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CONTROL NO: **2563**

FILE: _____

FROM: Duke Power Company Charlotte, NC Mr Thies		DATE OF DOC 2-28-75	DATE REC'D 3-7-75	LTR XXXX	TWX	RPT	OTHER
TO: Mr Giambusso		ORIG 3 signed	CC	OTHER	SENT AEC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XXXXX	PROP INFO	INPUT XX	NO CYS REC'D 3	DOCKET NO: <u>50-269/270/287</u>		
DESCRIPTION: Ltr notarized 3-7-75....trans the following: DO NOT REMOVE NO KNOWLEDGE				ENCLOSURES: Amdt to OL/Change to Tech Specs: Consisting of revision to Appendix A of the Tech Specswith regard to tech review & control & independent review and audit.....			
PLANT NAME: Oconee 1-3							

FOR ACTION/INFORMATION 3-10-75 ehf

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<u>14</u> - ACRS HOLDING/SENT TO L.A. SHEPPARD		

Handwritten initials/signature

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28201

A. C. THIES
SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

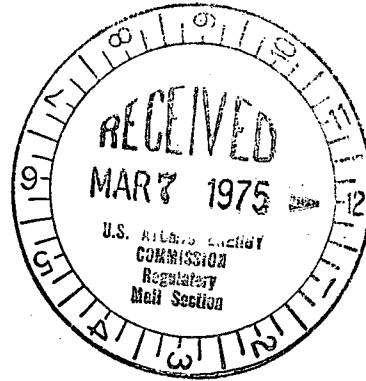
P. O. Box 2178

February 28, 1975

File 072

Regulatory

Mr. Angelo Giambusso, Director
Division of Reactor Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

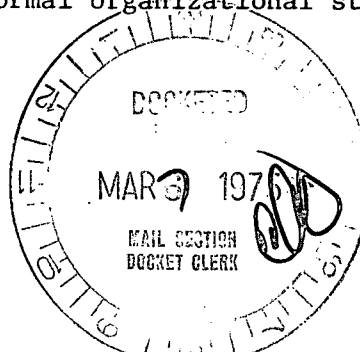


Re: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Mr. Giambusso:

Pursuant to 10CFR50.90, please find attached a proposed amendment to the Oconee Nuclear Station Technical Specifications, Appendix A to Facility Operating Licenses DPR-38, -47, and -55. This proposed amendment is submitted in response to Mr. Robert A. Purple's letter of December 18, 1974. As per Mr. Purple's letter the revisions included in the attached are concerned with two major topics: Technical review and control and independent review and audit.

With regard to technical review and control (see proposed Technical Specification 6.1.2), the current Oconee Technical Specifications and the standard technical specifications forwarded by Mr. Purple's letter establish an on-site review committee. The attached does not establish an on-site review committee, rather, controls have been identified which, when implemented, will be more effective than use of such a committee. These proposed changes in the area of technical review and control are based on significant experience at Oconee, from which it has been determined that for control of technical matters, such as procedures and changes thereto, proposed tests and experiments, proposed Technical Specification changes and proposed modifications, that better results can be obtained by use of a comprehensive second-party verification, rather than by a committee review. For other matters normally within the purview of an on-site review committee, such as incident investigation, performance of special reviews, review of the station security program and review of the station emergency plan, it has been determined that these can best be accomplished by use of the normal organizational structure or, as necessary, by ad hoc groups.



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It should also be noted that the standard technical specifications assign to the on-site review committee the responsibility for "review of facility operations to detect potential safety hazards." This item is not included in the attached as it is felt that the on-site operating organization, as part of the normal duties of station supervisory personnel, should provide timely and continuing monitoring of operating activities, including detection of specific potential safety hazards, to verify that such activities are conducted safely. These monitoring activities are properly considered to be an integral part of the routine supervisory function. The overview of station activities to detect significant, generic potential safety hazards cannot be performed by personnel intimately involved in day-to-day operating activities, i.e., station personnel, but rather must be and is performed by the independent review group.

