

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

#### NIAGARA MOHAWK POWER CORPORATION

#### DOCKET NO. 50-410

#### NINE MILE POINT NUCLEAR STATION, UNIT 2

#### AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 9 License No. NPF-69

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Niagara Mohawk Power Corporation (the licensee) dated June 6, 1988, as amended July 22 and November 8, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-69 is hereby amended to read as follows:



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#### (2) <u>Technical Specifications and Environmental Protection Plan</u>

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, as revised through Amendment No. <sup>9</sup> are hereby incorporated into this license. Niagara Mohawk Power Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance, to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert a. Coper

Robert A. Capra, Director Project Directorate I-1 Division of Reactor Projects, I/II

Attachment: Changes to the Technical Specifications

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Date of Issuance: June 30, 1989

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#### ATTACHMENT TO LICENSE AMENDMENT

#### AMENDMENT NO. 9 TO FACILITY OPERATING LICENSE NO. NPF-69

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## Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
6-1	6-1
	6-1a
6-2	6-2
6-3	6-3
6-4	6-4
6-5	6-5
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6-15	6-15
6-18	6-18
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#### 6.1 RESPONSIBILITY

6.1.1 The General Superintendent - Nuclear Generation shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during the Superintendent's absence.

6.1.2 The Station Shift Supervisor - Nuclear (or during the Supervisor's absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Executive Vice President - Nuclear Operations shall be reissued to all station personnel annually.

#### 6.2 ORGANIZATION

#### 6.2.1 <u>Onsite and Offsite Organization</u>

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions or in equivalent forms of documentation. The organization charts shall be documented in the Final Safety Analysis Report, and the functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions are documented in procedures.
- b. The Executive Vice President Nuclear Operations shall have corporate responsibility for overall plant nuclear safety. The Executive Vice President - Nuclear Operations shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. The General Superintendent Nuclear Generation shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the plant.
- d. The persons responsible for the training, health physics and quality assurance functions may report to an appropriate manager onsite, but shall have direct access to responsible corporate management at a level where action appropriate to the mitigation of training, health physics and quality assurance concerns can be accomplished.

#### UNIT STAFF

- 6.2.2 The unit organization shall be subject to the following:
- Each on-duty shift shall be composed of at least the minimum shift crew shown in Table 6.2.2-1;

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• ORGANIZATION

UNIT STAFF

- 6.2.2 (Continued)
- b. At least one Licensed Operator shall be in the control room when fuel is in the reactor. In OPERATIONAL CONDITIONS 1, 2, or 3, at least one Licensed Senior Operator or Licensed Operator shall be at the controls of the unit.
- c. A Radiation Protection Technician\* shall be on site when fuel is in the reactor;
- d. At least two Licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips.
- e. A Licensed Senior Operator shall be required in the control room during OPERATIONAL CONDITIONS 1, 2, and 3 and when the emergency plan is activated. This may be the Station Shift Supervisor - Nuclear, the Assistant Station Shift Supervisor - Nuclear or other individuals with a valid senior operator license. When the emergency plan is activated in OPERATIONAL CONDITIONS 1, 2, or 3 the Assistant Station Shift Supervisor -Nuclear becomes the Shift Technical Advisor and the Station Shift Supervisor - Nuclear is restricted in the control room until an additional Licensed Senior Operator arrives.

<sup>\*</sup> The Radiation Protection Technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming crewman being late or absent.

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, ORGANIZATION

#### UNIT STAFF

- 6.2.2 (Continued)
- f. A Licensed Senior Operator shall be responsible for all movement of new and irradiated fuel within the site boundary. All core alterations shall be directly supervised by a Licensed Senior Operator who has no other concurrent responsibilities during this operation. A Licensed Operator will be required to manipulate the controls of all fuel handling equipment except movement of new fuel from receipt through dry storage. All fuel moves within the core shall be directly monitored by a member of the reactor analyst group.
- g. A Fire Brigade\* of five members shall be maintained on site at all times. The Fire Brigade shall not include the Shift Supervisor and the two other fimembers of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- h. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Licensed Senior Operators, licensed operators, health physicists, auxiliary operators, and key maintenance personnel.
- i. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:
  - 1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
  - 2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
  - 3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.

