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FROM: Niagara Mohawk Power Corporation Syracuse, N. Y. 13202 T. J. Brosnan	DATE OF DOC: 8-10-72	DATE REC'D 8-11-72	LTR X	MEMO	RPT	OTHER
TO: Mr. Skovholt	ORIG 3 signed	CC	OTHER	SENT AEC PDR <u>X</u> SENT LOCAL PDR <u>X</u>		
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DESCRIPTION:
Ltr re proposed changes to Appendix A of Tech Specs, trans the following:

ENCLOSURES:
Rev pages 117 thru 128 & page 130, encompassing paragraphs 6.1 thru 6.5 of Tech Specs for Nine Mile Point Nuclear Station, Unit # 1.

PLANT NAMES: Nine Mile Point Nuclear Station

(19 cys rec'd)

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20 added on rec'd 8-16-72

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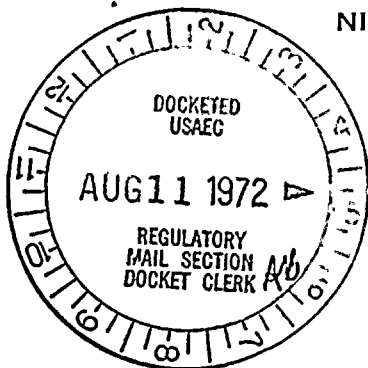
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NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK300 ERIE BOULEVARD, WEST
SYRACUSE, N. Y. 13202

August 10, 1972



Mr. Donald J. Skovholt
 Assistant Director for Reactor Operations
 Division of Reactor Licensing
 United States Atomic Energy Commission
 Washington, D. C. 20545



Dear Mr. Skovholt:

Re: Provisional Operating License: DPR-17
 Docket No.: 50-220

Pursuant to Paragraph 50.59 of 10 CFR Part 50, Niagara Mohawk Power Corporation proposes changes to Appendix A (Technical Specifications) of Provisional Operating License DPR-17 for the Nine Mile Point Nuclear Station.

Enclosed are revised pages 117 through 128 and page 130 encompassing paragraphs 6.1 through 6.5 of the Technical Specifications. These revisions incorporate changes in the Station Operating Organization preparatory to the joint operation of the Nine Mile Point Nuclear Station, Unit #1 and the James A. FitzPatrick Nuclear Power Plant.

An outline of the revisions is given below. References to the original Technical Specifications refer to the edition published May 1971 covering operation at 1850 Thermal Megawatts.

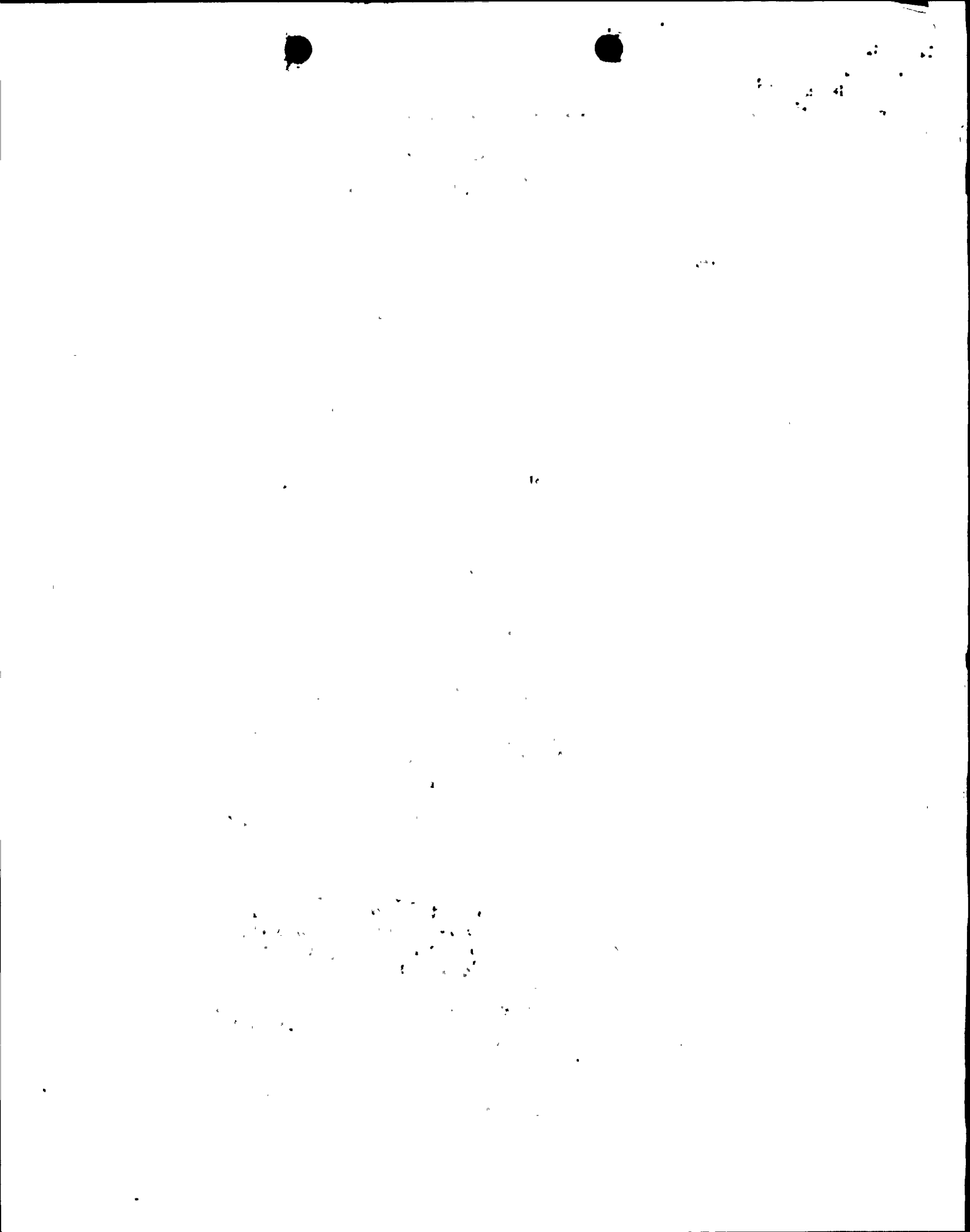
Page 117

Paragraph

- | | |
|--------------|--|
| 6.1.a. | A General Superintendent, Nuclear Generation is added to the Organization. |
| 6.1.b.(2)(a) | The qualifications for the General Superintendent are given. |
| 6.1.b.(2)(b) | The qualifications for the Station Superintendent are redefined to align with the site organization. The Assistant Station Superintendent is eliminated. |

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Page 118

Paragraph

6.1.b.(2)(c) The position of Operations Supervisor is replaced with an Assistant to the Station Superintendent for Operation with the same qualifications.

Page 119

6.1.b.(2)(j) A Station Assistant Radiochemistry and Radiation Protection Supervisor is added.

6.1.b.(2)(k) A Station Assistant Instrument and Control Supervisor is added.

6.1.b.(2)(l) The duties and qualifications of Assistants to the General Superintendent are defined.

Page 120

6.1.b.(2)(m) The qualifications of the Shift Operating Foreman and Relief Operator R are defined.

6.1.b.(2)(n) The qualifications of the Nuclear Auxiliary Operator E and Relief Operator P are defined.

6.1.b.(2)(o) The qualifications of other operators are defined.

6.1.b.(4)(original) The requirement for supplementing the operating forces by one additional operator when the process computer is inoperative is eliminated since the operating force has been permanently increased by one man.

