ENCLOSURE 1

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/OPERATING LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT

NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

RETYPED TECHNICAL SPECIFICATION PAGES

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager - Robinson Plant shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

6.2.2 Definitions

Personnel reporting to the General Manager - Robinson Plant shall be identified in Section 6 of the Technical Specifications as the plant staff.

Facility Staff

6.2.3 The Robinson Nuclear Project organization shall be subject to the following:

a) The shift complement during hot operations shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Senior Control Operator holding a Senior Reactor Operator's License, two Control Operators each holding a Reactor Operator's License, two additional shift members, and one Shift Technical Advisor. If an individual that holds a Senior Reactor Operator's License also meets the Shift Technical Advisor requirements, that individual may act in both capacities. The limitations on the use of overtime applies to the HBR2 Shift Foremen, Senior-Control Operators, Control Operators, and Shift Engineers. These limitations apply only when HBR2 Reactor Coolant System is greater than 200°F or when fuel is being moved within the Reactor Pressure Vessel. These limitations may be applied to other key "safety" personnel as warranted by the plant conditions and other circumstances at the discretion of the Plant General Manager.

6.4 TRAINING

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

6.5.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager - Operations and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions shall be conducted at least quarterly.

assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review. The list will include the disciplines for which each person is qualified.

6.5.1.1.5 Temporary changes to procedures, tests, or experiments may be approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator License if such change does not change the intent of the original procedure, test, or experiment. Temporary changes shall be documented and, within 21 days of receiving temporary approval, be reviewed in accordance with Specifications 6.5.1.1.2, 6.5.1.1.3, and 6.5.1.1.4 and incorporated as a permanent change or deleted.

6.5.1.1.6 Those procedures, tests, or experiments and changes thereto that constitute an unreviewed safety question, or involve a change to Technical Specifications shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such procedures, tests, or experiments and changes shall be reviewed by the Nuclear Assessment Department prior to implementation.

6.5.1.1.7 Procedures, tests, or experiments, which constitute a change to the FSAR shall also be reviewed by the Nuclear Assessment Department. These reviews may be conducted after plant Management approval, and implementation may proceed prior to completion of review as provided for by 10 CFR 50.59(a)(1).

6.5.1.2 Modifications

6.5.1.2.1 A safety analysis shall be prepared for all modifications that affect nuclear safety. The analysis shall include a written determination of whether or not the modification is a change in the facility as described in the FSAR, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59(a)(2).

6.5.1.2.4 Modifications that are determined to either constitute an unreviewed safety question, as defined in 10 CFR 50.59(a)(2), or a change to the Technical Specifications, shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such modifications shall be approved by the Nuclear Assessment Department prior to implementation.

6.5.1.2.5 Modifications which constitute changes to the facility as described in the FSAR shall also be reviewed by the Nuclear Assessment Department. This review may be conducted after plant management approval, and implementation may proceed prior to completion of review.

6.5.1.3 Technical Specifications and License Changes

6.5.1.3.1 Each proposed Technical Specification or Operating License change shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval.

6.5.1.4 Review of Technical Specification Violations

6.5.1.4.1 All violations of Technical Specifications shall be investigated and a report prepared that evaluates the event and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the Plant Nuclear Safety Committee and approved by the Plant General Manager or his designee and submitted to the Vice President - Robinson Nuclear Project and to the Manager - Nuclear Assessment Department.

6.5.1.5 Nuclear Safety Review Qualification

6.5.1.5.1 Individuals shall be designated by the Vice President - Robinson Nuclear Project for the safety reviews of Specifications 6.5.1.1.2, 6.5.1.1.3, 6.5.1.2.1, and 6.5.1.2.2. These reviewers shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience.

6.5.1.6 Plant Nuclear Safety Committee (PNSC)

6.5.1.6.1 a. As an effective means for the regular overview, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) is established.

b. The committee shall function, through the utilization of subcommittees, audits, investigations, reports, and/or performance of reviews as a group, to advise the General Manager on all matters related to nuclear safety.

