

ATTACHMENT A

PROPOSED CHANGES TO APPENDIX A,

TECHNICAL SPECIFICATIONS, OF FACILITY

OPERATING LICENSES DPR-19 and DPR-25

DRESDEN STATION

	<u>UNIT 2</u>	<u>UNIT 3</u>
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6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review, Investigation and Audit

Insert (C)
following
page

~~A. The Station Manager shall have overall full-time responsibility for safe operation of the facility. During periods when the Station Manager is unavailable, he shall designate this responsibility to an established alternate who satisfies the ANSI N18.1 of March 8, 1971 experience requirements for plant manager.~~

~~B. **DELETED** The organization chart of the corporate management which relates to the operation of this station is shown in Figure 6.1-1 and the normal functional organization chart for operation of the station is shown in Figure 6.1-2.~~

C. The shift manning for the station shall be as shown in Table 6.1.1. The Assistant Superintendent, Operating Operating Engineer, Shift Engineers, and Shift Foreman shall have a Senior Operating License. The Fuel Handling Foreman has a limited Senior Operating License. The Assistant Vice President and General Manager - Nuclear Stations on the corporate level has responsibility for the Fire Protection Program. An Operating Engineer at the station will be responsible for implementation of the Fire Protection Program. A fire brigade of at least 5 members shall be maintained on-site at all times. This excludes the shift crew necessary for safe shutdown of the plant and any personnel required for essential functions during a fire emergency.

Vice President
SWR Operation

D. Qualifications of the station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, with the exception of the Radiological Chemical Supervisor who shall meet or exceed the qualifications of Radiation Protection Manager of Regulatory Guide 1.8, September, 1975, and the Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents. The individual filling the position of Assistant Superintendent - Technical Services shall meet the minimum acceptable level for "Technical Manager" as described in 4.2.4 of ANSI N18.1 - 1971.

Health Physics
Services Supervisor

Technical
Superintendent

E. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.

- A. Onsite and offsite organizations shall be established for the unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through the intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, section 3 Organizational Authority, Activity; section 6 Interdepartmental Relationships.
 2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of plant.
 3. The Senior Vice President-Nuclear Operations shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
 4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operational pressures.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

6.1. A training program for the fire brigade shall be maintained under the direction of the Operating Engineer and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975, except for fire brigade training sessions which shall be held at least quarterly.

F. Retraining shall be conducted at intervals not exceeding two years.

G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

1. The ~~Supervisor~~ of the Off-Site Review and Investigative Function shall be appointed by the ~~Vice President Nuclear Operations~~. The ~~Audit~~ Function shall be the responsibility of the Manager of Quality Assurance and shall be independent of operations.

Corporate audit

Superintendent

Manager of QA/NS

Nuclear Safety (QA/NS)

Insert (ii)

a. Off-Site Review and Investigative Function

Superintendent

The ~~Supervisor~~ of the Off-Site Review and Investigative Function shall: (i) provide directions for the review and investigative function and appoint a senior-participant to provide appropriate direction, (ii) select each participant for this function, (iii) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (iv) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (v) approve and report in a timely manner all findings of noncompliance with NRC requirements and provide recommendations to the Station Manager, ~~Assistant Vice President and General Manager - Nuclear Stations, Manager of Quality Assurance, and the Vice President Nuclear Operations~~. During periods when the ~~Supervisor~~ of the Off-Site Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate who satisfies the formal training and experience requirements for the ~~Supervisor~~ of the Off-Site Review and Investigative Function.

Vice President BWR Operations, Manager of QA/NS, Assistant Vice President (AVP) Quality Programs and Assessment, and the Senior Vice President Nuclear Operations

Superintendent

Insert ii

The Manager of QA/NS reports directly to the Chief Executive Officer and has the responsibility to set Corporate Policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate department to determine that QA/NS policy is being carried out.