6.1.b.(5)(original) The requirement for an additional operator on reactor startups is eliminated since the operating force has been permanently increased by one man.

6.1.b.(6)(original) This requirement has been renumbered 6.1.b(4)



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Page 120 (Cont'd)

Paragraph

6.1.c.(1)

The Station Operations Review Committee is renamed Site Operations Review Committee.

Page 121

6.1.c.(3)(a)

The members of the Site Operations Review Committee are listed. The General Superintendent, Nuclear Generation, Plant Superintendent, James A. FitzPatrick Nuclear Power Plant, and the Power Authority of the State of New York Resident Engineer are added. The Assistant Station Superintendent and the Operating Supervisors are eliminated.

6.1.c.(3)(b)

The composition of the Safety Review and Audit Board is augmented to encompass both plants on site. The Station Superintendent is replaced by the General Superintendent, Nuclear Generation (the same person) and the PASNY Principal Nuclear Engineer is added.

Page 123

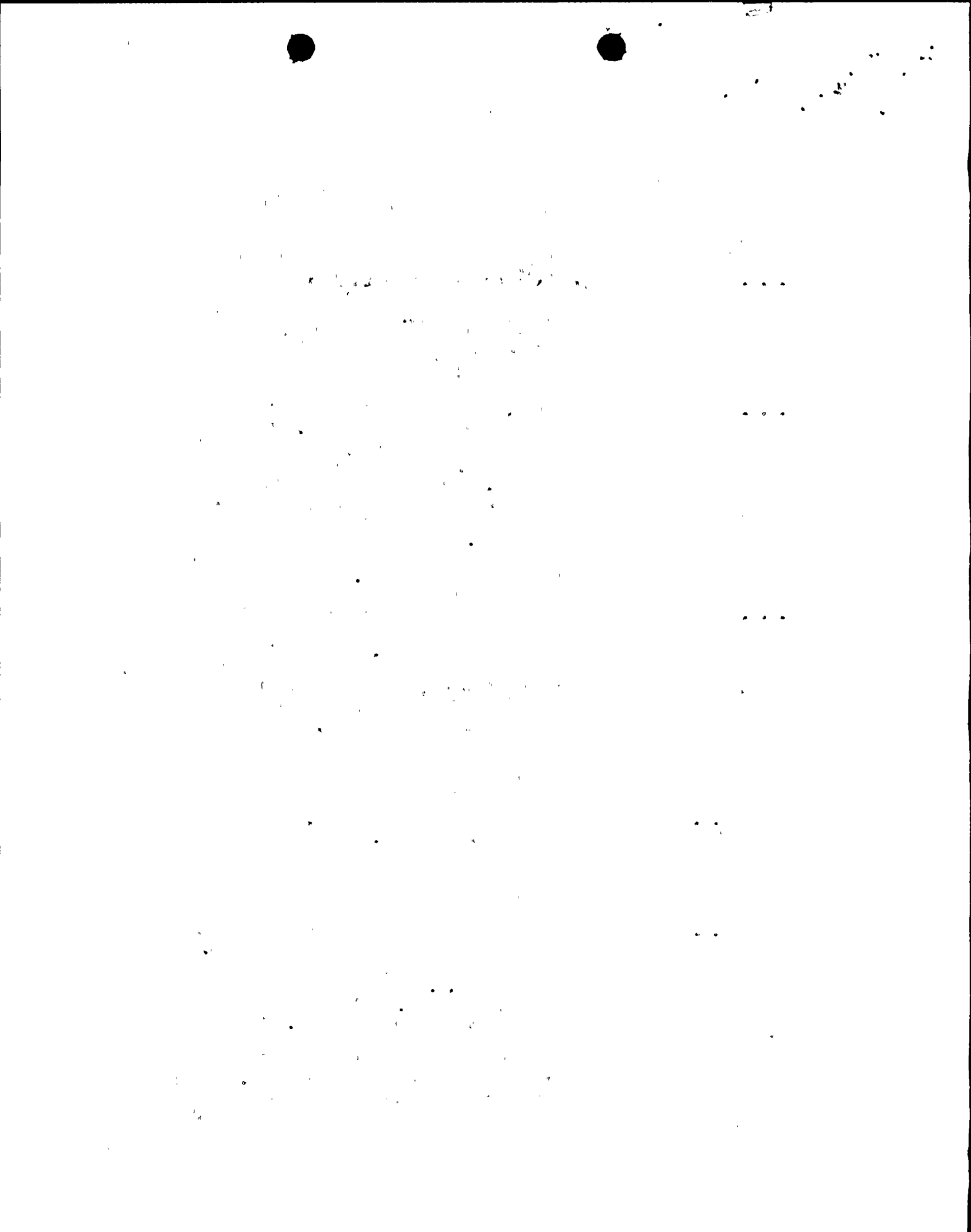
Figure 6.1.1

The General Superintendent, Nuclear Generation is added.

Page 124

Figure 6.1.2

The organization for both the Nine Mile Point Nuclear Station and the James A. FitzPatrick Nuclear Power Plant are shown on Figure 6.1.2 because a general staff is provided for administrative and technical support to both stations. Each station has an organization which is self sufficient in the routine functions of operation maintenance and repairs. Implementation of the support functions is administered by the station superintendent



Page 124 (Cont'd)

Figure 6.1.2
(Continued)

through the maintenance foreman "B" for mechanical and electrical repairs, and through the assistant instrument and control supervisor and the assistant radiochemistry and radiation protection supervisor in their respective disciplines. This relationship is shown in solid lines in Figure 6.1.2. Functional control is exercised by supervision from the general staff. Assignment of repair personnel or technicians to each plant is based on work requirements.

Page 125

Figure 6.1.3

As noted in paragraph 6.1.b.(3)(b), the General Superintendent, Nuclear Generation is added to both the Safety Review and Audit Board and the Site Operations Review Committee. The Station Superintendent is removed from the Safety Review and Audit Board but retained on the Site Operations Review Committee. The PASNY Principal Nuclear Engineer is added to the Safety Review and Audit Board and the PASNY Resident Engineer is added to the Site Operations Review Committee. The Station Superintendent, PASNY, FitzPatrick Plant, is also included in the Site Operations Review Committee. The Chief Engineer, PASNY, is added in a management support function.

Pages 126, 127, 128

Figure 6.1.4

The Station Operations Review Committee is changed to Site Operations Review Committee.

Page 128

Paragraph

6.3 a

The Station Operations Review Committee is changed to Site Operations Review Committee.



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Page 130

Paragraph

6.5

Change Station Operations Review Committee to Site Operations Review Committee and "approved for issuance" from Operating Supervisor to Assistant to the Station Superintendent.

Conclusion

These changes do not constitute a basic change in the mode of operation of the Nine Mile Point Nuclear Station as described in the Safety Analysis Report and do not involve an unreviewed safety question. All the original supervisory functions are preserved or augmented to provide for joint operation of two stations without diminishing the quality of supervision. These changes have been reviewed by the Safety Review and Audit Board which approves of the changes as submitted.

Very truly yours,



T. J. Brosnan
Vice President - Chief Engineer

Enclosure



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6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review and Audit

- a. The General Superintendent, Nuclear Generation is directly responsible for the safe, orderly, and efficient operation of all generating units on the Nine Mile Point Site. As such he is responsible for safeguarding the general public and Station personnel from radiation exposure and for adherence to all requirements of the Operating License and Technical Specifications. During periods when the General Superintendent is unavailable, he may delegate his responsibilities to either the Station Superintendent Nine Mile Point Nuclear Station or the Plant Superintendent James A. FitzPatrick Nuclear Power Plant.

