

ATTACHMENT I TO IPN-95-077

PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND MANAGEMENT POSITION TITLE

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***** [Appendix A] *****

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***** [Appendix B, Part II] *****

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NEW YORK POWER AUTHORITY

INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Site Executive Officer shall be responsible for overall facility operation. During periods when the Site Executive Officer is unavailable, one of the General Managers will assume his responsibilities or the Site Executive Officer may delegate this responsibility to other qualified supervisory personnel.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a) Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
- b) The Site Executive Officer shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c) The Executive Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

g) Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. (Operating personnel are defined as on shift senior reactor operators, reactor operators, nuclear plant operators, shift technical advisors and shift contingency health physicists, I&C and maintenance personnel.) However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification on a temporary basis the following guidelines shall be followed:

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

Any deviation from the above guidelines shall be authorized by the Site Executive Officer or his designee, or higher levels of management, in accordance with established procedures.

- h) At least one individual holding a Senior Reactor Operator (SRO) license shall be on duty in the Control Room at all times.
- i) The Assistant Operations Manager, Shift Supervisor and Senior Reactor Operator shall hold a Senior Reactor Operator (SRO) license. The Reactor Operator shall hold a Reactor Operator (RO) license. The Operations Manager shall either hold an SRO license or shall have held an SRO license at Indian Point Unit 3*.

* For the period ending three years after restart from the 1993/1994 Performance Improvement Outage, the Operations Manager will be permitted to have held an SRO license at a Pressurized Water Reactor other than Indian Point Unit 3.

- 6.5.0.2 Each program and procedure required by Technical Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.
- 6.5.0.3 Designated technical reviewers shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions, with the exclusion of the positions identified in Sections 4.3.2 and 4.5. Individuals whose positions are described in Sections 4.3.2 and 4.5 may qualify as designated technical reviewers provided they meet the qualifications described in other portions of Section 4.
- 6.5.0.4 The designated technical reviewers shall determine the need for cross disciplinary reviews. Individuals performing cross disciplinary reviews shall meet the same qualifications required for designated technical reviewers.
- 6.5.0.5 Each program and procedure required by Technical Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed from a safety perspective by a qualified safety reviewer. Safety and/or environmental impact evaluations, when required, shall be reviewed by PORC per Technical Specification 6.5.1.6.a.
- 6.5.0.6 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by the appropriate member(s) of management.
- 6.5.0.7 All changes to the Process Control Program (PCP) and the Offsite Dose Calculation Manual (ODCM) shall be reviewed by PORC and accepted by the Site Executive Officer prior to implementation.

6.5.1 PLANT OPERATING REVIEW COMMITTEE (PORC)

FUNCTION

- 6.5.1.1 The Plant Operating Review Committee shall function to advise the Site Executive Officer on all matters related to nuclear safety and all matters which could adversely change the plant's environmental impact.

COMPOSITION

- 6.5.1.2 The Plant Operating Review Committee shall be composed of a Chairman, Vice Chairmen and members designated in writing by the Site Executive Officer. Members shall collectively have responsibility in at least the areas of operations, maintenance, radiation safety, chemistry, engineering, instrumentation and controls, reactor engineering, nuclear licensing, and quality assurance.

ALTERNATES

- 6.5.1.3 All alternate members shall be appointed in writing by the (PORC) Chairman to serve on a temporary basis.

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 A quorum of the PORC shall consist of the Chairman or Vice Chairman and at least five members including alternates. Vice Chairmen may act as members when not acting as Chairman. A quorum shall contain no more than two alternates.

RESPONSIBILITIES

- 6.5.1.6 The Plant Operating Review Committee shall be responsible for:
- a. Review of 10 CFR 50.59 safety and environmental impact evaluations associated with procedures and programs required by Technical Specification 6.8, and changes thereto.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Operating License and Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.
 - 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 Site Executive Officer, who will forward the report to the Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the Safety Review Committee.
 - g. Review of all reportable events.
 - h. Review of facility operations to detect potential nuclear safety hazards.
 - i. Performance of special reviews, investigations or analyses and reports thereon as requested by the Site Executive Officer or the Chairman of the Safety Review Committee (SRC).
 - j. Deleted
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1. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Site Executive Officer and to the Safety Review Committee.
- m. Review of the Fire Protection Program and implementing procedures.