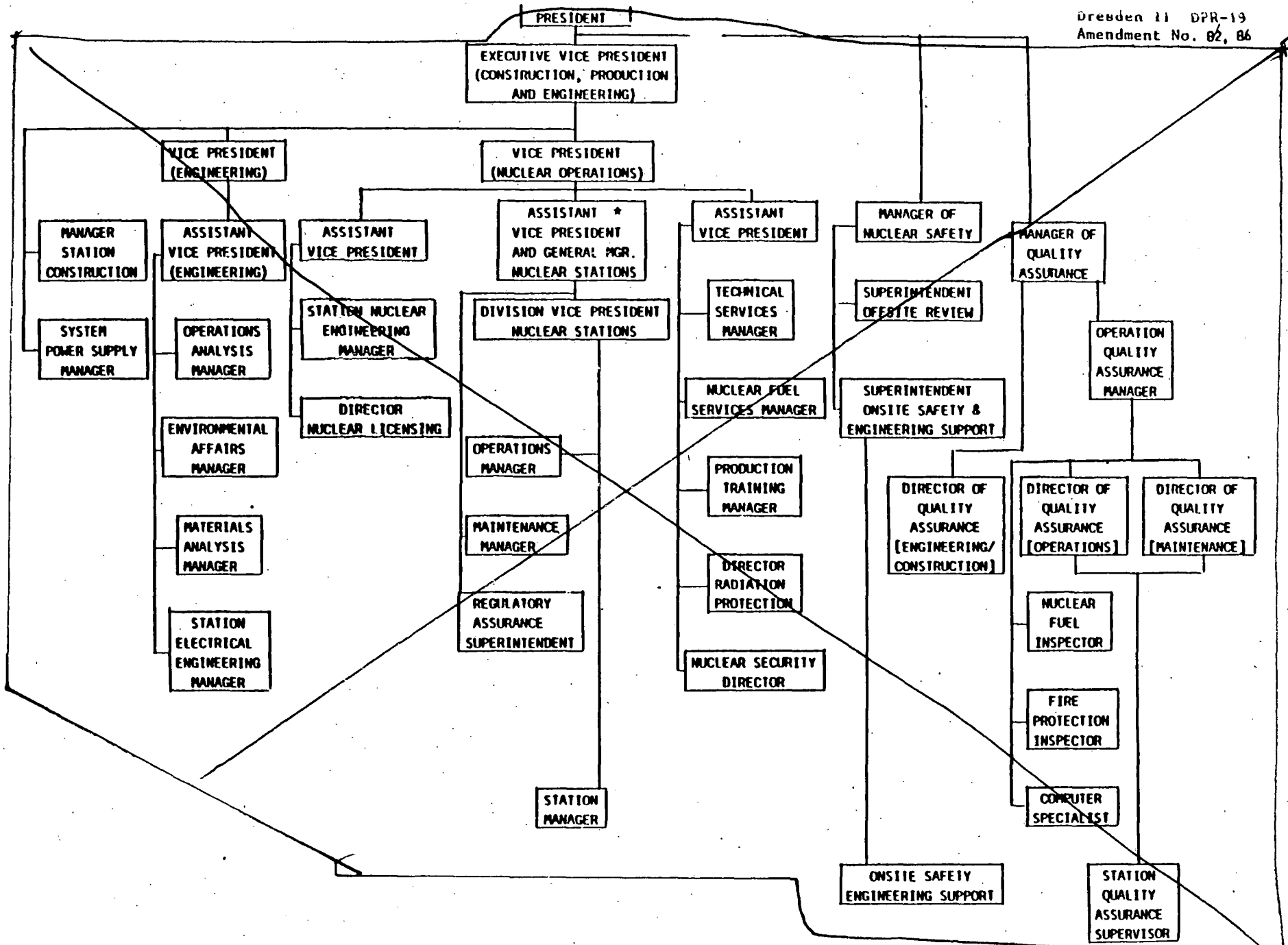


Figure 6.1-1

~~OPPSITE ORGANIZATION~~
~~DELETED~~
6-3

* Responsible for Fire Protection Program

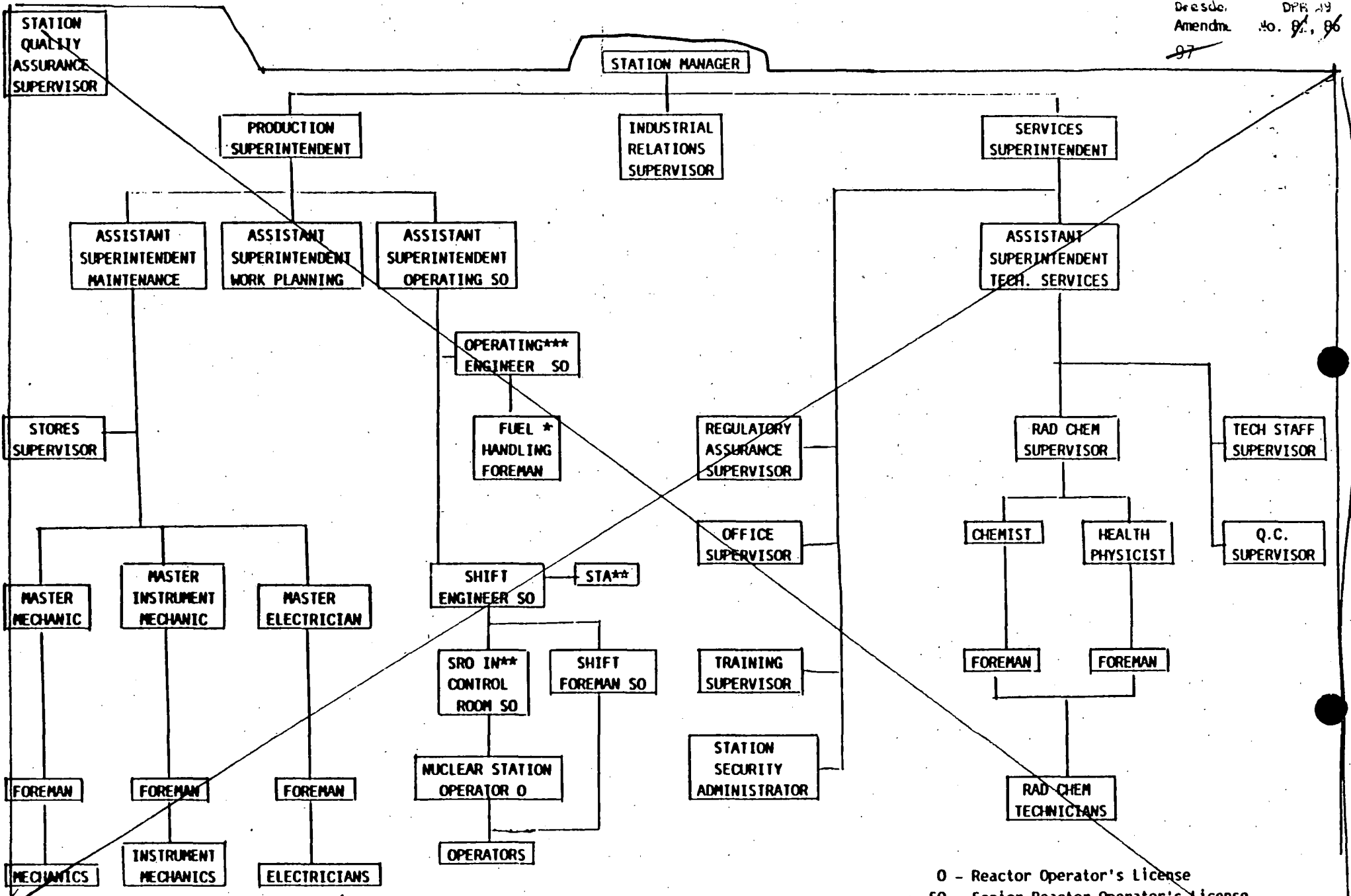


Figure 6.1-2
~~DELETED~~
 STATION ORGANIZATION

- O - Reactor Operator's License
- SO - Senior Reactor Operator's License
- * - Fuel Handling Foreman has SO or SO (Limited) Required only during fuel handling.
- ** - May be filled by a SCRE.
- *** - Responsible for Implementation of Fire Protection Program.

TABLE 6.1.1
 MINIMUM SHIFT MANNING CHART (1)

UNITS WITH FUEL	CONDITION OF			NUMBER OF MEN IN EACH POSITION				
	FIRST UNIT	SECOND UNIT	THIRD UNIT	SRO (2)	RO (3)	STA or SCRE	NON- LIC.	RAD MEN
ONE	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	1	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	2	1	5	1
TWO	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	2	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	3	1	5	1
	Cold Shutdown	Above Cold Shutdown	Above Cold Shutdown	2	3	1	5	1
THREE	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	3	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	4	1	5	1
	Cold Shutdown	Above Cold Shutdown	Above Cold Shutdown	2	4	1	5	1
	Above Cold Shutdown	Above Cold Shutdown	Above Cold Shutdown	2	4	1	5	1

- SRO - Senior Reactor Operator. At least one SRO must remain in the Control Room at all times when one or more units is above cold shutdown. This person may, however, leave the Control Room for periods not to exceed 10 minutes, provided another SRO acts as relief operator. The SCRE or shift supervisor can fulfill this requirement.
- RO - Reactor Operator (For each reactor containing fuel, one RO will be in the Control Room at all times.)
- STA - Shift Technical Advisor.
- SCRE - Station Control Room Engineer (STA with Senior Reactor Operator's License).
- NON-LIC. - Equipment Operators and Equipment Attendants.
- RAD MEN - Radiation Protection Men.