The General Superintendent, or designated alternate, shall report to and be responsible to the General Superintendent of Operations, Central Division. The Niagara Mohawk management organization is shown in Figure 6.1.1. Other engineering departments within Niagara Mohawk Power Corporation not shown in Figure 6.1.1 will provide adequate technical support for the Nine Mile Point Nuclear Station.

- b. Station Organization

- (1) The Nine Mile Point Nuclear Site organization is shown on Figure 6.1.2.
- (2) The qualifications with respect to the educational and experience background required for supervisory positions of Figure 6.1.2 are as follows:

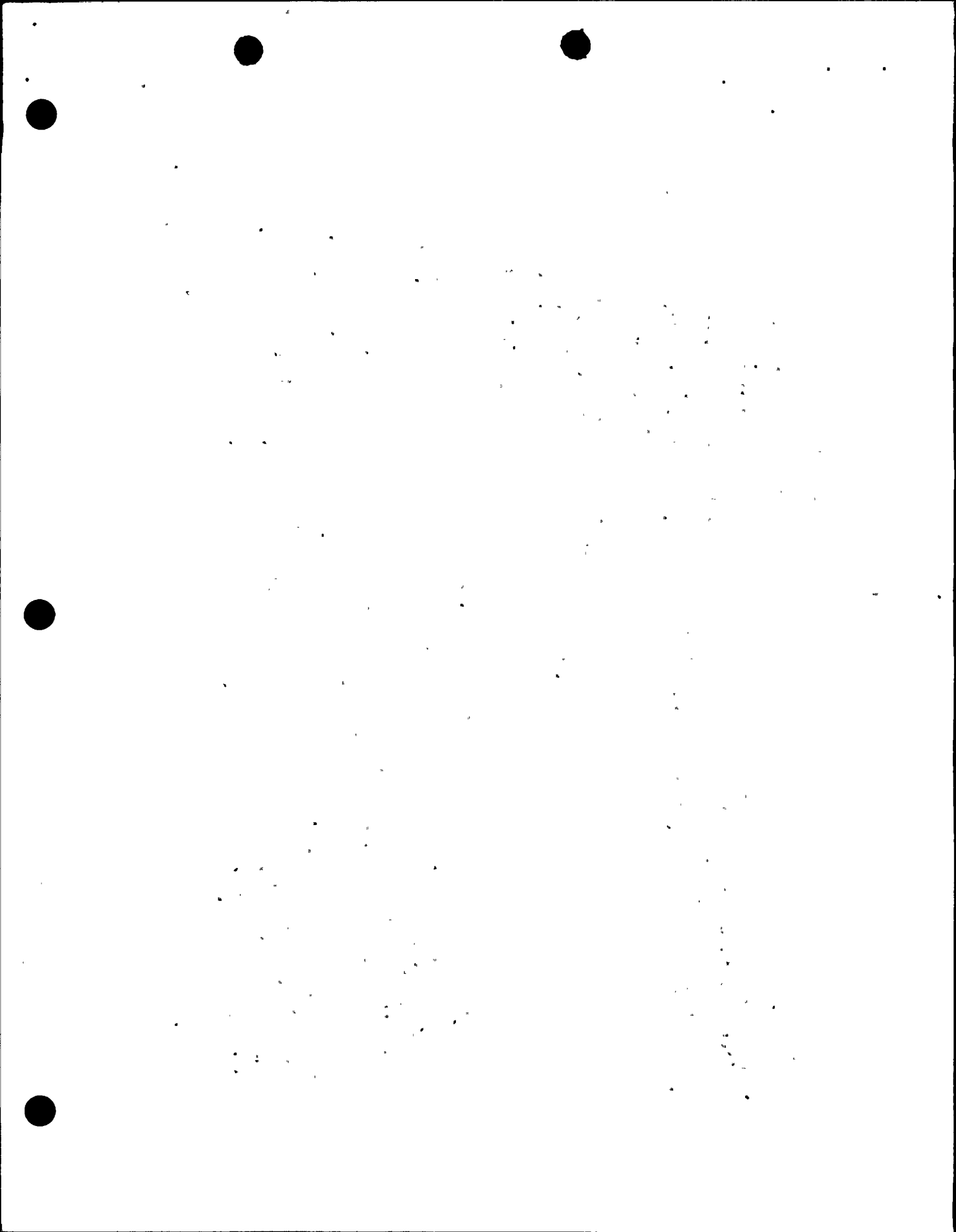
- (a) General Superintendent, Nuclear Generation

Education: Four year college graduate or equivalent.

Experience: Eight years' experience in the engineering, operation and/or maintenance of a thermal power station or similar facility with at least three years in a responsible supervisory position of such facilities. His specialized training shall provide him with a good knowledge of nuclear power station technology and with a thorough understanding of the technical and administrative controls required to meet license and safety requirements.

- (b) Station Superintendent

Education: Four year college graduate or equivalent.



Experience: Five years' experience in the engineering, operation and/or maintenance of a thermal power station or similar facility with at least two years in a responsible supervisory position of such facilities. His specialized training shall provide him with a practical knowledge of nuclear power station equipment and controls and a good understanding of reactor physics and radiation protection.

(c) Assistant to the Station Superintendent for Operation

Education: Four year college graduate or equivalent.

Experience: Five years' experience in the engineering, operation and/or maintenance of a thermal power station or similar facility with at least two years in a responsible supervisory position of such facilities. He will obtain a senior reactor operator license for Nine Mile Point Nuclear Station.

(d) Results Supervisor

Education: Four year college graduate or equivalent.

Experience: Five years' experience in the engineering and/or operation of a thermal power station or similar facility with at least two years in a responsible supervisory position of such facilities.

(e) Maintenance Supervisor

Education: High school graduate or equivalent.

Experience: Eight years' experience in the operations and/or maintenance of a thermal power station or similar facility with at least three years in a responsible supervisory position of such facilities.

