

# OCNGS UFSAR

## CHAPTER 13 - CONDUCT OF OPERATIONS

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## CHAPTER 13

### CONDUCT OF OPERATIONS

#### 13.1 ORGANIZATIONAL STRUCTURE

Exelon Generation Company, LLC, is a limited liability and is responsible for the safe, reliable, and efficient operation of its nuclear facilities. In addition, Exelon is responsible for appropriate standards, programs, processes, management controls, and support for the nuclear facilities. In keeping with these responsibilities, Exelon is committed to providing sufficient personnel having appropriate qualifications to both operate and technically support the facility.

##### 13.1.1 Offsite Organization

The Exelon corporate organization and its functions and responsibilities are described in Chapter 1 of the Quality Assurance Topical Report, NO-AA-10, as revised.

##### 13.1.2 Operating Organization

The overall organizational structure and reporting relationships are described in the Quality Assurance Topical Report, NO-AA-10, as revised with the following addendum:

#### Operating Department

The Operations Department is under the direction of the Director – Operations who reports to the Plant manager. The Director – Operations has the following direct reports: the Shift Operation Superintendent, the Reactor Engineering Manager, and the Senior Manager Operations Support and Services. The Shift Operations Superintendent is directly responsible for supervision of plant operations including management oversight of shift operations. The Shift Managers report directly to the Shift Operations Superintendent. The Director – Operations, Shift Operations Superintendent, Senior Manager Operations Support and Services, Operations Support Manager, or Operation Services Manager must possess a Senior Reactor Operator (SRO) license.

Oyster Creek uses either of the two options contained in Generic Letter 86-04, "Policy Statement on Engineering Expertise on Shift," for meeting the requirement for a Shift Technical Advisor (STA). These two options are as follows:

1. An STA program in accordance with the description in NUREG-0737 (Item 1.A.1.1); or
2. Combine one standard of the required licensed Senior Reactor Operator (SRO) positions and the STA position (i.e., dual-role SRO/STA).

If the second option is selected, the STA position may be filled by the on-shift Shift Manager, a Shift Supervisor, or any SRO provided the individual meets the Commission Policy Statement on Engineering Expertise on Shift. The STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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### 13.1.3 Qualification of Plant Personnel

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 - 1978 for comparable positions unless otherwise noted in the Technical Specifications. **The licensed operators shall comply only with the requirements of 10 CFR 55.** The Quality Assurance Topical Report, NO-AA-10, as revised describes the essential managerial positions and applicable Human Resources procedures describe comparable ANSI/ANS 3.1-1978 positions for the individuals responsible for programs and systems that ensure the safe and successful operation of the facility. Changes to these documents are evaluated in accordance with the applicable change control process.

### 13.1.4 Safety Review Functions

The safety review process defines how procedure changes, Technical Specification changes, Licensee Event Reports (LERs), plant modifications, Independent Spent Fuel Storage Facility (ISFSF) modifications, Certificate of Compliance changes, and other documents are reviewed, approved and implemented. This process spreads the responsibility for activity in these areas broadly across the organization. The process requires each director or manager to control the preparation, review and reporting activities of each activity in their area which affects nuclear safety. Responsibilities and Qualifications of Preparers, Reviewers, and Approvers are described in the Quality Assurance Topical Report, NO-AA-10, as revised.

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Refer to the Quality Assurance Topical Report, NO-AA-10, as revised for the qualifications of essential managerial positions and to the applicable Human Resources procedures for comparable ANSI/ANS 3.1-1978 positions for individuals responsible for programs and systems that ensure the safe and successful operation of the facility. Changes to these documents are evaluated in accordance with the applicable change control process.

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### 13.2 TRAINING

#### 13.2.1 Deleted

#### 13.2.2 Training Program

The training program includes development and conduct of technician, operator, and support programs. Additional training and educational programs are presented as needed. Training programs are prepared to include formal objectives and written lesson plans. During development of programs, close liaison is maintained with appropriate line managers to ensure that content, test material, mode of presentation, and schedule are appropriate. As additional training needs are identified, new training programs or lessons are developed to meet requirements not covered by existing programs.

#### 13.2.3 Technician Training

Initial and continuing (or cyclic) Technical Training Programs are INPO accredited training programs. The following technical programs are in place:

- a. Maintenance – Descriptions of the initial and continuing Maintenance Training Programs can be found in applicable Training procedures.
- b. Radiological Controls – A description of the initial and continuing Radiological Controls Training Programs can be found in applicable Training procedures.
- c. Chemistry – A description of the initial and continuing Chemistry Programs Training can be found in applicable Training procedures.

Technician Training programs are normally conducted by permanent employees. Contractor support is used as deemed necessary. Equipment training conducted by vendors is used where appropriate.

#### 13.2.4 Operations Training

##### 13.2.4.1 Initial Operator Training Programs (NPO/SRO)

Initial Operator Training Program is an INPO-accredited training program. This program satisfies the requirements of NUREG-1021, Examiner Standard 202, and is described in applicable Training procedures.

##### 13.2.4.2 Licensed Operator Requalification Training Program (NPO/SRO)

Initial Operator Training Program is an INPO-accredited training program. This program satisfies the requirement of 10CFR55.59 and is described in applicable Training procedures.