6.5.1.6.2 The PNSC shall be composed of the following:

Chairman - General Manager or designated alternate
Member - Manager - Operations or designated alternate
Member - Manager - Maintenance or designated alternate
Member - Manager - Technical Support or designated alternate
Member - Director - Regulatory Compliance or designated alternate
Member - Manager - Environmental & Radiation Control or designated alternate
Member - Manager - QA/QC or designated alternate
Member - Manager - Outages and Modifications or designated alternate
Member - Manager - Plant Support or designated alternate

6.5.1.6.3 Alternates shall be appointed in writing by the General Manager to serve on a temporary basis. All alternates shall, as a minimum, meet qualification criteria specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel, or for those disciplines not listed in Section 4.4, the equivalent of the Section 4.4 requirement.

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

6.5.1.6.5 A quorum of the PNSC shall consist of the Chairman, and four members, of which two may be alternates.

6.5.1.6.6 The PNSC activities shall include the following:

a) Perform an overview of Specifications 6.5.1.1 and 6.5.1.2 to assure that processes are effectively maintained.

b) Performance of special reviews, investigations, and reports thereon requested by the Manager - Nuclear Assessment Department.

c) Annual review of the Security Plan and Emergency Plan.

d) Perform reviews of Specifications 6.5.1.1.6, 6.5.1.2.4, 6.5.1.3.1, and 6.5.1.4.1.

e) Perform review of all reportable events.

f) Review of facility operations to detect potential nuclear safety hazards.

g) Review of every unplanned on site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrences to the Vice President - Robinson Nuclear Project, Manager - Nuclear Assessment Department.

h) Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.

i) Review of major changes to radioactive liquid, gaseous, and solid waste treatment systems.

6.5.1.6.7 In the event of disagreement between the recommendations of the Plant Nuclear Safety Committee and the actions contemplated by the General Manager, the course determined by the General Manager to be more conservative will be followed. The Vice President - Robinson Nuclear Project and the Manager - Nuclear Assessment Department will be notified within 24 hours of the disagreement and subsequent actions.

6.5.1.6.8 The PNSC shall maintain written minutes of each meeting that, at a minimum, document the results of all PNSC activities performed under the provisions of these Technical Specifications; and copies shall be provided to the Vice President - Robinson Nuclear Project and to the Manager - Nuclear Assessment Department.

6.5.2 Nuclear Assessment Department - Independent Review

The Nuclear Assessment Department shall provide independent review of significant plant changes, tests, and procedures; verify that reportable events are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer. Specific review subjects are defined in Specification 6.5.2.1.d.

6.5.2.1 The Manager - Nuclear Assessment Department is charged with the overall responsibility for administering the independent review function as follows:

a) Approves selection of the individuals to conduct safety reviews under Specification 6.5.2.

b) Has access to plant records and operating personnel in performing independent reviews.

c) Prepares and retains written records of reviews.

d) Assures independent reviews are conducted on the following subjects:

1) Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report, and tests or experiments not described in the Safety Analysis Report that are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as

defined in 10CFR50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.

(2) Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or an unreviewed safety question pursuant to 10CFR50.59(c). Matters of this kind shall be referred to the Nuclear Assessment Department by the Plant General Manager or by other functional organizational units within Carolina Power & Light Company prior to implementation.

(3) Proposed changes to the Technical Specifications or this operating license, prior to implementation.

(4) All reportable events.

(5) Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Department, deems appropriate for consideration of which is referred to the Manager - Nuclear Assessment Department, by the on-site operating organization or by other functional organizational units within Carolina Power & Light Company.

(6) Reports and minutes of the PNSC.

6.5.2.2 Results of Nuclear Assessment Department reviews, including recommendations and concerns, shall be documented.

a. Copies of documented reviews shall be retained in the NAD files.

b) Recommendations and concerns shall be submitted to the Plant General Manager and Vice President - Robinson Nuclear Project within 14 days of determination.

c) A summation of Nuclear Assessment Department recommendations and concerns shall be submitted to the Chairman/President; Executive Vice President - Power Supply; Senior Vice President - Nuclear Generation; Vice President - Robinson Nuclear Project; Plant General Manager; and others, as appropriate on at least a bimonthly frequency.

d) The Nuclear Assessment Department Independent Safety Review Program shall be conducted in accordance with written, approved procedures.

