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10 CFR 50.90

TMI-17-019

March 22, 2017

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: License Amendment Request – Administrative Changes to: Technical Specifications (TS) 5.4.2, Spent Fuel Pool Storage; TS 6.1.2; Chief Nuclear Officer Annual Management Directive for Control Room Command Function; and TS 6.2.2.2.d Footnote Reference to Non-SRO Licensed Control Room Supervisors

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (Exelon) requests the following amendment to the Technical Specifications, Appendix A, of Renewed Facility Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1 (TMI).

The proposed amendment updates TS 5.4.2, Spent Fuel Storage, for the current number of fuel assemblies and number of reactor cores that can be stored in Spent Fuel Pool A. The proposed amendment revises TS 6.1.2 requirements for the Chief Nuclear Officer (CNO) to eliminate the annual management directive to all unit personnel responsible for the control room command function. TS 6.1.2 will be replaced with the Babcock and Wilcox (B&W) Standard Technical Specification (STS) 5.1.2. The proposed amendment also deletes TS 6.2.2.2.d footnote that references Control Room Supervisors who do not possess a Senior Reactor Operator (SRO) NRC License.

Attachment 1 provides the Evaluation of Proposed Changes. Attachment 2 provides the Proposed Technical Specification Marked-Up Pages.

The proposed changes have been reviewed by the TMI Plant Operations Review Committee.

Exelon requests approval of the proposed amendment by March 22, 2018. Once approved, the amendment shall be implemented within 60 days.

There are no regulatory commitments contained in this submittal.

Using the standards in 10 CFR 50.92, "Issuance of amendment," Exelon has concluded that the proposed changes do not constitute a significant hazards consideration as described in the enclosed analysis performed in accordance with 10 CFR 50.91(a)(1).

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Exelon is notifying the Commonwealth of Pennsylvania of this application for changes to the TS by transmitting a copy of this letter and its attachments to the designated state official.

Should you have any questions concerning this submittal, please contact Frank Mascitelli at (610) 765-5512.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 22th day of March 2017.

Respectfully,

David P Helker
Manager - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1) Evaluation of Proposed Technical Specification Changes
2) Proposed Technical Specification Marked-Up Pages

cc: USNRC Regional Administrator, Region I
USNRC Project Manager, TMI-1
USNRC Senior Resident Inspector TMI-1
Director, Bureau of Radiation Protection - PA Department of Environmental Resources

bcc:	Sr. Vice President, Mid-Atlantic Operations	w/o attachments
	Vice President, Mid-Atlantic Operations	"
	Site Vice President - TMI-1	"
	Plant Manager - TMI-1	"
	Director, Operations - TMI-1	"
	Director, Engineering - TMI-1	"
	Director, Corporate Plant Engineering - Cantera	"
	Manager, Regulatory Assurance - TMI-1	"
	Manager, Licensing - KSA 3-E	w/attachments
	Commitment Coordinator - KSA 3-E	"
	Management - KSA 1-N-1	"
	P. S. Brady - TMI-1	"
	M. D. Fitzwater - TMI-1	"
	C. W. Smith - TMI-1	"

ATTACHMENT 1

EVALUATION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

SUBJECT: License Amendment Request – Administrative Changes to: Technical Specifications (TS) 5.4.2, Spent Fuel Pool Storage; TS 6.1.2, Chief Nuclear Officer Annual Management Directive for Control Room Command Function; and TS 6.2.2.2.d Footnote Reference to Non-SRO Licensed Control Room Supervisors

CONTENTS

License Amendment Request – Administrative Changes to: Technical Specifications (TS) 5.4.2 Spent Fuel Pool Storage; TS 6.1.2, Chief Nuclear Officer Annual Management Directive for Control Room Command Function; and TS 6.2.2.2.d Footnote Reference to Non-SRO Licensed Control Room Supervisors

1.0 SUMMARY DESCRIPTION

This evaluation supports a request to amend Renewed Facility Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1 (TMI).

Exelon Generation Company, LLC (Exelon) requests NRC approval for the revision of Technical Specifications (TS) to update TS 5.4.2, Spent Fuel Storage, for the current number of fuel assemblies and number of reactor cores that can be stored in Spent Fuel Pool A.
The proposed amendment also revises TS 6.1.2 requirements for the Chief Nuclear Officer (CNO) to eliminate the annual management directive to all unit personnel responsible for the control room command function. TS 6.1.2 will be replaced with the Babcock and Wilcox (B&W) Standard Technical Specification, TS 5.1.2 (Reference 1). In addition, the proposed amendment deletes the TS 6.2.2.2.d footnote that references Control Room Supervisors who do not possess a Senior Reactor Operator (SRO) NRC License.

