

**Levy Nuclear Plant Units 1 and 2  
COL Application  
Part 2, Final Safety Analysis Report**

CHAPTER 13  
CONDUCT OF OPERATIONS

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**CHAPTER 13**

**CONDUCT OF OPERATIONS**

13.1 ORGANIZATIONAL STRUCTURE OF APPLICANT

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

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STD DEP 1.1-1 DCD **Subsection 13.1.1**, Combined License Information, is renumbered in this FSAR section to 13.1.4.

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LNP COL 13.1-1 This section describes organizational positions of a nuclear power station and owner/applicant corporations and associated functions and responsibilities. The position titles used in the text are generic and describe the function of the position.

**Table 13.1-201**, Generic Position/Site Specific Position Cross Reference, provides a cross-reference to identify the corresponding site-specific position titles. Changes to the organization described herein are reviewed under the provisions of 10 CFR 50.54 (a) to ensure that any reduction in commitments in the QAPD (as accepted by the NRC) are submitted to and approved by the NRC, prior to implementation.

STD DEP 1.1-1 13.1.1 MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATION

Duke Energy has over 40 years of experience in the design, construction, and operation of nuclear generating stations. Duke Energy operates 12 nuclear units on seven sites: McGuire Units 1 and 2; Catawba Units 1 and 2; Oconee Units 1, 2 and 3; Harris Nuclear Plant Unit 1; Brunswick Nuclear Plant Units 1 and 2; H.B. Robinson Nuclear Plant Unit 2; and Crystal River Nuclear Plant Unit 3 (permanent shutdown/retired). The Nuclear Generation organization includes, but is not limited to, nuclear engineering, nuclear operations, corporate governance and operations support, corporate organizational effectiveness, nuclear major projects, nuclear development, and nuclear oversight.

13.1.1.1 Design, Construction, and Operating Responsibilities

The executive in charge of nuclear development is responsible for development of the licensing actions needed in support of new nuclear site development, and also is responsible for engineering oversight of contractors, site layout, staffing, operational readiness, and program development. The responsibility for the operation of the new nuclear generating plants is assigned to the Chief Nuclear Officer. Each of these individuals reports directly to the President - Duke Energy Nuclear. The division of responsibilities was made to allow the Chief Nuclear Officer and Nuclear Generation to remain focused on improving the performance of the operating fleet and minimize the distractions associated with the

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construction of new nuclear generating plants. Nuclear Development is initially responsible for construction planning and preparation, and the responsibility for construction transitions to the executive for Site Construction at the start of construction activities when the position is filled. Organizational control and responsibility for the newly constructed nuclear generating plants transfers to the Chief Nuclear Officer following the completion of construction activities and prior to loading of fuel. This transition point allows for the continued support by the Nuclear Development and Site Construction organizations, while the Operational Readiness (OR) organization transitions to the final structure typical of the operating fleet.

The first priority and responsibility of each member of the nuclear staff throughout the life of the plant is nuclear safety. Decision making for station activities is performed in a conservative manner with expectations of this core value regularly communicated to appropriate personnel by management interface, training, and station directives.

Lines of authority, decision making, and communication are clearly and unambiguously established to enable the understanding of the various project members, including contractors, that utility management is in charge and directs the project.

Key executive and corporate management positions, functions, and responsibilities are discussed in [Subsection 13.1.1.3.1](#). Corporate and construction management organizations are shown in [Figures 13.1-203 and 13AA-201](#). The management and technical support organization for design, construction, and preoperational activities is addressed in [Appendix 13AA](#).

#### 13.1.1.2 Provisions for Technical Support Functions

Before beginning preoperational testing, the executive – nuclear development, executive – corporate governance and operations support, the executive – corporate organizational effectiveness, and the executive – nuclear engineering establish the organization of managers, functional managers, supervisors, and staff sufficient to perform required functions for support of safe plant operation. These functions include the following:

- Nuclear, mechanical, structural, electrical, thermal-hydraulic, metallurgical and material, and instrumentation and controls engineering
- Safety review
- Quality assurance, audit and surveillance
- Plant chemistry
- Radiation protection and environmental support
- Fueling and refueling operations support

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- Training
- Maintenance support
- Operations support
- Fire protection
- Emergency planning organization
- Outside contractual assistance

In the event that station personnel are not qualified to deal with a specific problem, the services of qualified individuals from other functions within the company or an outside consultant are engaged. For example, major contractors, such as the reactor technology vendor or turbine generator manufacturer, provide technical support when equipment modifications or special maintenance problems are considered. Special studies, such as environmental monitoring, may be contracted to qualified consultants.

**Figure 13.1-201** illustrates the management and technical support organizations supporting operation of the plant. **Section 13.1.2** describes the responsibilities and authorities of management positions for organizations providing technical support. **Table 13.1-201** shows the estimated number of positions required for each function.

Multiple layers of protection are provided to preserve unit integrity, including organization. Organizationally, operators and other shift members are assigned to a specific unit. In addition, station procedures and programs provide operating staff with methods to minimize human error, including tagging programs, procedure adherence requirements, and training.

#### 13.1.1.2.1 Nuclear Engineering

The nuclear engineering department consists of plant engineering, design engineering, engineering programs, nuclear fuel management, and safety and engineering analysis. These groups are responsible for performing the classical design activities as well as providing engineering expertise in other areas of new plant sites and license renewal at the current plant sites. They are also responsible for probabilistic safety assessment and other safety issues, plant system reliability analysis, performance and technical support, core management and periodic reactor testing, and for programs, such as inservice inspection/ inservice testing (ISI/IST), fire protection, snubbers, and valves.

Each of the engineering groups has a functional manager who reports to the executive – nuclear engineering (**Figure 13.1-203**).

The nuclear engineering department is responsible for:

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- Support of plant operations in the engineering areas of mechanical, structural, electrical, thermal-hydraulic, metallurgy and materials, electronic, instrument and control, and fire protection. Priorities for support activities are established based on input from the plant manager with emphasis on issues affecting safe operation of the plant.
- Engineering programs.
- Major engineering projects for the nuclear fleet.
- Support of procurement, chemical and environmental analysis, and maintenance activities in the plant as requested by the plant manager.
- Performance of design engineering of plant modifications.
- Maintenance of the design basis by updating the record copy of design documents as necessary to reflect the actual as-built configuration of the plant.
- Accident and transient analyses.
- Human Factors Engineering design process.

Reactor engineering, led by the functional manager in charge of nuclear fuels and analysis engineering, provides technical assistance in the areas of core design, core operations, core thermal limits, and core thermal hydraulics.

Engineering work may be contracted to and performed by outside companies in accordance with the quality assurance program description (QAPD).

Engineering resources are shared between units. A single management organization oversees the engineering work associated with the station units. Physical separation of units helps to minimize wrong-unit activities.

#### 13.1.1.2.2 Nuclear Safety Assurance

Plant licensing, regulatory compliance, corrective actions and performance improvement, and emergency preparedness each have a functional manager who reports to and receives direction from the manager in charge of organizational effectiveness.

The nuclear safety assurance (NSA) organization, through the licensing department, is the normal contact point for the station with the Nuclear Regulatory Commission (NRC) in matters concerning licensing and is responsible for addressing NRC bulletins and orders. Typical duties include:

- Developing licensee event reports (LERs) and responding to notices of violations.



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- Writing/submitting operating license and technical specification amendments and updating the FSAR.
- Tracking commitments and answering generic letters.
- Analyzing operating experience data and monitoring industry issues.
- Preparing station for special NRC inspections, interfacing with NRC inspectors, and interpreting NRC regulations.
- Maintaining the licensing basis.

The organizational effectiveness organization administers the corrective action program and the station's emergency preparedness program.

Personnel resources of the NSA organization are shared between units. A single management organization oversees the NSA organization for the station units.

#### 13.1.1.2.3 Quality Assurance

The nuclear oversight organization provides independent oversight of the nuclear plant activities, maintains the Quality Assurance Program Manual, and administers the employee concerns program. The executive - nuclear oversight reports directly to the CNO. However, the executive - nuclear oversight reports to the President - Duke Energy Nuclear on matters related to the development and deployment of new nuclear generating plants.

Safety-related activities associated with the operation of the plant are governed by QA direction established in **Chapter 17** of the FSAR and the QAPD. The requirements and commitments contained in the QAPD apply to activities associated with structures, systems, and components which are safety-related and are mandatory and must be implemented, enforced, and adhered to by individuals and organizations. QA requirements are implemented through the use of approved procedures, policies, directives, instructions, or other documents which provide written guidance for the control of quality-related activities and provide for the development of documentation to provide objective evidence of compliance. QA is a corporate function under the executive - nuclear oversight and includes:

- General QA indoctrination and training for the nuclear station personnel.
- Maintenance of the QAPD.
- Coordination of the development of audit schedules.
- Audit, surveillance, and evaluation of nuclear division suppliers.
- Quality control (QC) inspection/testing activities.

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Oversight of safety review of station programs, procedures, and activities is performed by a plant safety review committee, a corporate safety review committee, and the QA organization. Review and audit activities are addressed in Chapter 17 and the QAPD.

QA/QC management is independent of the station management line organization. Onsite personnel resources of the QA/QC organization are shared between units. QA and QC personnel report to the functional manager in charge of nuclear oversight at LNP. The functional manager in charge of nuclear oversight at LNP reports directly to the executive – nuclear oversight.

13.1.1.2.4 Chemistry

The corporate governance and operations support organization provides the standardization and support of the chemistry program at each site. A chemistry department is established to monitor and control the chemistry of various plant systems such that corrosion of components and piping is minimized and radiation from corrosion byproducts is kept to levels that allow operations and maintenance with radiation doses as low as reasonably achievable.

The functional manager in charge of environmental and chemistry is responsible to the plant general manager for maintaining chemistry programs and for monitoring and maintaining the water chemistry of plant systems. The staff of the chemistry department consists of laboratory technicians, support personnel, and supervisors who report to the functional manager in charge of environmental and chemistry.

Personnel resources of the chemistry organization are shared between units. A single management organization oversees the chemistry group for the station units.

13.1.1.2.5 Radiation Protection

The corporate governance and operations support organization provides for the standardization and support of the radiation protection programs at each site. A radiation protection program is established to protect the health and safety of the surrounding public and personnel working at the plant. The radiation protection program is described in **Chapter 12** of the FSAR. The program includes:

- Respiratory Protection
- Personnel Dosimetry
- Bioassay
- Survey Instrument Calibration and Maintenance
- Radioactive Source Control

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- Effluents and Environmental Monitoring and Assessment
- Radioactive Waste Shipping
- Radiation Work Permits
- Job Coverage
- Radiation Monitoring and Surveys

The radiation protection department is staffed by radiation protection technicians, support personnel, and supervisors who report to the functional manager in charge of radiation protection. To provide sufficient organizational freedom from operating pressures, the functional manager in charge of radiation protection reports directly to the plant manager.

Personnel resources of the radiation protection organization are shared between units. A single management organization oversees the radiation protection group for both units.

#### 13.1.1.2.6 Fueling and Refueling Support

The corporate governance and operations support organization provides the standardization and support of the refueling programs at each site. The function of fueling and refueling is performed by a combination of personnel from various departments including operations, maintenance, radiation protection, engineering, and reactor technology vendor or other contractor staff. Initial fueling and refueling operations are a function of the work control organization. The functional manager in charge of outage and scheduling is responsible for planning and scheduling outages and for refueling support and reports to the plant manager.

Personnel resources of the work control organization are shared between units. A single management organization oversees the work control associated with both units.

#### 13.1.1.2.7 Training and Development

The corporate organizational effectiveness organization provides for the standardization and support of the training programs at each site. The training department is responsible for providing training programs that are established, maintained, and implemented in accordance with applicable plant administrative directives, regulatory requirements, and company operating policies so that station personnel can meet the performance requirements of their jobs in operations, maintenance, technical support, and emergency response. The objective of training programs is to provide qualified personnel to operate and maintain the plant in a safe and efficient manner and to provide compliance with the license, technical specifications, and applicable regulations. The training department's responsibilities encompass operator initial license training,

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requalification training, and plant staff training as well as the plant access training (general employee training) and radworker training. The functional manager in charge of training at LNP is independent of the operating line organization to provide for independence from operating pressures. Nuclear plant training programs are described in **Section 13.2** of the FSAR.

Personnel resources of the training department are shared between units. A single management organization provides oversight of station training activities.

**13.1.1.2.8 Maintenance Support**

The corporate governance and operations support organization provides the standardization and support of the maintenance programs at each site. In support of maintenance activities, planners, schedulers, and parts specialists prepare work packages, acquire proper parts, and develop procedures that provide for the successful completion of maintenance tasks. Maintenance tasks are integrated into the station schedule for evaluation of operating or safe shutdown risk elements and to provide for efficient and safe performance. Personnel of the maintenance support organization receive direction from the functional manager in charge of maintenance who reports to the plant manager.

Personnel of the maintenance support organization are shared between units. A single management organization oversees the function of maintenance support for the station units.

**13.1.1.2.9 Operations Support**

The corporate governance and operations support organization provides the standardization and support of the operations programs at each site. The operations support function is provided under the direction of the functional manager in charge of operations. Operations support includes the following programs:

- Operations procedures
- Operations surveillances
- Equipment tagging
- Fire protection testing and surveillance
- Radwaste system operation

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**13.1.1.2.10 Fire Protection**

LNP COL 9.5-1

The station is committed to maintaining a fire protection program as described in DCD **Subsection 9.5.1**. The site executive in charge of plant management is responsible for the fire protection program. Assigning the responsibilities at that

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level provides the authority to obtain the resources and assistance necessary to meet fire protection program objectives, resolve conflicts, and delegate appropriate responsibility to fire protection staff. The relationship of the site executive in charge of plant management to other staff personnel with fire protection responsibilities is shown on **Figure 13.1-201**. Fire protection for the facility is organized and administered by the engineer in charge of fire protection. The site executive in charge of plant management, through the engineer in charge of fire protection, is responsible for development and implementation of the fire protection program including development of fire protection procedures and inspections of fire protection systems and functions. Fire brigade training, drills, and practice are organized by the functional supervisor in charge of emergency preparedness in consultation with the engineer in charge of fire protection. Fire protection trainers are qualified to perform classroom instruction or practical training as discussed in FSAR **Subsection 9.5.1.8.2.2**. The engineer in charge of fire protection reports to the site executive in charge of plant management through engineering department management and coordinates operations related fire protection program activities with the manager in charge of operations. Functional descriptions of position responsibilities are included in appropriate procedures. Station personnel are responsible for adhering to the fire protection/prevention requirements detailed in DCD **Subsection 9.5.1**. The site executive in charge of plant management has the lead responsibility for the overall site fire protection during construction of new units.

