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| FROM: Duke Power Company Charlotte, N C A C Thies | | DATE OF DOC 6-19-75 | DATE REC'D 6-26-75 | LTR XX | TWX | RPT | OTHER |
| TO: Mr. A Giambusso | | ORIG 1 signed | CC | OTHER | SENT NRC PDR <u>XXXX</u> | | SENT LOCAL PDR <u>XXXX</u> |
| CLASS | UNCLASS <u>XXXX</u> | PROP INFO | INPUT | NO CYS REC'D 40 | DOCKET NO: 50-269/270/287 | | |
| DESCRIPTION: Ltr notarized 6-19-75 trans the following: | | | | ENCLOSURES: Proposed Amdt to Tech Spec: consists of revisions to Appendix A with regards to reporting requirements... 40 copies encl rec'd | | | |
| PLANT NAME: Oconee | | | | | | | |

FOR ACTION/INFORMATION

wtm 6-27-75

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DUKE POWER COMPANY

POWER BUILDING

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

A. C. THIES
SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

June 19, 1975

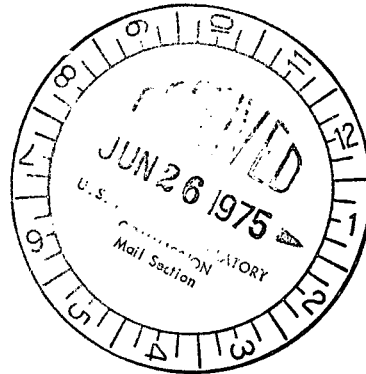
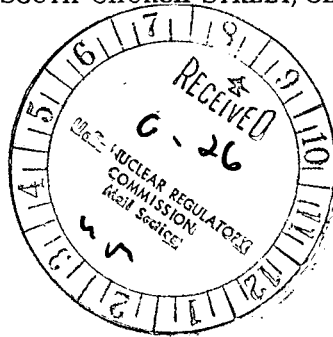
Mr. Angelo Giambusso, Director
Division of Reactor Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Dear Mr. Giambusso:

Pursuant to 10 CFR 50, §50.90, please find attached a proposed amendment to the Technical Specifications for Oconee Nuclear Station, Appendix A to Facility Operating Licenses DPR-38, -47, and -55. This proposed amendment supersedes my February 28, 1975 transmittal. Major changes from that previous submittal reflected in the attached are as follows:

- (1) Section 6.1.2.1.a has been clarified with regard to procedure changes which are to be reviewed, i.e., all procedure changes other than editorial or typographical changes shall be reviewed.
- (2) Section 6.1.2.1.a has been revised to incorporate provisions for temporary approvals.
- (3) Approval requirements for procedures, procedure changes, modifications and tests and experiments have been clarified, see Sections 6.1.2.1.a, 6.1.2.1.c and 6.1.2.1.e of the attached.
- (4) Minimum qualification requirements for reviewers of procedures, procedure changes, Technical Specification changes, and modifications have been established, see Section 6.1.2.1.d of the attached. These qualification requirements are consistent with the provisions of Sections 4.3 and 4.4 of ANSI N18.1-1971; and, therefore, assure that reviews will be performed by personnel with minimum qualifications comparable to those applicable to station supervisors and responsible professional/technical personnel.
- (5) Section 6.1.3.2.a has been revised to clarify that the NSRU is to perform broad, multi-discipline reviews.



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Mr. Angelo Giambusso

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- (6) Minimum qualification requirements for NSRU members have been established, see Section 6.1.3.2.b of the attached. These qualification requirements are consistent with the provisions of Section 4.6.1 of ANSI N18.1-1971 and with the existing Oconee Technical Specifications (Section 6.1.2.2.d) and, therefore, assure that NSRU functions will be performed by personnel with minimum qualifications comparable to those applicable to the "Engineer-in-Charge" of off-site technical support personnel and current independent review (NSRC) personnel.
- (7) Section 6.1.3.5.b has been revised to specify a minimum time for preparation and transmittal of minutes of NSRU meetings.
- (8) Section 6.1.3.5.d has been revised to specify a minimum time for preparation and transmittal of audit reports.

Very truly yours,

s/A. C. Thies

A. C. Thies

ACT:vr

Attachment

Mr. Angelo Giambusso
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June 19, 1975

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 Nuclear Regulatory 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.

s/A. C. Thies

A. C. Thies, Senior Vice President

ATTEST:

s/Lewis F. Camp

Lewis F. Camp
Assistant Secretary
(Seal)

Subscribed and sworn to before me this 19th day of June, 1975

s/Margaret D. Henderson
Notary Public
(Notarial Seal)

My Commission Expires:

April 26, 1978

-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 N18.1-1971, "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 N18.1-1971, "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 changes (other than editorial or typographical changes) thereto, shall be prepared by a qualified individual/organization. Each such procedure, or procedure change, shall be reviewed 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. Such procedures and procedure changes may be approved for temporary use by two members of the station staff, at least one of whom holds a Senior Reactor Operator's License on the unit(s) affected. Procedures and procedure changes shall be approved prior to use or within seven days of receiving temporary approval for use by the station Manager; or by the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent, as previously designated by the station Manager.
- b. Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be reviewed 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.