- NOTES: (1) - Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- (2) - Does not include the licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling, supervising CORE OPERATIONS.
- (3) - Shall not operate units on which they are not licensed.

ADDITIONAL REQUIREMENTS

- SRO can be RO at controls.
- SRO in Control Room cannot provide relief to SRO/RO at controls.
- SRO in Control Room must be in sight of or audible range of operator at all times or be in audible range of annunciators.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

The responsibilities of the personnel performing this function are stated below. The Off-Site Review and Investigative Function shall review:

- (1) The safety evaluations for 1) changes to procedures, equipment or systems as described in the safety analysis report and 2) tests or experiments completed under the provision of 10 CFR Section 50.59 to verify that such actions did not constitute unreviewed safety questions. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of ~~Quality Assurance~~. QA/NS
- (2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
- (3) Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59 10 CFR.
- (4) Proposed changes in Technical Specifications or NRC operating licenses.
- (5) Noncompliance with requirements, or of internal procedures, or instructions having nuclear safety significance.
- (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the On-Site Review and Investigative Function.
- (7) All reportable events reportable under 10 CFR 50.73.
- (8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- (9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such changes.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

(10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, ~~Assistant Vice President and General Manager Nuclear Stations and Manager of Quality Assurance.~~

Vice President
 BWR Operations

Station
 Audit Function

AVP Quality
 Programs and
 Assessment

The Audit Function shall be the responsibility of the ~~Manager of Quality Assurance independent of the Production Department.~~ Such responsibility is delegated to the ~~Director of Quality Assurance (Operations) and the Director of Quality Assurance (Maintenance).~~

AVP Quality
 Programs and
 Assessment

BWR
 Operations

Nuclear Quality Programs Manager

Either of the above, or designated Corporate Staff or Supervision approved by ~~Manager of Quality Assurance,~~ shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within the period designated below:

- (1) Audit of the Conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- (2) Audit of the adherence to procedures, training and qualification of the station staff at least once per year.
- (3) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months.
- (4) Audit of the performance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B", 10 CFR 50.
- (5) Audit of the Facility Emergency Plan and implementing procedures at least once per 12 months.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (6) Audit of the Facility Security Plan and implementing procedures at least once per 12 months.
- (7) Audit On-Site and Off-Site reviews.
- (8) Audit of Facility Fire Protection Program and implementing procedures at least once per 24 months.
- (9) The radiological environmental monitoring program and the results thereof at least once per 12 months.
- (10) The ODCM and implementing procedures at least once per 24 months.
- (11) The PCP and implementing procedures for solidification of radioactive waste at least once per 24 months.
- (12) Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station Manager, the ~~Assistant Vice President and General Manager Nuclear Stations, Manager of Quality Assurance, the General Superintendent of Production Systems Analysis, and to the Vice President-Nuclear Operations.~~

Insert
(iii)

c. Authority

The Manager of ^{QA/NS} ~~Quality Assurance~~ reports to the ~~Chairman and President.~~ ~~The Supervisor of the Off Site Review and Investigative Function reports to the~~ ~~Manager of Nuclear Safety who reports to the Chairman and President.~~ ~~Either the Manager of Quality Assurance or the Supervisor of the Off Site Review and Investigative Function has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.~~

The QA/NS Chief Executive Officer

Insert iv →

d. Records

- (1) Reviews, audits and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b.

Insert iii

Manager of QA/NS, the Vice President BWR Operations, AVP Quality Programs and Assessment, the Senior Vice President- Nuclear Operations and the Chief Operating Officer.

Insert iv

The AVP Quality Programs and Assessment reports to the Senior Vice President-Nuclear Operations. The AVP Quality Programs and Assessment has the authority to recommend unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operating Officer.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

(2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the Off-Site Reviews and Investigative Functions described in Specifications 6.1.G.1.a. These procedures shall cover the following:

Superintendent

- (1) Content and method of submission of presentations to the ~~Supervisor~~ of the Off-Site Review and Investigative Function.
- (2) Use of committees and consultants.
- (3) Review and approval.
- (4) Detailed listing of items to be reviewed.
- (5) Method of (a) appointing personnel, (b) performing reviews, investigations, (c) reporting findings and recommendations of reviews and investigations, (d) approving reports, and (e) distributing reports.
- (6) Determining satisfactory completion of action required based on approved findings and recommendations reported by personnel performing the review and investigative function.

f. Personnel

Superintendent

- (1) The persons, including consultants, performing the review and investigative function, in addition to the ~~Supervisor~~ of the Off-Site Review and Investigative Function, shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated.
 - (a) nuclear power plant technology
 - (b) reactor operations
 - (c) utility operations
 - (d) power plant design
 - (e) reactor engineering
 - (f) radiological safety

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

(g) Safety Analysis

Engineering graduate or equivalent with at least 5 years of experience in nuclear engineering.

(h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

(i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

Superintendent

(3) The ~~Supervisor~~ of the Off-Site Review and Investigative Function shall have experience and training which satisfy ANSI N18.1 - 1971 requirements for plant managers.