Personnel resources that implement the fire protection program are shared between units. A single management organization oversees the fire protection program for the station units.

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13.1.1.2.11 Emergency Organization

LNP COL 13.1-1 The corporate organizational effectiveness organization provides for the standardization and support of the emergency response programs at each site. The emergency organization is a matrixed organization composed of personnel who have the experience, training, knowledge, and ability necessary to implement actions to protect the public in the case of emergencies. Managers and station personnel assigned positions in the emergency organization are responsible for supporting the emergency preparedness organization and emergency plan as required. The staff members of the emergency planning organization orchestrate drills and training to maintain qualification of personnel and develop procedures to guide and direct the emergency organization during an emergency. The functional supervisor in charge of emergency preparedness reports to the functional manager in charge of organizational effectiveness. The site emergency plan organization is described in the Emergency Plan.

Resources of the emergency planning group are shared between units. A single management organization oversees the emergency planning group for the station units.

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13.1.1.2.12 Outside Contractual Assistance

Contract assistance with vendors and suppliers of services not available from organizations established as part of utility staff is provided by the materials, purchasing, and contracts organization. Personnel in the materials, purchasing, and contracts organization perform the necessary functions to contract vendors of special services to perform tasks for which utility staff does not have the experience or equipment required. The functional manager in charge of Nuclear Generation – supply chain reports to the vice president – supply chain.

Resources of the materials, purchasing, and contracts organization are shared between units. A single management organization oversees the materials, purchasing, and contracts group for the station units.

13.1.1.3 Organizational Arrangement

13.1.1.3.1 Executive Management Organization

Executive management is ultimately responsible for execution of activities and functions for the nuclear generating plants owned by the utility. Executive management establishes expectations such that a high level of quality, safety, and efficiency is achieved in aspects of plant operations and support activities through an effective management control system and an organization selected and trained to meet the above objectives. The nuclear executive organization is shown in [Figure 13.1-203](#). A high-level chart of the Duke Energy corporate organization showing the relationship of the nuclear division to the rest of the corporate organization is illustrated in [Figure 13.1-204](#). Executives and managers with direct line of authority for activities associated with operation of the plant are shown in [Figure 13.1-201](#). Responsibilities of those executives and managers are specified below.

13.1.1.3.1.1 Chairman, President and Chief Executive Officer (CEO)

The Duke Energy Chairman, President and CEO has the ultimate responsibility for the safe and reliable operation of each nuclear station owned and/or operated by the utility. The CEO is responsible for the overall direction and management of the corporation and the execution of the company policies, activities, and affairs. The CEO is assisted by the President – Duke Energy Nuclear and other nuclear executive staff. Also reporting to the Chairman, President and CEO are Group Executives responsible for providing support to Nuclear Generation for the following: electrical transmission; electrical distribution; laboratory services; switchyard maintenance and technical support; support for the emergency response communications; information technology services; document control and record management activities; support for contracts, engineering, and management related to new plant construction as requested.

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13.1.1.3.1.2      President – Duke Energy Nuclear

The President of Duke Energy Nuclear reports to the Chairman, President and Chief Executive Officer and is responsible for the Duke nuclear fleet, enterprise project management and construction, new plant development and decommissioning activities. The President - Duke Energy Nuclear has overall authority and responsibility for the QA Program. The President - Duke Energy Nuclear directs the following group executives: (1) chief nuclear officer (CNO); (2) nuclear development; (3) project management and construction; (4) nuclear oversight; and (5) site construction. There are two additional direct reports to the President - Duke Energy Nuclear. One is the functional director of nuclear policy and support. The other position is the functional director for the U.S. nuclear industry for Fukushima responses.

13.1.1.3.1.3      Group Executive Chief Nuclear Officer (CNO)

The group executive - Nuclear Generation is the CNO. The CNO reports to the President - Duke Energy Nuclear of Duke Energy. The CNO directs the following executives: (1) executive - nuclear engineering, (2) executive – corporate governance and operations support, (3) executive – corporate organizational effectiveness, (4) executive - nuclear major projects, (5) executive – nuclear oversight and (6) the three executives for nuclear operations. The CNO has responsibility for overall plant nuclear safety and takes the measures needed to provide acceptable performance of the staff in operating, maintaining, and providing technical support to the plant. The CNO delegates authority and responsibility for the operation and support of the sites to the executive - nuclear operations for each site group. It is the responsibility of the CNO to provide guidance and direction such that safety-related activities including engineering, testing, modifications, preoperational testing, operations, maintenance, and planning are performed following the guidelines of the QA program. The Independent Nuclear Oversight Committee reports directly to the CNO. The CNO has no ancillary responsibilities that might detract attention from nuclear safety matters.

13.1.1.3.1.4      Executive - Nuclear Operations (Specified Duke Sites)

The executive(s) in charge of nuclear operations is responsible for oversight of operations at each of the stations under his purview. Currently the sites are divided among three executives in charge of nuclear operations as follows: one responsible for Oconee and Robinson nuclear stations; one responsible for Catawba and McGuire nuclear stations; and one responsible for Brunswick and Harris nuclear stations. With the completion of construction of each new unit (e.g., LNP Units 1 and 2), responsibilities will be redistributed among the executives – nuclear operations to maintain proper focus and oversight. Reporting to each executive - nuclear operations are the site executives for the respective nuclear stations. The executives - nuclear operations report to the CNO.

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13.1.1.3.1.5 Site Executive(s) – Plant Management (McGuire, Catawba, Oconee, Harris, Brunswick, Robinson, and Future LNP Site)

The site executive(s) in charge of plant management reports to the executives(s) in charge of nuclear operations. The site executive in charge of plant management is directly responsible for management and direction of activities associated with the efficient, safe, and reliable operation of the nuclear station, except for those functions delegated to the executive – corporate governance and operations support and the executive – corporate organizational effectiveness. The site executive in charge of plant management is assisted in management and technical support activities by the plant manager and managers in charge of organizational effectiveness, engineering, training, security, nuclear oversight, major projects, human resources, corporate communications, and finance. As LNP approaches startup, the site organization transitions to the Plant Management Organization shown in [Figure 13.1-201](#) from the construction focused organization shown in [Figure 13AA-201](#). The site executive in charge of plant management is responsible for the site fire protection program through the engineer in charge of fire protection and engineering management.

13.1.1.3.1.6 Executive - Nuclear Development

The executive in charge of nuclear development is responsible for development of the licensing actions needed in support of new nuclear site development. Responsibilities also include engineering oversight of contractors, site layout, staffing, operational readiness, and program development. The executive in charge of nuclear development is assisted by a support staff and reports directly to the President – Duke Energy Nuclear. This position is supported by the functional managers in charge of engineering, licensing, project management, and operational readiness. Nuclear Development responsibilities include the establishment and execution of a contract or contracts for the engineering, procurement, construction, and startup activities of new nuclear plants. Organizational control and responsibility for newly constructed nuclear generating plants transfers to the Chief Nuclear Officer following construction activities and prior to loading of fuel. [Figure 13AA-201](#) shows the Construction Management Organization. Initially, Nuclear Development is responsible for construction planning and preparation. The responsibility for construction transitions to the Executive for Site Construction at the start of construction activities when filled. As LNP approaches startup, the site organization transitions from the construction focused organization in [Figure 13AA-201](#) to the Plant Management Organization shown in [Figure 13.1-201](#).

13.1.1.3.1.7 Executive - Major Projects

The executive in charge of major projects provides project management, engineering, and vendor oversight for selected large projects at the nuclear sites. Providing oversight for these significant projects provides more focus and continuity for upgrades and eliminates distractions for site management. Nuclear major projects is responsible for contracts, engineering, and management related



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to fleet and nuclear site major projects. The executive in charge of major projects reports to the CNO.

13.1.1.3.1.8 Executive – Site Construction

The executive for site construction reports directly to the president Duke Energy Nuclear. This reporting relationship allows the CNO and Nuclear Generation to remain focused on improving the performance of the operating fleet and minimize the distractions associated with the construction of new nuclear generating plants. This position will be filled in support of the start of construction activities for a new nuclear plant. This position is responsible for the control and oversight of all construction activities associated with a new nuclear unit. Reporting to this position will be the manager for construction; manager for site engineering; and the site plant manager as shown on **Figure 13AA-201**. This position will transfer responsibility for the constructed unit to the site executive reporting to the CNO at the completion of construction activities and prior to the loading of fuel in that unit. This position will retain responsibilities for other units under construction at a multi-unit site until construction activities for each unit are completed. This position is supported during these construction activities by other Duke Energy Nuclear organizations, as needed.

13.1.1.3.1.9 Executive – Corporate Governance and Operations Support

The executive for corporate governance and operations support reports to the CNO. Corporate governance and operations support provides support to help improve overall fleet performance. This centralized organization includes protective services (security and access services); nuclear support services; and operations support.

13.1.1.3.1.10 Executive – Corporate Organizational Effectiveness

The executive for corporate organizational effectiveness reports to the CNO. The executive for corporate organizational effectiveness will support fleet performance through improving overall fleet effectiveness. Reporting to this position will be organizational effectiveness; regulatory affairs; training; leadership development; performance improvement and emergency preparedness.

13.1.1.3.1.11 Executive – Nuclear Engineering

The executive in charge of nuclear engineering provides support to the stations in severe accident analysis, safety analysis, nuclear design, core mechanical and thermal hydraulic analysis, fuel management, switchyard support, metallurgical laboratory services, material aging program, steam generator maintenance, ISI program support, QC inspector training and certification, procurement engineering, welding, and radiological engineering.

The executive - nuclear engineering reports to the CNO. Nuclear engineering provides broad engineering leadership and technical support to the nuclear sites,

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with emphasis on generic issues and consistent practices. This includes providing expertise in safety assessment with technical support in the areas of risk assessment, radiological engineering, and safety analysis; fuel management with leadership and technical support in the areas of fuel supply, spent fuel management, and reactor core mechanical and thermal hydraulic analysis; fleet electrical and procurement engineering with technical support in the areas of procurement engineering, nuclear process systems, and electrical systems and analysis; and programs and components support in the areas of steam generator inspections and maintenance, engineering programs, component engineering, material failure analysis and materials science, equipment reliability, and ASME code inspections and testing.

Nuclear engineering provides record storage and document management services, technology planning, project control, and technical support for information technology applications and systems such as equipment databases, applications, infrastructure, and plant process information systems.

13.1.1.3.1.12 Executive - Nuclear Oversight

The executive in charge of nuclear oversight provides support and leadership to the general office and stations with QA program audits, performance assessment, procurement quality, supplier verification, and QA, QC, NDE, and ISI, as applicable. In addition, nuclear oversight provides an advisory function to senior management through the Nuclear Safety Review Board. The executive - nuclear oversight has the authority and organizational freedom to identify quality problems; initiate, recommend, or provide solutions to quality problems through designated channels; verify the implementation of solutions to quality problems; and ensure cost and schedule do not influence decision-making involving quality. The executive - nuclear oversight has unfettered access to the CNO to communicate QA program concerns and issues.

The executive - nuclear oversight is delegated primary ownership of the department QA program description and is responsible for day-to-day administration of the program and resolution of QA issues. If significant quality problems are identified by nuclear oversight personnel, the executive - nuclear oversight or designee has the responsibility and authority to stop work pending satisfactory resolution of the identified problem. The executive - nuclear oversight reports directly to the CNO. The executive - nuclear oversight is responsible for providing oversight of Nuclear Generation activities; administration of the employee concerns program; and maintenance of the Quality Assurance Program Manual. The executive – nuclear oversight is responsible for and reports to the President – Duke Energy Nuclear on all matters related to the independent monitoring and assessing of activities performed by or in support of the development and deployment of new nuclear generating plants, decommissioning activities, and project management and construction activities not controlled by the CNO. Assisting the executive - nuclear oversight is the functional manager in charge of corporate nuclear oversight and the functional manager(s) in charge of nuclear oversight for each nuclear plant site.

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13.1.1.3.1.13      Functional Director - Nuclear Protective Services

The functional director in charge of nuclear protective services is responsible for providing guidance and direction to the functional manager – security at each site on the nuclear security, access authorization, and fitness for duty programs. The director - nuclear protective services reports to the executive – corporate governance and operations support.

13.1.1.3.2      Site Support Organization

13.1.1.3.2.1      The Functional Manager - Engineering

The functional manager in charge of engineering reports to the executive - nuclear engineering. The functional manager in charge of engineering is responsible for engineering activities related to the operation or maintenance of the plant and design change implementation support activities and other functions described in **Subsection 13.1.1.2.1**.

The functional manager in charge of engineering directs functional discipline engineers responsible for system engineering, design engineering, and engineering programs.

A single management organization oversees the engineering support for the station units.

13.1.1.3.2.1.1      Functional Manager - Plant Engineering

The functional manager in charge of plant engineering reports to the functional manager in charge of engineering and supervises a technical staff of engineers and other engineering specialists and coordinates their work with that of other groups. System engineering staff includes reactor engineering as discussed in **Subsection 13.1.1.2.1**. The functional manager in charge of plant engineering is responsible for providing direction and guidance to system engineers as follows:

- Monitoring the efficiency and proper operation of balance of plant and reactor systems.
- Planning programs for improving equipment performance, reliability, or work practices.
- Conducting operational tests and analyzing the results.
- Providing safety-related software services, including the maintenance, testing, and configuration control of plant digital I&C systems.
- Identification of plant spare parts for systems.

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13.1.1.3.2.1.2 Functional Manager - Design Engineering

The functional manager in charge of design engineering reports to the functional manager in charge of engineering and is responsible for:

- Resolution of design issues.
- Onsite development of design related change packages and plant modifications.
- Implementation of effective project management methods and procedures, including cost controls, for implementation of modifications and construction activities.
- Management of contractors who may perform modification or construction activities.
- Maintaining configuration control program.

