an equivalent level of regulatory authority while providing for a more appropriate change control process.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

Exelon has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.90, "Issuance of amendment," as discussed below:

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

   Response: No. The proposed changes involve the relocation of several administrative requirements from the Technical Specifications (TS) to a document subject to the control of 10 CFR 50.54(a), and is therefore, administrative in nature. The relocated requirements involve the onsite and offsite organization's review and audit, the review and approval of procedures, and the retention of records. The change will not alter the physical design or operational procedures associated with any plant structure, system, or component. The change does not reduce the duties and responsibilities of the organizations performing the review, audit, and approval functions essential to ensuring the safe operation of the plant.

   Therefore, this proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No. The proposed changes are administrative in nature. The changes do not alter the physical design, safety limits, or safety analysis assumptions, associated with the operation of the plant. Accordingly, the

changes do not introduce any new accident initiators, nor do they reduce or adversely affect the capabilities of any plant structure, system, or component to perform their safety function.

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

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

Response: No. The proposed changes conform to NRC regulatory guidance regarding the content of plant Technical Specifications. The guidance is presented in Administrative Letter 95-06, and NUREG-1433, Rev. 2. 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), consistent with the guidance identified above. Accordingly, the relocation results in an equivalent level of regulatory control.

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

Based on the above, Exelon concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The NRC provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors, 58 FR 39132, July 22, 1993. In particular, the NRC indicated that certain items could be relocated from the TS to licensee-controlled documents, and identified criteria to be used to determine the functions to be included in the Technical Specifications (TS). The NRC's policy statement provides that particular details of administrative controls may be relocated to licensee-controlled documents where section 50.54, 50.59, or other regulations provide adequate regulatory control. The NRC adopted revisions to 10 CFR 50.36, "Technical Specifications," pursuant to which the rule was revised to codify and incorporate these criteria. In adopting the revision of the rule, the NRC indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS. The NRC further concluded that the specific content of the administrative controls section of the TS is, therefore, that information which the Commission deems essential for the safe operation of the facility and which is not already adequately covered by other regulations. Accordingly, the NRC has determined that requirements that are not specifically required under 50.36(c)(5), and are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from TS administrative controls.

Consistent with this policy position, the NRC staff issued Administrative Letter (AL) 95-06, December 12, 1995, identifying TS administrative control requirements that qualify for relocation to licensee quality assurance control documents subject to the controls of 10 CFR

50.54(a). Requirements identified by AL 95-06 included review and audit, procedure review and approval, and record retention requirements. The changes proposed herein conform to the NRC staff position presented in AL 95-06.

NRC approved NUREG-1433, "Standard Technical Specifications – General Electric Plants, BWR/4," Revision 2, identifies an improved TS that was developed based on the criteria in the Final Commission Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors, dated July 22, 1993, and subsequently codified in 10 CFR 50.36. The preface of this document encourages licensees to adopt some or all of the improved TS into their existing TS. The TS sections proposed herein for relocation do not appear in the improved Standard Technical Specification (STS) presented in NUREG-1433, and accordingly, are not required to be in the TS.

The proposed license amendment to relocate these administrative requirements to a document subject to the controls of 10 CFR 50.54(a), conforms with NRC guidance as stated above, and results in an equivalent level of regulatory control.

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

6.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to changes to administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

I. REFERENCES

1. NRC "Final Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors," (58 FR 39132, dated July 22, 1993).

2. NRC Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995).

3. 10 CFR 50.36, "Technical Specifications."

4. 10 CFR 50.54, "Conditions of Licenses."

5. 10 CFR 50.92, "Issuance of Amendment."

6. NRC Administrative Letter 95-06, "Relocation of Technical Specifications Administrative Controls Related to Quality Assurance."