- c. Proposed modifications to station nuclear safety-related structures, systems and components shall be designed by a qualified individual/organization. Each such modification shall be reviewed 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. Proposed modifications to station nuclear safety-related structures, systems and components shall be approved prior to implementation by the station Manager; or by the Operating Superintendent, the Technical Services Superintendent, or the Maintenance Superintendent, as previously designated by the station Manager.
- d. Individuals responsible for reviews performed in accordance with 6.1.2.1.a, 6.1.2.1.b, and 6.1.2.1.c shall have a minimum of five years of technical experience, of which a minimum of one year shall be nuclear experience. A maximum of four years of this five years of experience may be fulfilled by academic or related technical training.
- e. 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; or by the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent, as previously designated by the station Manager.
- f. 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.
- g. 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.
- h. The station security program, and implementing procedures, 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.
- i. The station emergency plan, and implementing procedures, 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. Administrative control and 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, for the purpose of assuring interaction in reviews of specific operational phase activities. The period between these meetings shall not exceed 60 days.
- b. Members of the NSRU shall have a minimum of seven years of technical experience, of which a minimum of three years shall be in one or more of the areas given in 6.1.3.1. A maximum of four years of this seven years of experience may be fulfilled by academic or related technical training.
- c. Consultants shall be utilized as determined by the supervisor of the NSRU to provide expert advice to the NSRU.

6.1.3.3 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 (a)(1) 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 station 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.

6.1.3.4 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.

6.1.3.5 Responsibilities and Authorities

- a. The NSRU shall report to and advise the Vice President, Steam Production, on those areas of responsibility specified in Specifications 6.1.3.3 and 6.1.3.4.

- b. Minutes shall be prepared and forwarded to the Vice President, Steam Production, and to the Senior Vice President, Production and Transmission, within 14 days following each formal meeting of the NSRU.
- c. Records of activities performed in accordance with Specifications 6.1.3.3 and 6.1.3.4 shall be maintained.
- d. Audit reports encompassed by Section 6.1.3.4 shall be forwarded to the Vice President, Steam Production, and to the Senior Vice President, Production and Transmission, and to the management positions responsible for the areas audited within 30 days of completion of each audit.