13.1.1.3.2.1.3 Functional Manager – Engineering Programs

The functional manager in charge of engineering programs reports to the functional manager in charge of engineering and is responsible for programs such as:

- Valve engineering
- Maintenance rule tracking and trending
- Fire protection
- Piping erosion/corrosion
- Inservice testing
- Equipment reliability engineering.

13.1.1.3.2.2 Functional Manager Organizational Effectiveness

The functional manager in charge of organizational effectiveness is responsible for those functions described in **Subsection 13.1.1.2.2** and reports to the site executive in charge of plant management. The responsibilities of the manager in charge of nuclear safety assurance are fulfilled through the functional supervisors in charge of plant licensing and regulatory compliance, corrective actions and performance improvement, emergency preparedness.

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13.1.1.3.2.2.1      Functional Supervisor in Charge of Plant Licensing and Regulatory Compliance

The responsibility of the functional supervisor in charge of plant licensing and regulatory compliance is to provide a coordinated focus for interface with the NRC and technical direction and administrative guidance for the licensing staff for those activities listed in **Subsection 13.1.1.2.2**. The functional supervisor in charge of plant licensing and regulatory compliance reports directly to the functional manager in charge of organizational effectiveness.

13.1.1.3.2.2.2      Functional Supervisor in Charge of Corrective Actions and Performance Improvement

The responsibilities of the functional supervisor in charge of corrective actions and performance improvement includes establishing processes and procedures to facilitate identification and correction of conditions adverse to quality and implement corrective actions. The functional supervisor in charge of corrective actions and performance improvement reports directly to the functional manager in charge of organizational effectiveness.

13.1.1.3.2.2.3      Functional Supervisor in Charge of Emergency Preparedness

The functional supervisor in charge of emergency preparedness is responsible for:

- Coordinating and implementing the plant emergency response plan with state and local emergency plans.
- Developing, planning, and executing emergency drills and exercises including coordination of fire brigade training exercises with the engineer in charge of fire protection.
- Emergency action level development.
- NRC reporting associated with 10 CFR 50.54(q).

The functional supervisor in charge of emergency preparedness reports directly to the functional manager in charge of organizational effectiveness.

13.1.1.3.2.2.4      Additional Organizational Effectiveness Support

A functional supervisor in charge of procedures develops quality site procedures and reports to the organizational effectiveness manager. In addition, a functional supervisor in charge of human performance works with the site to improve human performance on behalf of the organizational effectiveness manager.

13.1.1.3.2.3      Functional Manager – Finance

The manager in charge of finance is responsible for planning, scheduling, and

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implementing special projects and financial programs, and for providing oversight of accounting and payroll processes for the site. The manager in charge of finance reports to the site executive in charge of plant management.

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13.1.1.3.2.4      Functional Manager - Training and Development

LNP COL 18.10-1    The functional manager in charge of training and development is responsible for training programs at the site required for the safe and proper operation and maintenance of the plant including:

- Operations training programs
- Plant staff training programs
- Plant access training
- Emergency plan training
- Radiation worker training

The functional manager in charge of training may seek assistance from other departments within the company or outside specialists, such as educators and manufacturers. The manager in charge of training supervises a staff of training supervisors who coordinate the development, preparation, and presentation of training programs for nuclear plant personnel and reports to the site executive in charge of plant management.

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LNP COL 13.1-1    13.1.1.3.2.5      Functional Manager in Charge of Security

The functional manager in charge of security is responsible for:

- Implementation and enforcement of security directives, procedures, and instructions received from appropriate authorities.
- Day-to-day supervision of the security guard force.
- Administration of the security program.

The functional manager in charge of security reports directly to the functional director - nuclear protective services and indirectly to the site executive - plant management.

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13.1.1.4      Qualifications of Technical Support Personnel

LNP COL 18.6-1    The qualifications of managers and supervisors of the technical support organization meet the qualification requirements in education and experience for

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those described in ANSI/ANS-3.1-1993 ([Reference 201](#)) as endorsed and amended by Regulatory Guide 1.8. For positions that do not have a cross-reference section in ANSI/ANS-3.1 the most comparable section of ANSI/ANS-3.1 is used for guidance in establishing experience and education requirements. The qualification and experience requirements of headquarters staff is established in corporate policy and procedure manuals.

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13.1.2 OPERATING ORGANIZATION

LNP COL 13.1-1

13.1.2.1 Plant Organization

The plant management, technical support, and plant operating organizations are shown in [Figure 13.1-201](#). The on-shift operating organization is presented in [Figure 13.1-202](#), which shows those positions requiring NRC licenses. Additional personnel are required to augment normal staff during outages.

Nuclear plant employees are responsible for reporting problems with plant equipment and facilities. They are required to identify and document equipment problems in accordance with the QA Program. QA Program requirements, as they apply to the operating organization, are described in FSAR [Chapter 17](#). The guidelines of Regulatory Guide 1.33 for the operating organization, onsite review, and rules of practice are implemented at the site via administrative procedure or standing order and include:

- Establishment of a quality assurance program for the operational phase.
- Preparation of procedures necessary to carry out an effective quality assurance program. See FSAR [Section 13.5](#) for description of the station procedure program.
- A program for review and audit of activities affecting plant safety. See FSAR [Section 17.5](#) for description of station review and audit programs.
- Programs and procedures for rules of practice as described in Section 5.2 of ANSI/ANS-3.2-1988 ([Reference 203](#)).

Managers and supervisors within the plant operating organization are responsible for establishing goals and expectations for their organization and to reinforce behaviors that promote radiation protection. Specifically, managers and supervisors are responsible for the following, as applicable to their position within the plant organization:

- Interface directly with radiation protection staff to integrate radiation protection measures into plant procedures and design documents and into the planning, scheduling, conduct, and assessment of operations and work.
- Notify radiation protection personnel promptly when radiation protection

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problems occur or are identified, take corrective actions, and resolve deficiencies associated with operations, procedures, systems, equipment, and work practices.

- Train site personnel on radiation protection, and provide periodic retraining, in accordance with 10 CFR Part 19 so that they are properly instructed and briefed for entry into restricted areas.
- Periodically observe and correct, as necessary, radiation worker practices.
- Support radiation protection management in implementing the radiation protection program.
- Maintain exposures to site personnel ALARA.

13.1.2.1.1 Plant Manager

The plant manager reports to the site executive in charge of plant management, is responsible for overall safe operation of the plant, and has control over those on-site activities necessary for safe operation and maintenance of the plant including the following:

- Operations
- Maintenance and modification
- Chemistry and radiochemistry
- Outage management
- Scheduling and activity coordination

Additionally, the plant manager has overall responsibility for occupational and public radiation safety. Radiation protection responsibilities of the plant manager are consistent with the guidance in Regulatory Guide 8.8 and Regulatory Guide 8.10 including the following:

- Provide management radiation protection policy throughout the plant organization.
- Provide an overall commitment to radiation protection by the plant organization.
- Interact with and support the manager in charge of radiation protection on implementation of the radiation protection program.
- Support identification and implementation of cost-effective modifications to plant equipment, facilities, procedures and processes to improve radiation protection controls and reduce exposures.



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- Establish plant goals and objectives for radiation protection.
- Maintain exposures to site personnel ALARA.
- Support timely identification, analysis and resolution of radiation protection problems (e.g., through the plant corrective action program).
- Provide training to site personnel on radiation protection in accordance with 10 CFR Part 19.
- Establish an ALARA Committee with delegated authority from the plant manager that includes, at a minimum, the managers in charge of operations, maintenance, engineering, and radiation protection to help provide for effective implementation of line organization responsibilities for maintaining worker doses ALARA.

The line of succession of authority and responsibility for overall operations in the event of unexpected events of a temporary nature is:

- a. Manager in charge of operations
- b. Manager in charge of plant maintenance
- c. Assistant manager in charge of operations

As described in **Subsection 13.1.2.1.2.4**, the manager in charge on-shift is the plant manager's direct representative for the conduct of operations. The succession of authority includes the authority to issue standing or special orders as required.

#### 13.1.2.1.1.1 Functional Manager – Maintenance

Maintenance of the plant is performed by the maintenance department mechanical, electrical, and instrumentation and control disciplines. The functions of this department are to perform preventive and corrective maintenance, equipment testing, and implement modifications as necessary.

The manager in charge of maintenance is responsible for the performance of preventive and corrective maintenance and modification activities required to support operations, including compliance with applicable standards, codes, specifications, and procedures. The manager in charge of maintenance reports to the plant manager and provides direction and guidance to the maintenance discipline functional managers and maintenance support staff.

#### 13.1.2.1.1.2 Maintenance Discipline Functional Managers

The functional managers of each maintenance discipline (mechanical, electrical, and instrumentation and control) are responsible for maintenance activities within their discipline including plant modifications. They provide guidance in maintenance planning and craft supervision. They establish the necessary

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manpower levels and equipment requirements to perform both routine and emergency type maintenance activities, seeking the services of others in performing work beyond the capabilities of the plant maintenance group. Each discipline functional manager is responsible for liaison with other plant staff organizations to facilitate safe operation of the station. These functional managers report to the manager in charge of plant maintenance.

13.1.2.1.1.3 Maintenance Discipline Supervisors

The maintenance discipline supervisors (mechanical, electrical, and instrumentation and control) supervise maintenance activities, assist in the planning of future maintenance efforts, and guide the efforts of the craft within their discipline. The maintenance discipline supervisors report to the appropriate maintenance discipline functional manager.

13.1.2.1.1.4 Functional Manager – Work Control

The functional manager in charge of work control is responsible for planning, scheduling, and coordinating maintenance, modification, and testing activities during power operations and shutdown periods. This includes taking necessary measures to minimize risk to the plant and personnel during the above activities.

The functional manager in charge of work control reports to the plant manager.

13.1.2.1.1.5 Functional Manager – Radiation Protection

The functional manager in charge of radiation protection has the responsibility for providing adequate protection of the health and safety of personnel working at the plant and members of the public during activities covered within the scope and extent of the license. Radiation protection responsibilities of the functional manager in charge of radiation protection are consistent with the guidance in Regulatory Guide 8.8 and Regulatory Guide 8.10. They include:

- Manage the radiation protection organization.
- Establish, implement, and enforce the radiation protection program.
- Provide radiation protection input to facility design and work planning.
- Track and analyze trends in radiation work performance and take necessary actions to correct adverse trends.
- Support the plant emergency preparedness program and assign emergency duties and responsibilities within the radiation protection organization.
- Delegate authority to appropriate radiation protection staff to stop work or order an area evacuated (in accordance with approved procedures) when, in his or her judgment, the radiation conditions warrant such an

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action and such actions are consistent with plant safety.

The functional manager in charge of radiation protection reports to the plant manager and is assisted by the supervisors in charge of radiation protection.

The functional manager in charge of radiation protection reports indirectly to and receives support from the corporate functional manager in charge of nuclear support.

13.1.2.1.1.6      Functional Supervisor(s) in Charge of Radiation Protection

The functional supervisors in charge of radiation protection are responsible for carrying out the day-to-day operations and programs of the radiation protection department as listed in [Subsection 13.1.1.2.5](#).

Supervisors in charge of radiation protection report to the functional manager in charge of radiation protection.

13.1.2.1.1.7      Radiation Protection Technicians

Radiation protection technicians (RPTs) directly carry out responsibilities defined in the radiation protection program and procedures. In accordance with technical specifications an RPT is on-site whenever there is fuel in the vessel. See [Table 13.1-202](#).

The following are some of the duties and responsibilities of the RPTs:

- As delegated authority by the functional manager in charge of radiation protection, stop work or order an area evacuated (in accordance with approved procedures) when, in his or her judgment, the radiation conditions warrant such an action and such actions are consistent with plant safety.
- Provide coverage and monitor radiation conditions for jobs potentially involving significant radiation exposure.
- Conduct surveys, assess radiation conditions and establish radiation protection requirements for access to and work within restricted, radiation, high radiation, very high radiation, airborne radioactivity areas, and areas containing radioactive materials.
- Provide control over the receipt, storage, movement, use, and shipment of licensed radioactive materials.
- Review work packages, proposed design modifications, and operations and maintenance procedures to facilitate integration of adequate radiation protection controls and dose-reduction measures.
- Review and oversee implementation of plans for the use of process or other engineering controls to limit the concentrations of radioactive

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materials in the air.

- Provide personnel monitoring and bioassay services.
- Maintain, prescribe, and oversee the use of respiratory protection equipment.
- Perform assigned emergency response duties.

13.1.2.1.1.8      Functional Manager – Chemistry

The functional manager in charge of chemistry is responsible for development, implementation, and direction and coordination of the chemistry, radiochemistry, and nonradiological environmental monitoring programs. The chemistry department has charge of overall operation of the hot lab, cold lab, emergency off-site facility lab, and nonradiological environmental monitoring. The functional manager in charge of chemistry is responsible for the development, administration, and implementation of procedures and programs which provide for effective compliance with environmental regulations. The functional manager in charge of chemistry reports to the plant manager and directly supervises the chemistry supervisors and chemistry technicians as assigned. The functional manager in charge of chemistry reports indirectly to and receives support from the corporate located functional manager in charge of nuclear support services. Three functional supervisors over chemistry disciplines assist the functional manager in charge of chemistry.

13.1.2.1.2      Operations Department

All operations activities are conducted with safety of personnel, the public, and equipment as the overriding priority. The operations department is responsible for:

- Operation of station equipment.
- Monitoring and surveillance of safety and non-safety related equipment.
- Fuel handling.
- Providing the nucleus of emergency and fire-fighting teams.

The operations department maintains sufficient licensed and senior licensed operators to staff the control room continuously using a crew rotation system. The operations department is under the direction of the manager in charge of operations, who through the assistant manager in charge of operations directs the day-to-day operation of the plant.

Specific duties, functions, and responsibilities of key shift members are discussed in **Subsections 13.1.2.1.2.4 through 13.1.2.1.2.8** and in plant administrative procedures and the technical specifications. The minimum shift manning requirements are shown in **Table 13.1-202**.

