5. The status and performance of automatic isolation valves and discharge tank selection valves and results of independent liquid waste samples shall be checked and logged.

Basis

The surveillance requirements given under Specification 4.11.a provide assurance that liquid wastes are properly controlled and monitored during any planned release of radioactive materials in liquid effluents. These surveillance requirements provide the data for the licensee and the Commission to evaluate the plant's performance relative to radioactive liquid wastes released to the environment. Reports on the quantities of radioactive materials released in liquid effluents shall be furnished to the Commission on the basis of Section 6.9 of these Technical Specifications. On the basis of such reports any additional information the Commission may obtain from the licensee or others, the Commission may from time to time require the licensee to take such action as the Commission deems appropriate.

4.11.b AIRBORNE EFFLUENTS

1. Gross radioactivity of gaseous effluents shall be monitored and recorded to enable release rates of gross radioactivity to be determined on an hourly basis.

2. Radioactive gaseous waste sampling and activity analysis shall be performed in accordance with Table TS 4.11-2.

3. The waste gas holding tank effluent monitor shall be tested prior to any release of radioactive gas from a holdup tank and shall be calibrated at refueling intervals. The calibration procedure shall consist of exposing the detector to a referenced calibration source in a controlled reproducible geometry. The source and geometry shall be referenced to the original monitor calibration which provides the

applicable calibration curves.

4. During release of radioactive gaseous waste to the Auxiliary Building vent, the following conditions shall be met:
   a. At least one Auxiliary Building exhaust fan shall be operating.
   b. At least one Auxiliary Building vent activity monitor (R-13 or R-14) shall be operating.
5. During power operation, the condenser air ejector discharge shall be continuously monitored for gross radiogas activity. Whenever this monitor and the two Auxiliary Building vent monitors are inoperable, grab samples shall be taken and analyzed for gross radioactivity (,) and the ratio of long-lived (greater than 8 days half-life) to short-lived radioactivity determined at least five days per week and whenever the primary coolant gross radioactivity or the unidentified leak rate increases by a factor of 2.

6. When the secondary system iodine concentration is greater than 25 percent of the limit specified in Section 3.4 (Secondary Coolant limit), samples from the air ejector shall be taken at least weekly. At the same time, a determination of the iodine partition factor for the blowdown tank shall be made.

7. Facility records of iodine and particulate releases with half-lives greater than eight days shall be maintained on the basis of all the iodine sampling devices and particulate filter analyses.

8. Records shall be maintained and reports of the sampling and analysis results shall be submitted in accordance with Section 6.9 (Plant Reporting Requirements) of these Specifications.

Basis

The surveillance requirements given under Specification 4.11.b provide assurance

that radioactive gaseous effluents from the station are properly controlled and monitored over the life of the plant. These surveillance requirements provide the data for the licensee and the Commission to evaluate the plant performance relative to radioactive gaseous wastes released to the environment. Reports on the quantities of radioactive materials released in gaseous effluents shall be furnished to the Commission on the basis of Section 6.9 of these Technical Specifications. On the basis of such reports and any additional information the Commission may obtain from the licensee or others, the Commission may from time to time require the licensee to take such action as the Commission deems appropriate.

Since the condenser air ejector discharges into the Auxiliary Building ventilation system at all times, its discharge monitor is backed up by the two Auxiliary Building vent monitors R13 and R14.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager has overall on-site responsibility for plant operation. In the absence of the Plant Manager, the succession to this responsibility shall be in the following order:

a. Assistant Manager-Plant Maintenance
b. Assistant Manager-Plant Operations
c. Superintendent-Plant Operations
d. Assistant Manager-Plant Technical and Services
e. Shift Supervisor

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for plant management and technical support shall be as shown on Figure TS 6.2-1.

FACILITY STAFF

6.2.2 The plant organization shall be as shown on Figure TS 6.2-2 and:

a. Each on-duty shift complement shall consist of at least:
   (1) One Shift Supervisor (SRO)
   (2) Two licensed Reactor Operators
   (3) One Auxiliary Operator
   (4) One Equipment Operator
   (5) One Radiation Technologist

b. While above cold shutdown, the on-duty shift complement shall consist of the personnel required by 6.2.2a. above and an additional SRO.

c. In the event that one of the shift members becomes incapacitated due to illness or injury or the Radiation Technologist has to accompany an injured person to the hospital, reactor operations may continue with the reduced complement until a replacement arrives. In all but severe weather conditions, a replacement is required within two hours.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the Plant Staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 or ANSI-N18.1-1971 and Appendix A of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Fire Marshal and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions shall be held quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC) FUNCTION

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

COMPOSITION

6.5.1.2 The PORC shall be composed of, but not necessarily limited to:

Chairman:	Plant Manager
Required Members:	Assistant Manager-Plant Maintenance Assistant Manager-Plant Operations Assistant Manager-Plant Technical and Services Superintendent-Plant Operations Plant Reactor Supervisor Superintendent-Plant Quality Control

ALTERNATES

6.5.1.3 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 in PORC meetings at any one time.

technical and quality assurance activities in support of the Kewaunee Plant Staff.