<sup>\*</sup> The radiation protection qualified individual and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

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#### ORGANIZATION

#### UNIT STAFF

- 6.2.2.i (Continued)
  - 4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Superintendent, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures so that individual overtime shall be reviewed monthly by the General Superintendent - Nuclear Generation or a designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

j. The Superintendent Operations Nuclear, Assistant Superintendent Operations Nuclear, Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear shall hold senior reactor operator licenses.

#### **5.2.3 INDEPENDENT SAFETY ENGINEERING GROUP**

#### FUNCTION

6.2.3.1 The Independent Safety Engineering Group (ISEG) shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Supervisor Technical Support - Nuclear.

#### COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years of professional level experience in his/her field, at least 1 year of which experience shall be in the nuclear field.

#### RESPONSIBILITIES

6.2.3.3 The principal function of the ISEG is to examine plant operating characteristics and the various NRC and industry licensing and service advisories, and to recommend areas for improving plant operations or safety. The ISEG will perform independent review of plant activities, including maintenance, modifications, operational concerns, and analysis and make recommendations to the Supervisor Technical Support - Nuclear.

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6.5 REVIEW AND AUDIT

#### 6.5.1 SITE OPERATIONS REVIEW COMMITTEE

#### FUNCTION

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6.5.1.1 The Site Operations Review Committee (SORC) shall function to advise the General Superintendent - Nuclear Generation on all matters related to nuclear safety.

#### COMPOSITION

6.5.1.2 The SORC shall be composed of the

Chairman:	General Superintendent - Nuclear Generation
Member:	Station Superintendent - Nuclear Generation
Member:	Technical Superintendent - Nuclear Generation
Member:	Superintendent Technical Services - Nuclear
Member:	Site Superintendent Maintenance - Nuclear
Member:	Supervisor Instrument and Control - Nuclear
Member:	Superintendent Chemistry and Radiation Management
Member:	Supervisor Reactor Analysis
Member:	Supervisor Technical Support
Member:	Engineer

#### **ALTERNATES**

6.5.1.3 All alternate members shall be appointed in writing by the SORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SORC activities at any one time.

#### MEETING FREQUENCY

6.5.1.4 The SORC shall meet at least once every calendar month and as convened by the SORC Chairman or a designated alternate.

#### QUORUM

6.5.1.5 The quorum of the SORC necessary for the performance of the SORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or a designated alternate and four members including alternates.

#### RESPONSIBILITIES

6.5.1.6 The SORC shall be responsible for:

 a. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Executive Vice President -Nuclear Operations and to the Safety Review and Audit Board;

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#### 6.5 REVIEW AND AUDIT

#### 6.5.1 SITE OPERATIONS REVIEW COMMITTEE

#### 6.5.1.6 (Continued)

- b. Review of all REPORTABLE EVENTS;
- c. Review of unit operations to detect potential hazards to nuclear safety;
- d. Performance of special reviews, investigations, or analyses and reports thereon as requested by the General Superintendent - Nuclear Generation or the Safety Review and Audit Board;
- e. Safety evaluations and analyses resulting from technical review and control activities 6.5.2.1, 6.5.2.2, 6.5.2.3, and 6.5.2.5.

#### DUTIES

6.5.1.7 The SORC shall:

- a. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6.a through e constitutes an unreviewed safety question.
- b. Provide written notification within 24 hours to the Executive Vice President - Nuclear Operations and the Safety Review and Audit Board of disagreement between the SORC and the General Superintendent - Nuclear Generation; however, the General Superintendent - Nuclear Generation shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

#### RECORDS

6.5.1.8 The SORC shall maintain written minutes of each SORC meeting that at a minimum, document the result of all SORC activities performed under the responsibilities and authority provisions of these Technical Specifications. Copies shall be provided to the Executive Vice President - Nuclear Operations and the Safety Review and Audit Board.