##### 13.2.4.3 Shift Technical Advisor (STA) Training Program

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Shift Technical Advisor (STA) Training Program is an INPO-accredited training program. This program is described in applicable Training procedures.

### 13.2.5 Support Training Programs

Additional training is provided by Exelon and Oyster Creek to provide General Employee Training (GET), fire protection training, first aid, emergency preparedness training, and security force training.

#### 13.2.5.1 General Employee Training Programs

General Employee Training is conducted for all non-visitor personnel (company and contractors) at the Oyster Creek site. All personnel receive instruction on topics such as use of procedures, security, emergency preparedness, quality assurance, industrial safety, and basic radiation protection. Employees who enter radiologically controlled areas receive additional training on topics such as radiation effects and risks, federal standards, radiological protection practices and procedures. Employees required to wear respiratory protection devices receive training in respiratory protection. Practical factors training is conducted for radiation workers and for wearers of respiratory protection devices. In order to maintain continuing access to the specified areas of the station, all workers must successfully complete an appropriate annual retraining program.

#### 13.2.5.2 Fire Protection Training Programs

The Oyster Creek Fire Protection Training Program is designed to meet the requirements of Section 27 of the NFPA Code 1975 and is presented to members of the Fire Brigade. The details of the Fire Protection program are contained in the Fire Hazards Analysis Report (FHAR), which is incorporated by reference.

#### 13.2.5.3 Emergency Preparedness Training Programs

Emergency preparedness training is intended to prepare all personnel to successfully perform their emergency duties as outlined in the Emergency Plan and the Emergency Plan Implementing Document for OCNGS.

All personnel receive a familiarization with the salient features of the emergency plans as part of General Employee Training. The training includes identification of specific emergency conditions and associated alarms, and proper employee responses. Retraining is conducted annually.

Personnel who have specific emergency related duties receive specialized emergency preparedness training. That training is tailored to the specific emergency duty positions and emergency response roles. Retraining is conducted annually.

#### 13.2.5.4 Security Training Program

The Security Training Program is intended to prepare site protection personnel to perform their duties in accordance with the NRC approved training and qualification plan.

### 13.2.6 Training Records



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Records showing the training and retraining provided by the Training Department to members of the plant staff are prepared by the Training Department and submitted to Records Management for retention for the life of the license.

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### 13.3 OCNGS EMERGENCY PLAN

The prime objectives of emergency planning are to: (1) Develop a plan and implementing procedures that will provide the means for mitigating the consequences of emergencies (including very low probability events) in order to protect the health and safety of the general public and site personnel and to prevent damage to property, and (2) Ensure operational readiness of emergency preparedness capabilities.

The OCNGS Emergency Plan assures that all emergency situations, including those which involve radiation or radioactive material are handled logically and efficiently. It covers the entire spectrum of emergencies from minor, localized emergencies to major emergencies involving action by offsite emergency response agencies and organizations.

The Emergency Plan Implementing Document provides a single source of pertinent and significant information and data and the procedures that would be required by or useful for various emergency response agencies and organizations in the event of an emergency.

The Implementing document consolidates and integrates specific material detailed in documents such as the OCNGS Emergency Plan, the State Plans, and the Various County Plans.

This Emergency Plan has been developed in accordance with the provisions of 10CFR50, Appendix E, and 10CFR50.47 and is consistent with the guidelines given in "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG 0654/FEMA-REP-1, dated November 1, 1980. Other guidance and sources of information used in the development of the Emergency Plan have been identified in the Exelon Nuclear Standardized Radiological Emergency Plan Annex for Oyster Creek.

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### 13.4 REVIEW AND AUDIT

The functions, composition and responsibilities of those organizations responsible for performing the nuclear safety review and audit of the Oyster Creek Nuclear Generating Station are delineated in the Quality Assurance Topical Report, NO-AA-10, as revised. |

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### 13.5 PLANT PROCEDURES

As directed by the Technical Specifications, written procedures have been established, and are implemented and maintained, to meet or exceed the requirements of Sections 5.1 and 5.3 of American National Standard N18.7-1976 and Appendix A to Regulatory Guide 1.33-1972, except as noted in Section 6.8 of the Oyster Creek Nuclear Generating Station Technical Specifications.

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### 13.6 SECURITY PLAN

Oyster Creek Nuclear Generating Station implements and maintains in effect all provisions of the NRC-approved physical security, guard training and qualification, safeguards contingency plans, and the cyber security plan for Oyster Creek Nuclear Generating Station in accordance with the operating license. The plans are specified in the following documents, as revised and filed with the NRC:

- A. "Oyster Creek Nuclear Generating Station Security Plan,"
- B. "Oyster Creek Nuclear Generating Station Security Personnel Training and Qualification,"
- C. "Oyster Creek Nuclear Generating Station Safeguards Contingency Plan," and
- D. "Cyber Security Plan for Exelon Nuclear."

These plans meet the requirements of 10 CFR 73.55 and Part 73, Appendices B and C, ANSI N18.17-1973.

Procedures to implement the Oyster Creek Nuclear Generating Station Security Plan were developed to establish administrative requirements and responsibilities for the plant security program and to supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital areas within the plant. These procedures were written and remain under the cognizance of the Manager, Nuclear Security and the procedures that contain Safeguards Information shall be withheld from public disclosure.

The security plan documents Safeguards Information protected under 10 CFR 73.21 and are, therefore, withheld from public disclosure.