ORGANIZATION

6.5.2.2 The CNES consists of the following groups:

a. Nuclear Licensing and Systems
b. Nuclear Services
c. Nuclear Training
d. Nuclear Design Change
e. System Planning and Engineering
f. Power Plant Design and Construction
g. Fuel and Fossil Operations
h. Administrative Staff
i. Environmental Services

ACTIVITIES

6.5.2.3 1. Review and report all violations of the Technical Specifications, codes, regulations, and statutes.

2. Review all activities associated with nuclear safety for technical adequacy and compliance with internal procedures or instructions.

3. Review and report significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.

4. Review and report all events which are required by regulations or Technical Specifications to be reported to the NRC (Plant personnel will provide the initial reporting to the NRC of those events requiring 24 hour notification).

5. Investigate any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.

c. MONTHLY OPERATING REPORT

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, with a copy to the appropriate Regional Office, to be submitted by the fifteenth of each month following the calendar month covered by the report.

6.9.2 DELETED

6.9.3 UNIQUE REPORTING REQUIREMENTS

a. ANNUAL ENVIRONMENTAL OPERATING REPORTS

(1) For each medium sampled during the reporting period, e.g., air, lake bottom, surface water, soil, fish, include:
   (a) Number of sampling locations,
   (b) Total number of samples,
   (c) Number of locations at which levels are found to be significantly above local backgrounds.
   (d) Highest, lowest, and the average concentrations or levels of radiation for the sampling point with the highest average and description of the location of that point with respect to the site.

(2) If levels of radioactive materials in environmental media as determined by an environmental monitoring program indicate the likelihood of public intakes in excess of 1% of those that could result from continuous exposure to the concentration values listed in Appendix B, Table II, Part 20, estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided.

(3) If statistically significant variations of offsite environmental concentrations with time are observed, correlation of these results with effluent release shall be provided.

b. RADIOACTIVE EFFLUENT RELEASES

A statement of the quantities of radioactive effluents released from the plant, with data summarized on a monthly basis following the format of US NRC Regulatory Guide 1.21 and submitted on a semiannual basis.

(1) Gaseous Effluents

(a) Gross Radioactivity Releases

(i) Total gross radioactivity (in curies), excluding halogens and particulates with half-lives longer than eight days.

(ii) Total radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.

(iii) Percent of the quarterly technical specification limit for gross gaseous activity.

(b) Iodine Realeases

(i) Total iodine radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.

(ii) Average release rate (in microcuries/second) for I-131.

(iii) Percent of technical specification limit for I-131 released.

(c) Particulate Releases

(i) Total radioactivity (in curies) of nuclides with half-lives greater than eight days.

(ii) Maximum radioactive release rate over any one hour period of halogens and particulates with half-lives greater than eight days.

(iii) Percent of technical specification limits for halogens and particulates with half-lives greater than eight days.

(iv) Gross alpha radioactivity released (in curies) excluding background radioactivity.

(d) Tritium Releases

(i) Total tritium released during the reporting periods.

(ii) Average release rate (uCi/sec) of tritium.

(iii) Percent of appropriate technical specification limit for tritium released.

(2) Liquid Effluents

(a) Total gross radioactivity released (in curies) excluding tritium, dissolved gases and alpha, and average concentration released to the unrestricted area.

(b) The maximum concentration of gross radioactivity, excluding tritium, dissolved gases and alpha, released to the unrestricted area (averaged over the period of release).

(c) Total tritium and total alpha radioactivity (in curies) released and average concentration released to the unrestricted area.

(d) Total dissolved gas radioactivity (in curies) and average concentration released to the unrestricted area.

(e) Total volume (in liters) of liquid waste released prior to dilution.

(f) Total volume (in liters) of dilution water used prior to release from the restricted area.

(g) Total gross radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.

(h) Percent of technical specification limit for total radioactivity release rate.

(3) Solid Waste Shipped

(a) The total amount of solid waste packaged (in cubic meters).

(b) The total estimated radioactivity (in curies) involved.

(c) Disposition including date and destination if shipped offsite.

c. SAFETY CLASS I INSERVICE INSPECTION

Sixty days after the completion of the first refueling outage.

6.10 RECORD RETENTION

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

a. Records and logs of plant operation, including power levels and periods of operation at each power level.

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

c. Reports of all Reportable Events.

d. Records of periodic checks, inspections, and calibrations required by these Technical Specifications.

e. Records of nuclear safety related tests or experiments.

f. Records of radioactive shipments.

g. Records of changes to operating procedures.

h. Records of sealed source leak tests and results.

i. Records of annual physical inventory of all source material or record.

j. Records of Quality Assurance activities required by the QA Manual except where it is determined that the records should be maintained for a longer period of time.

6.10.2 The following records shall be retained for the duration of the Plant Operating License.

a. Records of a complete set of as-built drawings for the plant as originally licensed and all print changes showing modifications made to the plant.
b. Records of new and spent fuel inventory, fuel transfers, and assembly burnup histories.
c. Records of plant radiation and contamination surveys.
d. Records of radiation exposure of all plant personnel, and others who enter radiation control areas.
e. Records of radioactivity in liquid and gaseous wastes released to the environment.
f. Records of transient or operational cycles for these facility components.
g. Records of training and qualification for current members of the plant staff.
h. Records of in-service inspections performed pursuant to these Technical Specifications.
i. Records of meetings of the NSRAC and PORC.
j. Records for Environmental Qualification.