7. NUREG-1433, Revision 2, "Standard Technical Specifications-General Electric Plants. BWR/4," June 2001.

ATTACHMENT 2

License Amendment Request

Limerick Generating Station Units 1 and 2

Docket Nos. 50-352 and 50-353

Relocate Administrative Control Requirements

Markup of Proposed Technical Specification Page Changes

Unit 1 TS Pages	Unit 2 TS Pages
xxvi	xxvi
xxvii	xxvii
6-7	6-7
6-8	6-8
6-9	6-9
6-10	6-10
6-12	6-12
6-12a	6-12a
6-13	6-13
6-19	6-19
6-20	6-20
6-21a	6-21a
6-22	6-22

ADMINISTRATIVE CONTROLS

SECTION		PAGE
6.1 RESPONSIBILITY		6-1
6.2 ORGANIZATION		6-1
6.2.1 OFFSITE AND ONSITE ORGANIZATION		6-1
	Figure 6.2.1-1 Deleted	6-3
6.2.2 UNIT STAFF		6-2
	Figure 6.2.2-1 Deleted	6-4
	Table 6.2.2-1 Minimum Shift Crew Composition	6-5
6.2.3 DELETED; Refer to note on page		6-6
6.2.4 SHIFT TECHNICAL ADVISOR		6-6
6.3 UNIT STAFF QUALIFICATIONS		6-6
6.4 DELETED		6-7
6.5 ~~REVIEW AND AUDIT~~ Deleted		
6.5.1 ~~Plant Operations Review Committee (PORC)~~ Deleted		
~~Function~~ Deleted		6-7
~~Composition~~ Deleted		6-7
~~Alternates~~ Deleted		6-7
~~Meeting Frequency~~ Deleted		6-7
~~Quorum~~ Deleted		6-7
~~Responsibilities~~ Deleted		6-8
~~Records~~ Deleted		6-9

INDEX

ADMINISTRATIVE CONTROLS

SECTION		PAGE
6.5.2	~~NUCLEAR REVIEW BOARD (NRB).~~ Deleted	
	~~Function.~~ Deleted	6-9
	~~Composition.~~ Deleted	6-9
	~~Alternates.~~ Deleted	6-10
	~~Consultants.~~ Deleted	6-10
	~~Meeting Frequency.~~ Deleted	6-10
	~~Quorum.~~ Deleted	6-10
	~~DELETED; Refer to note on page.~~ Deleted	6-10
	~~Records.~~ Deleted	6-12
6.5.3	~~PROGRAM/PROCEDURE REVIEW AND APPROVAL.~~ Deleted	6-12
6.6	REPORTABLE EVENT ACTION	6-12a
6.7	SAFETY LIMIT VIOLATION	6-12a
6.8	PROCEDURES AND PROGRAMS	6-13
6.9	REPORTING REQUIREMENTS	
6.9.1	ROUTINE REPORTS	6-15
	Startup Report	6-15
	Annual Reports	6-15
	Monthly Operating Reports	6-16
	Annual Radiological Environmental Operating Report	6-16
	Semiannual Radioactive Effluent Release Report	6-17
	CORE OPERATING LIMITS REPORTS	6-18a
6.9.2	SPECIAL REPORTS	6-18a
6.10	~~RECORD RETENTION.~~ Deleted	6-19
6.11	RADIATION PROTECTION PROGRAM	6-20
6.12	HIGH RADIATION AREA	6-20

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6.4 DELETED

6.5 ~~REVIEW AND AUDIT~~ Deleted

Delete

~~6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)~~

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

Plant Operations
Engineering
Maintenance
Instrumentation and Controls
Planning
Radiation Safety
Chemistry
Regulatory Assurance

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

The information from Section 6.5 has been relocated to the QATR

~~RESPONSIBILITIES~~ delete

6.5.1.6 The PORC shall be responsible for:

a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by specification 6.8 and requiring a 10 CFR 50.59 evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 evaluation;

b. Review of all proposed tests and experiments that affect nuclear safety;

c. Review of all proposed changes to Appendix A Technical Specifications;

d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;

e. DELETED.

f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;

g. Review of all REPORTABLE EVENTS;

h. Review of unit operations to detect potential hazards to nuclear safety;

i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, plant Manager or the Chairman of the Nuclear Review Board;

j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and

k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.

l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.

m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

n. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Review Board.

6.5.1.7 The PORC shall:

a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.

b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. requires NRC approval pursuant to 10 CFR 50.59.