6.5.2.3 Personnel

a. Personnel assigned responsibility for independent reviews shall be specified in technical disciplines and shall collectively have the experience and competence required to review problems in the following areas:

(1) Nuclear power plant operations
(2) Nuclear engineering
(3) Chemistry and radiochemistry
(4) Metallurgy
(5) Instrumentation and control
(6) Radiological safety
(7) Mechanical and electrical engineering
(8) Administration controls
(9) Seismic and environmental
(10) Quality assurance practices
(11) Nondestructive Testing

b. The following minimum experience requirements shall be established for those persons involved in the independent safety review program:

(1) Manager of NAD - Bachelor of Science in engineering or related field and ten (10) years' related experience, including five (5) years' involvement with operation and/or design of nuclear power plants.

(2) Reviewers - Bachelor of Science in engineering or related field or equivalent and five (5) years' related experience.

c. An individual may possess competence in more than one specialty area. If sufficient expertise is not available

within the Nuclear Assessment Department, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

d. At least three persons, qualified as discussed in Specification 6.5.2.3.b, shall review each item submitted under the requirements of Section 6.5.2.1.d.

e. Independent safety reviews shall be performed by personnel not directly involved with the activity or responsible for the activity.

6.5.3 Nuclear Assessment Department - Audit Program

6.5.3.1 The Nuclear Assessment Department shall perform audits of plant activities. Specific audit subjects are defined in Specification 6.5.3.2.d.

6.5.3.2 The Manager - Nuclear Assessment Department is charged with the overall responsibility for administering the audit program as follows:

a) Approves selection of the individual(s) to conduct audits.

b) Has access to the plant operating records and operating personnel in performing the audits.

c) Prepares and retains written records of audits.

d) Assures audits are conducted on the following subjects:

1) The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.

2) The training and qualifications of the entire facility staff at least once per 12 months.

3) The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per 6 months.

(4) The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix B, 10CFR50, at least once per 24 months.

(5) The Emergency Plan and implementing procedures at least once per 12 months.

(6) The Security Plan and implementing procedures at least once per 12 months.

(7) The Facility Fire Protection Program and implementing procedures at least once per 24 months.

(8) Any other area of facility operation considered appropriate by the Nuclear Assessment Department; the Executive Vice President - Power Supply; or the Senior Vice President - Nuclear Generation.

(9) The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.

(10) The Offsite Dose Calculation Manual and implementing procedure at least once per 24 months.

(11) The Process Control Program and implementing procedures for solidification of radioactive wastes at least once per 24 months.

(12) The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 at least once per 12 months.

e. Distribute reports and other records to appropriate managers.

6.5.3.3 Audit Personnel

a) Audit personnel shall be independent of the area audited. Selection for auditing assignments is based on experience or training that establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting auditing personnel, consideration shall be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.

b) Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation shall be used to augment the audit teams when necessary. Individuals performing the audits may be members of the audited organization; however, they shall not audit activities for which they have immediate responsibility, and while performing the audit, they shall not report to a management representative who has immediate responsibility for the activity audited.

6.5.3.4 Results of plant audits are approved by the Manager - Nuclear Assessment Department and transmitted to the Executive Vice President - Power Supply; the Senior Vice President - Nuclear Generation; Vice President - Robinson Nuclear Project; Plant General Manager; and others, as appropriate within 30 days after the completion of the audit.

6.5.3.5 The Nuclear Assessment Department Audit Program shall be conducted in accordance with written, approved procedures.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for events requiring immediate notification:

a) The NRC shall be notified pursuant to the requirements of 10 CFR 50.72.

b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment Department, and the Vice President - Robinson Nuclear Project.

6.6.2 The following actions shall be taken for reportable events requiring a Licensee Event Report:

a) A report shall be submitted to the NRC pursuant to the requirements of 10 CFR 50.73.

b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment Department, and the Vice President - Robinson Nuclear Project.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

a) The provisions of 10 CFR 50.72 shall be complied with.

b) The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with.

c) The safety limit violation shall be reported to the NRC Region II within one hour and the Vice President - Robinson Nuclear Project and the Manager - Nuclear Assessment Department within 24 hours.

d) A Safety Limit Report shall be prepared. The report shall be reviewed in accordance with Specification 6.5.1.6.6. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems, or structures; and (3) corrective action taken to prevent recurrence.

e) The Safety Limit Violation Report shall be submitted to the NRC, Vice President - Robinson Nuclear Project, and the Manager - Nuclear Assessment Department within 14 days of the violation.