With regard to independent review and audit, the attached adopts the standard technical specifications. The Nuclear Safety Review Unit described, however, while being in agreement with the standard technical specifications, does represent a change from the presently established Nuclear Safety Review Committee as it is felt that the effective performance of the responsibilities placed upon the independent review and audit group by the attached dictates use of an organizational unit rather than a standing committee. Upon approval and issuance of the attached by the Commission, it is Duke's intent to establish the Nuclear Safety Review Unit as specified and to staff the Unit with several full-time personnel. Other personnel within the Company will be designated, as required, to participate in the Unit on a part-time basis. Also consultants will be utilized, as deemed necessary.

Very truly yours,



A. C. Thies

ACT:vr

Mr. Angelo Giambusso
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A. C. THIES, being duly sworn, states that he is Senior Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Atomic Energy Commission this request for amendment of the Oconee Nuclear Station Technical Specifications, Appendix A to Facility Operating Licenses DPR-38, DPR-47, and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.

A. C. Thies

A. C. Thies, Senior Vice President

ATTEST:

John C. Goodman, Jr.
John C. Goodman, Jr.
Assistant Secretary

Subscribed and sworn to before me this 28th day of February, 1975.

Edna B. James
Notary Public

My Commission Expires:

October 24, 1977

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, AND AUDIT

6.1.1 Organization

6.1.1.1 The station Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.1.2 In all matters pertaining to actual operation and maintenance and to these Technical Specifications, the station Manager shall report to and be directly responsible to the Vice President, Steam Production, through the Manager, Nuclear Production. The organization is shown in Figure 6.1-2.

6.1.1.3 The station organization for Operations, Technical Services, and Maintenance shall be functionally as shown in Figure 6.1-1. Minimum operating shift requirements are specified in Table 6.1-1.

6.1.1.4 Incorporated in the staff of the station shall be supervisory and professional personnel meeting the minimum requirements encompassing the training and experience described in Section 4 of the ANSI 18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

6.1.1.5 Retraining and replacement of station personnel shall be in accordance with Section 5.5 of the ANSI 18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

6.1.2 Technical Review and Control

6.1.2.1 Activities

- a. Procedures required by Technical Specification 6.4 and other procedures which affect station nuclear safety, and major changes thereto, shall be prepared by a qualified individual/organization. The preparation of each such procedure, or procedure change, shall be checked by an individual/group other than the individual/group which prepared the procedure, or procedure change, but who may be from the same organization as the individual/group which prepared the procedure, or procedure change. This preparation and check of a procedure, and major changes thereto, shall include the determination as to whether or not each such procedure, or procedure change, involves an unreviewed safety question. Such procedures, and procedure changes, shall be approved prior to use by the station Manager, the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent.
- b. Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications shall be reviewed by the station Manager, the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent.

- c. Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be checked by an individual/group other than the individual/group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the Technical Specifications shall be approved by the station Manager.
- d. Proposed modifications to station nuclear safety-related structures, systems and components shall be designed by a qualified individual/organization. The design of each such modification shall be checked by an individual/group other than the individual/group which designed the modification but who may be from the same organization as the individual/group which designed the modification. This design and check of a proposed modification shall include the determination as to whether or not the modification involves an unreviewed safety question. Proposed modifications to station nuclear safety-related structures, systems and components shall be approved prior to implementation by the station Manager, the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent.
- e. Incidents reportable pursuant to Technical Specification 6.6.2.1 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the supervisor of the Nuclear Safety Review Unit.
- f. The station Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President, Steam Production.
- g. The station security program, and implementing procedures therefore, shall be reviewed at least annually. Changes determined to be necessary as a result of such review shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the supervisor of the Nuclear Safety Review Unit.
- h. The station emergency plan, and implementing procedures therefore, shall be reviewed at least annually. Changes determined to be necessary as a result of such review shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the supervisor of the Nuclear Safety Review Unit.

6.1.2.2 Records

Records of the above activities shall be maintained.