6.11 RADIATION PROTECTION PROGRAM

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.

IODINE MONITORING

The licensee shall implement a program which will ensure the capability to accuratley determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

6.12 SYSTEM INTEGRITY

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by Paragraph 20.203 (c) (2):

a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr, but less than 1000 mrem/hr, shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1.a above, and in addition locked doors shall be provided to prevent unauthorized entry into these areas. The areas shall be maintained under the administrative control of the Shift Supervisor on duty.

6.14 POST ACCIDENT SAMPLING AND MONITORING

The licensee shall implement a program which will ensure the capability to monitor containment radiation levels, to obtain and analyze reactor coolant and containment atmosphere samples, and to monitor the plant gaseous effluent under accident conditions. The program shall be defined in Administrative Control Directives and will include the following:

1. Responsibilities for program implementation.

2. Delineation of instrumentation required.

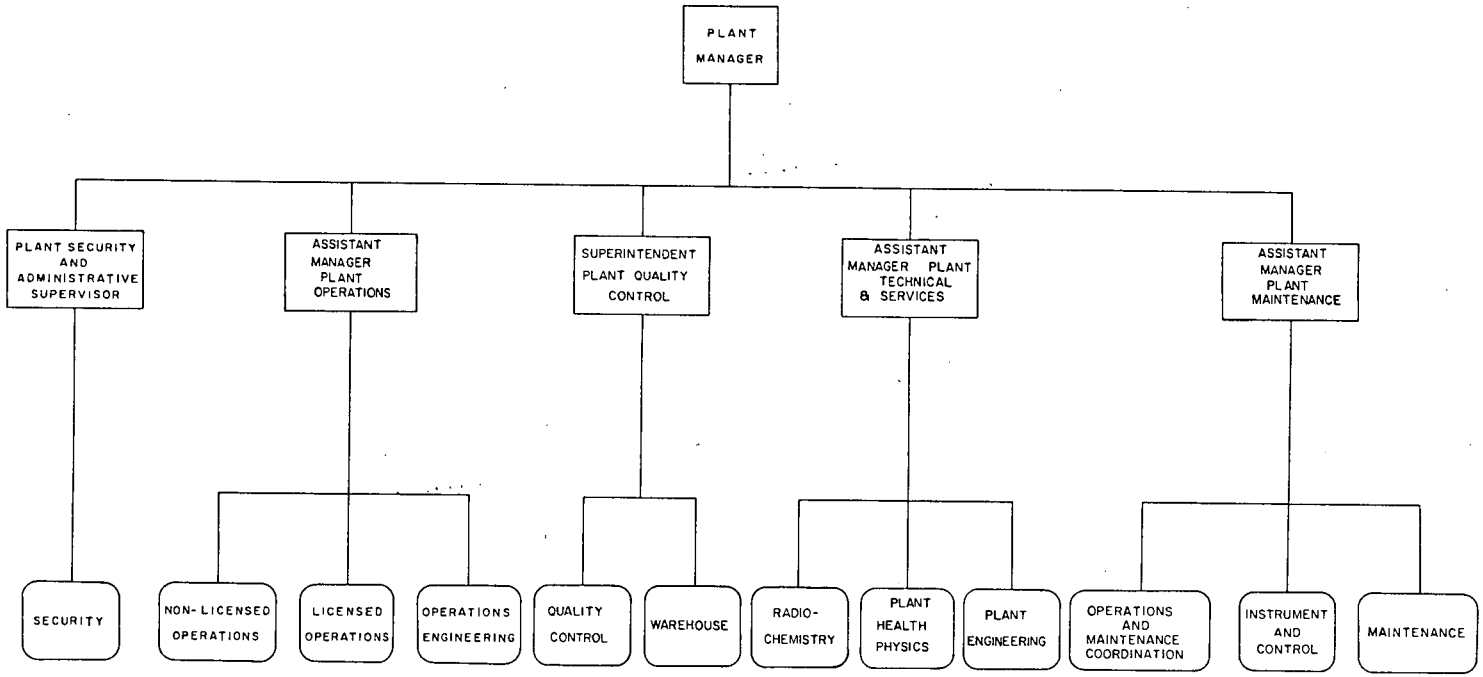
3. Provisions for preventive maintenance and periodic surveillance of instrumentation.

4. Pre-planned procedures and back-up instrumentation to be used if one or more monitoring instruments become inoperable.

5. Administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.

6.15 SECONDARY WATER CHEMISTRY

The licensee shall implement a secondary water chemistry monitoring program. The intent of this program will be to control corrosion thereby inhibiting steam generator tube degradation. The secondary water chemistry program shall act as a guide for the chemistry group in their routine as well as non-routine activities.



PROPOSED AMENDMENT NO. 67

FIGURE TS 6.2-2