Exelon requests approval of the proposed amendment by March 22, 2018. Once approved, the amendment shall be implemented within 60 days.

2.0 DETAILED DESCRIPTION

Technical Specification (TS) Changes

TS 5.4.2.d states:

> "The fuel assembly storage racks provided and the number of fuel elements each will store are listed by location below:

	Spent Fuel Pool A North End of Fuel Handling Building	Spent Fuel Pool B South End of Fuel Handling Building	Dry New Fuel Storage Area Fuel Handling Building
Fuel Assys.	1062 *	496	54
Cores	6.0	2.8	0.37

NOTE: * Includes three spaces for accommodating failed fuel containers. An additional 432 storage locations can be installed to provide a total of 1494 locations or 8.44 cores."

The proposed change will revise TS 5.4.2.d to:

> "The fuel assembly storage racks provided and the number of fuel elements each will store are listed by location below:

	Spent Fuel Pool A North End of Fuel Handling Building	Spent Fuel Pool B South End of Fuel Handling Building	Dry New Fuel Storage Area Fuel Handling Building
Fuel Assys.	1494 *	496	54
Cores	8.44	2.8	0.37

> NOTE: * Includes three spaces for accommodating failed fuel containers."

TS 6.1.2 states:

> "The Shift Manager (or during his 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 Chief Nuclear Officer shall be reissued to all unit personnel on an annual basis."

The proposed change will revise TS 6.1.2 to:

> "The Control Room Supervisor (CRS) shall be responsible for the control room command function. During any absence of the CRS from the control room while the unit is in POWER OPERATION, STARTUP, HOT STANDBY, or HOT SHUTDOWN, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the CRS from the control room while the unit is in COLD SHUTDOWN or REFUELING SHUTDOWN, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function."

TS 6.2.2.2.d states:

> "The Shift Manager or Control Room Supervisor # shall be in the control room at all times other than cold shutdown conditions (T_{ave} < 200°F) when he shall be onsite.
> .
> .
> .
> # If not SRO licensed, he shall have completed the SRO Training program."

The proposed change will revise TS 6.2.2.2.d to:

> "The Shift Manager or Control Room Supervisor shall be in the control room at all times other than cold shutdown conditions (T_{ave} < 200°F) when he shall be onsite."

3.0 TECHNICAL EVALUATION

Update TS 5.4.2, Spent Fuel Pool Storage

The first proposed change involves updating the Spent Fuel Pool A fuel assembly and full core storage capacities to current designed capability. A plant modification (Reference 2) added the final 432 additional fuel storage locations to the Spent Fuel Pool A. This was the final phase (Phase 3) of the Spent Fuel Pool Rerack Project that began circa 1992. However, no follow-up action was created to update the final installed capacity in the TS. This proposed revision to the TS is considered to be administrative in nature and updates the TS to current approved design for the plant. The original Spent Fuel Rerack Project was NRC approved in TMI TS Amendment No. 164, dated April 27, 1992 (Reference 3) and was to be completed in three phases. In TS Amendment No. 164, NRC had documented in the safety analysis their review and analysis for the full 1494 fuel assembly locations, when eventually installed. The additional storage locations could be installed at a later date to provide a total of 1494 locations, or 8.44 cores. The third phase of the rerack project, which installed the remaining 432 storage locations, was completed circa 2009.

TS 6.1.2, CNO Annual Management Directive Requirement

Section 50.36, "Technical Specifications," (TS) of 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," requires that each applicant for a license authorizing operation of a nuclear power plant include in its application proposed TS. These TS, as issued by the NRC, are incorporated into the facility operating license as Appendix A. Specifically, Section 10 CFR 50.36(c)(5) requires that the Administrative Controls Section of TS include the provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to ensure safe operation of the facility. This license amendment request (LAR) will eliminate the TS 6.1.2 annual requirement for the CNO to issue a signed management directive to all station personnel describing the expectations for the command responsibilities of the Operations Shift Management, specifically, the responsibility for the control room command function.