The information for Section 6.5 has been relocated to the QATR

RESPONSIBILITIES (Continued)

c. Provide written notification within 24 hours to the Vice President, Limerick Generating Station and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President, Limerick Generating Station, Plant Manager, and the Nuclear Review Board.

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

6.5.2.1 The NRB shall function to provide independent review and audit of designated activities in the areas of:

a. Nuclear power plant operations,

b. Nuclear engineering,

c. Chemistry and radiochemistry,

d. Metallurgy,

e. Instrumentation and control,

f. Radiological safety,

g. Mechanical and electrical engineering, and

h. Quality assurance practices.

The NRB shall report to and advise the Senior Vice President and Chief Nuclear Officer on those areas of responsibility pertaining to NRB Review and Audits.

COMPOSITION

6.5.2.2 The Chairman, members, and alternates of the NRB shall be appointed in writing by the Chief Nuclear Officer, and shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of 5 years technical experience, of which a minimum of 3 years shall be in one or more areas given in Specification 6.5.2.1. The NRB shall be composed of no less than eight and no more than 12 members.

The members and alternates of the NRB will be competent in the area of Quality Assurance practice and cognizant of the Quality Assurance requirements of 10 CFR Part 50, Appendix B. Additionally, they will be cognizant of the corporate Quality Assurance Program and will have the corporate Quality Assurance organization available to them.

delete

The information from Section 6.5 has been relocated to the QATR

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ALTERNATES

6.5.2.3 All alternates shall be appointed in writing by the NRB Chairman to serve on a continuing basis. They shall receive correspondence sent to NRB members with regard to NRB activities and shall be invited to attend all NRB meetings. Alternates shall vote only in the absence of those members for whom they are the alternate.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NRB Chairman to provide expert advice to the NRB.

MEETING FREQUENCY

6.5.2.5 The NRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the NRB necessary for the performance of the NRB review and audit functions of these Technical Specifications shall consist of the Chairman or a designated alternate and at least four but not less than one half of the voting NRB members. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 - DELETED. The information from this section is located in the UFSAR.

AUDITS

6.5.2.8 - DELETED. The information from this section is located in the UFSAR.

delete

The information from Section 6.5 has been relocated to the QATR

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.

b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.

c. Audit reports shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 evaluation is required. If a 10 CFR 50.59 evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Director or Manager or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

delete

The information from Section 6.5 has been relocated to the QATR

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 evaluation, the responsible Director or Manager shall render a determination in writing of whether or not the new program, procedure, or change thereto requires NRC approval pursuant to 10 CFR 50.59, and shall forward the new program, procedure, or change thereto with the associated 10 CFR 50.59 evaluation to PORC for review. If NRC approval is required, obtain NRC approval prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Director or Manager shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

delete

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 reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

6.7 SAFETY LIMIT VIOLATION

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

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.

c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

SAFETY LIMIT VIOLATION (Continued)

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.

c. Refueling operations.

d. Surveillance and test activities of safety-related equipment.

e. Security Plan implementation.

f. Emergency Plan implementation.

g. Fire Protection Program implementation.

h. PROCESS CONTROL PROGRAM implementation.

i. OFFSITE DOSE CALCULATION MANUAL implementation.

j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed as set forth in Administrative Procedures.

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

a. The intent of the original procedure is not altered;

b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and

c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.

delete

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6.8.2 The information from Section 6.8.2 has been relocated to the QATR

6.8.3 The information from Section 6.8.3 has been relocated to QATR

6.10 ~~RECORD RETENTION~~ Deleted

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

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

a. Records and logs of unit operation covering time interval at each power level.

b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.

c. All REPORTABLE EVENTS.

d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.

e. Records of changes made to the programs and procedures required by Specification 6.8.

f. Records of radioactive shipments.

g. Records of sealed source and fission detector leak tests and results.

h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

delete

The information from Section 6.10 has been relocated to the QATR.

delete

RECORD RETENTION (Continued)

d. Records of gaseous and liquid radioactive material released to the environs.

e. Records of transient or operational cycles for those unit components identified in Table 5.6.1-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the unit staff.

h. Records of inservice inspections performed pursuant to these Technical Specifications.

i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Section 6.10.2.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the PORC and the NRB.

l. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records.

m. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date.

n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION PROTECTION PROGRAM

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

6.12 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

6.12.1 High Radiation Areas with dose rates (deep dose equivalent) greater than 0.1 rem/hr and not exceeding 1.0 rem/hour (at 30 centimeters from the radiation sources or from any surface penetrated by the radiation):

a. Each accessible entryway to such an area shall be barricaded and conspicuously posted as a High Radiation Area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

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HIGH RADIATION AREA (Continued)

a) A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for controlling personnel radiation exposure within the area, OR

b) Be under the surveillance, as specified in the RWP or equivalent, by means of closed circuit television, of a health physics qualified individual (i.e., qualified in radiation protection procedures), responsible for controlling personnel radiation exposure in the area, and with the means to communicate with the individuals in the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

a. Shall be documented with the following information: ~~and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain~~:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

PROCESS CONTROL PROGRAM (Continued)

2. A determination that the change did not reduce the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective upon review and acceptance by the PORC and approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

a. Shall be documented with the following information: ~~and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:~~

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective upon review and acceptance by the PORC and the approval of the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.15 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.

ADMINISTRATIVE CONTROLS

SECTION			PAGE
6.1 RESPONSIBILITY			6-1
6.2 ORGANIZATION			6-1
6.2.1 OFFSITE AND ONSITE ORGANIZATION			6-1
	Figure 6.2.1-1	DELETED	6-3
6.2.2 UNIT STAFF			6-2
	Figure 6.2.2-1	DELETED	6-4
	Table 6.2.2-1	Minimum Shift Crew Composition	6-5
6.2.3 DELETED; Refer to note on page			6-6
6.2.4 SHIFT TECHNICAL ADVISOR			6-6
6.3 UNIT STAFF QUALIFICATIONS			6-6
6.4 DELETED			6-7
6.5 ~~REVIEW AND AUDIT~~ Deleted			
6.5.1 ~~Plant Operations Review Committee (PORC)~~ Deleted			
~~Function~~. Deleted			6-7
~~Composition~~. Deleted			6-7
~~Alternates~~. Deleted			6-7
~~Meeting Frequency~~. Deleted			6-7
~~Quorum~~. Deleted			6-7
~~Responsibilities~~. Deleted			6-8
~~Records~~. Deleted			6-9

ADMINISTRATIVE CONTROLS

SECTION		PAGE
6.5.2	~~NUCLEAR REVIEW BOARD (NRB)~~ Deleted	
	~~Function~~ Deleted	6-9
	~~Composition~~ Deleted	6-9
	~~Alternates~~ Deleted	6-10
	~~Consultants~~ Deleted	6-10
	~~Meeting Frequency~~ Deleted	6-10
	~~Quorum~~ Deleted	6-10
	~~DELETED; Refer to note on page~~ Deleted	6-10
	~~Records~~ Deleted	6-12
6.5.3	~~PROGRAM/PROCEDURE REVIEW AND APPROVAL~~ Deleted	6-12
6.6 REPORTABLE EVENT ACTION		6-12a
6.7 SAFETY LIMIT VIOLATION		6-12a
6.8 PROCEDURES AND PROGRAMS		6-13
6.9 REPORTING REQUIREMENTS		
6.9.1	ROUTINE REPORTS	6-15
	Startup Report	6-15
	Annual Reports	6-15
	Monthly Operating Reports	6-16
	Annual Radiological Environmental Operating Report	6-16
	Semiannual Radioactive Effluent Release Report	6-17
	CORE OPERATING LIMITS REPORTS	6-18a
6.9.2	SPECIAL REPORTS	6-18a
6.10 ~~RECORD RETENTION~~	Deleted	6-19
6.11 RADIATION PROTECTION PROGRAM		6-20
6.12 HIGH RADIATION AREA		6-20

6.4 DELETED

6.5 ~~REVIEW AND AUDIT~~ Deleted — delete

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

Plant Operations
Engineering
Maintenance
Instrumentation and Controls
Planning
Radiation Safety
Chemistry
Regulatory Assurance

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

The information from Section 6.5 has been relocated to the QATR

delete

RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 evaluation;

b. Review of all proposed tests and experiments that affect nuclear safety;

c. Review of all proposed changes to Appendix A Technical Specifications;

d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;

e. DELETED.

f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;

g. Review of all REPORTABLE EVENTS;

h. Review of unit operations to detect potential hazards to nuclear safety;

i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, plant Manager or the Chairman of the Nuclear Review Board;

j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and

k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.

l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.

m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

n. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Review Board.