#### 6.5.2 TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.1 Each procedure and program required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be prepared by a qualified individual/organization. Each such procedure, and changes thereto, shall be reviewed by an individual/group other than the individual/group that prepared the procedure, or changes thereto, but who may be from the same organization as the individual/group that prepared the procedure, or changes thereto. Approval of procedures and programs and changes thereto and their safety evaluations, shall be controlled by administrative procedures.

6.5.2.2 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 that prepared the proposed change, but who may be from the same organization as the individual/group that prepared the proposed change.

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#### REVIEW AND AUDIT

#### TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.2 (Continued)

Proposed changes to the Technical Specifications shall be approved by the General Superintendent - Nuclear Generation.

6.5.2.3 Proposed modifications to unit structures, systems, and components that affect nuclear safety shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group that designed the modification, but who may be from the same organization as the individual/group that designed the modification. Proposed modifications to structures, systems, and components and the safety evaluations shall be approved before implementation by the General Superintendent - Nuclear Generation; or the Station Superintendent - Nuclear Generation, or the Technical-Superintendent - Nuclear Generation, as previously designated by the General Superintendent - Nuclear Generation.

6.5.2.4 Individuals responsible for reviews performed in accordance with Specifications 6.5.2.1, 6.5.2.2, and 6.5.2.3 shall be members of the station supervisory staff, previously designated by the General Superintendent - Nuclear Generation to perform such reviews. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary such review shall be performed by the appropriate designated station review personnel.

6.5.2.5 Proposed tests and experiments that affect station nuclear safety and are not addressed in the FSAR or Technical Specifications and their safety evaluations shall be reviewed by the General Superintendent - Nuclear Generation; or by the Station Superintendent - Nuclear Generation, or the Technical Superintendent - Nuclear Generation, as previously designated by the General Superintendent - Nuclear Generation.

6.5.2.6 The General Superintendent - Nuclear Generation shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Executive Vice President - Nuclear Operations.

6.5.2.7 The facility security program and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the General Superintendent - Nuclear Generation and transmitted to the Executive Vice President - Nuclear Operations, and to the Chairman of the Safety Review and Audit Board.

6.5.2.8 The facility emergency plan and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the General Superintendent - Nuclear Generation and transmitted to the Executive Vice President - Nuclear Operations and to the Chairman of the Safety Review and Audit Board.

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REVIEW AND AUDIT

#### TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.9 The General Superintendent - Nuclear Generation shall assure the performance of a review by a qualified individual/organization of changes to the Radiological Waste Treatment systems.

6.5.2.10 Review of any accidental, unplanned, or uncontrolled radioactive release, including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence. and the forwarding of these reports to the Executive Vice President - Nuclear Operations and to the Safety Review and Audit Board.

6.5.2.11 Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL. Approval of any changes shall be made by the General Superintendent - Nuclear Generation or a designee before implementation of such changes.

6.5.2.12 Reports documenting each of the activities performed under Specifications 6.5.2.1 through 6.5.2.9 shall be maintained. Copies shall be provided to the Executive Vice President - Nuclear Operations and the Safety Review and Audit Board.

#### 6.5.3 SAFETY REVIEW AND AUDIT BOARD

#### FUNCTION

6.5.3.1 The Safety Review and Audit Board (SRAB) 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 and
- **i**. Other appropriate fields associated with the unique characteristics of the nuclear power plant

The SRAB shall report to and advise the Executive Vice President - Nuclear Operations on those areas of responsibility in Specifications 6.5.3.7 and 6.5.3.8.