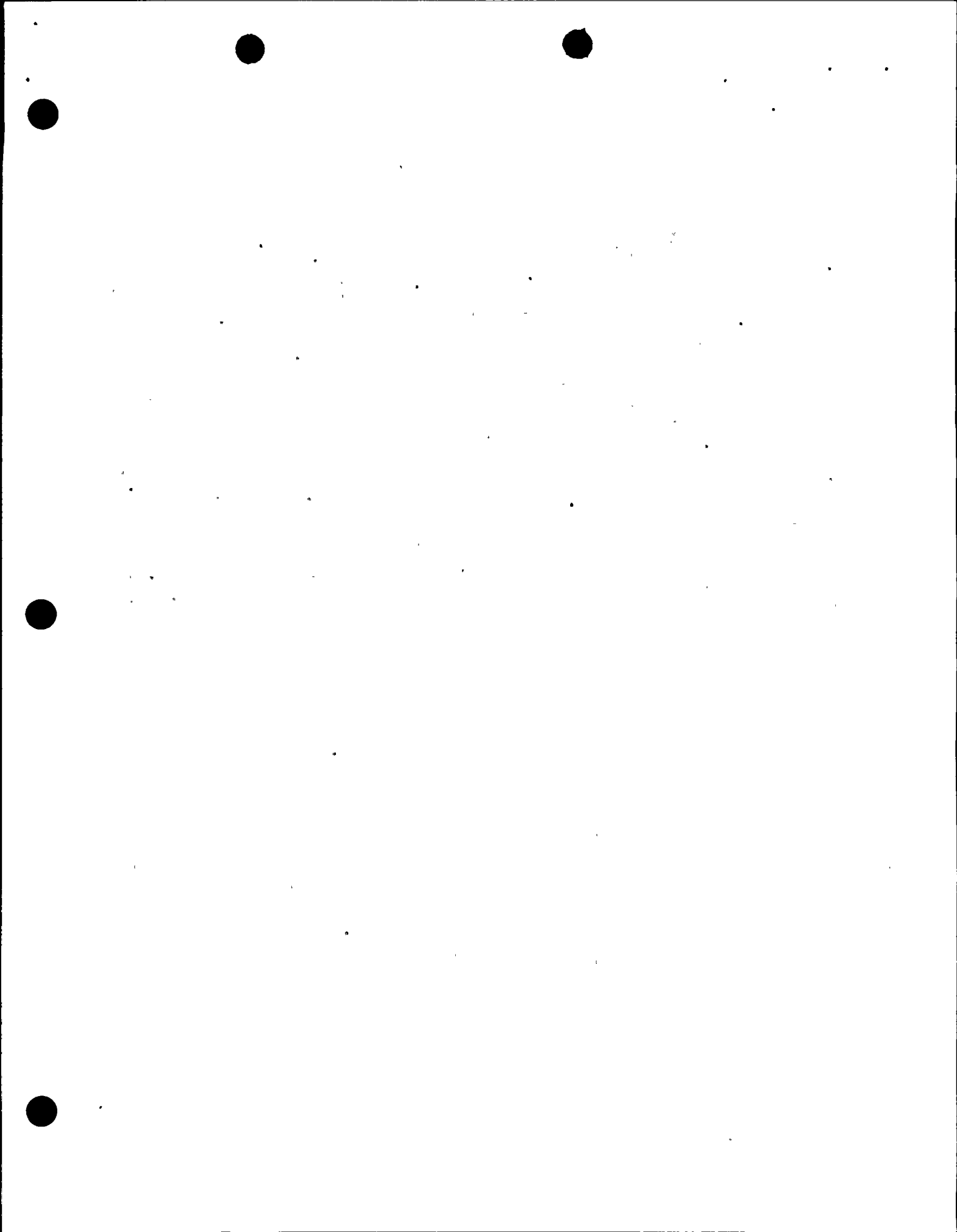
(f) Reactor Analyst Supervisor

Education: Four year college graduate or equivalent.

Experience: Three years' experience in the engineering and/or operations of a thermal power station or similar facility with at least one year's training in nuclear technology.

(g) Radiochemistry and Radiation Protection Supervisor

Education: Four year college graduate or equivalent.



Experience: Three years' experience in the engineering and/or operation of a thermal power station or similar facility with at least one year's experience in the radiation protection and chemistry section of a nuclear facility.

(h) Instrument and Control Supervisor

Education: Four year college graduate or equivalent.

Experience: Three years' experience in the engineering and/or operation of a thermal power station or similar facility with at least one year's experience with power station instrumentation and control systems.

(i) Station Shift Supervisors

Education: High school graduate or equivalent.

Experience: Five years' experience in the operation of a thermal power station or similar facility with at least two years' training in nuclear station technology. Each will obtain a senior reactor operator license for Nine Mile Point Nuclear Station.

(j) Station Assistant Radiochemistry and Radiation Protection Supervisor

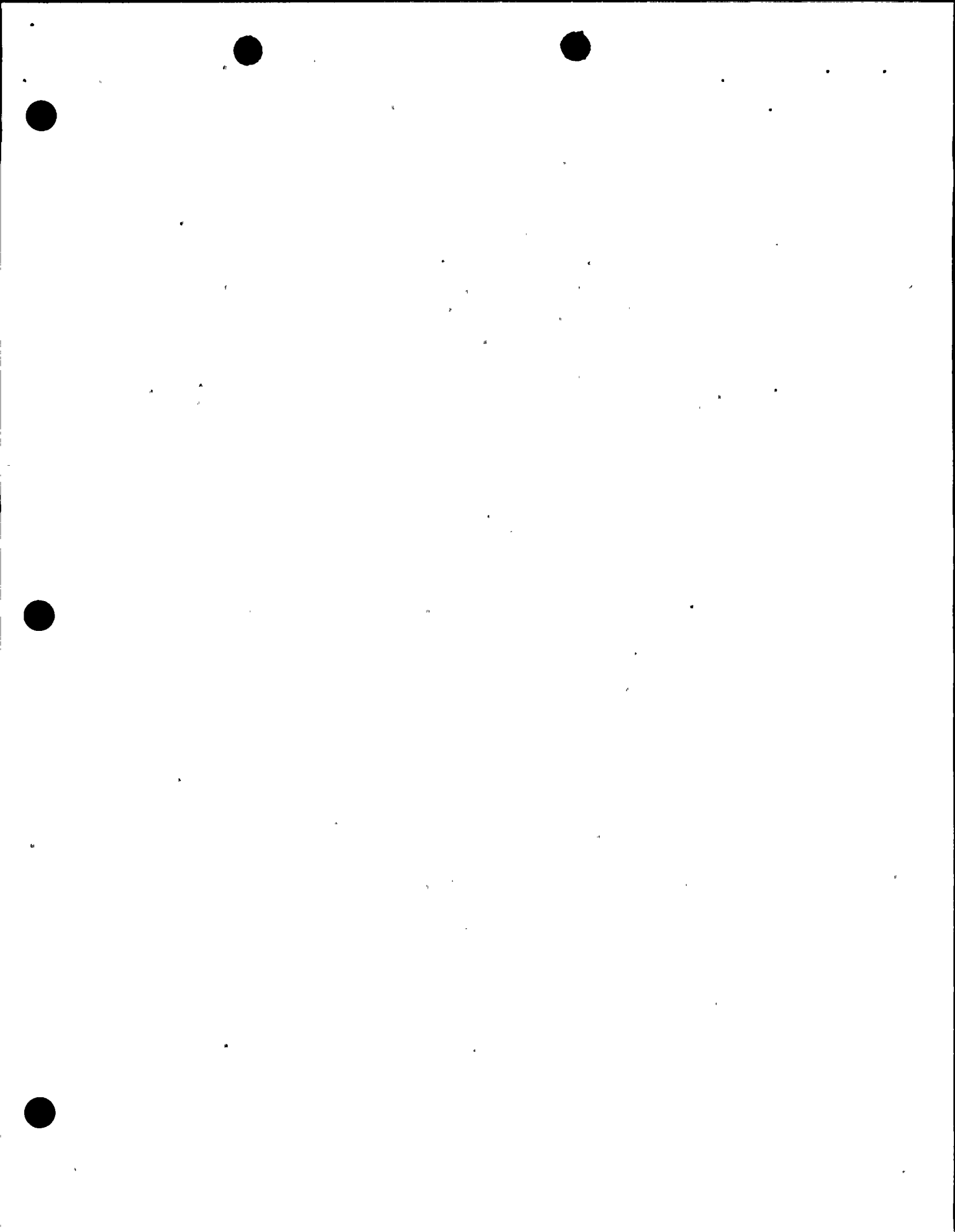
The Station Assistant Radiochemistry and Radiation Protection Supervisor shall be a two year graduate or equivalent in engineering or chemistry. In addition, he shall have specialized training in radiation protection (health physics) and in radiation chemistry, and work experience in a responsible capacity at a nuclear power station or comparable facility.

(k) Station Assistant Instrument and Control Supervisor

The Station Assistant Instrument and Control Supervisor shall have an Associate's degree in engineering or equivalent and should have a thorough knowledge of the theory and operation of all conventional and nuclear instrumentation used in the station. He shall have extensive experience in a responsible capacity in instrumentation and control systems. His specialized training shall include work experience at a nuclear power station.

(l) Assistants to the General Superintendent

Assistants to the General Superintendent shall be graduate engineers, chemists, physicists,



or technical specialists in an on-the-job training capacity.