6.5.1.7 The PORC shall:

a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.

b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. requires NRC approval pursuant to 10 CFR 50.59.

The information for Section 6.5 has been relocated to the QATR

RESPONSIBILITIES (Continued)

c. Provide written notification within 24 hours to the Vice President, Limerick Generating Station and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President, Limerick Generating Station, Plant Manager, and the Nuclear Review Board.

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

6.5.2.1 The NRB shall function to provide independent review and audit of designated activities in the areas of:

a. Nuclear power plant operations,

b. Nuclear engineering,

c. Chemistry and radiochemistry,

d. Metallurgy,

e. Instrumentation and control,

f. Radiological safety,

g. Mechanical and electrical engineering, and

h. Quality assurance practices.

The NRB shall report to and advise the Senior Vice President and Chief Nuclear Officer on those areas of responsibility pertaining to NRB Review and Audits.

COMPOSITION

6.5.2.2 The Chairman, members, and alternates of the NRB shall be appointed in writing by the Chief Nuclear Officer, and shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of 5 years technical experience, of which a minimum of 3 years shall be in one or more areas given in Specification 6.5.2.1. The NRB shall be composed of no less than eight and no more than 12 members.

The members and alternates of the NRB will be competent in the area of Quality Assurance practice and cognizant of the Quality Assurance requirements of 10 CFR Part 50, Appendix B. Additionally, they will be cognizant of the corporate Quality Assurance Program and will have the corporate Quality Assurance organization available to them.

delete

The information from Section 6.5 has been relocated to the QATR

ALTERNATES

6.5.2.3 All alternates shall be appointed in writing by the NRB Chairman to serve on a continuing basis. They shall receive correspondence sent to NRB members with regard to NRB activities and shall be invited to attend all NRB meetings. Alternates shall vote only in the absence of those members for whom they are the alternate.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NRB Chairman to provide expert advice to the NRB.

MEETING FREQUENCY

6.5.2.5 The NRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the NRB necessary for the performance of the NRB review and audit functions of these Technical Specifications shall consist of the Chairman or a designated alternate and at least four but not less than one half of the voting NRB members. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 DELETED. The information from this section is located in the UFSAR.

AUDITS

6.5.2.8 DELETED. The information from this section is located in the UFSAR.

delete

The information from section 6.5 has been relocate to the QATR

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.

b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.

c. Audit reports shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 evaluation is required. If a 10 CFR 50.59 evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Director or Manager or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

2 — delete

The information from Section 6.5 has been relocated to the QA-TR

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 evaluation, the responsible Director or Manager shall render a determination in writing of whether or not the new program, procedure, or change thereto requires NRC approval pursuant to 10 CFR 50.59, and shall forward the new program, procedure, or change thereto with the associated 10 CFR 50.59 evaluation to PORC for review. If NRC approval is required, obtain NRC approval prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Director or Manager shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

delete

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 reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

6.7 SAFETY LIMIT VIOLATION

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

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.

c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

SAFETY LIMIT VIOLATION (Continued)

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.

c. Refueling operations.

d. Surveillance and test activities of safety-related equipment.

e. Security Plan implementation.

f. Emergency Plan implementation.

g. Fire Protection Program implementation.

h. PROCESS CONTROL PROGRAM implementation.

i. OFFSITE DOSE CALCULATION MANUAL implementation.

j. Quality Assurance Program for effluent and environmental monitoring, delete using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed as set forth in Administrative Procedures.

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

a. The intent of the original procedure is not altered;

b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and

c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.