The current TS 6.1.2 is a legacy requirement for TMI originating from TS Amendment No.77 (Reference 4), dated April 28, 1982 (... management directive to this effect signed by the President – GPUNC...), which was in partial response to the need for a complete rewrite of the TS administrative section to address the many committees and NUREGs required for the restart of Unit 1 after the accident at TMI-2.

TMI is part of the Exelon fleet in which most nuclear sites have adopted the Improved Standard Technical Specifications. For example, NUREG-1430 (Reference 1) Section 5.1 Responsibility standards (STS 5.1.2), states:

> "The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function."

TMI desires to standardize with other sites in the fleet and reduce the unnecessary administrative burden placed on the CNO to annually issue a management directive to all station personnel regarding the control room command function. TMI is the only site in the

Exelon fleet that has this requirement. Currently, there are no existing operating conditions unique to TMI that would warrant this level of directive. In regards to operational conduct in Exelon control rooms, all sites follow Exelon operations fleet wide procedure, OP-AA-101-111, "Roles and Responsibilities of On-Shift Personnel," (Reference 5). OP-AA-101-111 adequately describes control room personnel roles and command function responsibilities during normal, abnormal operating transients and accident conditions. OP-AA-101-111 complies with and enforces STS 5.1.2 requirements.

The removal of the CNO annual requirement to issue a management directive to all station personnel regarding the control room command function and replace it with the STS 5.1.2 requirements does not reduce the expectations/training/conduct of existing control room operation, as these expectations are embedded in existing operational and training procedures.

TMI has retained original custom TS format and does not specifically use the "MODE" terminology. Therefore, the improved STS wording has been modified to specifically call out the reactor condition (e.g., Power Operations in lieu of Mode 1) instead of a numerical format (i.e., MODEs 1, 2, 3, 4, 5 and 6).

Delete TS 6.2.2.2.d Footnote Reference to non-SRO Licensed Control Room Supervisors

The third proposed change involves the deletion of a reference to a footnote in TS 6.2.2.2.d regarding Control Room Supervisors who are not SRO licensed. TS 6.2.2.2.d requires that a Shift Manager or a Control Room Supervisor shall be in the control room at all times other than cold shutdown condition when he shall be onsite. The footnote reference for Control Room Supervisor allows for the Control Room Supervisor to be non-SRO licensed, provided that he shall have completed the SRO Training Program. TS 6.2.2.2.d was approved in TMI TS Amendment No. 77, dated April 28, 1982 (Reference 4) and reflected the reality that several existing Control Room Supervisors (formally titled Shift Foreman) were allowed to perform the control room supervisory role if not SRO licensed, but had completed the SRO Training Program. The Updated Final Safety Analysis Report (UFSAR) Section 12.1.2.1.1, Operations Department, dated April 2000, was updated as part of the implementation for NRC approved TMI TS Amendment No. 219, dated January 7, 2000 (Reference 6), and stated that:

> "Control Room Supervisors must either be SRO licensed, or hold a Reactor Operator (RO) license and have made significant progress towards completion of training for an SRO license."

Subsequently, in the April 2008, Rev 19 update of the UFSAR, the wording was revised per Engineering Change Request (ECR) 07-00486 (Reference 7) to the following words in accordance with the current operating philosophy at that time:

> "Control Room Supervisors must be SRO licensed."

The change in the qualification requirements of the Control Room Supervisors from "must either be SRO licensed or RO licensed" to "must be SRO licensed" was more restrictive as an SRO license requires more training than an RO license.

4.0 REGULATORY EVALUATION

4.1 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. Exelon has determined that the proposed changes do not require any exemptions or relief from regulatory requirements. Note that TMI was designed and constructed taking into consideration the general design criteria for nuclear power plant construction permits as listed in the proposed AEC General Design Criteria, dated July 1967. The following current applicable regulations and regulatory requirements were reviewed in making this determination:

10 CFR 50.36, "Technical specifications"

Section 182a of the Atomic Energy Act of 1954, as amended (the Act), requires applicants for nuclear power plant operating licenses to state TS to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36, "Technical specifications." The regulation requires that TS include items in five specific categories, including: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls.