(m) Shift Operating Foreman and Relief Operator R

The Shift Operating Foreman and Relief Operator R shall be high school graduates or equivalent with at least four years' experience in power plant operation, at least one year of which is in an operating nuclear power plant. The Shift Operating Foreman and Relief Operator R shall be required to obtain an AEC reactor operator's license.

(n) Nuclear Auxiliary Operator E and Relief Operator P

The Nuclear Auxiliary Operator E and Relief Operator P shall be high school graduates or equivalent with at least two years' experience in power plant operation, at least one of which is in nuclear power. The Nuclear Auxiliary Operator E and Relief Operator P shall be required to obtain an AEC operator's license.

(o) Other Operators

Other Operators shall be high school graduates or equivalent, and have had previous experience in a power station.

(3) The functional organization for operation to the Station is shown on Figure 6.1.2. The type and number of licensed operators required shall be as follows:

(a) At least one licensed senior reactor operator shall be at the Station at all times there is fuel in the reactor vessel.

(b) At least one licensed reactor operator or senior reactor operator shall be in the control room at all times there is fuel in the reactor vessel.

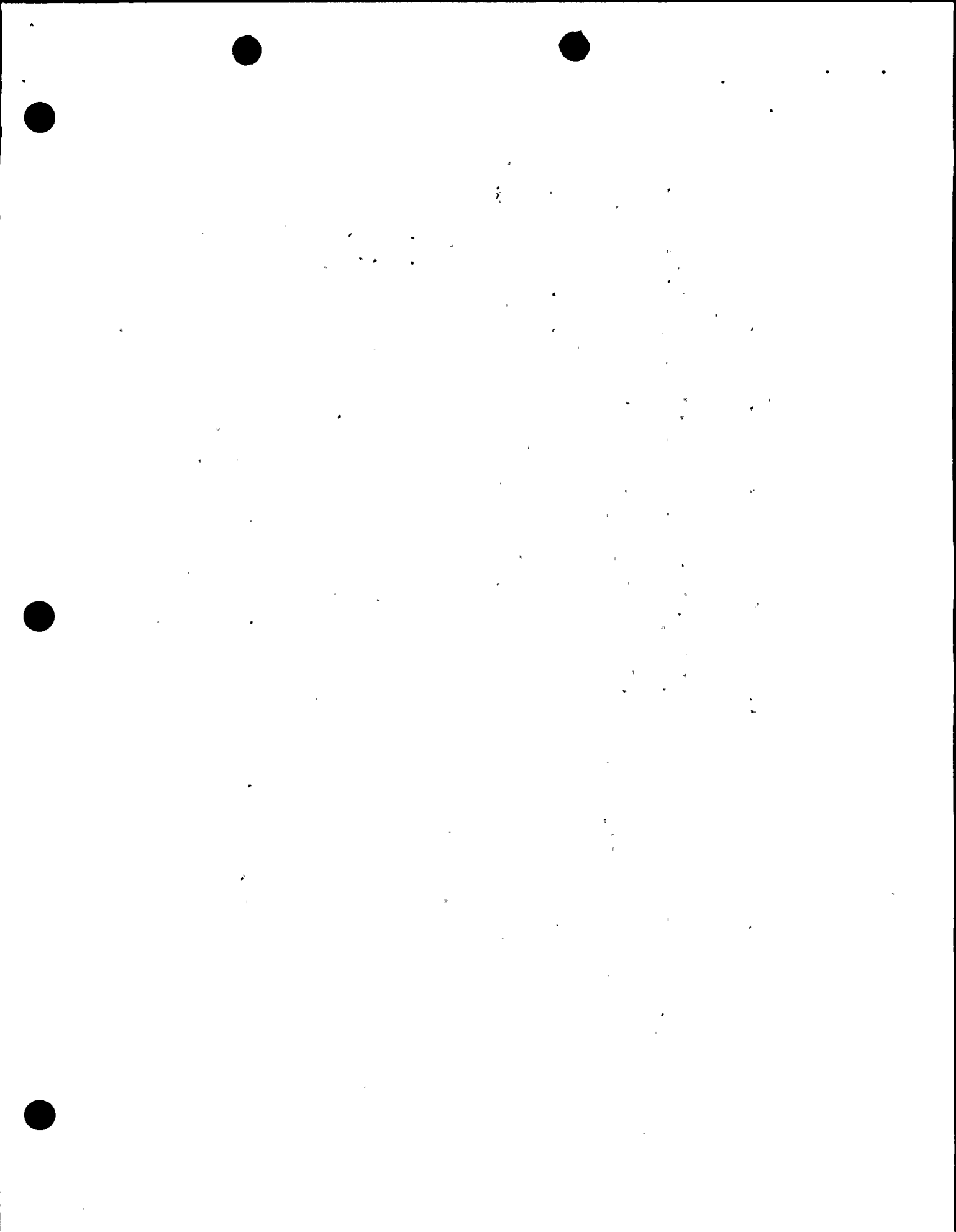
(4) The stack monitor readout shall be monitored on the "flight panel" trend recorder or on a trend printout typewriter whenever the process computer is available.

c. Safety Review and Audit

(1) The following safety groups as shown in Figure 6.1.3 are organized to ensure the Station is operated in a safe manner.

(a) Site Operations Review Committee

(b) Safety Review and Audit Board



The Site Operations Review Committee is composed of supervisors attached to the Nine Mile Point Station and the James A. FitzPatrick Plant.

The Safety Review and Audit Board is composed of individuals knowledgeable in the various disciplines affecting Station safety including at least one technical member from outside the Niagara Mohawk Power Corporation organization for the first few years of Station operation.

In the absence of the Chairman, an acting Chairman who meets the education and experience qualifications will be designated.

- (2) The Vice President - Chief Engineer or in his absence the Vice President - Operations has the authority to perform the responsibilities listed in Figure 6.1.4.
- (3) The qualifications with respect to the education and experience required for members of the safety groups of Figure 6.1.3 are as follows:

(a) Site Operations Review Committee:

General Superintendent - Nuclear Generation - See Section 6.1.b (2) (a) above
Station Superintendent - NMPNS - See Section 6.1.b (2) (b) above
Plant Superintendent - FitzPatrick Plant - See Section 6.1.b (2) (b) above
Results Supervisor - See Section 6.1.b (2) (d) above
Maintenance Supervisor - See Section 6.1.b (2) (e) above
PASNY - Resident Engineer - Not presently assigned.