AUTHORITY

- 6.5.1.7 The Plant Operating Review Committee shall:
- a. Recommend to the Site Executive Officer approval or disapproval of items considered under 6.5.1.6(a) through (e) above.
 - b. Render determinations with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.
 - c. Provide notification within 24 hours to the Chairman of the SRC and the Executive Vice President and Chief Nuclear Officer of disagreement between the PORC and the Site Executive Officer; however, the Site Executive Officer shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

- 6.5.1.8 The Plant Operating Review Committee shall maintain minutes of each meeting and copies shall be provided to the Chairman of the SRC and Executive Vice President and Chief Nuclear Officer.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

- 6.5.2.1 The SRC 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 engineering

- b. Each REPORTABLE EVENT shall be reviewed by the PORC and a report submitted by the Site Executive Officer to the Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC.

6.7 SAFETY LIMIT VIOLATION

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

- a. The reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36(c)(1)(i).
- b. The Safety Limit Violation shall be reported immediately to the Commission. The Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC will be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared by the PORC. This report shall describe (1) applicable circumstances preceding the occurrences, (2) effects of the occurrence upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC by the Site Executive Officer.

6.8 PROCEDURES

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, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Process Control Program implementation.
- g. Offsite Dose Calculation Manual implementation.

5.4 RECORD RETENTION

Records associated with the radiological environmental monitoring program are to be retained as required by Appendix A Specification 6.10.2.

5.5 PROCESS CONTROL PROGRAM (PCP)

5.5.1 The PCP shall be approved by the Commission prior to implementation.

5.5.2 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.
2. Shall become effective upon review and acceptance by the Site Executive Officer.

5.6 OFFSITE DOSE CALCULATION MANUAL (ODCM)

5.6.1 The ODCM shall be approved by the Commission prior to implementation.

5.6.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the changes(s);

- b. A determination that the change will not reduce the accuracy of reliability of dose calculations or setpoint determination; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.
2. Shall become effective upon review and acceptance by the Site Executive Officer.

5.7 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS*

Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid):

1. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PORC. The discussion of each shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59.
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. An evaluation of the change, which shows the predicted released of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e. An evaluation of the change, which shows the expected maximum exposures to individual in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. An estimate of the exposure to plant operating as a result of the change; and

* The information called for in this Specification will be submitted as part of the annual FSAR update.

ATTACHMENT II TO IPN-95-077

SAFETY EVALUATION FOR PROPOSED
TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND MANAGEMENT TITLE

NEW YORK POWER AUTHORITY

INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

ATTACHMENT II TO IPN-95-077
SAFETY EVALUATION
(Page 1 of 4)

DESCRIPTION OF PROPOSED CHANGES:

This application for an amendment to the Indian Point 3 Technical Specifications proposes the following changes:

1. The title specific list of management positions assigned to the Plant Operating Review Committee (PORC) is replaced with a more general statement of membership requirements. The proposed change includes the addition of Nuclear Licensing and Quality Assurance disciplines on the committee.

Specification 6.5.1.2, which reads:

"The Plant Operating Review Committee shall be composed of the:

Chairman:	General Manager - Operations
Vice-Chairmen/Members:	General Manager - Maintenance
	General Manager - Support Services
Member:	Operations Manager
Member:	Technical Services Manager
Member:	Maintenance Manager
Member:	Instrument & Control Manager
Member:	Radiological and Environmental Services Manager
Member:	Site Engineering Manager"

is revised to read:

"The Plant Operating Review Committee shall be composed of a Chairman, Vice Chairmen and members designated in writing by the Site Executive Officer. Members shall collectively have responsibility in at least the areas of operations, maintenance, radiation safety, chemistry, engineering, instrumentation and controls, reactor engineering, nuclear licensing, and quality assurance."

2. A related change is proposed to Specification 6.5.1.5:

"A quorum of the PORC shall consist of the Chairman or one of the two Vice Chairmen, and five members including alternates."

is revised to read:

"A quorum of the PORC shall consist of the Chairman or Vice Chairman and at least five members including alternates."

3. The management position title 'Resident Manager' is revised to 'Site Executive Officer.'

ATTACHMENT II TO IPN-95-077
SAFETY EVALUATION
(Page 2 of 4)

4. A change in addition to the above title revision is proposed to Specification 6.1.1. The second and third sentences, which read:

"During periods when the Resident Manager is unavailable, one of the three General Managers will assume his responsibilities. In the event all four are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel."

are revised to read:

"During periods when the Site Executive Officer is unavailable, one of the General Managers will assume his responsibilities or the Site Executive Officer may delegate this responsibility to other qualified supervisory personnel."