6.9 REPORTING REQUIREMENTS

Information to be reported to the NRC, in addition to the reports required by Title 10, Code of Federal Regulations, shall be as indicated in the following sections.

6.9.1 Routine Reports

6.9.1.1 Startup Report. A summary report of plant startup and power escalation shall be submitted following (1) amendment to the license involving a planned increase in power level; (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier; and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests performed related to the startup and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

6.9.1.2 Annual Reports

Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

1. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions.

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* This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20.

2. The results of specific analyses in which the primary coolant exceeded the limits of Specification 3.1.4. The following information shall be included: (a) reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (b) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (c) clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (d) graph of the I-131 concentration (μCi/gm) and one other radioiodine isotope concentration (μCi/gm) as a function of time for the duration of the specific activity above the steady-state level; and (e) the time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

3. Annual Radiological Environmental Operating Report

Routine radiological environmental operating reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. With the radiological environmental monitoring program not being conducted as specified in Table 3.17-1, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence shall be included.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, operational controls (as appropriate),

and previous environmental surveillance reports and an assessment of the observed impacts of the plant operations on the environment. The reports shall also include the results of land use censuses required by Specification 3.17.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Table and Figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps* covering all sampling locations keyed to a table giving distances and directions from the centerline of the reactor, the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.17.3; discussion of all deviations from the sampling schedule of Table 3.17-1; and discussion of all analyses in which the LLD required by Table 3.17-3 was not achievable.

4. Primary safety and relief valve challenges.

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* One map shall cover stations near the site boundary; a second shall be the more distant stations.

6.9.1.3 Semiannual Radioactive Effluent Release Report. Routine radioactive effluent release reports covering the operation of the unit during the previous six months shall be submitted within 60 days after January 1 and July 1 of each year. Those portions of the report due within 60 days of January 1 and July 1 shall include:

1. A summary of the quantities of radioactive liquid and gaseous effluent and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Radioactive Materials in Liquid and Gaseous Effluents from Light Water Cooled Nuclear Power Plants" (Revision 1, June 1974), with data summarized on a quarterly basis following the format of Appendix B thereof.

2. The Radioactive Effluent Release Report to be submitted within 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint

frequency distributions of wind speed, wind direction, and atmospheric stability.* This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to members of the public due to their activities inside the site boundary (Figure 1.1-1) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. [For ORs: approximate and conservative approximate methods are acceptable.] The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the Offsite Dose Calculation Manual (ODCM).

3. The Radioactive Effluent Release Report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed member of the public from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation.

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* In lieu of submission with the first half year Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

4. The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

a. Container volume,

b. Total curie quantity (specify whether determined by measurement or estimate),

c. Principal radionuclides (specify whether determined by measurement or estimate),

d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),

e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and

f. Solidification agent or absorbent (e.g., cement, urea formaldehyde).

5. The Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to unrestricted areas of radioactive materials in gaseous and liquid effluents made during the reporting period.

6. The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the Process Control Program (PCP) and to the Offsite Dose Calculation Manual (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.17.2.2.

7. Changes to the radioactive waste systems (liquid, gaseous, and solid) shall become effective upon review and acceptance by the Plant Nuclear Safety Committee and shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PNSC.* The discussion of each change shall contain:

a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59;

b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;

c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;

d. An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;

e. An evaluation of the change, which shows the expected maximum exposure to an individual in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;

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* The licensee may choose to submit the information called for in this Specification as part of the annual FSAR update.

f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;

g. An estimate of the exposure to plant operating personnel as a result of the change; and

h. Documentation of the fact that the change was reviewed and found acceptable by the PNSC.

6.9.1.4 Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis. The report formats set forth in Appendices B, C, and D to Regulatory Guide 1.16 shall be completed in accordance with the instructions provided. The completed forms should be submitted by the tenth of the month following the calendar month covered by the report to the NRC.

(PAGE 6.9.8 HAS BEEN DELETED)

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

c. Records of facility radiation and contamination surveys.

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

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

f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.

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

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required by the QA program.

j. Records of review performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR50.59.

k. Records of (1) meetings of the PNSC, (2) the independent reviews performed by the previous Corporate Nuclear Safety Section, and (3) the independent reviews performed by the Nuclear Assessment Department.

l. Records of data results required by the radiological environmental monitoring program.