Section 50.36(c)(5), "Administrative controls," are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to ensure safe operation of the facility. The specific content of the administrative controls section of the TS is, therefore, related to those programs and reports that the Commission deems essential for the safe operation of the facility, which are not adequately covered by regulations or other regulatory requirements. Accordingly, the NRC staff may determine that specific requirements, such as those associated with this change, may be revised or deleted from the administrative controls in the TS if they are not explicitly required by 10 CFR 50.36(c)(5) and are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

The annual requirement for a CNO management directive on expectations for the control room command function is not deemed essential for the safe operation of the facility as the control room command and control function is adequately described in plant procedures and the proposed replacement STS 5.1.2 requirements.

The proposed final storage capacity requirements for Spent Fuel Pool A maintain compliance to 10 CFR 50.36(c)(4), Design features, by updating the TS to the current geometric arrangements within Spent Fuel Pool A.

10 CFR 50.120, "Training and qualification of nuclear power plant personnel"

(b)(2)(ii) specifies that a training program employing a systems approach to training for shift supervisors (control room supervisors).

10 CFR 55, "Operators Licenses"

Control Room Supervisors are within scope of Part 55.2(b), Scope, which states that any individual designated by a facility license to be responsible for directing any licensed activity of a licensed operator.

Regulatory Guide 1.8 Rev 3, "Qualification and Training of Personnel for Nuclear Power Plants"

RG 1.8 Rev 3 endorses, with certain additions and exception, ANSI/ANS-3.1-1993, "American National Standard for Selection, Qualification, and Training of Personnel for Nuclear Power Plants." ANSI/ANS-3.1-1993 Section 4.4.2, Senior Operator, states that a senior operator has special requirements to hold a senior operator license for the units assigned.

TMI TS 6.3.1 states that each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. ANSI/ANS 3.1 of 1978 does not specify if a Control Room Supervisor needs to be a senior operator. Requiring Control Room Supervisors to be SRO licensed is more conservative and a higher qualification standard than possessing an RO license and completing an SRO training program.

4.2 PRECEDENT

In regards to the proposed changes to TS 6.1.2, TMI similar designed and operating nuclear plants (Oconee 1, 2, 3, Arkansas Nuclear One -1, and Davis-Besse) have all adopted the improved STS 5.1.2 (NUREG 1430, Revision 4) statement regarding the control room command function.

4.3 NO SIGNIFICANT HAZARDS CONSIDERATION

Exelon has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed changes do not involve the modification of any plant equipment or affect plant operation. The proposed changes will have no impact on any safety related structures, systems, or components. The proposed changes are administrative in nature and there are no changes to the conduct of control room licensed operators during evaluated accidents.

   Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No.

The proposed changes have no impact on the design, function or operation of any plant structure, system or component. The proposed changes do not affect plant equipment or accident analyses. The proposed changes are administrative in nature.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed changes do not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analyses. There is no change being made to safety analysis assumptions, safety limits or limiting safety system settings that would adversely affect plant safety as a result of the proposed changes. Margins of safety associated with fission product barriers are unaffected by proposed administrative changes.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, Exelon concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of no significant hazards consideration is justified.

4.4 CONCLUSIONS

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements; ii) changes to recordkeeping, reporting, or administrative procedures or requirements; (iii) changes to the licensee's or permit holder's name, phone number, business or e-mail address; (iv) changes to the name, position, or title of an officer of the licensee or permit holder, including but not limited to, the radiation safety officer or quality assurance manager; or (v) changes to the format of the license or permit or otherwise makes editorial, corrective or other minor revisions, including the updating of NRC approved references. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. NUREG-1430, Standard Technical Specifications, Babcock and Wilcox Plants, Revision 4 Volume 1, Specifications, dated April 2012, TS 5.1.2

2. -ECR TM 16-00011 Revision 0, TS 5.4.2 Updates per ECR 08-00872, completed January 08, 2016
   -ECR TM 08-00872, Revision 1, Spent Fuel Pool Rerack Project-Phase 3, completed March 31, 2009

3. TMI License Amendment No. 164, Reflect Planned Reracking of the A Spent Fuel Pool to Allow Additional Storage Capability, M79289, dated April 27, 1992 (ML003766347)

4. TMI TS Amendment No. 77, Revise Administrative Controls Section of Technical Specifications, dated April 28, 1982 (ML003763983)

5. OP-AA-101-111, "Roles and Responsibilities of On-Shift Personnel," Revision 9

6. Letter forwarding Amendment 219, TMI-1 Plant Organization Title Changes (TAC NO. MA5758), dated January 7, 2000 (ML003674179)