6.1.3 Independent Review and Audit

A review and audit program shall be established by the Nuclear Safety Review Unit (NSRU) of the Duke Power Company Steam Production Department.

6.1.3.1 Function

The NSRU shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Quality assurance practices

6.1.3.2 Organization

- a. The NSRU shall have primary responsibility for review and audit of operational phase activities. The supervisor of the NSRU shall schedule periodic formal meetings of the staff, or appropriate subparts thereof. The period between these meetings shall not exceed 30 days.
- b. Consultants shall be utilized as determined by the supervisor of the NSRU to provide expert advice to the NSRU.

6.1.3.4 Subjects Requiring Review

The following subjects shall be reported to and reviewed by the NSRU:

- a. The safety evaluations for (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provisions of 10 CFR 50.59(b) to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Proposed changes in Technical Specifications or the Facility Operating Licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. Incidents that are the subjects of non-routine reports submitted to the Commission.

- h. Quality Assurance Department audits relating to station operations and actions taken in response to these audits.

6.1.3.5 Audits

Audits of station activities shall be performed under the cognizance of the NSRU. These audits shall encompass:

- a. The conformance of station operation to provisions contained within the Technical Specifications and applicable facility operating license conditions at least once per year.
- b. The performance, training and qualifications of the station staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months.
- d. The performance of activities required by the quality assurance program to meet the criteria of Appendix B to 10 CFR 50 at least once per two years.
- e. The station emergency plan and implementing procedures at least once per two years.
- f. The station security plan and implementing procedures at least once per two years.
- g. Any other area of station operation considered appropriate by the NSRU or the Vice President, Steam Production.

6.1.3.6 Responsibilities and Authorities

- a. The NSRU shall report to and advise the Vice President, Steam Production, on those areas of responsibility specified in Specifications 6.1.3.4 and 6.1.3.5.
- b. Minutes shall be prepared and forwarded to the Vice President, Steam Production, and to the Senior Vice President, Production and Transmission, following each formal meeting of the NSRU.
- c. Records of activities performed in accordance with Specifications 6.1.3.4 and 6.1.3.5 shall be maintained.
- d. Audit reports encompassed by Section 6.1.3.5 shall be forwarded to the Vice President, Steam Production, to the Senior Vice President, Production and Transmission, and to the management positions responsible for the areas audited.

Table 6.1-1
Minimum Operating Shift Requirements
With Fuel in the Three Reactor Vessels

Minimum AEC License Requirement	Unit 1 or 2 Above Cold Shutdown; Unit 3 Cold Shutdown	Units 1 and 2 Above Cold Shutdown; Unit 3 Cold Shutdown	Units 1 or 2 Above Cold Shutdown; Unit 3 Above Cold Shutdown	Units 1 and 2 Cold Shutdown; Unit 3 Above Cold Shutdown	Units 1, 2, and 3 Above Cold Shutdown	Units 1, 2, and 3 Cold Shutdown
Senior Reactor Operator	2	2	2	2	3	2
Reactor Operator	4	4	4	4	4	3
Unlicensed Operator	2	2	2	2	4	

Additional Requirements:

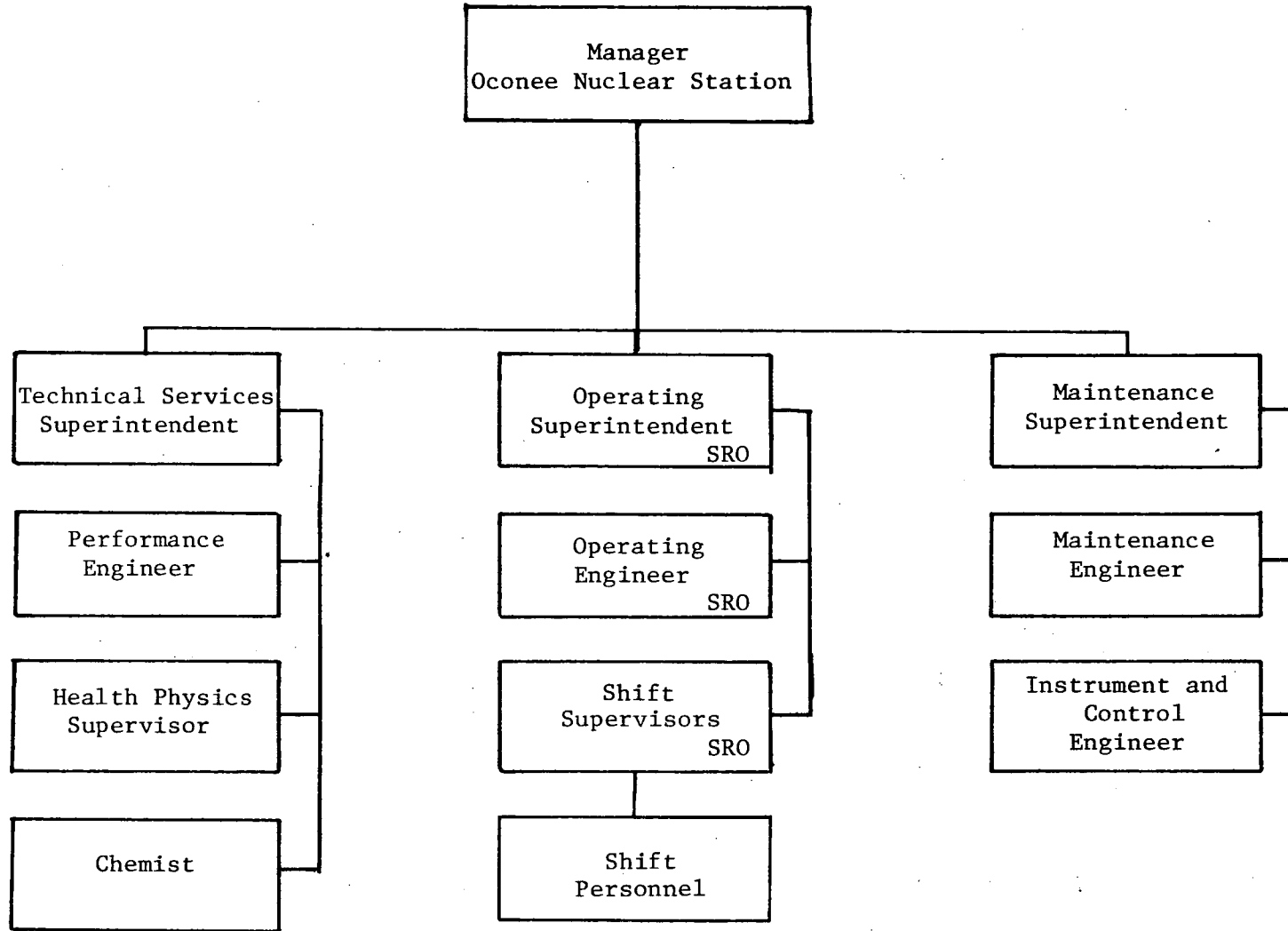
1. One licensed operator per unit shall be in the Control Room at all times when there is fuel in the reactor vessel
2. Two licensed operators shall be in the Control Room during startup and scheduled shutdown of a reactor.
3. At least one licensed operator shall be in the reactor building when fuel handling operations in the reactor building are in progress.
4. An operator holding a Senior Reactor Operator license and assigned no other operational duties shall be in direct charge of refueling operations.
5. At least one person per shift shall have sufficient training to perform routine health physics requirements.
6. If the computer for a reactor is inoperable for more than eight hours, an operator in addition to those required above shall supplement the shift crew.