2. The On-Site Review and Investigative Function shall be supervised by the Station Manager. The Station Manager can designate this responsibility to an alternate who satisfies the ANSI N18.1 (March 8, 1971) experience requirements for Plant Manager.

a. Onsite Review and Investigative Function

The Station Manager (or designee) shall: (i) provide direction for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as a senior participant to provide appropriate direction; (ii) approve participants for this function; (iii) assure that a complement of more than one participant who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive inter-disciplinary review coverage under this function; (iv) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (v) report all findings of noncompliance with NRC requirements, and provide recommendations to the Assistant Vice President and General Manager Nuclear Stations and the Supervisor of the Off-Site Review and Investigative Function; and (vi) submit to the Off-Site Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the On-Site Review and Investigative Function.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

The responsibilities of the personnel performing this function are stated below:

- (1) Review of: 1) procedures required by Specification 6.2 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Station Manager (or designee) to affect nuclear safety.
- (2) Review of all proposed tests and experiments that affect nuclear safety.
- (3) Review of all proposed changes to the Technical Specifications.
- (4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- (5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence, ~~to the Assistant Vice President and General Manager - Nuclear Stations and to the Supervisor of the Off-Site Review and Investigative Function.~~
- (6) Review of facility operations to detect potential safety hazards.
- (7) Performance of special reviews and investigations and reports thereon as requested by the ~~Supervisor~~ ^{Superintendent} of the Off-Site Review and Investigative Function.
- (8) Review the Station Security Plan and shall submit recommended changes to the ~~Assistant Vice President and General Manager - Nuclear Station.~~
- (9) Review the Emergency Plan and station implementing procedures and shall submit recommended changes to the ~~Division Vice President - Nuclear Stations.~~ ^{identification of}
- (10) Review of reportable events and actions taken to prevent recurrence.

Director of Corporate Security and the AVP Quality Programs and Assessment in lieu of distribution in accordance with 6.1.6.2.c.(1)

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

(11) Review of any unplanned on-site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation recommendations and disposition of the corrective action to prevent recurrence to the ~~Assistant Vice President and General Manager Nuclear Stations~~, and to the ~~Supervisor of the Off-Site Review and Investigative Function~~.

Vice President
BWR Operations

(12) Review of changes to the PCP and ODCM and major changes to the radwaste treatment systems.

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager (or designee) and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation and administrative procedures relating to facility operations. The Technical Staff Supervisor shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager (or designee) shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the ~~Assistant Vice President and General Manager Nuclear Stations~~ and the Supervisor of the Off-Site Review and Investigative Function.

Vice President
BWR Operations

Superintendent

c. Records

prepared and performed for
specification 6.1.G.2.a

- (1) Reports, reviews, investigations, and recommendations shall be documented with copies to the ~~Assistant Vice President and General Manager Nuclear Stations~~, the Supervisor of the Off-Site Review and Investigative Function, the ~~Station Manager (or designee)~~ and the ~~Manager of Quality Assurance~~. AVP Quality Programs and Assessment
- (2) Copies of all records and documentation shall be kept on file at the station.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the On-Site Review and Investigative Function. These procedures shall include the following:

- (1) Content and method of submission and presentation to the Station Manager (or designee), ~~Assistant Vice President and General Manager Nuclear Stations~~ and the ~~Supervisor~~ of the Off-Site Review and Investigative Function.

Vice President
BWR Operations

Superintendent

- (2) Use of committees.
- (3) Review and approval.
- (4) Detailed listing of items to be reviewed.
- (5) Procedures for administration of the quality control activities.
- (6) Assignment of responsibilities.

e. Personnel

- (1) The personnel performing the On-Site Review and Investigative Function, in addition to the Station Manager (or designee), shall consist of persons having expertise in:
- (a) nuclear power plant technology
 - (b) reactor operations
 - (c) reactor engineering
 - (d) radiological safety
 - (e) chemistry
 - (f) instrumentation and control
 - (g) mechanical and electric systems.
- (2) Personnel performing the On-Site Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1-1971, Sections 4.2 and 4.4.

H. Fire Protection.

1. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

B. Radiation control procedures shall be maintained, made available to all station personnel and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.

C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation, fuel handling, or Maintenance instrument maintenance, and by the ~~Assistant Superintendent - Maintenance~~ and Technical Staff Supervisor in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the ~~Radiological Chemical~~ Supervisor. At least one person approving each of the above procedures shall hold a valid senior operator's license. In addition, these procedures and changes thereto must have authorization by the ~~Station Production or Services Superintendent~~ before being implemented.

Health Physics Services

Manager or designee

2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Maintenance Assistant Superintendent ~~Maintenance~~ where the written authority has been provided by the Production Superintendent. The "Maintenance/Modification Procedure" utilized for safety related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

Maintenance

omit

D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:

- 1. The intent of the original procedure is not altered.
- 2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- 3. The change is documented, reviewed by the On-Site Review and Investigative Function and approved by the ~~Production or Services Superintendent~~ within 14 days of implementation.

Station Manager Or designee

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

E. Drills of the emergency procedures described in Specification 6.2.A.4 shall be conducted at the frequency specified in the Generating Station Emergency Plan. These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

6.3 Action to be Taken in the Event of a Reportable Event in Plant Operation

Vice President BWR Operations

Any reportable event shall be promptly reported to the ~~Assistant Vice President and General Manager Nuclear Stations~~ or his designated alternate. The incident shall be promptly reviewed pursuant to Specification 6.1.G.2.a(5) and a separate report for each reportable event shall be prepared in accordance with the requirements of Specification 6.6.B.

6.4 Action to be Taken in the Event a Safety Limit is Exceeded

If a safety limit is exceeded, the reactor shall be shut down immediately and reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the ~~Assistant Vice President and General Manager Nuclear Stations~~ or his designated alternate. The incident shall be reviewed pursuant to Specification 6.1.G.1.a and 6.1.G.2.a and a separate report for each event shall be prepared in accordance with Specification 6.6.B.

Vice President
BWR Operations
or his designated
alternate

6.5 Plant Operating Records

- A. Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least five years.
1. Records of normal plant operation, including power levels and periods of operation at each power level.
 2. Records of principal maintenance activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety.
 3. Records and reports of reportable and safety limit events.
 4. Records and periodic checks, inspection and/or calibrations performed to verify the Surveillance Requirements (See Section 4 of these Specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded.

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review, Investigation and Audit

Insert (C)

A. ~~The Station Manager shall have overall full-time responsibility for safe operation of the facility. During periods when the Station Manager is unavailable, he shall designate this responsibility to an established alternate who satisfies the ANSI N18.1 of March 8, 1971 experience requirements for plant manager.~~

~~DELETED~~
B. ~~The organization chart of the corporate management which relates to the operation of this station is shown in Figure 6.1-1, and the normal functional organization chart for operation of the station is shown in Figure 6.1-2.~~

C. The shift manning for the station shall be as shown in Table 6.1.1. The Assistant Superintendent, Operating Engineers, Shift Engineers, and Shift Foreman shall have a Senior Operating License. The Fuel Handling Foreman has a limited Senior Operating License. The ~~Assistant Vice President and General Manager~~ Nuclear Stations on the corporate level has responsibility for the Fire Protection Program. An Operating Engineer at the station will be responsible for implementation of the Fire Protection Program. A fire brigade of at least 5 members shall be maintained on-site at all times. This excludes the shift crew necessary for safe shutdown of the plant and any personnel required for essential functions during a fire emergency.