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

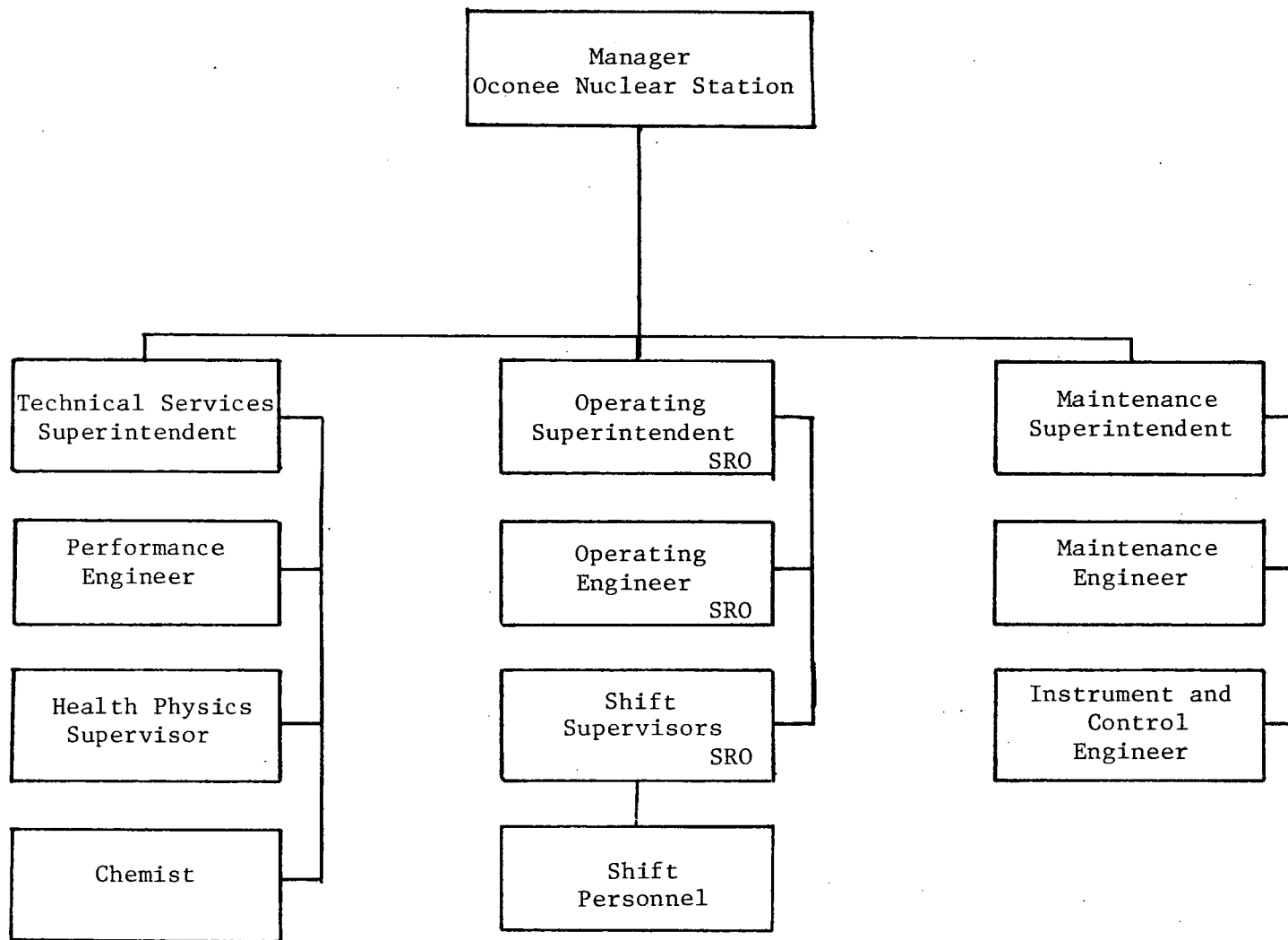
| <u>Minimum AEC License Requirement</u> | <u>Unit 1 or 2 Above Cold Shutdown; Unit 3 Cold Shutdown</u> | <u>Units 1 and 2 Above Cold Shutdown; Unit 3 Cold Shutdown</u> | <u>Units 1 or 2 Above Cold Shutdown; Unit 3 Above Cold Shutdown</u> | <u>Units 1 and 2 Cold Shutdown; Unit 3 Above Cold Shutdown</u> | <u>Units 1, 2, and 3 Above Cold Shutdown</u> | <u>Units 1, 2 and 3 Cold Shutdown</u> |
|--|--|--|---|--|--|---------------------------------------|
| 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.

6.1-6

7/19/74



6.1-7

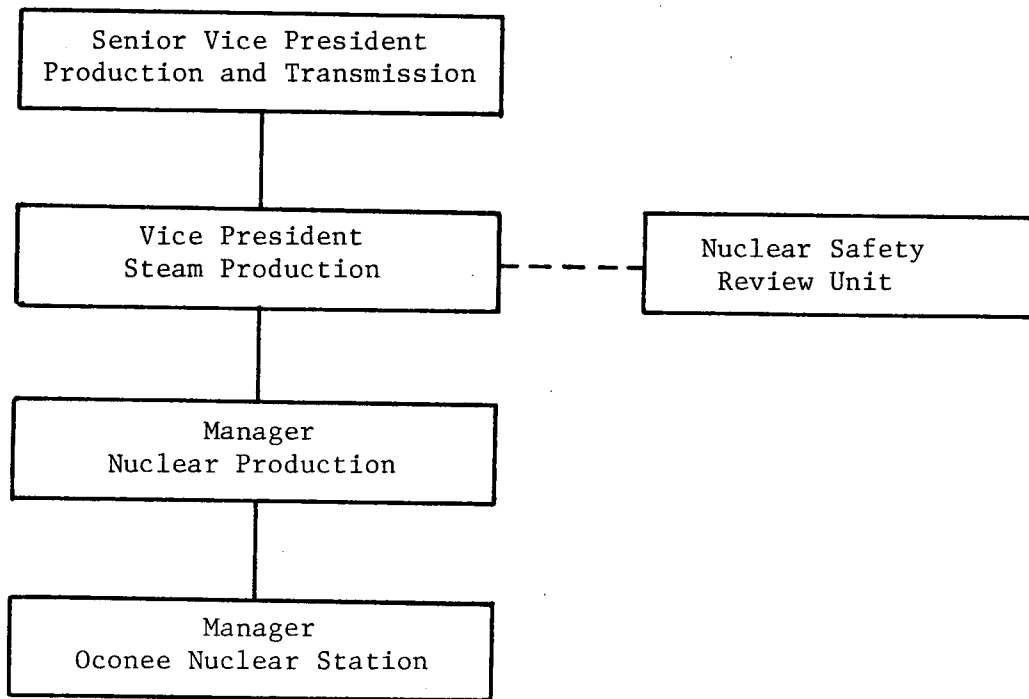
9/23/74



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.