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Some resources of the operations organization are shared between units. Administrative and support personnel perform their duties on either unit. Additional operations staff is required to fill the on-shift staffing requirements of the additional units. To operate, or supervise the operation of more than one unit, a senior reactor operator (SRO) or reactor operator (RO) must hold an appropriate, current license for each unit. A single management organization oversees the operations group for the station units. See [Table 13.1-201](#) for estimated number of staff in the operations department for a single unit. Positions required for operation of the second unit are also shown.

The operations support section is staffed with sufficient personnel to provide support activities for the operating shifts and overall operations department. The following is an overview of the operations organization.

13.1.2.1.2.1      Functional Manager – Operations

The functional manager in charge of operations has overall responsibility for the day-to-day operation of the plant. The functional manager in charge of operations reports to the plant manager and is assisted by the assistant functional manager in charge of operations and assistant functional manager in charge of operations support. The functional manager in charge of operations receives support from the engineer in charge of fire protection for coordination of operations related fire protection activities. The functional manager in charge of operations or the assistant functional manager of operations is SRO licensed.

13.1.2.1.2.2      Assistant Functional Manager – Operations

The assistant functional manager in charge of operations, under the direction of the functional manager in charge of operations, is responsible for:

- Shift plant operations in accordance with the operating license, technical specifications, and written procedures.
- Providing supervision of operating shift personnel for operational shift activities including those of emergency and firefighting teams.
- Coordinating with the assistant functional manager in charge of operations support and other plant staff sections.
- Verifying that nuclear plant operating records and logs are properly prepared, reviewed, evaluated, and turned over to the assistant functional manager in charge of operations support.

The assistant functional manager in charge of operations is assisted in these areas by the managers in charge on-shift who direct the operating shift personnel. The assistant functional manager in charge of operations reports to the functional manager in charge of operations and in the absence of the manager in charge of operations or assistant functional manager in charge of

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operations support may assume the duties and responsibilities of either of these positions.

13.1.2.1.2.3      Assistant Functional Manager in Charge of Operations Support

The assistant functional manager in charge of operations support, under the direction of the functional manager in charge of operations, is responsible for:

- Directing and guiding plant operations support activities in accordance with the operating license, technical specifications, and written procedures.
- Providing supervision of operating support personnel, for operations support activities, and coordination of support activities.
- Providing for nuclear plant operating records and logs to be turned over to the nuclear records group for maintenance as quality assurance records.

The assistant functional manager in charge of operations support is assisted by the supervisors of work management, operations procedures group, and other support personnel. In the absence of the functional manager in charge of operations or assistant functional manager in charge of operations, the assistant functional manager in charge of operations support may assume the duties and responsibilities of either of these positions.

13.1.2.1.2.4      Manager in Charge On-Shift

The manager in charge on-shift is a licensed SRO responsible for the control room command function, and is the plant manager's direct management representative for the conduct of operations. As such, the manager in charge on-shift has the responsibility and authority to direct the activities and personnel on-site as required to:

- Protect the health and safety of the public, the environment, and personnel on the plant site.
- Protect the physical security of the plant.
- Prevent damage to site equipment and structures.
- Comply with the operating license.

The manager in charge on-shift retains this responsibility and authority until formally relieved of operating responsibilities by a licensed SRO. Additional responsibilities of the manager in charge on-shift include:

- Directing nuclear plant employees to report to the plant for response to potential and real emergencies.
- Seeking the advice and guidance of the shift technical advisor and others

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in executing the duties of the manager in charge on-shift whenever in doubt as to the proper course of action.

- Promptly informing responsible supervisors of significant actions affecting their responsibilities.
- Participating in operator training, retraining, and requalification activities from the standpoint of providing guidance, direction, and instruction to shift personnel.

The manager in charge on-shift is assisted in carrying out the above duties by the supervisors in charge on shift and the operating shift personnel. The manager in charge on-shift reports to the assistant functional manager in charge of operations.

13.1.2.1.2.5 Supervisors in Charge On-Shift

The supervisor in charge on-shift is a licensed SRO. The primary function of the supervisor in charge on-shift is to administratively support the manager in charge on-shift such that the “command function” is not overburdened with administrative duties and to supervise the licensed and non-licensed operators in carrying out the activities directed by the manager in charge on-shift. Other duties include:

- Being aware of maintenance and testing performed during the shift.
- Shutting down the reactor if conditions warrant this action.
- Informing the manager in charge on-shift and other station management in a timely manner of conditions which may affect public safety, plant personnel safety, plant capacity or reliability, or cause a hazard to equipment.
- Initiating immediate corrective action as directed by the manager in charge on-shift in any upset situation until assistance, if required, arrives.
- Participating in operator training, retraining, and requalification activities from the standpoint of providing guidance, direction, and instruction to shift personnel.

The supervisor in charge on-shift reports directly to the manager in charge on-shift.

13.1.2.1.2.6 Reactor Operator

The ROs are licensed reactor operators and report to the supervisor in charge on-shift. They are responsible for routine plant operations and performance of major evolutions at the direction of the supervisor in charge on-shift. The RO duties include:

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- Monitoring control room instrumentation.
- Responding to plant or equipment abnormalities in accordance with approved plant procedures.
- Directing the activities of non-licensed operators.
- Documenting operational activities, plant events, and plant data in shift logs.
- Initiating plant shutdowns or scrams or other compensatory actions when observation of plant conditions indicates a nuclear safety hazard exists or when approved procedures so direct.

Whenever there is fuel in the reactor vessel, at least one reactor operator is in the control room monitoring the status of the unit at the main control panel. The RO assigned to the main control panel is designated the “operator at the controls” and conducts monitoring and operating activities in accordance with the guidance set forth in Regulatory Guide 1.114, which is further described in [Subsection 13.1.2.1.3](#), Conduct of Operations.

13.1.2.1.2.7 Non-Licensed Operator

The non-licensed operators perform routine duties outside the control room as necessary for continuous, safe plant operation including:

- Assisting in plant startup, shutdown, surveillance, and emergency response by manually or remotely changing equipment operating conditions, placing equipment in service, or securing equipment from service at the direction of the reactor operator.
- Performing assigned tasks in procedures and checklists such as valve manipulations for plant startup or data sheets on routine equipment checks, and making accurate entries according to the applicable procedure, data sheet, or checklist.
- Assisting in training of new employees and for improvement and upgrading of their own performance by participating in the applicable sections of the training program.

Non-licensed operators include auxiliary operators as shown in [Figure 13.1-202](#).

13.1.2.1.2.8 Shift Technical Advisor

The station is committed to meeting NUREG-0737 TMI Action Plan item I.A.1.1 for shift technical advisors. The shift technical advisor (STA) reports directly to the manager in charge on-shift and provides advanced technical assistance to the operating shift complement during normal and abnormal operating conditions. The STA’s responsibilities are detailed in plant administrative procedures as



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required by TMI Action Plan I.A.1.1 and NUREG-0737 Appendix C. These responsibilities include:

- Activities to monitor core power distribution and critical parameters.
- Activities to assist the operating shift with technical expertise during normal and emergency conditions.
- Evaluation of technical specifications, special reports, and procedural issues.

The STA is to primarily contribute to maximizing safety of operations by independently observing plant status and advising shift supervision of conditions that could compromise plant safety. During transients or accident situations, the STA independently assesses plant conditions and provides technical assistance and advice to mitigate the incident and minimize the effect on personnel, the environment, and plant equipment.

A senior reactor operator on shift who meets the qualifications for the combined SRO/STA position specified for Option 1 of Generic Letter 86-04 ([Reference 202](#)) may also serve as the STA. If this option is used for a shift, then the separate STA position may be eliminated for that shift.

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13.1.2.1.2.9      Engineer – Fire Protection

LNP COL 9.5-1

The engineer in charge of fire protection and the fire protection program staff are responsible for the following:

- Fire protection program requirements, including consideration of potential hazards associated with postulated fires, knowledge of building layout, and system design.
- Post-fire shutdown capability.
- Design, maintenance, surveillance, and quality assurance of fire protection features (e.g., detection systems, suppression systems, barriers, dampers, doors, penetration seals, and fire brigade equipment).
- Fire prevention activities (administrative controls and training).
- Fire brigade organization and oversight of fire brigade training.
- Pre-fire planning including review and updating of pre-fire plans at least every two years.

The engineer in charge of fire protection reports through engineering department management to the site executive in charge of plant management who has ultimate responsibility for fire protection of the plant. Additionally, the engineer in charge of fire protection works with the manager in charge of operations to

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coordinate activities and program requirements with the operations department. In accordance with Regulatory Guide 1.189 the engineer in charge of fire protection is a graduate of an engineering curriculum of accepted standing and has completed not less than six years of engineering experience, three of which were in a responsible position in charge of fire protection engineering work. The engineer in charge of fire protection is trained and experienced in nuclear plant safety or has available personnel who are trained and experienced in nuclear plant safety.

LNP COL 13.1-1

13.1.2.1.2.10 Radwaste Operations Lead

The Radwaste Operations Lead is responsible for development, implementation, direction, and coordination of radwaste activities. The Radwaste Operations Lead reports to the operations manager in charge on-shift.

The Radwaste Operations Lead supervises radwaste operators assigned to the radwaste area.

13.1.2.1.3 Conduct of Operations

Station operations are controlled and/or coordinated through the control room. Maintenance activities, surveillances, and removal from/return to service of structures, systems, and components affecting the operation of the plant may not commence without the approval of senior control room personnel. The rules of practice for control room activities, as described by administrative procedures, which are based on Regulatory Guide 1.114, address the following:

- Position/placement of operator at the controls workstation and the expected area of the control room where the majority of the supervisor/manager in charge on-shift's time should be spent.
- Definition and outline of "surveillance area" and requirement for continuous surveillance by the operator at the controls.
- Relief requirements for operator at the controls and the supervisor/manager in charge on-shift.

In accordance with 10 CFR 50.54:

- Reactivity controls may be manipulated only by licensed reactor operators and senior reactor operators except as allowed for training under 10 CFR Part 55.
- Apparatus and mechanisms other than controls which may affect reactivity or power level of the reactor shall be operated only with the consent of the operator at the controls or the manager/supervisor in charge on-shift.

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- During operation of the facility in modes other than cold shutdown or refueling, a senior operator shall be in the control room and a licensed reactor operator or senior reactor operator shall be present at the controls.

13.1.2.1.4 Operating Shift Crews

Plant administrative procedures implement the required shift staffing. These procedures establish crews with sufficient qualified plant personnel to staff the operational shifts and be readily available in the event of an abnormal or emergency situation. The objective is to operate the plant with the required staff and to develop work schedules that minimize overtime for plant staff members who perform safety-related functions. Work hour limitations and shift staffing requirements defined by TMI Action Plan I.A.1.3 are retained in station procedures. When overtime is necessary the provisions in the technical specifications and the plant administrative procedures apply. Shift crew staffing plans may be modified during refueling outages to accommodate safe and efficient completion of outage work in accordance with the proceduralized work hour limitations.

The minimum composition of the operating shift crew is contingent upon the unit operating status. Position titles, license requirements and minimum-shift manning for various modes of operation are contained in Technical Specifications, administrative procedures, and [Table 13.1-202](#), and illustrated in [Figure 13.1-202](#).

13.1.2.1.5 Fire Brigade

The station is designed and the fire brigade organized to be self-sufficient with respect to fire fighting activities. The fire brigade is organized to deal with fires and related emergencies that could occur. It consists of a fire brigade leader and a sufficient number of team members to be consistent with the equipment that must be put in service during a fire emergency. A sufficient number of trained and physically qualified fire brigade members are available on-site during each shift. The fire brigade consists of at least five members on each shift. Members of the fire brigade are knowledgeable of building layout and system design. The assigned fire brigade members for any shift does not include the manager in charge on-shift nor any other members of the minimum shift operating crew necessary for safe shutdown of the unit. Nor does it include any other personnel required for other essential functions during a fire emergency. Fire brigade members for a shift are designated in accordance with established procedures at the beginning of the shift.

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13.1.3 QUALIFICATIONS OF NUCLEAR PLANT PERSONNEL

13.1.3.1 Qualification Requirements

LNP COL 18.6-1  
LNP COL 13.1-1

Qualifications of managers, supervisors, operators, and technicians of the operating organization meet the qualification requirements in education and experience for those described in ANSI/ANS-3.1-1993 (**Reference 201**), as endorsed and amended by Regulatory Guide 1.8. For positions that do not have a cross-reference section in ANSI/ANS-3.1 the most comparable section of ANSI/ANS-3.1 is used for guidance in establishing experience and education requirements.

13.1.3.2 Qualification of Plant Personnel

Resumes and/or other documentation of qualification and experience of initial appointees to appropriate management and supervisory positions are available for review by regulators upon request after position vacancies are filled.

STD DEP 1.1-1

13.1.4 COMBINED LICENSE INFORMATION ITEM

LNP COL 13.1-1

This COL item is addressed in **Subsections 13.1, 13.1.1.2.11, 13.1.2, 13.1.2.1.3, 13.1.4, and Appendix 13AA.**

Add the following information after renumbered DCD **Subsection 13.1.4:**

13.1.5 REFERENCES

201. American Nuclear Society, "American National Standard for Selection, Qualification, and Training of Personnel for Nuclear Power Plant," ANSI/ANS -3.1-1993.
202. U.S. Nuclear Regulatory Commission, "Generic Letter 86-04, Policy Letter, Engineering Expertise on Shift."
203. American Nuclear Society, "American National Standard for Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," N18.7-1976/ANS-3.2.