Vice President
BWR Operations

D. Qualifications of the station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, with the exception of the ~~Radiological Chemical Supervisor~~ who shall meet or exceed the qualifications of Radiation Protection Manager of Regulatory Guide 1.8, September, 1975, and the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents. The individual filling the position of ~~Assistant Superintendent - Technical Services~~ shall meet the minimum acceptable level for "Technical Manager" as described in 4.2.4 of ANSI N18.1 - 1971.

Health Physics
Services

Technical

E. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.

- A. Onsite and offsite organizations shall be established for the unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through the intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, section 3 Organizational Authority, Activity; section 6 Interdepartmental Relationships.
 2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of plant.
 3. The Senior Vice President-Nuclear Operations shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
 4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operational pressures.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

6.1

A training program for the fire brigade shall be maintained under the direction of the Operating Engineer and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975, except for fire brigade training sessions which shall be held at least quarterly.

F. Retraining shall be conducted at intervals not exceeding two years.

G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

1. The Supervisor of the Off-Site Review and Investigative Function shall be appointed by the ~~Vice President Nuclear Operations~~. The Audit Function shall be the responsibility of the Manager of Quality Assurance and shall be independent of operations.

Manager of QA/NS

Insert (ii)

Nuclear Safety (QA/NS)

a. Off-Site Review and Investigative Function

Supervisor

The Supervisor of the Off-Site Review and Investigative Function shall: (i) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (ii) select each participant for this function, (iii) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (iv) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (v) approve and report in a timely manner all findings of noncompliance with NRC requirements and provide recommendations to the Station Manager, ~~Assistant Vice President and General Manager Nuclear Stations, Manager of Quality Assurance, and the Vice President Nuclear Operations~~. During periods when the Supervisor of the Off-Site Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate who satisfies the formal training and experience requirements for the Supervisor of the Off-Site Review and Investigative Function.

Vice President BWR Operations, Manager QA/NS, Assistant Vice President (AVP) Quality Programs and Assessment and the Senior Vice President-Nuclear Operations

Supervisor

The Manager of QA/NS reports directly to the Chief Executive Officer and has the responsibility to set Corporate Policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate department to determine that QA/NS policy is being carried out.