#### COMPOSITION

6.5.3.2 The SRAB shall be composed of the:

Chairman: Vice President, Manager or Staff Engineer Member: General Superintendent - Nuclear Generation Member: Staff Engineer - Nuclear Member: Staff Engineer - Mechanical or Electrical Member: Staff Engineer - Environmental Consultant (Specification 6.5.3.4) Member:

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REVIEW AND AUDIT

SAFETY REVIEW AND AUDIT BOARD

#### AUDITS

- 6.5.3.8 (Continued)
- j. Any other area of unit operation considered appropriate by the SRAB or the Executive Vice President Nuclear Operations.
- k. The Fire Protection Program and implementing procedures at least once per 24 months.
- 1. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- m. An inspection and audit of the fire protection and loss prevention program ' shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

#### AUTHORITY

6.5.3.9 The SRAB shall report to and advise the Executive Vice President – Nuclear Operations on those areas of responsibility specified in Sections 6.5.3.7 and 6.5.3.8.

#### RECORDS

6.5.3.10 Records of SRAB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each SRAB meeting shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear Operations within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.3.7b, e, g, h shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear Operations within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.3.8 shall be forwarded to the Executive Vice President Nuclear Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

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#### 6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.72 and 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the SRAB and the Executive Vice President -Nuclear Operations.

#### 6.7 SAFETY LIMIT VIOLATION

The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Executive Vice President - Nuclear Operations and the SRAB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared in accordance with 10 CFR 50.73. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission within 30 days of the violation, and to the SRAB, and the Executive Vice President - Nuclear Operations within 14 days.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

#### 6.8 PROCEDURES AND PROGRAMS

#### PROCEDURES

5.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory guide 1.33, Revision 2, February 1978
- b. The applicable procedures required to implement the requirements of NUREG-0737
- c. Refueling operations

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#### 6.9 REPORTING REQUIREMENTS

#### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4.

#### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

6.9.1.2 The startup report shall address each of the tests identified in the Final Safety Analysis Report Subsection 14.2.12.2 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.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement 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 or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

#### ANNUAL REPORTS

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted before March 1 of each year. The initial report shall be submitted before March 1 of the year after the plant achieves initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

a. A tabulation 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, waste processing, and refueling). The dose assignments to various duty functions may be estimated on the basis of pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totaling 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total

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<sup>\*</sup> This tabulation supplements the requirements of 10 CFR 20.407.

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• REPORTING REQUIREMENTS

ROUTINE REPORTS

#### ANNUAL REPORTS

6.9.1.5 (Continued)

whole-body dose received from external sources should be assigned to specific major work functions.

- b. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included: (1) Reactor power history starting 48 hours before the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed before exceeding the limit, results of analysis while the 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; (3) Cleanup system flow history starting 48 hours before the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.
- c. Documentation of all challenges to safety/relief valves; and
- d. Any other unit unique reports required on an annual basis.

#### MONTHLY OPERATING REPORTS

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam system safety/relief. valves, shall be submitted monthly in accordance with 10 CFR 50.4 no later than the 15th of each month following the calendar month covered by the report.

#### ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT\*

6.9.1.7 Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The initial report shall be submitted before May 1 of the year after the plant achieves initial criticality.

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

<sup>\*</sup> A single submittal may be made for a multiple unit site. The submittal should combine those sections that are common to all units at the site.

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#### SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.8 (Continued)

The Semiannual 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), pursuant to Specifications 6.13 and 6.14, respectively, as well as any major change to liquid, gaseous, or solid radwaste treatment systems pursuant to Specification 6.15. It shall also include a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

The Semiannual Radioactive Effluent Release Reports shall also include the following: an explanation of why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Specification 3.3.7.9 or 3.3.7.10, respectively, and a description of the events leading to liquid holdup tanks exceeding the limits of Specification 3.11.1.4.

#### SPECIAL REPORTS

6.9.2 Special reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

#### 6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, of the Code of Federal Regulations (10 CFR), the following records shall be retained for at least the minimum period indicated.

6.10.1.1 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety
- c. All REPORTABLE EVENTS submitted to the Commission
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications
- e. Records of changes made to the procedures required by Specification 6.8.1
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results
- h. Records of annual physical inventory of all sealed source material of record

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