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LNP COL 18.6-1  
LNP COL 13.1-1

**Table 13.1-201 (Sheet 1 of 6)  
Generic Position/Site-Specific Position Cross Reference**

| Nuclear Function     | Function Position -<br>ANSI/ANS-3.1-1993<br>section reference |       | Nuclear Plant Position<br>(Site-Specific)              | Expected<br>Positions<br>1st unit | Expected<br>additional<br>positions<br>2nd unit |
|----------------------|---|-------|--|-----------------------------------|---|
| Executive management | chief executive officer                                       | n/a   | President and Chief Executive Officer, Duke Energy     | 1                                 | -   |
|                      |   | n/a   | President, Duke Energy Nuclear                         | 1                                 | -   |
|                      | chief nuclear officer   | n/a   | Group Executive, Chief Nuclear Officer                 | 1                                 | -   |
|                      | executive, nuclear operations                                 | n/a   | Executive, Nuclear Operations                          | 1                                 | -   |
|                      | executive, nuclear generation and development                 | n/a   | Executive, Nuclear Development                         | 1                                 | 0   |
| Nuclear support      | executive, nuclear support                                    | n/a   | Executive, Corporate Governance and Operations Support | 1                                 | -   |
|                      |   | n/a   | Executive, Corporate Organizational Effectiveness      | 1                                 | -   |
|                      | manager   | 4.2.4 | Manager, Nuclear Plant Support                         | 1                                 | -   |
| Plant management     | executive   | n/a   | Site Executive, Plant Management                       | 1                                 | -   |
|                      | plant manager   | 4.2.1 | Nuclear Station Plant Manager                          | 1                                 | -   |
| Engineering          | executive   | n/a   | Executive, Nuclear Engineering                         | 1                                 | -   |
|                      | executive   | n/a   | Executive, Major Projects                              | 1                                 | -   |
|                      | manager   | 4.2.4 | Functional Manager, Engineering                        | 1                                 | -   |
|                      | manager   | 4.2.4 | Manager, Nuclear Support Services                      | 1                                 | -   |

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LNP COL 18.6-1  
LNP COL 13.1-1

**Table 13.1-201 (Sheet 2 of 6)  
Generic Position/Site-Specific Position Cross Reference**

| Nuclear Function                | Function Position -<br>ANSI/ANS-3.1-1993<br>section reference | Nuclear Plant Position<br>(Site-Specific)        | Expected<br>Positions<br>1st unit | Expected<br>additional<br>positions<br>2nd unit |
|---------------------------------|---|--|-----------------------------------|---|
| system engineering              | functional manager  | 4.3.9 Functional Manager, Plant Engineering      | 1                                 | -   |
|                                 | system engineer   | 4.6.1 System Engineer                            | 16                                | 4   |
| design engineering              | functional manager  | 4.3.9 Functional Manager, Design Engineering     | 1                                 | -   |
|                                 | design engineer   | 4.6 - staff engineer Design Engineer             | 23                                | 7   |
| safety and engineering analysis | functional manager  | 4.3.9 Manager, Safety and Engineering Analysis   | 1                                 | -   |
|                                 | programs engineer   | 4.6 - staff engineer Analysis Engineer           | 4                                 | -   |
| engineering programs            | functional manager  | 4.3.9 Functional Manager, Engineering Programs   | 1                                 | -   |
|                                 | programs engineer   | 4.6 - staff engineer Programs Engineer           | 20                                | 5   |
| reactor engineering             | functional manager  | 4.3.9 Functional Supervisor, Reactor Engineering | 1                                 | -   |
|                                 | reactor engineer  | 4.6 - staff engineer Reactor Engineer            | 3                                 | 1   |
| Maintenance                     | manager   | 4.2.3 Manager, Maintenance                       | 1                                 | -   |

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LNP COL 18.6-1  
LNP COL 13.1-1

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Generic Position/Site-Specific Position Cross Reference**

| Nuclear Function            | Function Position -<br>ANSI/ANS-3.1-1993<br>section reference | Nuclear Plant Position<br>(Site-Specific)             | Expected<br>Positions<br>1st unit | Expected<br>additional<br>positions<br>2nd unit |
|-----------------------------|---|---|-----------------------------------|---|
| instrumentation and control | functional manager  | 4.3.4 Functional Manager, Instrumentation and Control | 1                                 | -   |
|                             | supervisor  | 4.4.7 Supervisor, Instrumentation and Control         | 7                                 | -   |
|                             | technician  | 4.5.3.3 Instrumentation and Control Technician        | 30                                | 17  |
| Mechanical                  | functional manager  | 4.3.6 Manager, Mechanical                             | 1                                 | -   |
|                             | supervisor  | 4.4.9 Supervisor, Mechanical                          | 9                                 | -   |
|                             | technician  | 4.5.7.2 Mechanic                                      | 30                                | 14  |
| electrical                  | functional manager  | 4.3.5 Manager, Electrical                             | 1                                 | -   |
|                             | supervisor  | 4.4.8 Supervisor, Electrical                          | 6                                 | 4   |
|                             | technician  | 4.5.7.1 Electrician                                   | 18                                | 3   |
| support                     | functional manager  | 4.3 Manager, Maintenance Support                      | 1                                 | -   |
|                             | manager   | 4.2.2 Manager, Operations                             | 1                                 | -   |
| operations, plant           | functional manager  | 4.3.8 Assistant Operations Manager                    | 1                                 | -   |
| operations, admin           | functional manager  | 4.3.8 Assistant Operations Manager Support            | 1                                 | -   |
| operations, radwaste        | supervisor  | 4.4 Lead - Radwaste Operations                        | 1                                 | 1   |

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LNP COL 18.6-1  
LNP COL 13.1-1

**Table 13.1-201 (Sheet 4 of 6)  
Generic Position/Site-Specific Position Cross Reference**

| Nuclear Function         | Function Position -<br>ANSI/ANS-3.1-1993<br>section reference | Nuclear Plant Position<br>(Site-Specific) | Expected<br>Positions<br>1st unit                | Expected<br>additional<br>positions<br>2nd unit |    |
|--------------------------|---|---|--|---|----|
| operations, (on-shift)   | functional manager  | 4.4.1                                     | Shift Manager                                    | 5   | 5  |
|                          | supervisor  | 4.4.2                                     | Shift Supervisor                                 | 5   | 5  |
|                          | licensed operator   | 4.5.1                                     | Control Room Operator                            | 10  | 10 |
|                          | non-licensed operator   | 4.5.2                                     | Plant Equipment Operator                         | 30  | 30 |
|                          | shift technical advisor                                       | 4.6.2                                     | Shift Technical Advisor                          | 5   | 5  |
| Fire protection          | supervisor  | 4.4                                       | Engineer, Fire Protection Program                | 1   | -  |
| Radiation protection     | functional manager  | 4.3.3                                     | Functional Manager, Radiation Protection         | 1   | -  |
|                          | supervisor  | 4.4.6                                     | Radiation Protection Functional Supervisor       | 3   | -  |
| Chemistry                | technician  | 4.5.3.2                                   | Radiation Protection Technician                  | 20  | 10 |
|                          | ALARA specialist  | n/a                                       | ALARA Specialist                                 | 2   | -  |
|                          | functional manager  | 4.3.2                                     | Functional Manager, Chemistry and Environmental  | 1   | -  |
|                          | supervisor  | 4.4.5                                     | Chemistry Functional Supervisor                  | 3   | -  |
|                          | technician  | 4.5.3.1                                   | Chemistry Technician                             | 14  | 12 |
| Nuclear safety assurance | radwaste operator   | 4.5.2                                     | Radwaste Operator                                | 5   | 4  |
|                          | manager   | 4.2                                       | Functional Manager, Organizational Effectiveness | 1   | -  |



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LNP COL 18.6-1  
LNP COL 13.1-1

**Table 13.1-201 (Sheet 5 of 6)  
Generic Position/Site-Specific Position Cross Reference**

| Nuclear Function       | Function Position -<br>ANSI/ANS-3.1-1993<br>section reference |       | Nuclear Plant Position<br>(Site-Specific)                            | Expected<br>Positions<br>1st unit | Expected<br>additional<br>positions<br>2nd unit |
|------------------------|---|-------|--|-----------------------------------|---|
| licensing              | functional manager  | 4.3   | Manager, Plant Licensing and Regulatory Compliance                   | -                                 | -   |
|                        | supervisor  | n/a   | Functional Supervisor, Licensing and Regulatory Programs             | 1                                 | 0   |
|                        | licensing engineer  | n/a   | Licensing Engineer   | 5                                 | -   |
| corrective action      | functional manager  | 4.3   | Functional Supervisor, Corrective Action and Performance Improvement | 1                                 | -   |
|                        | corrective action engineer                                    | n/a   | corrective action engineer   | 2                                 | -   |
| emergency preparedness | functional manager  | 4.3   | Functional Supervisor, Emergency Preparedness                        | 1                                 | -   |
|                        | EP planner  | n/a   | EP Planner   | 2                                 | -   |
| Training               | functional manager  | 4.3.1 | Functional Manager, Training and Development                         | 1                                 | -   |
|                        | supervisor ops trng   | 4.4.4 | Training Supervisor, Operations                                      | 1                                 | -   |
|                        | ops training instructor                                       | n/a   | Ops Training Instructor  | 6                                 | 6   |
|                        | supervisor tech staff/maint trng                              | 4.5.4 | Supervisor Tech Staff/Maint Trng                                     | 1                                 | -   |
|                        | tech staff/maint instructors                                  | 4.4.4 | Tech Staff/Maint Instructor  | 8                                 | -   |

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LNP COL 18.6-1  
LNP COL 13.1-1

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Generic Position/Site-Specific Position Cross Reference**

| Nuclear Function          | Function Position -<br>ANSI/ANS-3.1-1993<br>section reference |        | Nuclear Plant Position<br>(Site-Specific)    | Expected<br>Positions<br>1st unit | Expected<br>additional<br>positions<br>2nd unit |
|---------------------------|---|--------|--|-----------------------------------|---|
| Purchasing, and contracts | functional manager  | 4.3    | Functional Manager, Purchasing and Contracts | 1                                 | -   |
| Security                  | functional manager  | 4.3    | Functional Manager, Security                 | 1                                 | -   |
| Planning and scheduling   | functional manager  | 4.3    | Functional Manager, Planning and Scheduling  | 1                                 | -   |
| Quality assurance         | functional manager  | 4.3    | Functional Manager, Outages                  | 1                                 | -   |
|                           | functional manager  | 4.3.7  | Functional Manager, Nuclear Oversight        | 1                                 | -   |
|                           | supervisor  | 4.4.13 | Quality Assurance Supervisor                 | 1                                 | -   |
|                           | QA auditor  | 4.5.6  | QA Auditor                                   | 6                                 | -   |
|                           | supervisor  | 4.4.13 | Quality Control Supervisor                   | 1                                 | -   |
| Startup testing           | QC inspector  | 4.5.5  | QC Inspector                                 | 4                                 | 2   |
|                           | supervisor  | 4.4.11 | Startup Testing Supervisor                   | 1                                 | -   |
|                           | startup test engineer   | 4.4.1  | Startup Test Engineer                        | 6                                 | -   |
|                           | supervisor  | 4.4.12 | Preop Testing Supervisor                     | 1                                 | -   |
|                           | preop test engineer   | 4.4.1  | Preop Test Engineer                          | 20                                | -   |

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LNP COL 13.1-1  
LNP COL 18.6-1

**Table 13.1-202  
Minimum On-Duty Operations Shift Organization for Two-Unit Plant**

| Units Operating   | Two units<br>Two Control Rooms                                    |
|---|---|
| All Units Shutdown  | 1 SM (SRO)<br>2 RO<br>3 NLO                                       |
| One Unit Operating <sup>(a)</sup>                               | 1 SM (SRO)<br>2 SRO<br>3 RO<br>4 NLO                              |
| Two Units Operating <sup>(a)</sup>                              | 1 SM (SRO)<br>2 SRO<br>4 RO<br>4 NLO                              |
| SM – Shift Manager<br>SRO – Licensed Senior Reactor<br>Operator | RO – Licensed Reactor Operator<br><br>NLO – Non-Licensed Operator |

a) Operating modes other than cold shutdown or refueling.

Notes:

- (1) In addition, one Shift Technical Advisor (STA) is assigned per shift during plant operation. A shift manager or another SRO on shift, who meets the qualifications for the combined Senior Reactor Operator/Shift Technical Advisor position, as specified for option 1 of Generic Letter 86-04, (Reference 202) the commission’s policy statement on engineering expertise on shift, may also serve as the STA. If this option is used for a shift, then the separate STA position may be eliminated for that shift.
- (2) In addition to the minimum shift organization above, during refueling a licensed Senior Reactor Operator or Senior Reactor Operator limited (fuel handling only) is required to directly supervise any core alteration activity.
- (3) A shift manager/supervisor (SRO licensed for each unit that is fueled), shall be on-site at all times when at least one unit is loaded with fuel.
- (4) A radiation protection technician shall be on-site at all times when there is fuel in a reactor.
- (5) A chemistry technician shall be on-site during plant operation in modes other than cold shutdown or refueling.
- (6) To operate, or supervise the operation of more than one unit, an operator (SRO or RO) must hold an appropriate, current license for each unit.

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13.2 TRAINING

This **section** of the referenced DCD is incorporated by reference with the following departures and/or supplements.

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STD COL 13.2-1 This section incorporates by reference NEI 06-13A, Template for an Industry Training Program Description. See **Table 1.6-201**.

**Table 13.4-201** provides milestones for training implementation.

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STD COL 18.10-1 Operators involved in the Human Factors Engineering Verification and Validation (V&V) Program receive additional training specific to the task of performing V&V. A systematic approach to training is incorporated in developing this training program along with input from WCAP-14655, Designer's Input to the Training of the Human Factors Engineering Verification and Validation Personnel (**Reference 201**).

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13.2.1 COMBINED LICENSE INFORMATION ITEM

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STD COL 13.2-1 This COL Item is addressed in **Section 13.2**.

---

Add the following subsection after DCD **Subsection 13.2.1**:

13.2.2 REFERENCES

201. Westinghouse, "Designer's Input to the Training of the Human Factors Engineering Verification and Validation Personnel," WCAP-14655, Revision 1, August 1996.

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13.3 EMERGENCY PLANNING

This **section** of the referenced DCD is incorporated by reference with the following departures and /or supplements.

---

STD COL 13.3-1 The emergency planning information is submitted to the Nuclear Regulatory Commission as a separate licensing document and is incorporated by reference. (see **Table 1.6-201**).

Post-72 hour support actions, as discussed in DCD **Subsections 1.9.5.4 and 6.3.4**, are addressed in DCD **Subsections 6.2.2, 8.3, and 9.1.3**. Provisions for establishing post-72 hour ventilation for the main control room, instrumentation and control rooms, and dc equipment rooms are established in operating procedures.