Dresden III DPR-75
Amendment No. 35, 18 92

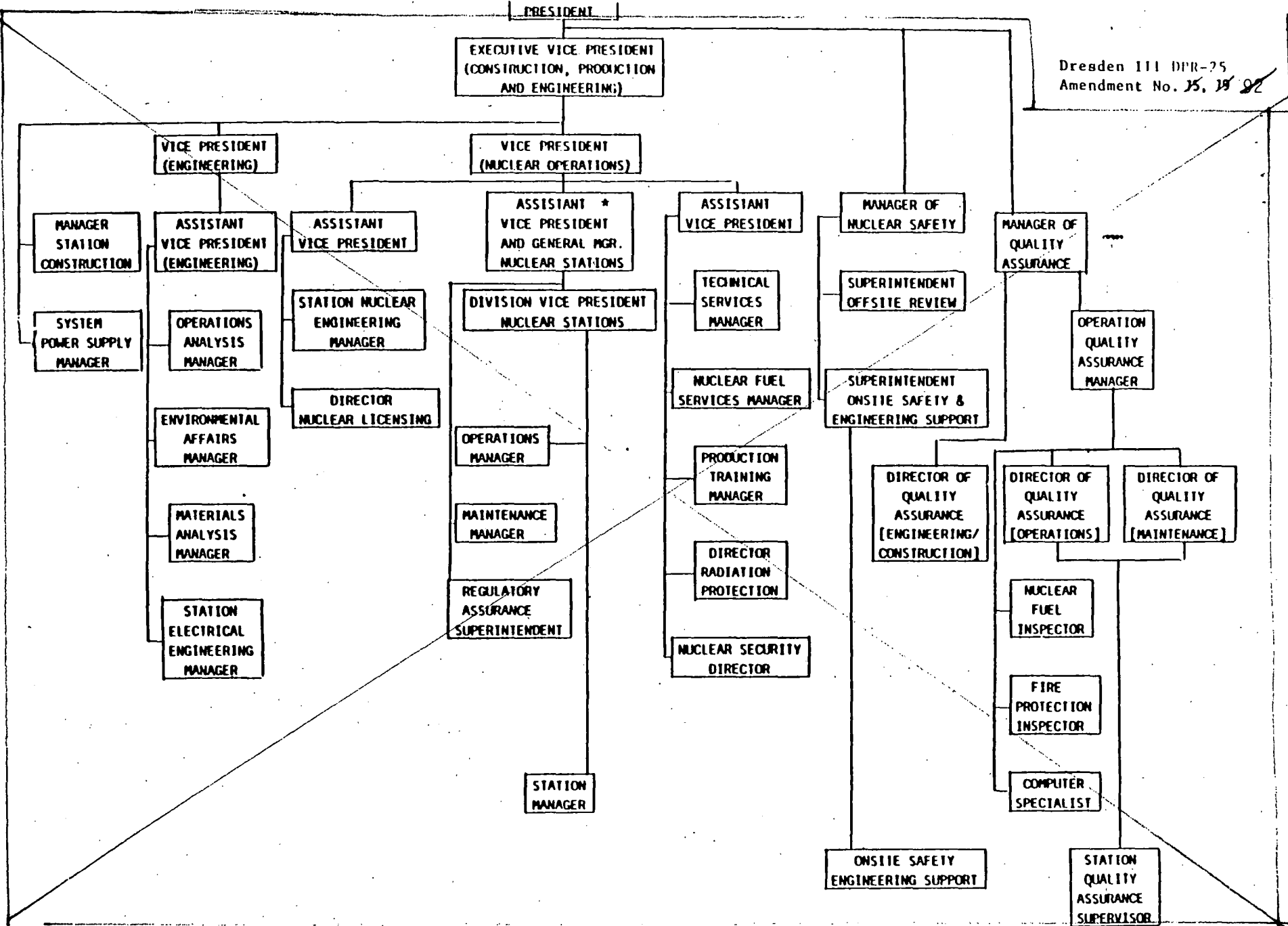


Figure 6.1-1
~~OFFSITE ORGANIZATION~~
~~DELETED~~

← Responsible for Fire Protection Program →

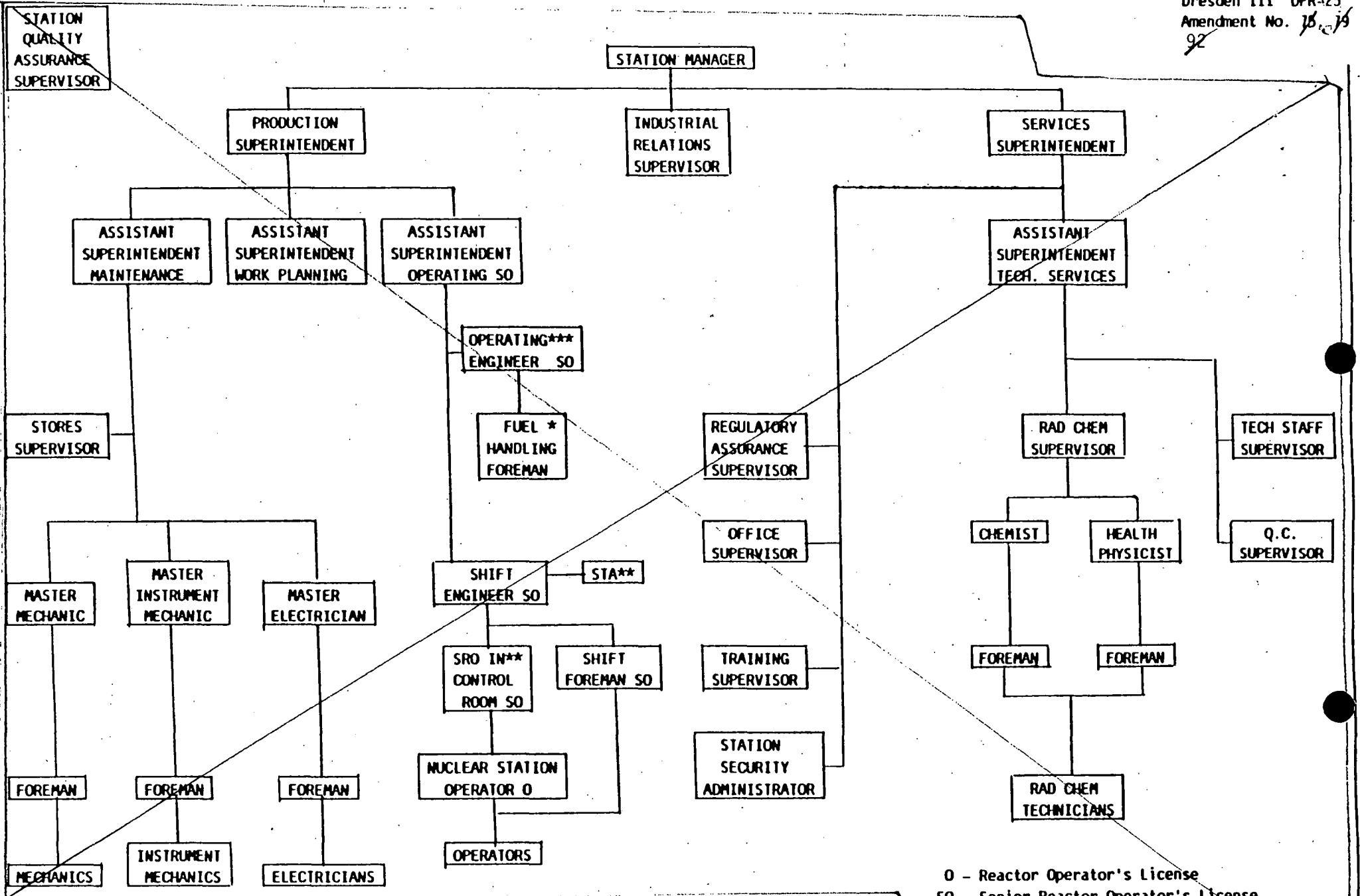


Figure 6.1-2
 DELETED
 STATION ORGANIZATION

- O - Reactor Operator's License
- SO - Senior Reactor Operator's License
- * - Fuel Handling Foreman has SO or SO (Limited) Required only during fuel handling.
- ** - May be filled by a SCRE.
- *** - Responsible for Implementation of Fire Protection Program.

TABLE 6.1.1

MINIMUM SHIFT MANNING CHART (1)

UNITS WITH FUEL	CONDITION OF			NUMBER OF MEN IN EACH POSITION				
	FIRST UNIT	SECOND UNIT	THIRD UNIT	SRO (2)	RO (3)	STA or SCRE	NON- LIC.	RAD MEN
ONE	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	1	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	2	1	5	1
TWO	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	2	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	3	1	5	1
	Cold Shutdown	Above Cold Shutdown	Above Cold Shutdown	2	3	1	5	1
THREE	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	3	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	4	1	5	1
	Cold Shutdown	Above Cold Shutdown	Above Cold Shutdown	2	4	1	5	1
	Above Cold Shutdown	Above Cold Shutdown	Above Cold Shutdown	2	4	1	5	1

- SRO - Senior Reactor Operator. At least one SRO must remain in the Control Room at all times when one or more units is above cold shutdown. This person may, however, leave the Control Room for periods not to exceed 10 minutes, provided another SRO acts as relief operator. The SCRE or shift supervisor can fulfill this requirement.
- RO - Reactor Operator (For each reactor containing fuel, one RO will be in the Control Room at all times.)
- STA - Shift Technical Advisor.
- SCRE - Station Control Room Engineer (STA with Senior Reactor Operator's License).
- NON-LIC. - Equipment Operators and Equipment Attendants.
- RAD MEN - Radiation Protection Men.

- NOTES: (1) - Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- (2) - Does not include the licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling, supervising CORE OPERATIONS.
- (3) - Shall not operate units on which they are not licensed.