PURPOSE OF THE PROPOSED CHANGES:

One purpose of the proposed changes is to reflect changes in organization and position titles. The change of the title 'Resident Manager' to 'Site Executive Officer' is an administrative change which does not alter the responsibility or authority of this position.

Changes in organization and position titles also affect the existing list of designated PORC members. The proposed approach to replace the title specific positions for PORC membership with a description of membership requirements reduces the need for future license amendments when such administrative changes are made. Membership requirements are stated in terms of which disciplines must be represented on the committee roster. Specific individuals who have responsibility in these disciplines are designated in writing by the Site Executive Officer, through the implementing administrative procedure for PORC. A single member may represent more than one discipline. The removal of position titles from the technical specifications is consistent with Generic Letter 88-06 (Reference 1). This approach is also consistent with a previous license amendment (Reference 2) which implemented a similar change for defining the membership of the Safety Review Committee.

The number of members required for a quorum is not reduced. The wording of the specification is changed from 'five members' to 'at least five members' to assure that flexibility exists to identify a larger quorum in the implementing administrative procedure. The proposed revision to Specification 6.5.1.5 regarding quorum eliminates unnecessary administrative detail which specifies the number of Vice Chairmen assigned to the PORC membership roster.

The proposed addition of nuclear licensing and quality assurance disciplines on PORC will provide additional expertise for the review activities performed by the committee. The Nuclear Licensing and Quality Assurance groups are part of the Appraisal and Compliance Department which provides an oversight function in support of the Nuclear Generation Department. Adding these disciplines to PORC provides an additional mechanism for this oversight function to be performed.

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SAFETY EVALUATION
(Page 3 of 4)

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION:

Operation of the Indian Point 3 Nuclear Power Plant in accordance with the proposed amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92, since it would not:

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

The proposed changes are administrative in nature and do not involve plant equipment or operating parameters. There is no change to any accident analysis assumptions or other conditions which could affect previously evaluated accidents. The proposed changes will not decrease the organization's ability to respond to a design basis accident.

2. create the possibility of a new or different kind of accident from those previously evaluated.

Since the proposed changes are administrative in nature and do not involve hardware design, modifications or operation, the possibility of new or different accidents is not created.

3. involve a significant reduction in the margin of safety.

The proposed title change for the Resident Manager is an administrative change and does not affect the responsibilities, authority, or reporting relationships for this management position. Replacing the title specific list of PORC members with a statement of membership requirements for the committee does not reduce the effectiveness of the committee to advise the Resident Manager (Site Executive Officer) on matters regarding nuclear safety.

IMPLEMENTATION OF THE PROPOSED CHANGES:

Implementation of the proposed changes will be made through revisions to applicable administrative procedures and other affected plant documents. Indian Point 3 Administrative Procedure AP-2 will be revised as needed to document the written designation of PORC members as required by the proposed new Specification 6.5.1.2. Procedures and documents which are affected by changes in position titles only will be updated as part of the periodic/biennial review.

There are no physical plant modifications required. The proposed changes do not change the implementation of the ALARA, Fire Protection, Emergency Plan, or Security Programs at Indian Point 3. The proposed changes also have no effect on the environment.

ATTACHMENT II TO IPN-95-077
SAFETY EVALUATION
(Page 4 of 4)

CONCLUSION:

The proposed changes do not constitute an unreviewed safety question as defined in 10 CFR 50.92. The proposed changes:

1. will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;
2. will not increase the possibility of an accident or malfunction of a type different than any previously evaluated in the Safety Analysis Report; and
3. will not reduce the margin of safety as defined in the basis for any technical specification.

The changes therefore involve no significant hazards consideration, as defined in 10 CFR 50.92.

REFERENCES:

1. Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements"
2. NRC letter N. F. Conicella to W. J. Cahill, Jr., regarding Amendment 156 to Indian Point 3 Facility Operating License, dated December 22, 1994.

ATTACHMENT III TO IPN-95-077

MARKED UP PAGES FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND MANAGEMENT POSITION TITLE

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The ~~Resident Manager~~ **Site Executive Officer** shall be responsible for overall facility operation. During periods when the ~~Resident Manager~~ **Site Executive Officer** is unavailable, one of the ~~three~~ General Managers will assume his responsibilities. ~~In the event all four are unavailable, the Resident Manager~~ **or the Site Executive Officer** may delegate this responsibility to other qualified supervisory personnel.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

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- b) The ~~Resident Manager~~ **Site Executive Office** shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
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4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the ~~Resident~~ **Manager Site Executive Officer** or his designee, or higher levels of management, in accordance with established procedures.