---

STD COL 13.3-2 The emergency plan describes the plans for coping with emergency situations, including communications interfaces and staffing of the emergency operations facility.

---

STD SUP 13.3-1 **Table 13.4-201** provides milestones for emergency planning implementation.

---

13.3.1 COMBINED LICENSE INFORMATION ITEM

---

STD COL 13.3-1 This COL Item is addressed in **Section 13.3**.

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STD COL 13.3-2 This COL Item is addressed in **Section 13.3** and in the Emergency Plan.

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13.4 OPERATIONAL PROGRAMS

This **section** of the referenced DCD is incorporated by reference with the following departures and /or supplements.

---

STD COL 13.4-1

Operational programs are specific programs that are required by regulations. **Table 13.4-201** lists each operational program, the regulatory source for the program, the section of the FSAR in which the operational program is described, and the associated implementation milestone(s).

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13.4.1 COMBINED LICENSE INFORMATION ITEM

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STD COL 13.4-1

This COL Item is addressed in **Section 13.4**.

---

Add the following subsection after DCD **Subsection 13.4.1**:

13.4.2 REFERENCES

201. ASME Boiler and Pressure Vessel Code (B&PVC), "Section XI - Rules for Inservice Inspection of Nuclear Power Plant Components."
  202. ASME "OM Code for the Operation and Maintenance of Nuclear Power Plants."
-

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STD COL 13.4-1

**Table 13.4-201 (Sheet 1 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title                                | Program Source<br>(Required by)                                 | FSAR<br>Section           | Implementation<br>Milestone                           | Implementation<br>Requirement                            |
|------|--|---|---------------------------|---|--|
| 1.   | Inservice Inspection Program                 | 10 CFR 50.55a(g)  | 5.2.4,<br>5.4.2.5,<br>6.6 | Prior to Commercial service                           | 10 CFR 50.55a(g), ASME XI IWA-2430(b)<br>(Reference 201) |
| 2.   | Inservice Testing Program                    | 10 CFR 50.55a(f);<br>10 CFR Part 50,<br>Appendix A              | 3.9.6,<br>5.2.4           | After generator online on nuclear heat <sup>(a)</sup> | 10 CFR 50.55a(f), ASME OM Code<br>(Reference 202)        |
| 3.   | Environmental Qualification Program          | 10 CFR 50.49(a)   | 3.11                      | Prior to initial fuel load                            | License Condition  |
| 4.   | Preservice Inspection Program                | 10 CFR 50.55a(g)  | 5.2.4,<br>5.4.2.5,<br>6.6 | Completion prior to initial plant start-up            | 10 CFR 50.55a(g); ASME XI IWB-2200(a)<br>(Reference 201) |
| 5.   | Reactor Vessel Material Surveillance Program | 10 CFR 50.60;<br>10 CFR 50.61;<br>10 CFR Part 50,<br>Appendix H | 5.3.2.6                   | Prior to initial criticality                          | License Condition  |

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STD COL 13.4-1

**Table 13.4-201 (Sheet 2 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title                                 | Program Source<br>(Required by)   | FSAR<br>Section | Implementation<br>Milestone  | Implementation<br>Requirement                         |
|------|---|---|-----------------|--|---|
| 6.   | Preservice Testing Program                    | 10 CFR 50.55a(f)  | 3.9.6           | Prior to initial fuel load   | License Condition                                     |
| 7.   | Containment Leakage Rate Testing Program      | 10 CFR 50.54(o);<br>10 CFR 50,<br>Appendix A<br>(GDC 52);<br>10 CFR 50,<br>Appendix J | 6.2.5.1         | Prior to initial fuel load   | License Condition                                     |
| 8.   | Fire Protection Program                       | 10 CFR 50.48  | 9.5.1.8         | Prior to receipt of fuel onsite<br>Prior to initial fuel load  | License Condition                                     |
|      | (portions applicable to radioactive material) | 10 CFR 30.32<br>10 CFR 40.31<br>10 CFR 70.22  |                 | Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18) | 10 CFR 30.32(a)<br>10 CFR 40.31(a)<br>10 CFR 70.22(a) |



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STD COL 13.4-1

**Table 13.4-201 (Sheet 3 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title  | Program Source<br>(Required by)   | FSAR<br>Section | Implementation<br>Milestone | Requirement       |
|------|--|---|-----------------|-----------------------------|-------------------|
| 9.   | Process and Effluent Monitoring and Sampling Program:                                  |   |                 |                             |                   |
|      | Radiological Effluent Technical Specifications/Standard Radiological Effluent Controls | 10 CFR 20.1301 and 20.1302;<br>10 CFR 50.34a;<br>10 CFR 50.36a;<br>10 CFR 50,<br>Appendix I,<br>Section II and IV | 11.5            | Prior to initial fuel load  | License Condition |
|      | Offsite Dose Calculation Manual  | Same as above   | 11.5            | Prior to initial fuel load  | License Condition |
|      | Radiological Environmental Monitoring Program  | Same as above   | 11.5            | Prior to initial fuel load  | License Condition |
|      | Process Control Program  | Same as above   | 11.4            | Prior to initial fuel load  | License Condition |

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**Table 13.4-201 (Sheet 4 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title   | Program Source<br>(Required by)  | FSAR<br>Section | Implementation<br>Milestone  | Requirement          |
|------|---|----------------------------------|-----------------|--|----------------------|
| 10.  | Radiation Protection Program<br>(including ALARA principle)   | 10 CFR 20.1101<br>10 CFR 20.1406 | 12.1<br>12.5    |  | License<br>Condition |
|      | <ul style="list-style-type: none"> <li>• Radioactive Source Control (assignment of RP Supervisor)</li> <li>• Assignment of RP Supervisor</li> <li>• Minimization of Contamination</li> </ul>                                |                                  |                 | 1. Prior to initial receipt of by-product, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18) |                      |
|      | <ul style="list-style-type: none"> <li>• Personnel Dosimetry</li> <li>• Radiation Monitoring and Surveys</li> <li>• Radiation Work Permits</li> </ul>   |                                  |                 | 2. Prior to receipt of fuel onsite   |                      |
|      | <ul style="list-style-type: none"> <li>• Assignment of RP Manager</li> <li>• Respiratory Protection</li> <li>• Bioassay</li> <li>• Effluents and Environmental Monitoring and Assessment</li> <li>• Job Coverage</li> </ul> |                                  |                 | 3. Prior to initial fuel load  |                      |
|      | <ul style="list-style-type: none"> <li>• Radioactive Waste Shipping</li> </ul>  |                                  |                 | 4. Prior to first shipment of radioactive waste  |                      |

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**Table 13.4-201 (Sheet 5 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title                                 | Program Source<br>(Required by)  | FSAR<br>Section | Implementation<br>Milestone  | Requirement   |
|------|---|--|-----------------|--|---|
| 11.  | Non Licensed Plant Staff Training Program     | 10 CFR 50.120  | 13.2            | 18 months prior to scheduled date of initial fuel load   | 10 CFR 50.120(b)                                      |
|      | (portions applicable to radioactive material) | 10 CFR 30.32<br>10 CFR 40.31<br>10 CFR 70.22                                     |                 | Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18) | 10 CFR 30.32(a)<br>10 CFR 40.31(a)<br>10 CFR 70.22(a) |
| 12.  | Reactor Operator Training Program             | 10 CFR 55.13;<br>10 CFR 55.31;<br>10 CFR 55.41;<br>10 CFR 55.43;<br>10 CFR 55.45 | 13.2            | 18 months prior to scheduled date of initial fuel load   | License Condition                                     |
| 13.  | Reactor Operator Requalification Program      | 10 CFR 50.34(b);<br>10 CFR 50.54(i);<br>10 CFR 55.59                             | 13.2            | Within 3 months after the date the Commission makes the finding under 10 CFR 52.103(g)   | 10 CFR 50.54 (i-1)                                    |

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**Table 13.4-201 (Sheet 6 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title      | Program Source<br>(Required by)           | FSAR<br>Section | Implementation<br>Milestone  | Requirement   |
|------|--------------------|---|-----------------|--|---|
| 14.  | Emergency Planning | 10 CFR 50.47;<br>10 CFR 50,<br>Appendix E | 13.3            | Full participation<br>exercise conducted<br>within 2 years of<br>scheduled date for initial<br>loading of fuel.  | 10 CFR Part 50,<br>Appendix E,<br>Section<br>IV.F.2.a(ii) |
|      |                    |   |                 | Onsite exercise<br>conducted within 1 year<br>before the schedule<br>date for initial loading of<br>fuel   | 10 CFR Part 50,<br>Appendix E,<br>Section<br>IV.F.2.a(ii) |
|      |                    |   |                 | Applicant's detailed<br>implementing<br>procedures for its<br>emergency plan<br>submitted at least 180<br>days prior to scheduled<br>date for initial loading of<br>fuel | 10 CFR Part 50,<br>Appendix E,<br>Section V               |

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**Table 13.4-201 (Sheet 7 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title   | Program Source<br>(Required by)   | FSAR<br>Section     | Implementation<br>Milestone                             | Requirement                     |
|------|---|---|---------------------|---|---------------------------------|
| 15.  | Security Program:   |   |                     |   |                                 |
|      | Physical Protection Program<br>(applicable to protection of<br>special nuclear material prior<br>to the protected area being<br>declared operational) | 10 CFR 73.1,<br>10 CFR 73.67  | 13.5.2.2.8,<br>13.6 | Prior to initial receipt of<br>special nuclear material | 10 CFR 73.1(a),<br>10 CFR 73.67 |
|      | Physical Security Program   | 10 CFR 73.55(b);<br>10 CFR<br>73.55(c)(3);<br>10 CFR 73.56;<br>10 CFR 73.57;      | 13.6                | Prior to receipt of fuel<br>onsite (protected area)     | 10 CFR<br>73.55(a)(4)           |
|      | Safeguards Contingency<br>Program   | 10 CFR<br>73.55(c)(5);<br>10 CFR 73.55(k);<br>10 CFR Part 73,<br>Appendix C       | 13.6                | Prior to receipt of fuel<br>onsite (protected area)     | 10 CFR<br>73.55(a)(4)           |
|      | Training and Qualification<br>Program   | 10 CFR<br>73.55(c)(4);<br>10 CFR<br>73.55(d)(3);<br>10 CFR Part 73,<br>Appendix B | 13.6                | Prior to receipt of fuel<br>onsite (protected area)     | 10 CFR<br>73.55(a)(4)           |

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Operational Programs Required by NRC Regulations**

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|                | Item | Program Title                            | Program Source<br>(Required by)  | FSAR<br>Section | Implementation  |                       |
|----------------|------|--|--|-----------------|---|-----------------------|
|                |      |  |  |                 | Milestone   | Requirement           |
| LNP COL 13.4-1 | 16.  | Quality Assurance Program –<br>Operation | 10 CFR 50.54(a);<br>10 CFR Part 50,<br>Appendix A<br>(GDC 1);<br>10 CFR Part 50,<br>Appendix B | 17.5            | 30 days after COL<br>issuance                               | 10 CFR<br>50.54(a)(1) |
| STD COL 13.4-1 | 17.  | Maintenance Rule                         | 10 CFR 50.65   | 17.6            | Prior to fuel load<br>authorization per 10<br>CFR 52.103(g) | 10 CFR<br>50.65(a)(1) |
|                | 18.  | Motor-Operated Valve Testing             | 10 CFR<br>50.55a(b)(3)(ii)   | 3.9.6.2.2       | Prior to initial fuel load                                  | License Condition     |

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**Table 13.4-201 (Sheet 9 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title   | Program Source<br>(Required by)         | FSAR<br>Section | Implementation<br>Milestone  | Requirement                                    |
|------|---|---|-----------------|--|--|
| 19.  | Initial Test Program  | 10 CFR 50.34;<br>10 CFR<br>52.79(a)(28) | 14.2            | Prior to the first<br>construction test being<br>conducted for the<br>Construction Test<br>Program<br><br>Prior to the first<br>preoperational test for<br>the Preoperational Test<br>Program<br><br>Prior to initial fuel load<br>for the Startup Test<br>Program | License<br>Condition                           |
| 20.  | Fitness for Duty (FFD)<br>Program for Construction<br>(workers and first-line<br>supervisors) | 10 CFR 26.4(f)                          | 13.7            | Prior to initiating 10<br>CFR Part 26<br>construction activities   | 10 CFR Part 26,<br>Subpart K                   |
|      | FFD Program for Construction<br>(management and oversight<br>personnel)                       | 10 CFR 26.4(e)                          | 13.7            | Prior to initiating 10<br>CFR Part 26<br>construction activities   | 10 CFR Part 26,<br>Subparts A - H,<br>N, and O |

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**Table 13.4-201 (Sheet 10 of 11)  
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| Item | Program Title                         | Program Source<br>(Required by) | FSAR<br>Section | Implementation<br>Milestone  | Implementation<br>Requirement   |
|------|---------------------------------------|---------------------------------|-----------------|--|---|
|      | FFD Program for Security Personnel    | 10 CFR 26.4(e)(1)               | 13.7            | Prior to initiating 10 CFR Part 26 construction activities   | 10 CFR Part 26, Subparts A - H, N, and O                                    |
|      |                                       | 10 CFR 26.4(a)(5) or 26.4(e)(1) |                 | Prior to the earlier of:<br>A. Licensee's receipt of SNM in the form of fuel assemblies, or<br>B. Establishment of a protected area, or<br>C. The 10 CFR 52.103(g) finding | 10 CFR Part 26, Subparts A - I, N, and O                                    |
|      | FFD Program for FFD Program personnel | 10 CFR 26.4(g)                  | 13.7            | Prior to initiating 10 CFR Part 26 construction activities   | 10 CFR Part 26, Subparts A, B, D - H, N, O, and C per licensee's discretion |



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**Table 13.4-201 (Sheet 11 of 11)  
Operational Programs Required by NRC Regulations**

| Item | Program Title  | Program Source<br>(Required by)                               | FSAR<br>Section | Implementation<br>Milestone  | Requirement  |
|------|--|---|-----------------|--|--|
|      | FFD Program for persons required to physically report to the Technical Support Center (TSC) or Emergency Operations Facility (EOF) | 10 CFR 26.4(c)  | 13.7            | Prior to the conduct of the first full-participation emergency preparedness exercise under 10 CFR Part 50, App. E, Section F.2.a | 10 CFR Part 26, Subparts A - I, N, and O, except for §§ 26.205 - 209   |
|      | FFD Program for Operation  | 10 CFR 26.4(a) and (b)  | 13.7            | Prior to the earlier of:<br><br>A. Establishment of a protected area, or<br><br>B. The 10 CFR 52.103(g) finding                  | 10 CFR Part 26, Subparts A - I, N, and O, except for individuals listed in § 26.4(b), who are not subject to §§ 26.205 - 209 |
| 21.  | Cyber Security Program   | 10 CFR 73.54(b);<br>10 CFR 73.55(b)(8);<br>10 CFR 73.55(c)(6) | 13.6            | Prior to receipt of fuel onsite (protected area)   | 10 CFR 73.55(a)(4)   |
| 22.  | SNM Material Control and Accounting Program  | 10 CFR 74, Subpart B (§§ 74.11 – 74.19, excl. § 74.17)        | 13.5.2.2.9      | Prior to receipt of special nuclear material   | License Condition  |

a) Inservice Testing Program will be fully implemented by generator on line on nuclear heat. Appropriate portions of the program are implemented as necessary to support the system operability requirements of the technical specifications.