ADDITIONAL REQUIREMENTS

- A. SRO can be RO at controls.
- B. SRO in Control Room cannot provide relief to SRO/RO at controls.
- C. SRO in Control Room must be in sight of or audible range of operator at all times or be in audible range of annunciators.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

The responsibilities of the personnel performing this function are stated below. The Off-Site Review and Investigative Function shall review:

- (1) The safety evaluations for 1) changes to procedures, equipment or systems as described in the safety analysis report and 2) tests or experiments completed under the provision of 10 CFR Section 50.59 to verify that such actions did not constitute unreviewed safety questions. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of Quality Assurance. QA/NS
- (2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59 10 CFR.
- (3) Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59 10 CFR.
- (4) Proposed changes in Technical Specifications or NRC operating licenses.
- (5) Noncompliance with NRC requirements, or of internal procedures or instructions having nuclear safety significance.
- (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the On-Site Review and Investigative Function.
- (7) Reportable Events reported under 10 CFR 50.73.
- (8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- (9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such changes.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

Vice President
BWR Operations

(10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, ~~Assistant Vice President and General Manager - Nuclear Stations and Manager of Quality Assurance.~~

Station

b. Audit Function

AVP Quality Programs and Assessment

AVP Quality Programs and Assessment

The Audit Function shall be the responsibility of the ~~Manager of Quality Assurance~~ independent of the Production Department. Such responsibility is delegated to the ~~Director of Quality Assurance (Operations) and the Director of Quality Assurance (Maintenance).~~

Nuclear Quality Programs Manager

Either of the above, or designated Corporate Staff or Supervision approved by ~~Manager of Quality Assurance~~, shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within the period designated below:

- (1) Audit of the Conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- (2) Audit of the adherence to procedures, training and qualification of the station staff at least once per year.
- (3) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months.
- (4) Audit of the performance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B", 10 CFR 50.
- (5) Audit of the Facility Emergency Plan and implementing procedures at least once per 12 months.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (6) Audit of the Facility Security Plan and implementing procedures at least once per 12 months.
- (7) Audit On-Site and Off-Site Reviews.
- (8) Audit of Facility Fire Protection Program and implementing procedures at least once per 24 months.
- (9) The radiological environmental monitoring program and the results thereof at least once per 12 months.
- (10) The ODCM and implementing procedures at least once per 24 months.
- (11) The PCP and implementing procedures for solidification of radioactive waste at least once per 24 months.
- (12) Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station Manager, ~~the Assistant Vice President and General Manager - Nuclear Stations, Manager of Quality Assurance, the General Superintendent of Production Systems Analysis, and to the Vice President - Nuclear Operations.~~

Insert
(ILL)

c. Authority

~~The Manager of Quality Assurance reports to the Chief Executive Officer Chairman and President. The Supervisor of the Off-Site Review and Investigative Function reports to the Manager of Nuclear Safety who reports to the Chairman and President. Either the Manager of Quality Assurance or the Supervisor of the Off-Site Review and Investigative Function has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.~~

The

QA/NS

Insert IV →

d. Records

- (1) Reviews, audits and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b.

Insert iii

Manager of QA/NS, the Vice President BWR Operations, AVP Quality Programs and Assessment, the Senior Vice President- Nuclear Operations and the Chief Operating Officer.

Insert iv

The AVP Quality Programs and Assessment reports to the Senior Vice President-Nuclear Operations. The AVP Quality Programs and Assessment has the authority to recommend unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operating Officer.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the Off-Site Reviews and Investigative Functions described in Specifications 6.1.G.1.a. These procedures shall cover the following:

- (1) Superintendent Content and method of submission of presentations to the ~~Supervisor~~ of the Off-Site Review and Investigative Function.
- (2) Use of committees and consultants.
- (3) Review and approval.
- (4) Detailed listing of items to be reviewed.
- (5) Method of (a) appointing personnel, (b) performing reviews, investigations, (c) reporting findings and recommendations of reviews and investigations, (d) approving reports, and (e) distributing reports.
- (6) Determining satisfactory completion of action required based on approved findings and recommendations reported by personnel performing the Review and Investigative Function.

f. Personnel

- (1) Superintendent The persons, including consultants, performing the review and investigative function, in addition to the ~~Supervisor~~ of the Off-Site Review and Investigative Function, shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated.
 - (a) nuclear power plant technology
 - (b) reactor operations
 - (c) utility operations
 - (d) power plant design
 - (e) reactor engineering
 - (f) radiological safety

(g) Safety Analysis

Engineering graduate or equivalent with at least 5 years of experience in nuclear engineering.

(h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

(i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

Superintendent

- (3) The ~~Supervisor~~ of the Off-Site Review and Investigative Function shall have experience and training which satisfy ANSI N18.1 - 1971 requirements for plant managers.

2. The On-Site Review and Investigative Function shall be supervised by the Station Manager. The Station Manager can designate this responsibility to an alternate who satisfies the ANSI N18.1 (March 8, 1971), Experience Requirements for Plant Manager.

a. On-Site Review and Investigative Function

The Station Manager (or designee) shall: (i) provide direction for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as a senior participant to provide appropriate direction; (ii) approve participants for this function; (iii) assure that a complement of more than one participant who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive inter-disciplinary review coverage under this function; (iv) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (v) report all findings of noncompliance with NRC requirements, and provide recommendations ~~to the Assistant Vice President and General Manager - Nuclear Stations and the Supervisor of the Off Site Review and Investigative Function;~~ and (vi) submit to the Off-Site Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the On-Site Review and Investigative Function.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

The responsibilities of the personnel performing this function are stated below:

- (1) Review of: 1) procedures required by Specification 6.2 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Station Manager (or designee) to affect nuclear safety.
- (2) Review of all proposed tests and experiments that affect nuclear safety.
- (3) Review of all proposed changes to the Technical Specifications.
- (4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- (5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the ~~Assistant Vice-President and General Manager - Nuclear Stations and to the Supervisor of the Off-Site Review and Investigative Function.~~
- (6) Review of facility operations to detect potential safety hazards.
- (7) Performance of special reviews and investigations and reports thereon as requested by the ~~Supervisor of the Off-Site Review and Investigative Function.~~
- (8) Review the Station Security Plan and shall submit recommended changes to the ~~Assistant Vice-President and General Manager - Nuclear Stations.~~
- (9) Review the Emergency Plan and station implementing procedures and shall submit recommended changes to the ~~Division Vice-President - Nuclear Stations.~~
- (10) Review of reportable events and actions taken to prevent recurrence.

Superintendent

Director of Corporate Security and the AVP Quality Programs and Assessment in lieu of distribution in accordance with 6.1.G. 2. c(1)

identification of

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

(11) Review of any unplanned on-site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation recommendations and disposition of the corrective action to prevent recurrence to the ~~Assistant Vice President and General Manager Nuclear Stations, and to the Supervisor of Off Site Review and Investigative Function~~

Vice President
BWR Operations

(12) Review of changes to the PCP and ODCM and major changes to the radwaste treatment systems.