6.8.2 The information from Section 6.8.2 has been relocated to the QATR

6.8.3 The information from Section 6.8.3 has been relocated to the QATR

6.10 ~~RECORD RETENTION~~ Deleted

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

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

a. Records and logs of unit operation covering time interval at each power level.

b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.

c. All REPORTABLE EVENTS.

d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.

e. Records of changes made to the programs and procedures required by Specification 6.8.

f. Records of radioactive shipments.

g. Records of sealed source and fission detector leak tests and results.

h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

delete

The information from Section 6.10 has been relocated to the QATR.

delete

RECORD RETENTION (Continued)

d. Records of gaseous and liquid radioactive material released to the environs.

e. Records of transient or operational cycles for those unit components identified in Table 5.6.1-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the unit staff.

h. Records of inservice inspections performed pursuant to these Technical Specifications.

i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Section 6.10.2.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the PORC and the NRB.

l. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records.

m. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date.

n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION PROTECTION PROGRAM

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

6.12 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

6.12.1 High Radiation Areas with dose rates (deep dose equivalent) greater than 0.1 rem/hr and not exceeding 1.0 rem/hour (at 30 centimeters from the radiation sources or from any surface penetrated by the radiation):

a. Each accessible entryway to such an area shall be barricaded and conspicuously posted as a High Radiation Area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

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Amendment No. ~~11~~, ~~100~~

HIGH RADIATION AREA (Continued)

a) A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for controlling personnel radiation exposure within the area, OR

b) Be under the surveillance, as specified in the RWP or equivalent, by means of closed circuit television, of a health physics qualified individual (i.e., qualified in radiation protection procedures), responsible for controlling personnel radiation exposure in the area, and with the means to communicate with the individuals in the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

a. Shall be documented with the following information: ~~and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:~~

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

PROCESS CONTROL PROGRAM (Continued)

2. A determination that the change did not reduce the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective upon review and acceptance by the PORC and approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

a. Shall be documented with the following information: ~~and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:~~

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective upon review and acceptance by the PORC and the approval of the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.15 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.

ATTACHMENT 3

License Amendment Request

Limerick Generating Station Units 1 and 2

Docket Nos. 50-352 and 50-353

Relocate Administrative Control Requirements

Typed Technical Specification Page Changes

Unit 1 TS Pages	Unit 2 TS Pages
xxvi	xxvi
xxvii	xxvii
6-7	6-7
6-8	6-8
6-9	6-9
6-10	6-10
6-12	6-12
6-12a	6-12a
6-13	6-13
6-19	6-19
6-20	6-20
6-21a	6-21a
6-22	6-22

ADMINISTRATIVE CONTROLS

SECTION PAGE

6.1 RESPONSIBILITY 6-1

6.2 ORGANIZATION 6-1

6.2.1 OFFSITE AND ONSITE ORGANIZATION 6-1

Figure 6.2.1-1 Deleted 6-3

6.2.2 UNIT STAFF 6-2

Figure 6.2.2-1 Deleted 6-4

Table 6.2.2-1 Minimum Shift Crew Composition 6-5

6.2.3 DELETED; Refer to note on page 6-6

6.2.4 SHIFT TECHNICAL ADVISOR 6-6

6.3 UNIT STAFF QUALIFICATIONS 6-6

6.4 DELETED 6-7

6.5 DELETED

6.5.1 Deleted

Deleted 6-7

Deleted 6-7

Deleted 6-7

Deleted 6-7

Deleted 6-7

Deleted 6-8

Deleted 6-9

ADMINISTRATIVE CONTROLS

SECTION		PAGE
6.5.2	Deleted	
	Deleted	6-9
	Deleted	6-9
	Deleted	6-10
	Deleted	6-10
	Deleted	6-10
	Deleted	6-10
	Deleted	6-10
	Deleted	6-12
6.5.3	Deleted	6-12
6.6 REPORTABLE EVENT ACTION		6-12a
6.7 SAFETY LIMIT VIOLATION		6-12a
6.8 PROCEDURES AND PROGRAMS		6-13
6.9 REPORTING REQUIREMENTS		
6.9.1	ROUTINE REPORTS	6-15
	Startup Report	6-15
	Annual Reports	6-15
	Monthly Operating Reports	6-16
	Annual Radiological Environmental Operating Report	6-16
	Semiannual Radioactive Effluent Release Report	6-17
	CORE OPERATING LIMITS REPORTS	6-18a
6.9.2	SPECIAL REPORTS	6-18a
6.10 DELETED		6-19
6.11 RADIATION PROTECTION PROGRAM		6-20
6.12 HIGH RADIATION AREA		6-20