- h) At least one individual holding a Senior Reactor Operator (SRO) license shall be on duty in the Control Room at all times.
- i) The Assistant Operations Manager, Shift Supervisor and Senior Reactor Operator shall hold a Senior Reactor Operator (SRO) license. The Reactor Operator shall hold a Reactor Operator (RO) license. The Operations Manager shall either hold an SRO license or shall have held an SRO license at Indian Point Unit 3.

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6.5.1 PLANT OPERATING REVIEW COMMITTEE (PORC)

FUNCTION

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COMPOSITION

- 6.5.1.2 ~~The Plant Operating Review Committee shall be composed of the:~~

- Chairman: ~~General Manager - Operations~~
- Vice Chairmen/Members: ~~General Manager - Maintenance~~
- ~~General Manager - Support Services~~
- Member: ~~Operations Manager~~
- Member: ~~Technical Services Manager~~
- Member: ~~Maintenance Manager~~
- Member: ~~Instrument & Control Manager~~
- Member: ~~Radiological and Environmental Services Manager~~
- Member: ~~Site Engineering Manager~~

SEE INSERT A

INSERT A, for Specification 6.5.1.2

The Plant Operating Review Committee shall be composed of a Chairman, Vice Chairmen and members designated in writing by the Site Executive Officer. Members shall collectively have responsibility in at least the areas of operations, maintenance, radiation safety, chemistry, engineering, instrumentation and controls, reactor engineering, nuclear licensing, and quality assurance.

ALTERNATES

- 6.5.1.3 All alternate members shall be appointed in writing by the (PORC) Chairman to serve on a temporary basis.

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 - g. Review of all reportable events.
 - h. Review of facility operations to detect potential nuclear safety hazards.
 - i. Performance of special reviews, investigations or analyses and reports thereon as requested by the ~~Resident Manager~~ **Site Executive Officer** or the Chairman of the Safety Review Committee (SRC).
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- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the ~~Resident Manager~~ **Site Executive Officer** and to the Safety Review Committee.
- m. Review of the Fire Protection Program and implementing procedures.

AUTHORITY

- 6.5.1.7 The Plant Operating Review Committee shall:
- a. Recommend to the ~~Resident Manager~~ **Site Executive Officer** approval or disapproval of items considered under 6.5.1.6(a) through (e) above.
 - b. Render determinations with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.
 - c. Provide notification within 24 hours to the Chairman of the SRC and the Executive Vice President and Chief Nuclear Officer of disagreement between the PORC and the ~~Resident Manager~~ **Site Executive Officer**; however, the ~~Resident Manager~~ **Site Executive Officer** shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

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- a. Nuclear power plant operations
 - b. Nuclear engineering
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 - d. Metallurgy
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 - f. Radiological safety
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- b. Each REPORTABLE EVENT shall be reviewed by the PORC and a report submitted by the ~~Resident Manager~~ **Site Executive Officer** to the Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC.

6.7 SAFETY LIMIT VIOLATION

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

- a. The reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36(c)(1)(i).
- b. The Safety Limit Violation shall be reported immediately to the Commission. The Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC will be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared by the PORC. This report shall describe (1) applicable circumstances preceding the occurrences, (2) effects of the occurrence upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC by the ~~Resident Manager~~ **Site Executive Officer**.

6.8 PROCEDURES

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, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Process Control Program implementation.
- g. Offsite Dose Calculation Manual implementation.

5.4 RECORD RETENTION

Records associated with the radiological environmental monitoring program are to be retained as required by Appendix A Specification 6.10.2.

5.5 PROCESS CONTROL PROGRAM (PCP)

5.5.1 The PCP shall be approved by the Commission prior to implementation.

5.5.2 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:

- a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
- b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
- c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.

2. Shall become effective upon review and acceptance by the ~~Resident Manager~~ **Site Executive Officer**.

5.6 OFFSITE DOSE CALCULATION MANUAL (ODCM)

5.6.1 The ODCM shall be approved by the Commission prior to implementation.

5.6.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:

- a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the changes(s);

- b. A determination that the change will not reduce the accuracy of reliability of dose calculations or setpoint determination; **and**
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.
2. Shall become effective upon review and acceptance by the ~~Resident Manager~~ **Site Executive Officer**.

5.7 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS*

Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid):

1. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PORC. The discussion of each shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59.
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. An evaluation of the change, which shows the predicted released of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e. An evaluation of the change, which shows the expected maximum exposures to individual in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. An estimate of the exposure to plant operating as a result of the change; and

* The information called for in this Specification will be submitted as part of the annual FSAR update.