(b) Safety Review and Audit

Staff Engineer or Manager - Chairman

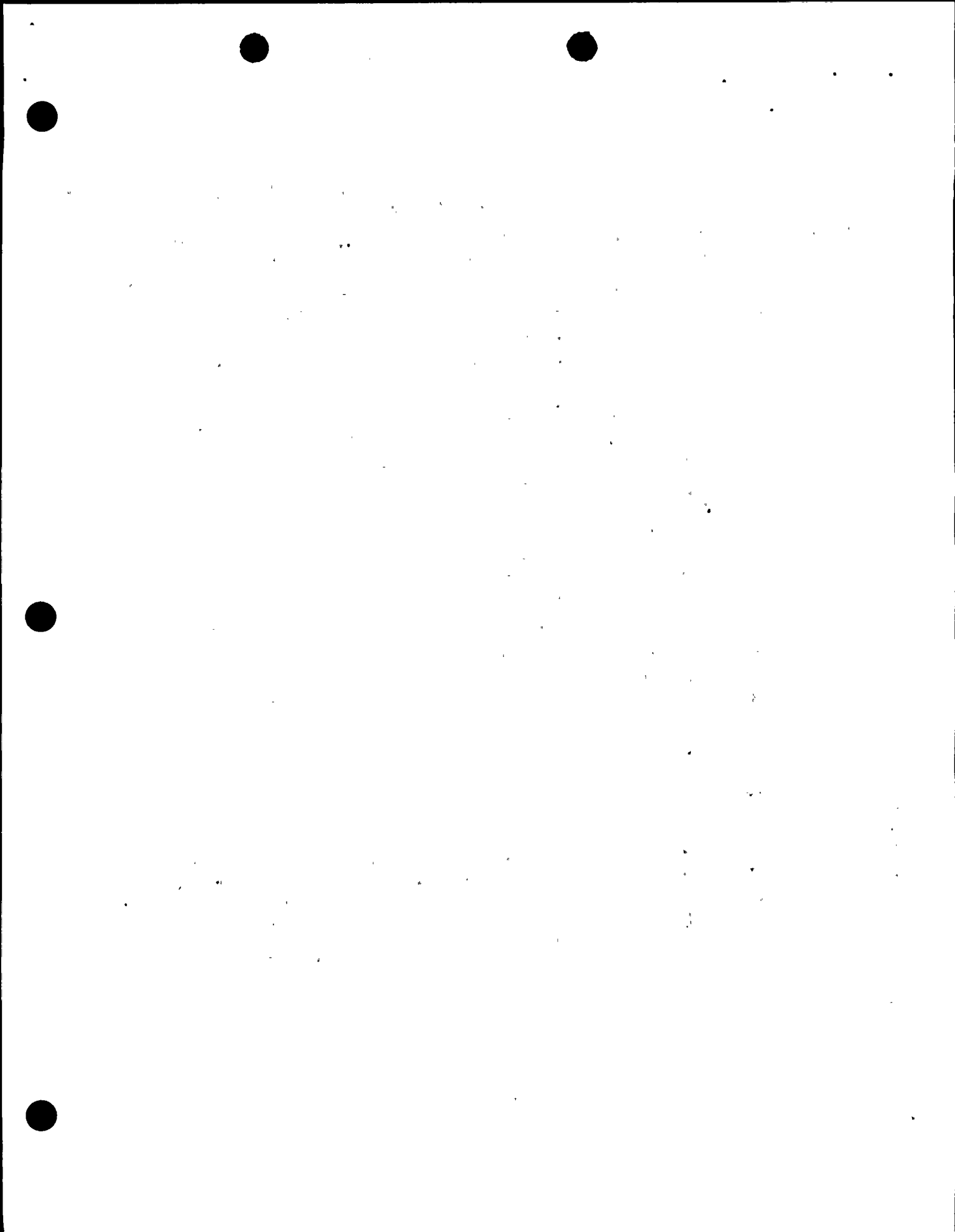
Education: Four year college graduate or equivalent

Experience: Ten years' electric utility experience with at least five years' in a responsible engineering position.

General Superintendent - Nuclear Generation - See Section 6.1.b (2) (a) above

Staff Engineer - Nuclear

Education: Four year college graduate in engineering or equivalent



Experience: Five years' experience in the engineering or operations of nuclear facilities with at least three years' experience in nuclear engineering.

Staff Engineer - Mechanical or Electrical

Education: Four year college graduate in engineering or equivalent.

Experience: Five years' experience in the engineering of mechanical or electrical components and control systems for thermal power stations or similar facilities.

Staff Engineer - Environmental

Education: Four years college graduate or equivalent.

Experience: Two years' experience in analysis of radiological effects on the environment.

PASNY, Principal Nuclear Engineer

Education: Four year college graduate in engineering or equivalent

Experience: Five years' experience in the engineering or operations of nuclear facilities with at least three years' experience in nuclear engineering.

Consultant (at least one)

Education: Minimum of four year college graduate in discipline of his speciality

Experience: Five years' experience in his specialty related to Nuclear Power plants or the discipline he represents.

- (c) The qualifications for membership in the safety groups with respect to the education and experience background shall be maintained at the level at least equal to the above requirements.



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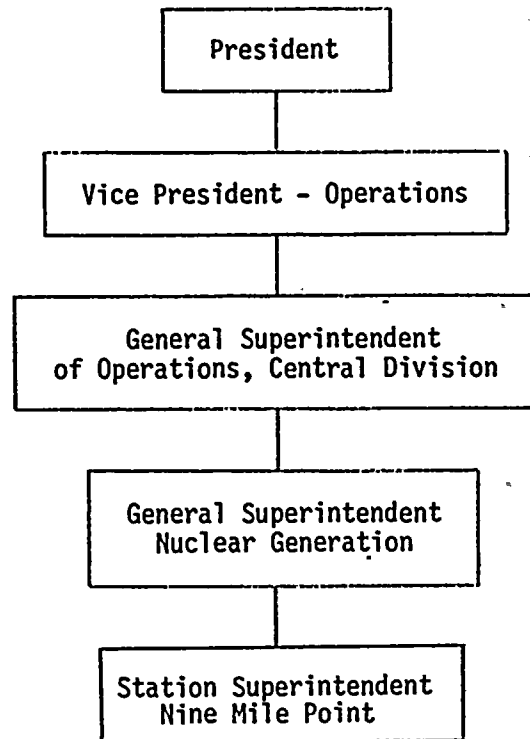
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FIGURE 6.1.1

Nine Mile Point Nuclear Station
Management Organization Chart



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NINE MILE POINT NUCLEAR STATION