6.4 DELETED

6.5 DELETED

THE INFORMATION FROM SECTION 6.5 HAS BEEN RELOCATED TO THE QATR

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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 reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

6.7 SAFETY LIMIT VIOLATION

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

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.

c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

SAFETY LIMIT VIOLATION (Continued)

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.

c. Refueling operations.

d. Surveillance and test activities of safety-related equipment.

e. Security Plan implementation.

f. Emergency Plan implementation.

g. Fire Protection Program implementation.

h. PROCESS CONTROL PROGRAM implementation.

i. OFFSITE DOSE CALCULATION MANUAL implementation.

j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 The information from Section 6.8.2 has been relocated to QATR. |

6.8.3 The information from Section 6.8.3 has been relocated to QATR. |

6.10 DELETED

THE INFORMATION FROM SECTION 6.10 HAS BEEN RELOCATED TO THE QATR.

6.11 RADIATION PROTECTION PROGRAM

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

6.12 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

6.12.1 High Radiation Areas with dose rates (deep dose equivalent) greater than 0.1 rem/hr and not exceeding 1.0 rem/hour (at 30 centimeters from the radiation sources or from any surface penetrated by the radiation):

a. Each accessible entryway to such an area shall be barricaded and conspicuously posted as a High Radiation Area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

HIGH RADIATION AREA (Continued)

a) A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for controlling personnel radiation exposure within the area, OR

b) Be under the surveillance, as specified in the RWP or equivalent, by means of closed circuit television, of a health physics qualified individual (i.e., qualified in radiation protection procedures), responsible for controlling personnel radiation exposure in the area, and with the means to communicate with the individuals in the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

a. Shall be documented with the following information:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

PROCESS CONTROL PROGRAM (Continued)

2. A determination that the change did not reduce the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective upon review and acceptance by the PORC and approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

a. Shall be documented with the following information:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective upon review and acceptance by the PORC and the approval of the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.15 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.

ADMINISTRATIVE CONTROLS

SECTION PAGE

6.1 RESPONSIBILITY 6-1

6.2 ORGANIZATION 6-1

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ADMINISTRATIVE CONTROLS

SECTION		PAGE
6.5.2	Deleted	
	Deleted	6-9
	Deleted	6-9
	Deleted	6-10
	Deleted	6-10
	Deleted	6-10
	Deleted	6-10
	Deleted	6-10
	Deleted	6-12
6.5.3	Deleted	6-12
6.6 REPORTABLE EVENT ACTION		6-12a
6.7 SAFETY LIMIT VIOLATION		6-12a
6.8 PROCEDURES AND PROGRAMS		6-13
6.9 REPORTING REQUIREMENTS		
6.9.1	ROUTINE REPORTS	6-15
	Startup Report	6-15
	Annual Reports	6-15
	Monthly Operating Reports	6-16
	Annual Radiological Environmental Operating Report	6-16
	Semiannual Radioactive Effluent Release Report	6-17
	CORE OPERATING LIMITS REPORTS	6-18a
6.9.2	SPECIAL REPORTS	6-18a
6.10 DELETED		6-19
6.11 RADIATION PROTECTION PROGRAM		6-20
6.12 HIGH RADIATION AREA		6-20

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c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

SAFETY LIMIT VIOLATION (Continued)

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

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

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.

c. Refueling operations.

d. Surveillance and test activities of safety-related equipment.

e. Security Plan implementation.

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h. PROCESS CONTROL PROGRAM implementation.

i. OFFSITE DOSE CALCULATION MANUAL implementation.

j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

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

6.12 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

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HIGH RADIATION AREA (Continued)

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PROCESS CONTROL PROGRAM (Continued)

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6.14.1 Changes to the ODCM:

a. Shall be documented with the following information:

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b. Shall become effective upon review and acceptance by the PORC and the approval of the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

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