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13.5 PLANT PROCEDURES

This **section** of the referenced DCD is incorporated by reference with the following departures and/or supplements.

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STD DEP 1.1-1 DCD **Subsection 13.5.1**, Combined License Information, is renumbered in this FSAR section to 13.5.3.

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STD COL 13.5-1 This section of the FSAR describes the administrative and other procedures which are not described in the DCD that the operating organization (plant staff) uses to conduct the routine operating, abnormal, and emergency activities in a safe manner.

The Quality Assurance Program Description (QAPD), as discussed in **Section 17.5**, describes procedural document control, record retention, adherence, assignment of responsibilities, and changes.

Procedures are identified in this section by topic, type, or classification in lieu of the specific title and represent general areas of procedural coverage.

Procedures are issued prior to fuel load to allow sufficient time for plant staff familiarization and to develop operator licensing examinations.

The format and content of procedures are controlled by the applicable AP1000 Writer's Guideline.

Each procedure is sufficiently detailed for an individual to perform the required function without direct supervision, but does not provide a complete description of the system or plant process. The level of detail contained in the procedure is commensurate with the qualifications of the individual normally performing the function.

Procedures are developed consistent with guidance described in DCD **Section 18.9**, "Procedure Development" and with input from the human factors engineering process and evaluations.

13.5.1 ADMINISTRATIVE PROCEDURES

This section describes administrative procedures that provide administrative control over activities that are important to safety for the operation of the facility.

Procedures outline the essential elements of the administrative programs and controls as described in ANSI/ANS 3.2-1988 (**Reference 201**) and in **Section 17.5**. These procedures are organized such that the program elements are prescribed in documents normally referred to as administrative procedures. Regulatory and industry guidance for the appropriate format, content and typical activities delineated in written procedures is implemented as appropriate.

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Administrative procedures contain adequate programmatic controls to provide effective interface between organizational elements. This includes contractor and owner organizations providing support to the station operating organization.

A Writer's Guideline promotes the standardization and application of human factors engineering principles to procedures. The Writer's Guideline establishes the process for developing procedures that are complete, accurate, consistent, and easy to understand and follow. The Writer's Guideline provides objective criteria so that procedures are consistent in organization, style, and content. The Writer's Guideline includes criteria for procedure content and format including the writing of action steps and the specification of acceptable acronym lists and acceptable terms to be used.

Procedure maintenance and control of procedure updates are performed in accordance with the QAPD, as discussed in [Section 17.5](#).

The administrative programs and associated procedures developed in the pre-COL phase are described in [Table 13.5-201](#) (for future designation as historical information).

The plant administrative procedures provide procedural instructions for the following:

- Procedures review and approval.
- Equipment control procedures - These procedures provide for control of equipment, as necessary, to maintain personnel and reactor safety, and to avoid unauthorized operation of equipment.
- Control of maintenance and modifications.
- Crane Operation Procedures - Crane operators who operate cranes over fuel pools are qualified and conduct themselves in accordance with ANSI B30.2 (Chapter 2-3), "Overhead and Gantry Cranes" ([Reference 202](#)).
- Temporary changes to procedures.
- Temporary procedure issuance and control.
- Special orders of a temporary or self-canceling nature.
- Standing orders to shift personnel including the authority and responsibility of the shift manager, licensed senior reactor operator in the control room, control room operator and shift technical advisor.
- Manipulation of controls and assignment of shift personnel to duty stations per the requirements of 10 CFR 50.54 (i), (j), (k), (l), and (m) including delineation of the space designated for the "At the Controls" area of the control room.

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- Shift relief and turnover procedures.
- Fitness for Duty.
- Control Room access.
- Working hour limitations.
- Feedback of design, construction, and applicable important industry and operating experience.
- Shift Manager administrative duties.
- Verification of correct performance of operational activities.
- A vendor interface program that provides vendor information for safety related components is incorporated into plant documentation.
- Fire protection program implementation.
- A process for implementing the safety/security interface requirements of 10 CFR 73.58.

13.5.2 OPERATING AND MAINTENANCE PROCEDURES

13.5.2.1 Operating and Emergency Operating Procedures

This information is addressed in the DCD.

13.5.2.2 Maintenance and Other Operating Procedures

The QAPD, as described in [Section 17.5](#), provides guidance for procedural adherence. Regulatory and industry guidance for the appropriate format, content, and typical activities delineated in written procedures is implemented as appropriate.

13.5.2.2.1 Plant Radiation Protection Procedures

The plant radiation protection program is contained in procedures. Procedures are developed and implemented for such things as: maintaining personnel exposures, plant contamination levels, and plant effluents ALARA; monitoring both external and internal exposures of workers, considering industry-accepted techniques; routine radiation surveys; environmental monitoring in the vicinity of the plant; radiation monitoring of maintenance and special work activities; evaluation of radiation protection implications of proposed modifications; establishing quality assurance requirements applicable to the radiation protection program; and maintaining radiation exposure records of workers and others.

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13.5.2.2.2 Emergency Preparedness Procedures

A discussion of emergency preparedness procedures can be found in the Emergency Plan.

13.5.2.2.3 Instrument Calibration and Test Procedures

The QAPD, as discussed in [Section 17.5](#), provides a description of procedural requirements for instrumentation calibration and testing.

13.5.2.2.4 Chemistry Procedures

Procedures provided for chemical and radiochemical control activities include the nature and frequency of sampling and analyses; instructions for maintaining fluid quality within prescribed limits; the use of control and diagnostic parameters; and limitations on concentrations of agents that could cause corrosive attack, foul heat transfer surfaces or become sources of radiation hazards due to activation.

Procedures are also provided for the control, treatment, and management of radioactive wastes and control of radioactive calibration sources.

13.5.2.2.5 Radioactive Waste Management Procedures

Procedures for the operation of the radwaste processing systems provide for the control, treatment, and management of on-site radioactive wastes. Procedural controls are in place for radiological releases.

LNP COL 13.5-1

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As required by License Condition, operating procedures that include provisions to assure that  $A_2$  quantities for radionuclides specified in Appendix A to 10 CFR Part 71 are not exceeded will be implemented prior to initial fuel load. Procedural controls limit the radionuclide inventory to less than the  $A_2$  limit in each of the three (3) monitor tanks, and in each of up to three (3) mobile radwaste processing systems. Procedures also ensure that any additional equipment to be potentially located in the Radwaste Building is limited to  $A_2$  quantities. Spent media transfer from a mobile radwaste processing system located in the Radwaste Building is procedurally controlled such that spent media transfer and packaging for off-site shipment must be complete prior to placing the mobile radwaste processing system back into service. The procedures also ensure that the total cumulative source term of unpackaged wastes, including liquid, wet solid, gaseous, activated, and contaminated waste present at any time in the Radwaste Building is limited consistent with RG 1.143, Revision 2, unmitigated radiological release and exposure acceptance criteria. The unmitigated, unshielded worker dose is calculated at 10 feet from the source. Unlimited worker occupancy workstations and low dose rate waiting areas are located no closer than 10 feet from a mobile radwaste processing system or a waste monitor tank. The liquid radwaste system is discussed in [Section 11.2](#).

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STD COL 13.5-1

13.5.2.2.6 Maintenance, Inspection, Surveillance, and Modification Procedures

13.5.2.2.6.1 Maintenance Procedures

Maintenance procedures describe maintenance planning and preparation activities. Maintenance procedures are developed considering the potential impact on the safety of the plant, license limits, availability of equipment required to be operable, and possible safety consequences of concurrent or sequential maintenance, testing or operating activities.

Maintenance procedures contain sufficient detail to permit the maintenance work to be performed correctly and safely. Procedures include provisions for conducting and recording results of required tests and inspections, if not performed and documented under separate test and inspection procedures. References are made to vendor manuals, plant procedures, drawings, and other sources as applicable.

Instructions are included, or referenced, for returning the equipment to its normal operating status. Testing is commensurate with the maintenance that has been performed. Testing may be included in the maintenance procedure or be covered in a separate procedure.

The preventive maintenance program, including preventive and predictive procedures, as appropriate for structures, systems and components, prescribes the frequency and type of maintenance to be performed. An initial program based on service conditions, experience with comparable equipment and vendor recommendations is developed prior to fuel loading. The program is revised and updated as experience is gained with the equipment. To facilitate this, equipment history files are created and kept current. The files are organized to provide complete and easily retrievable equipment history.

13.5.2.2.6.2 Inspection Procedures

The QAPD, as discussed in [Section 17.5](#), provides a description of procedural requirements for inspections.

13.5.2.2.6.3 Modification Procedures

Plant modifications and changes to setpoints are developed in accordance with approved procedures. These procedures control necessary activities associated with the modifications such that they are carried out in a planned, controlled, and orderly manner. For each modification, design documents such as drawings, equipment and material specifications, and appropriate design analyses are developed or the as-built design documents are utilized. Separate reviews are conducted by individuals knowledgeable in both technical and QA requirements to verify the adequacy of the design effort.

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Proposed modification(s) which involve a license amendment or a change to Technical Specifications are processed as proposed license amendment request(s).

Plant procedures impacted by modifications are changed prior to declaring the system operable to reflect revised plant conditions; and cognizant personnel who are responsible for operating and maintaining the modified equipment are adequately trained.

13.5.2.2.7 Material Control Procedures

The QAPD, as discussed in [Section 17.5](#), provides a description of procedural requirements for material control.

13.5.2.2.8 Security Procedures

A discussion of security procedures is provided in the Security Plan.

The Special Nuclear Material (SNM) Physical Protection Program describes the 10 CFR Part 70 required protection program in effect for the period of time during which new fuel as SNM is received and stored in a controlled access area (CAA), in accordance with the requirements of 10 CFR 73.67.

The New Fuel Shipping Plan addresses the applicable 10 CFR 73.67 requirements in the event that unirradiated new fuel assemblies or components are returned to the supplying fuel manufacturer(s) facility.

13.5.2.2.9 Special Nuclear Material (SNM) Material Control and Accounting Procedures

A material control and accounting system consisting of special nuclear material accounting procedures is utilized to delineate the requirements, responsibilities, and methods of special nuclear material control from the time special nuclear material is received until it is shipped from the plant. These procedures provide detailed steps for SNM shipping and receiving, inventory, accounting, and preparing records and reports. The Special Nuclear Material (SNM) Material Control and Accounting (MC&A) Program description is submitted to the Nuclear Regulatory Commission as a separate licensing basis document.

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STD DEP 1.1-1    13.5.3    COMBINED LICENSE INFORMATION ITEM

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STD COL 13.5-1    Information for this COL item is addressed in [Section 13.5](#).

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13.5.4 REFERENCES

201. ANSI/ANS 3.2-1988, "Administrative Control and Quality Assurance for the Operational Phase of Nuclear Power Plants."
  202. ANSI B30.2 (Chapter 2-3), "Overhead and Gantry Cranes."
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**Table 13.5-201  
Pre-COL Phase Administrative Programs and Procedures**

STD COL 13.5-1 (This table is included for future designation as historical information.)

- Design/Construction Quality Assurance Program
  - Reporting of Defects and Noncompliance, 10 CFR Part 21 Program
  - Design Reliability Assurance Program
-

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13.6 SECURITY

This **section** of the referenced DCD is incorporated by reference with the following departures and/or supplements.

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STD COL 13.6-1

The Security Plan consists of the Physical Security Plan, the Training and Qualification Plan, and the Safeguards Contingency Plan. The Security Plan is submitted to the Nuclear Regulatory Commission as a separate licensing document in order to fulfill the requirements of 10 CFR 52.79(a)(35) and 52.79(a)(36) and is incorporated by reference (see **Table 1.6-201**). The Security Plan meets the requirements contained in 10 CFR Part 73 and will be maintained in accordance with the requirements of 10 CFR 52.98. The Plan is categorized as Security Safeguards Information and is withheld from public disclosure pursuant to 10 CFR 73.21.

STD COL 13.6-5

The Cyber Security Plan is submitted to the Nuclear Regulatory Commission as a separate licensing document to fulfill the requirements contained in 10 CFR 52.79(a)(36) and 10 CFR 73.54 and is incorporated by reference (see **Table 1.6-201**). The Cyber Security Plan will be maintained in accordance with the requirements of 10 CFR 52.98. The Plan is withheld from public disclosure pursuant to 10 CFR 2.390.

**Table 13.4-201** provides milestones for security program and cyber security program implementation.

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13.6.1 COMBINED LICENSE INFORMATION ITEM

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STD COL 13.6-1

Information for the Security Plan portion of this COL item is addressed in **Section 13.6**.

Information for the Physical Security ITAAC portion of this COL item is addressed in **Section 14.3.2.3.2**.

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STD COL 13.6-5

Information for the cyber security program portion of this COL item is addressed in **Section 13.6**.