6.1-5

7/19/74

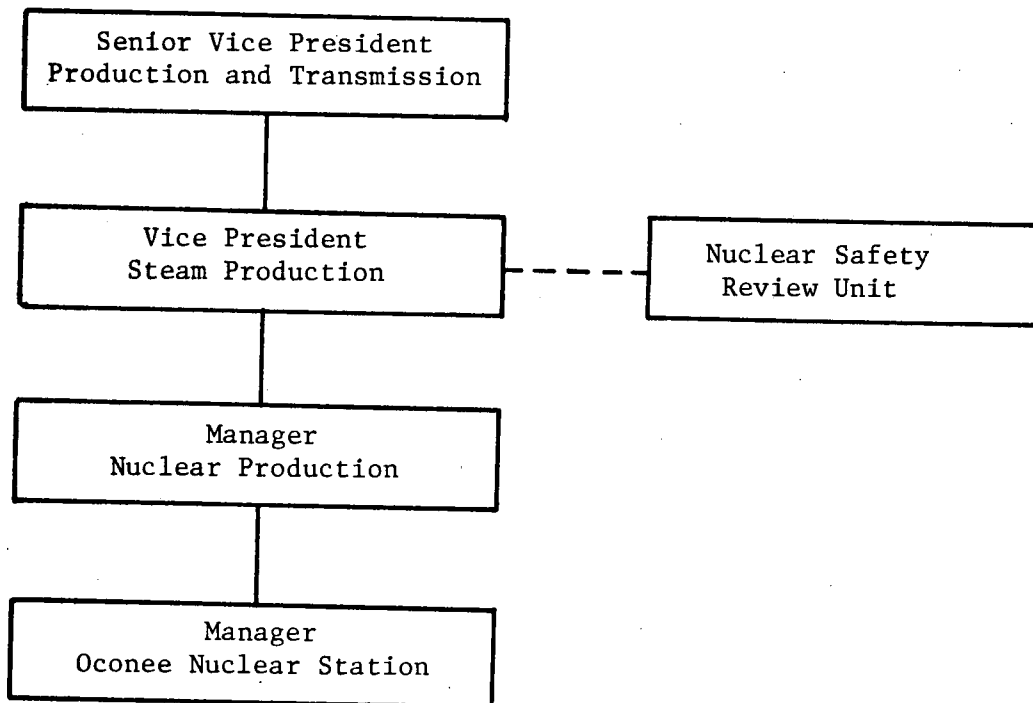
6.1-6

9/23/74



OCONEE NUCLEAR STATION
STATION ORGANIZATION CHART
FIGURE 6.1-1 | 14/9/1

September 23, 1974



**OCONEE NUCLEAR STATION
MANAGEMENT ORGANIZATION CHART**

Figure 6.1-2

6.2 ACTION TO BE TAKEN IN THE EVENT OF AN INCIDENT REPORTABLE TO THE COMMISSION

6.2.1 Any incident reportable to the Commission pursuant to Specification 6.6.2 shall be investigated promptly by the station Manager.

6.2.2 The Vice President, Steam Production, shall be notified of any such reportable incident. A written report shall be prepared which describes the circumstances leading up to and resulting from the incident and shall recommend appropriate action to prevent or minimize the probability of a recurrence. The report shall be submitted to the Vice President, Steam Production, and to the supervisor of the Nuclear Safety Review Unit.

6.2.3 The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.6.2.

6.3 ACTION TO BE TAKEN IN THE EVENT A SAFETY LIMIT IS EXCEEDED

- 6.3.1 If a safety limit is exceeded, the reactor shall be shut down immediately and maintained in a safe shutdown condition until the Commission authorizes resumption of operation.
- 6.3.2 The violation of a safety limit shall be reported to the Commission, the Vice President, Steam Production, and to the supervisor of the Nuclear Safety Review Unit immediately.
- 6.3.3 A report shall be prepared which describes (1) applicable circumstances preceding the violation, (2) effects of the violation upon structures, systems or components, and (3) corrective action taken to prevent recurrence. The report shall be reviewed by the Operating Superintendent and the station Manager. The report shall be submitted to the Vice President, Steam Production, and the supervisor of the Nuclear Safety Review Unit.
- 6.3.4 A report of the violation, with appropriate analyses and corrective action to prevent recurrence shall be submitted to the Commission within 10 days of the violation.