ASSISTANTS TO
THE SUPERINTENDENT
AS REQUIRED

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

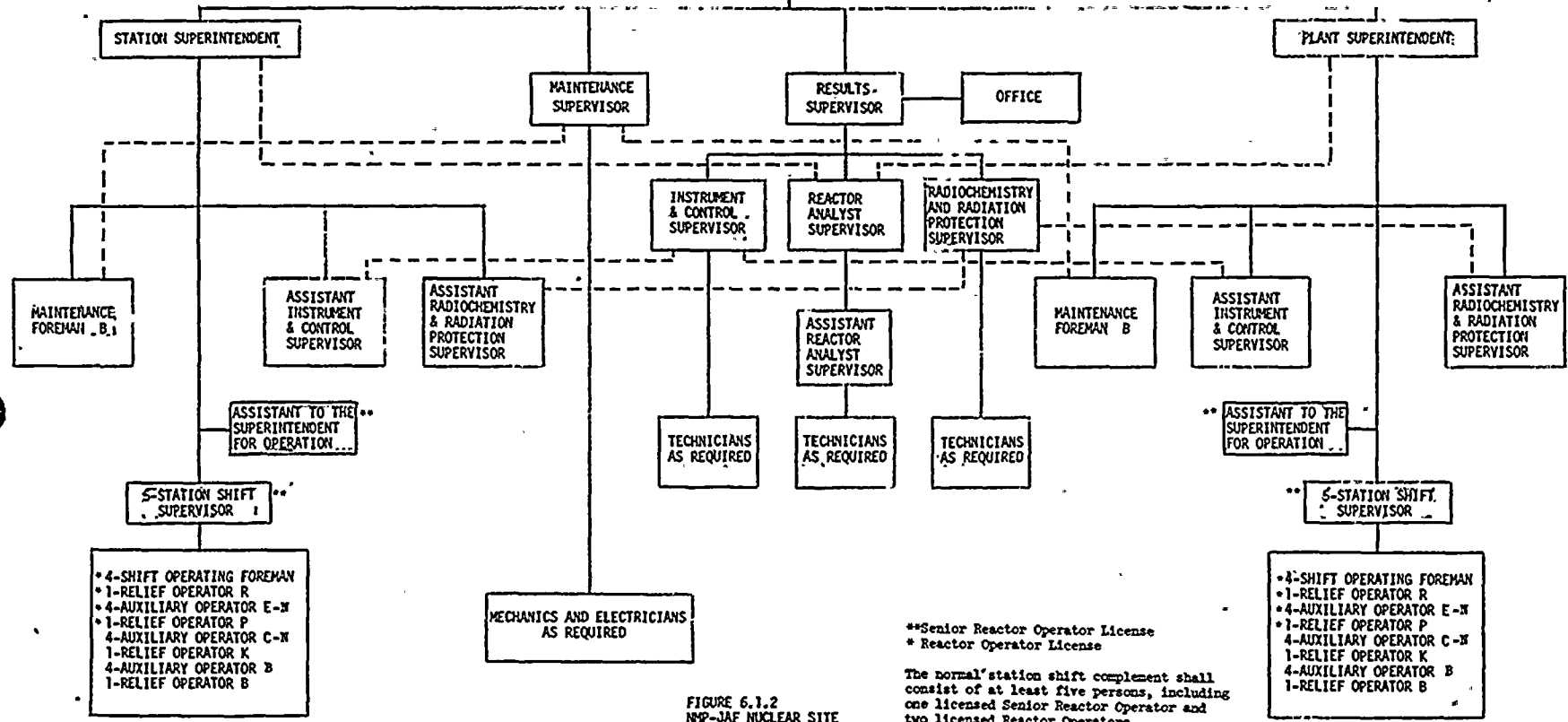


FIGURE 6.1.2
NMP-JAF NUCLEAR SITE
OPERATION ORGANIZATION

**Senior Reactor Operator License
* Reactor Operator License
The normal station shift complement shall consist of at least five persons, including one licensed Senior Reactor Operator and two licensed Reactor Operators.



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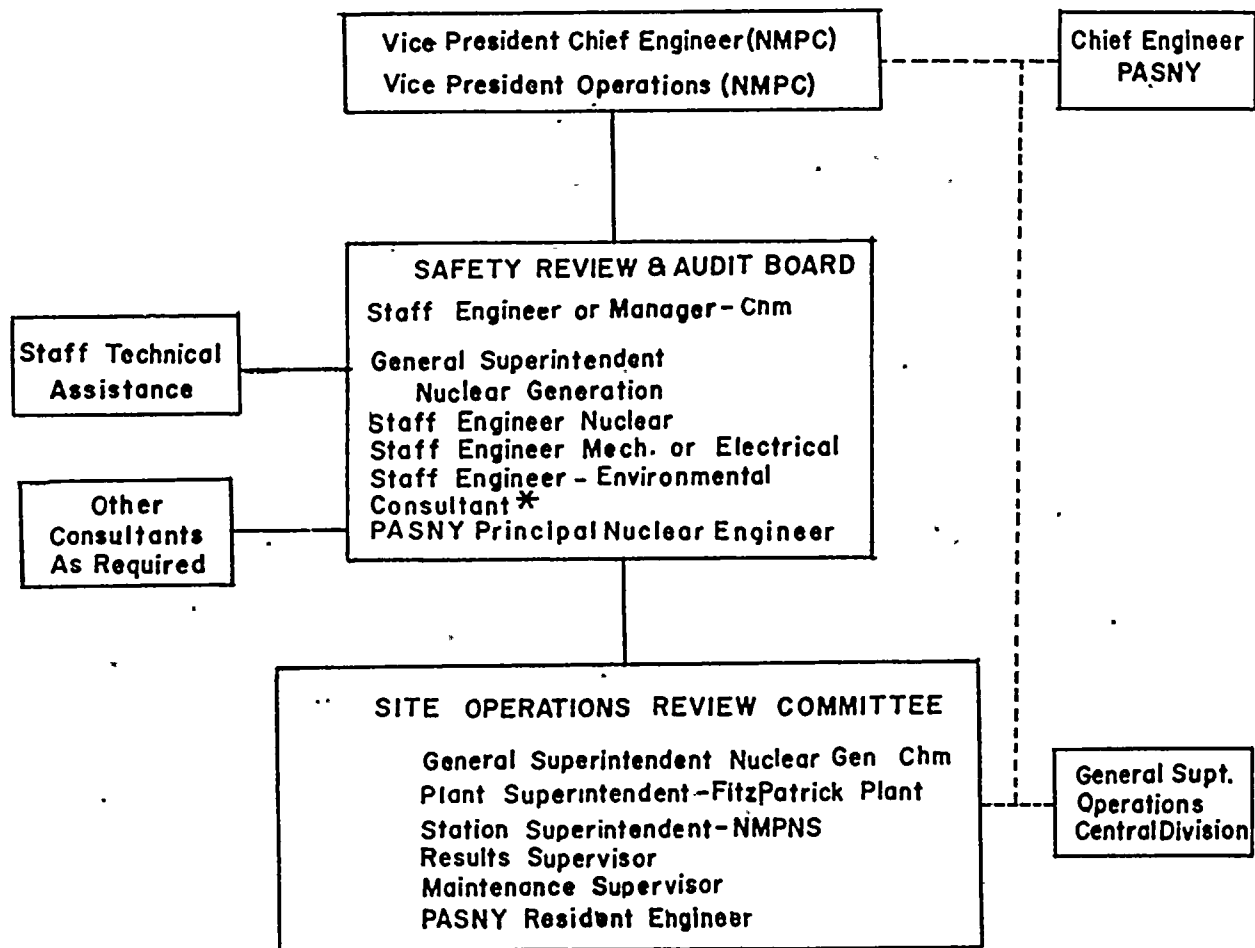
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* At least one technical member from outside the Niagara Mohawk Power Corporation organization for the first few years of Station operation

FIGURE 6.1.3
SAFETY ORGANIZATION
NINE MILE POINT NUCLEAR STATION
NIAGARA MOHAWK POWER CORPORATION

FEDERAL BUREAU OF INVESTIGATION
 UNITED STATES DEPARTMENT OF JUSTICE
 SECURITY ORGANIZATION
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Revised July 1975

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* At least one member of the Security Organization shall be assigned to each office of the Department of Justice.