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13.6.2 REFERENCES

201. Not used.

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STD DEP 1.1-1 DCD **Section 13.7** is redistributed to include DCD **Section 13.7** references 7, 8, and 10 with COLA FSAR **Subsection 13.5.4** and DCD **Section 13.7** references 2, 3, and 4 with COLA FSAR **Subsection 13.6.2**.

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Add the following new section after DCD **Section 13.6**.

13.7 FITNESS FOR DUTY

STD SUP 13.7-1 The Fitness for Duty Program (FFD) is implemented and maintained in multiple and progressive phases dependent on the activities, duties, or access afforded to certain individuals at the construction site. In general, two different FFD programs will be implemented: a construction FFD program and an operations FFD program. The construction and operations phase programs are illustrated in **Table 13.4-201**.

The construction FFD program is consistent with NEI 06-06 (**Reference 201**). NEI 06-06 applies to persons constructing or directing the construction of safety- and security-related structures, systems, or components performed onsite where the new reactor will be installed and operated. Management and oversight personnel, as further described in NEI 06-06, and security personnel prior to the receipt of special nuclear material in the form of fuel assemblies (with certain exceptions) will be subject to the operations FFD program that meets the requirements of 10 CFR Part 26, Subparts A through H, N, and O. At the establishment of a protected area, all persons who are granted unescorted access will meet the requirements of an operations FFD program. Prior to issuance of a Combined License, the construction FFD program at a new reactor construction site for those subject to Subpart K will be reviewed and revised as necessary should substantial revisions occur to either NEI 06-06 following NRC endorsement or the requirements of 10 CFR Part 26.

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LNP SUP 13.7-1 The following site-specific information is provided:

- The construction site area is defined in the Physical Security Plan and will be under the control of CB&I. The 10 CFR Part 26 requirements will be implemented for the construction site area based on the descriptions provided in **Table 13.4-201**.
- Construction Workers & First Line Supervisors (CB&I employees and subcontractors) are covered by the Duke-approved CB&I FFD Program (elements Subpart K).
- Duke employees and Duke subcontractor's construction management and oversight personnel are covered by a Duke Operations FFD Program and CB&I's employees and CB&I's subcontractors, construction management, and oversight personnel will be covered by the Duke-approved CB&I FFD Program (elements Subpart A - H, N and O).
- Duke security personnel are covered by a Duke Operations FFD Program and CB&I's security personnel are covered by the Duke-approved CB&I

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FFD Program (elements Subpart A - H, N and O). This coverage is applicable from the start of construction activities to the earlier of (1) the receipt of SNM in the form of fuel assemblies, or (2) the establishment of a Protected Area, or (3) the 10 CFR 52.103(g) finding.

- Duke FFD Program personnel are covered by a Duke Operations FFD Program and CB&I's FFD Program personnel will be covered by the Duke-approved CB&I FFD Program (elements Subpart A - H, N and O, and C per licensee's discretion).
- Duke security personnel protecting fuel assemblies are covered by a Duke Operations FFD Program (elements Subpart A - I, N and O).
- Personnel required to physically report to the Technical Support Center (TSC) or Emergency Operations Facility (EOF) when that requirement is in effect are covered by a Duke Operations FFD Program.

STD SUP 13.7-1

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The operations phase FFD program is consistent with the applicable subparts of 10 CFR Part 26 (elements Subpart A – I, N, and O, except for individuals listed in §26.4(b), who are not subject to §§ 26.205 – 209).

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13.7.1 REFERENCES

201. Nuclear Energy Institute "Fitness for Duty Program Guidance for New Nuclear Power Plant Construction Sites," NEI 06-06, Revision 5, August 2009 (ML092430016).
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Add the following new appendix at the end of DCD **Chapter 13**.

LNP COL 13.1-1

**APPENDIX 13AA CONSTRUCTION-RELATED ORGANIZATION**

The information in this appendix is included for future designation as historical information. Paragraphs are numbered to be subsequent to **Subsection 13.1.1.1**.

**13AA.1.1.1.1 Design and Construction Activities**

The Westinghouse Electric Company (WEC) was selected to design, fabricate, deliver, and install the AP1000 advanced light water pressurized water reactors (PWR) and to provide technical direction for installation and startup of this equipment. DCD **Subsection 1.4.1** provides detailed information regarding WEC past experience in design, development, and manufacturing of nuclear power facilities. Operating experience from design, construction, and operation of earlier WEC PWRs is applied in the design, construction, and operation of the AP1000 as described in numerous locations throughout the DCD (e.g., DCD **Subsections 3.6.4.4, 3.9.4.2.1, 4.2.3.1.3**).

A construction architect engineer (AE) provides the construction of the plant and additional design engineering for selected site specific portions of the plant. The AE is selected based on experience and proven technical capability in nuclear construction projects or projects of similar scope and complexity.

Other design and construction activities are generally contracted to qualified suppliers of such services. Implementation or delegation of design and construction responsibilities is described in the subsections below. Quality assurance aspects of these activities are described in **Chapter 17**.

**13AA.1.1.1.1.1 Principal Site-Related Engineering Work**

The principal site engineering activities accomplished towards the construction and operation of the plant are:

a. **Meteorology**

Information concerning local (site) meteorological parameters is developed and applied by station and contract personnel to assess the impact of the station on local meteorological conditions. An on-site meteorological measurements program is employed by station personnel to produce data for the purpose of making atmospheric dispersion estimates for postulated accidental and expected routine airborne releases of effluents. A maintenance program is established for surveillance, calibration, and repair of instruments. More information regarding the study and meteorological program is found in **Section 2.3**.

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b. Geology

Information relating to site and regional geotechnical conditions is developed and evaluated by utility and contract personnel to determine if geologic conditions could present a challenge to safety of the plant. Items of interest include geologic structure, seismicity, geological history, and ground water conditions. During construction, foundations within the power block area are mapped or visually inspected and photographed. [Section 2.5](#) provides details of these investigations.

c. Seismology

Information relating to seismological conditions is developed and evaluated by utility and contract personnel to determine if the site location and area surrounding the site is appropriate from a safety standpoint for the construction and operation of a nuclear power plant. Information regarding tectonics, seismicity, correlation of seismicity with tectonic structure, characterization of seismic sources, and ground motion are assessed to estimate the potential for strong earthquake ground motions or surface deformation at the site. [Section 2.5](#) provides details of these investigations.

d. Hydrology

Information relating to hydrological conditions at the plant site and the surrounding area is developed and evaluated by utility and contract personnel. The study includes hydrologic characteristics of streams, lakes, shore regions, the regional and local groundwater environments, and existing or proposed water control structures that could influence flood control and plant safety. [Section 2.4](#) includes more detailed information regarding this subject.

e. Demography

Information relating to local and surrounding area population distribution is developed and evaluated by utility and contract personnel. The data is used to determine if requirements are met for establishment of exclusion area, low population zone, and population center distance. [Section 2.1](#) includes more detailed information regarding population around the plant site.

f. Environmental Effects

Monitoring programs are developed to enable the collection of data necessary to determine possible impact on the environment due to construction, startup, and operational activities and to establish a baseline from which to evaluate future environmental monitoring.

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13AA.1.1.1.1.2      Design of Plant and Ancillary Systems

Responsibility for design and construction of systems outside the power block such as circulating water, service water, switchyard, and secondary fire protection systems are delegated to qualified contractors.

13AA.1.1.1.1.3      Review and Approval of Plant Design Features

Design engineering review and approval is performed in accordance with the reactor technology vendor QA Program and [Section 17.1](#). The reactor technology vendor is responsible for design control of the power block. Verification is performed by competent individuals or groups other than those who performed the original design. Design issues arising during construction are addressed and implemented with notification and communication of changes to the manager in charge of Nuclear Engineering for review. As systems are tested and approved for turnover and operation, control of design is turned over to plant staff. The manager in charge of Nuclear Engineering, along with functional managers and staff, assumes responsibility for review and approval of modifications, additions, or deletions in plant design features, as well as control of design documentation, in accordance with the Operational QA Program. Design control becomes the responsibility of the manager in charge of Nuclear Engineering prior to loading fuel. During construction, startup, and operation, changes to human-system interfaces of control room design are approved using a human factors engineering evaluation addressed within [Chapter 18](#). See Organization Charts, [Figures 13.1-201](#) and [13AA-201](#) for reporting relationships.

13AA.1.1.1.1.4      Site Layout With Respect to Environmental Effects and Security Provisions

Site layout was considered when determining the expected environmental effects from construction.

The Physical Security Plan is designed with provisions that meet the applicable NRC regulations. Site layout was considered when developing the Security Plan.

13AA.1.1.1.1.5      Development of Safety Analysis Reports

Information regarding the development of the Final Safety Analysis Report is found in [Chapter 1](#).

13AA.1.1.1.1.6      Review and Approval of Material and Component Specifications

Safety-related material and component specifications of structures, systems, and components designed by the reactor technology vendor are reviewed and approved in accordance with the reactor technology vendor quality assurance program and [Section 17.1](#). Review and approval of items not designed by the reactor vendor are controlled for review and approval by [Section 17.5](#) and the Quality Assurance Program Description.

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13AA.1.1.1.1.7 Procurement of Materials and Equipment

Procurement of materials during construction phase is the responsibility of the reactor technology vendor and constructor. The process is controlled by the construction QA Programs of these organizations. Oversight of the inspection and receipt of materials process is the responsibility of the manager in charge of quality assurance.

13AA.1.1.1.1.8 Management and Review of Construction Activities

Overall management and responsibility for construction activities is assigned to the executive in charge of site construction. The project director of the engineering, procurement, and construction (EPC) contractor is accountable to the executive in charge of site construction for construction activities. See organization chart **Figure 13AA-201**. Construction management personnel are sufficient in number to provide effective oversight in the areas of cost, schedule, and other functions as deemed necessary by the manager in charge of construction. **Table 13.1-201** provides additional information regarding the number of station personnel.

Monitoring and review of construction activities by utility personnel is a continuous process at the plant site. Contractor performance is monitored to provide objective data to utility management in order to identify problems early and develop solutions. Monitoring of construction activities verifies that the contractors are in compliance with contractual obligations for quality, schedule, and cost. Monitoring and review of construction activities is divided functionally across the various disciplines of the utility construction staff (e.g., electrical, mechanical, instrument and control) and tracked by schedule based on system and major plant components/areas.

After each system is turned over to plant staff, the construction organization relinquishes responsibility for that system. At that time they will be responsible for completion of construction activities as directed by plant staff and available to provide support for preoperational and start-up testing as necessary. To ensure equipment operability and reliability, plant maintenance programs such as preventive and corrective maintenance are developed and made effective during pre-operation/startup phase with approved administrative procedures under the direction of the managers in charge of maintenance, engineering and work control.

Periodic assessment involving both the construction and operations organizations continues to identify SSCs that could reasonably be expected to be impacted by scheduled construction activities. Appropriate administrative and managerial controls are then established as necessary. Specific hazards, impacted SSCs, and managerial and administrative controls are reviewed on a recurring basis and, if necessary, controls are revised/developed and implemented and maintained current as work progresses on site. For example, prior to construction activities that involve the use of large construction



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equipment such as cranes, managerial and administrative controls are in place to prevent adverse impacts on any operating unit(s) overhead power lines, switchyard, security boundary, etc., by providing the necessary restrictions on the use of large construction equipment.

13AA.1.1.1.2      Preoperational Activities

The plant manager reports to the site executive in charge of plant management. The plant manager, with the aid of those managers that report directly to the plant manager, is responsible for the activities required to transition the unit from the construction phase to the operational phase.

These activities include turnover of systems from construction, preoperational testing, schedule management, procedure development for tests, fuel load, integrated startup testing, and turnover of systems to plant staff.

13AA.1.1.1.2.1      Development of Human Factors Engineering Design Objectives and Design Phase Review of Proposed Control Room Layouts

Human factors engineering (HFE) design objectives are initially developed by the reactor technology vendor in accordance with **Chapter 18** of the FSAR and the Design Control Document (DCD). As a collaborative team, personnel from the reactor technology vendor design staff and personnel, including, licensed operators, engineers, and instrumentation and control technicians from owner and other organizations in the nuclear industry assess the design of the control room and man-machine interfaces to attain safe and efficient operation of the plant. See **Section 18.2** for additional details of HFE program management.

Modifications to the certified design of the control room or man-machine interface described in the Design Control Document are reviewed per engineering procedures, as required by **Section 18.2**, to evaluate the impact to plant safety. The Functional Superintendent – Design Engineering is responsible for the human factors engineering (HFE) design process and for the design commitment to HFE during construction and throughout the life of the plant as noted in **Subsection 13.1.1.2.1**. The HFE Program is established in accordance with the description and commitments in **Chapter 18**.

13AA.1.1.1.2.2      Preoperational Testing Organization

Preoperational and startup testing is conducted by the plant test and operations (PT&O) organization. The PT&O organization, functions, and responsibilities are addressed in **Section 14.2**. Sufficient numbers of personnel are assigned to perform preoperational and startup testing to facilitate safe and efficient implementation of the testing program. Plant-specific training provides instruction on the administrative controls of the test program. To improve operational experience, operations and technical staff are used as support in conducting the test program and in reviewing test results.

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See [Figure 13AA-201](#) for organization chart for preoperational and startup testing.

13AA.1.1.1.2.3      Development and Implementation of Staff Recruiting and Training Programs

Staffing plans are developed based on operating plant experience with input from the reactor technology vendor as determined by HFE. See [Section 18.6](#). These plans are developed under the direction and guidance of the site executive in charge of plant management. Staffing plans are completed and manager level positions are filled prior to start of preoperational testing. Personnel selected to be licensed Reactor Operators and Senior Reactor Operators along with other staff necessary to support the safe operation of the plant are hired with sufficient time available to complete appropriate training programs, and become qualified, and licensed, if required, prior to fuel being loaded in the reactor vessel. See [Figure 13AA-202](#) for an estimated timeline of hiring requirements for operator and technical staff relative to fuel load.

Because of the dynamic nature of the staffing plans and changes that occur over time, it is expected that specific numbers of personnel on-site will change; however, [Table 13.1-201](#) includes the initial estimated number of staff for selected positions and the estimated number of additional positions required for a second unit. Recruiting of personnel to fill positions is the shared responsibility of the manager in charge of human resources and the various heads of departments. The training program is described in [Section 13.2](#).

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