7. ECR TM 07-00486, "UFSAR Organization Update," completed July 18, 2007

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION MARKED-UP PAGES

Pages

5-7

6-1

6-1a

5.4.2 SPENT FUEL STORAGE (Reference 1)

a. Irradiated fuel assemblies will be stored, prior to offsite shipment, in the stainless steel lined spent fuel pools, which are located in the fuel handling building.

b. Whenever there is fuel in the pool except for initial fuel loading, the spent fuel pool is filled with water borated to the concentration used in the reactor cavity and fuel transfer canal.

c. Deleted.

d. The fuel assembly storage racks provided and the number of fuel elements each will store are listed by location below:

1494
8.44

	Spent Fuel Pool A North End of Fuel Handling Building	Spent Fuel Pool B South End of Fuel Handling Building	Dry New Fuel Storage Area Fuel Handling Building
Fuel Assys.	~~1062~~*	496	54
Cores	~~6.0~~	2.8	0.37

NOTE: * Includes three spaces for accommodating failed fuel containers. ~~An additional 432 storage locations can be installed to provide a total of 1494 locations or 8.44 cores.~~

e. All of the fuel assembly storage racks provided are designed to Seismic Class 1 criteria to the accelerations indicated below:

	Fuel Handling Building Dry New Fuel Storage Area And Spent Fuel Pool A	Fuel Handling Building Spent Fuel Pool B
Horiz.	0.38 g	**
Vertical	0.25 g	**

NOTE: ** The "B" pool fuel storage racks are designed using the floor response spectra of the Fuel Handling Building.

f. DELETED

g. When spent fuel assemblies are stored in the Spent Fuel Pool "A", Region II storage locations, the combination of initial enrichment and cumulative burnup for spent fuel assemblies shall be within the acceptable area of Figure 5-4.

h. When spent fuel assemblies are stored in the Spent Fuel Pool "B", storage locations, the combination of initial enrichment and cumulative burnup for spent fuel assemblies shall be within the acceptable area of Figure 5-5.

REFERENCES

(1) UFSAR, Section 9.7 - "Fuel Handling System"

The Control Room Supervisor (CRS) shall be responsible for the control room command function. During any absence of the CRS from the control room while the unit is in POWER OPERATION, STARTUP, HOT STANDBY, or HOT SHUTDOWN, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the CRS from the control room while the unit is in COLD SHUTDOWN or REFUELING SHUTDOWN, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President-TMI Unit 1 shall be responsible for TMI-1 operations and may, at any time, delegate his responsibilities in writing to the Plant Manager. He shall delegate the succession of his responsibilities in writing during his absence.

6.1.2 ~~The Shift Manager (or during his 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 Chief Nuclear Officer shall be reissued to all unit personnel on an annual basis.~~

6.2 ORGANIZATION

6.2.1 CORPORATE

6.2.1.1 An onsite and 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.

6.2.1.2 Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. These relationships shall be documented and updated as appropriate, in the form of organizational charts. These organizational charts will be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.

6.2.1.3 The Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take measures to ensure acceptable performance of the staff in operating, maintaining, and providing technical support so that continued nuclear safety is assured.

6.2.2 UNIT STAFF

6.2.2.1 The Vice President-TMI Unit 1 shall be responsible for overall site safe operation and shall have control over those on site activities necessary for safe operation and maintenance of the site.

6.2.2.2 The unit staff organization shall meet the following:

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

b. At least one licensed Reactor Operator shall be present in the control room when fuel is in the reactor.

Delete

c. At least two licensed Reactor Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.

d. The Shift Manager or Control Room Supervisor ~~#~~ shall be in the control room at all times other than cold shutdown conditions (T_{ave} < 200°F) when he shall be onsite.

e. An individual ## qualified pursuant to 6.3.2 in radiation protection procedures shall be on site when fuel is in the reactor.

f. All REFUELING OPERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

g. A Site Fire Brigade ## of at least 5 members shall be maintained onsite at all times. The Site Fire Brigade shall not include members 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. The Shift Technical Advisor shall serve in an advisory capacity to the Shift Manager on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.2.2.3 Individuals who train the operating staff and those who carry out the health physics and quality assurance function shall have sufficient organizational freedom to be independent from operating pressures, however they may report to the appropriate manager on site.

~~# If not SRO licensed, he shall have completed the SRO Training program.~~ ← Delete

The individual of item 6.2.2.2e and the 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.