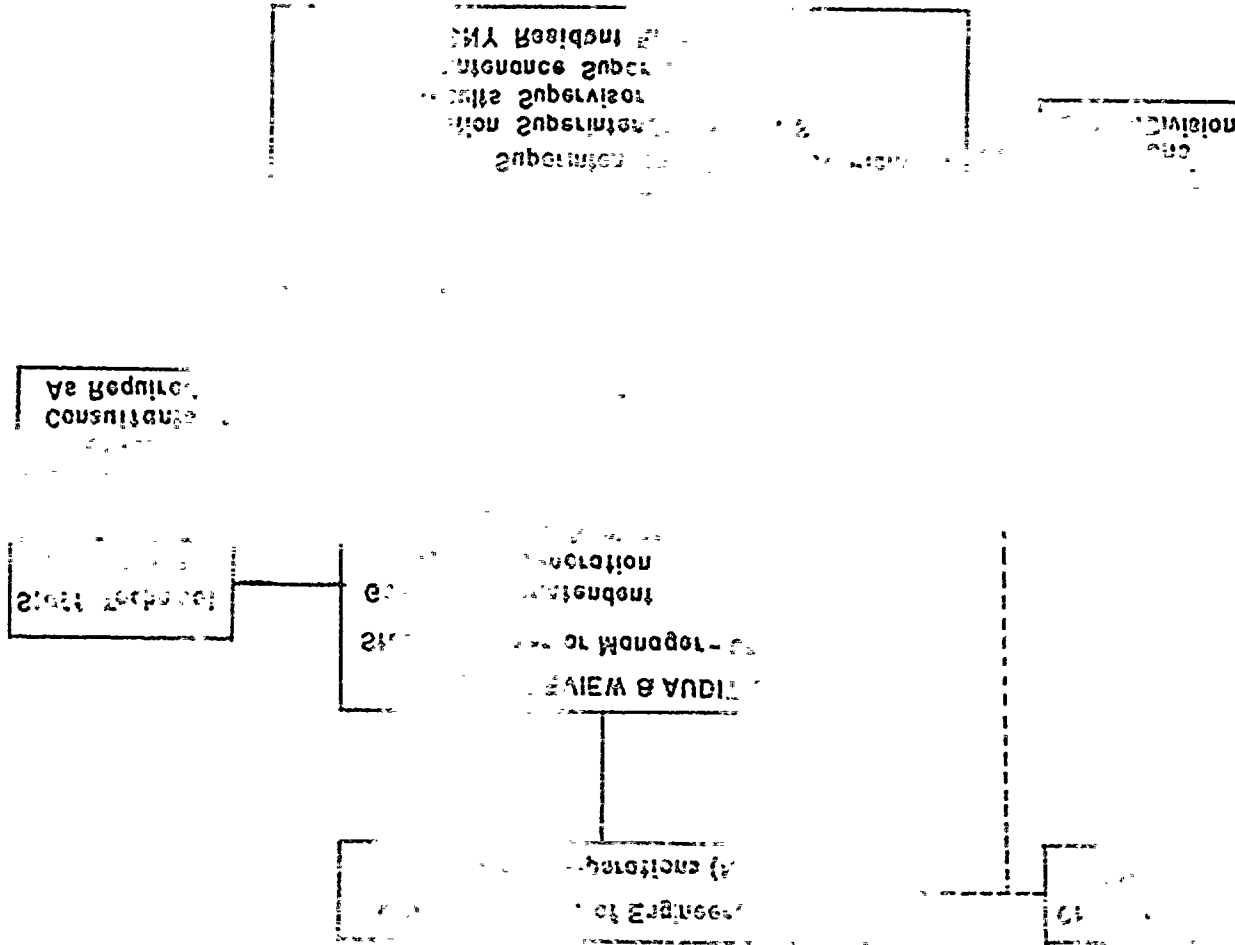


Figure 6.1.4

Responsibilities and Authority of Safety Organization
Nine Mile Point Nuclear Station

<u>Area</u>	<u>Site Operations Review Committee</u>	<u>Safety Review & Audit Board</u>	<u>Vice President - Chief Engineer Vice President - Operations</u>
Station Safety	<ol style="list-style-type: none">1. Review & approve all initial & revised procedures covering normal & emergency situations.2. Continuing analysis of Station operations to detect potential safety problems.	<ol style="list-style-type: none">1. Review any abnormalities arising during Station operation. Advise V.P. Chief Engr. and V.P. Operations.2. Perform periodic audits of Station operations, equipment performance, logs and procedures for compliance with license requirements & tech. specs.3. Review & approve test & operating procedures which would significantly affect Station safety.	<ol style="list-style-type: none">1. Provide overall management guidance.2. Review & approve results of periodic audits.
Technical Specifications	<ol style="list-style-type: none">1. Recommend modifications.2. Analyze & submit report to Station Review & Audit Board when a violation occurs.	<ol style="list-style-type: none">1. Review and analyze recommended changes. Prepare necessary papers and forward to V.P. Chief Engr. & V.P. Operations.2. Review & evaluate tech. spec. violations. Make specific recommendations to prevent recurrence. Submit safety analysis to V.P. Chief Engr. & V.P. Operations	<ol style="list-style-type: none">1. Formally submit safety analysis report to AEC if a technical specification is violated.2. Review, approve and formally submit to AEC recommended changes to tech. specs.



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Figure 6.1.4 (cont.)

**Responsibilities and Authority of Safety Organization
Nine Mile Point Nuclear Station**

<u>Area</u>	<u>Site Operations Review Committee</u>	<u>Safety Review & Audit Board</u>	<u>Vice President - Chief Engineer Vice President - Operations</u>
Design Changes	<ol style="list-style-type: none"> 1. Recommend design changes & request technical assistance as needed to implement changes. 2. Review effect of design changes on tech. spec. requirements. Recommend modifications if needed. 	<ol style="list-style-type: none"> 1. Review and approve requests for design changes - document reasons for change & whether it involves an "unreviewed safety question." Determine if tech. spec. modification is warranted. 2. Provide technical assistance to Station as required. 	<ol style="list-style-type: none"> 1. Approve all major proposed changes. Formally submit to AEC all necessary reports and applications.
Meeting Frequency	Monthly, and as required.	Quarterly, and as required.	As required.
Quorum	Chairman, or alternate, plus three members.	Chairman, alternate, plus three members.	
Records	Minutes shall be recorded of all meetings and copies forwarded to the Safety Review & Audit Board.	Minutes shall be recorded of all meetings and copies forwarded to the V. P. Chief Engr., V. P. Operations and Division Superintendent of Operations.	



6.2 Action to be Taken if a Safety Limit is Violated .

If a safety limit is exceeded, the reactor will be shut down until a safety analysis of the incident is made by the Safety Review and Audit Board. The incident and analysis will then be reviewed with the AEC, and the reactor started up only after authorized by the AEC.

6.3 Action to be Taken if a Limiting Safety System Setting (LS³) or a Limiting Condition for Operation (LCO) is Violated

- a. A Station shutdown initiated by an LS³ will be reviewed by the Site Operations Review Committee and logged in the permanent Station records. If required, suitable modification of operating procedures will be made to prevent a recurrence.
- b. During an actual transient if a Station parameter exceeds its corresponding LS³ without initiating an automatic corrective action, the event will be considered a violation of the Technical Specifications and will be reported in writing to the Safety Review and Audit Board and to the AEC. The result of the review of the violation by this Board and the corrective actions taken will be recorded and maintained as part of the permanent Station records.
- c. In the event of a Limiting Condition for Operation not being met, the remedial action required shall be initiated. The incident will be reviewed by the Site Operations Review Committee, and the action taken will be recorded and maintained as part of the permanent Station records.
- d. If a Limiting Condition for Operation is not met and the Station is not properly secured, the incident will be reported in writing to the Safety Review and Audit Board and the Atomic Energy Commission since this represents a violation of the Technical Specifications. The result of the review of the violation by this Board and the actions taken will be recorded and maintained as part of the permanent Station records.



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RADIATION AREA

6.5 Procedures

The Station will be operated and maintained in accordance with approved procedures. All procedures and changes thereto covering both normal operating and emergency procedures will be reviewed by the Site Operations Review Committee and approved for issuance by the Reactor Analyst, Radiation Protection Supervisor, Assistant to the Station Superintendent and Station Superintendent. The initial Station operating procedures will also be reviewed by the nuclear steam supply contractor and the Safety Review and Audit Board.

The following types of detailed procedures will be maintained.

- a. Normal startup, operation, and shutdown procedures for the major Station components and systems. These procedures will include applicable checkoff lists and instructions.
- b. Procedures which delineate the operator action required in the event of specific Station malfunctions and emergencies.
- c. Radiological procedures for all Station personnel.
- d. A site emergency plan which will include procedures to guide the behavior and action of all personnel in the event of emergency conditions, including the release of radioactive materials. Semiannual nuclear incident drills will be conducted to assure that all Station personnel are familiar with the emergency plan. All the procedures will be prefaced with the applicable Technical Specification limitations or the 10CFR20 regulations. The emergency plan and the results of the drills shall be reviewed annually by the Safety Review and Audit Board.