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager (or designee) and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation and administrative procedures relating to facility operations. The Technical Staff Supervisor shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager (or designee) shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the ~~Assistant Vice President and General Manager Nuclear Stations~~ and the ~~Supervisor of the Off-Site Review and Investigative Function~~. Superintendent

Vice President
BWR Operations

c. Records

prepared and performed for specification 6.1.6.2.a

(1) Reports, reviews, investigations, and recommendations shall be documented with copies to the ~~Assistant Vice President and General Manager Nuclear Stations, the Supervisor of the Off-Site Review and Investigative Function, the Station Manager (or designee) and the Manager of Quality Assurance~~. Superintendent

AVP Quality Programs and Assessments

(2) Copies of all records and documentation shall be kept on file at the station.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the On-Site Review and Investigative Function. These procedures shall include the following:

- (1) Content and method of submission and presentation to the Station Manager (or designee), ~~Assistant Vice President and General Manager Nuclear Stations and the Supervisor of the Off-Site Review and Investigative Function.~~
- (2) Use of committees.
- (3) Review and approval.
- (4) Detailed listing of items to be reviewed.
- (5) Procedures for administration of the quality control activities.
- (6) Assignment of responsibilities.

Vice President BWR Operations

Superintendent

e. Personnel

- (1) The personnel performing the On-Site Review and Investigative Function, in addition to the Station Manager (or designee), shall consist of persons having expertise in:
 - (a) nuclear power plant technology
 - (b) reactor operations
 - (c) reactor engineering
 - (d) radiological safety
 - (e) chemistry
 - (f) instrumentation and control
 - (g) mechanical and electric systems.
- (2) Personnel performing the On-Site Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1-1971, Sections 4.2 and 4.4.

H. Fire Protection

1. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

B. Radiation control procedures shall be maintained, made available to all station personnel and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.

C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation, fuel handling, or instrument maintenance, and by the Assistant Superintendent-~~Maintenance~~ and Technical Staff Supervisor in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the ~~Radiological Chemical~~ Supervisor. At least one person approving each of the above procedures shall hold a valid senior operator's license. In addition, these procedures and changes thereto must have authorization by the ~~Station Production or Services Superintendent~~ before being implemented.

Health Physics Services

Manager or designee

2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Assistant Superintendent-~~Maintenance~~ where the written authority has been provided by the Production Superintendent. The "Maintenance/Modification Procedure" utilized for safety related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:

1. The intent of the original procedure is not altered.
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
3. The change is documented, reviewed by the On-Site Review and Investigative Function and approved by the ~~Production or Services Superintendent~~ within 14 days of implementation.

Station Manager or designee

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

E. Drills of the emergency procedures described in Specification 6.2.A.4 shall be conducted at the frequency specified in the Generating Stations Emergency Plan. These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

6.3 Action to be Taken in the Event of a Reportable Event in Plant Operation

Any reportable event shall be promptly reported to the ~~Assistant Vice President and General Manager - Nuclear Stations~~ or his designated alternate. The incident shall be promptly reviewed pursuant to Specification 6.1.G.2.a(5) and a separate report for each reportable event shall be prepared in accordance with the requirements of Specification 6.6.B.

Vice President BWR Operations

6.4 Action to be Taken in the Event a Safety Limit is Exceeded

If a safety limit is exceeded, the reactor shall be shut down immediately and reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the ~~Assistant Vice President and General Manager - Nuclear Stations~~ or his designated alternate. The incident shall be reviewed pursuant to Specification 6.1.G.1.a and 6.1.G.2.a and a separate report for each event shall be prepared in accordance with Specification 6.6.B.

Vice President BWR Operations or his designated alternate

6.5 Plant Operating Records

A. Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least five years.

1. Records of normal plant operation, including power levels and periods of operation at each power level.
2. Records of principal maintenance activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety.
3. Records and reports of reportable and safety limit events.
4. Records and periodic checks, inspection and/or calibrations performed to verify the Surveillance Requirements (See Section 4 of these Specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded.

ATTACHMENT B

DETAILED DESCRIPTION AND SUMMARY

The proposed amendment requests several changes to the Administrative Controls Section 6.0 of the Technical Specifications which include: (1) Removal of Organizational Figures 6.1-1 and 6.1-2, (2) several position title changes due to reorganization, and (3) a clarification to the distribution requirement for Onsite Reviews. Following is a description of each of the changes.

- 1) In accordance with Generic Letter 88-06, we propose replacing the Organizational Figures 6.1-1 and 6.1-2 in Technical Specifications with more general organizational requirements. These general requirements capture the essence of those organizational features depicted on the figures that are necessary for ensuring safe operation.

The proposed revision to the Technical Specifications will require that lines of authority, responsibility and communication be established and defined for the highest management levels through intermediate levels and including all operating organization positions. These 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. These requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activities; Section 6 Interdepartmental Relationships.

The Technical Specifications are not specifically required to contain organizational figures by 10 CFR 50.36. Organizational figures in themselves do not have a significant safety relevance. However, specific operational requirements that bear more directly on safety matters of concern, than organizational figures, are required elsewhere in the Technical Specifications (TS). For example, the organizational element responsible for the control room command function is identified in TS 6.1.C, and the requirements for minimum staffing under various operating conditions is identified in Table 6.1.1. The organizational management functions for review investigations and audits, and onsite and offsite review and investigative groups, and shift technical advisors are also specified in other TS.

The important features identified on the organizational figures, but not currently included in the Technical Specifications as identified by Generic Letter 88-06, have been proposed to be added to TS 6.1.A. The organizational figures in the Quality Assurance Manual or Management Plan are of a level of detail consistent with that shown on the organizational figures in TS.

The proposed change will permit changes to the onsite and offsite organizational structures to be implemented without first obtaining NRC approval through issuance of a license amendment to update the TS. We believe changes to these figures have resulted in processing unnecessary amendments by both Commonwealth Edison Company and the NRC and, therefore, deletion will eliminate needless expenditure of resources for both organizations without affecting safe operation of the plant.

- 2) Several places in the Administrative Section 6.0 of TS, position title changes are required due to reorganization. The title revisions include changing "Assistant Vice President and General Manager - Nuclear Stations" to "Vice President BWR Operations", and "Vice President - Nuclear Operations" to "Senior Vice President - Nuclear Operations", and "Chairman and President" to "Chief Executive Officer" and the addition of the "Assistant Vice President Quality Programs and Assessment". These changes are required to accurately reflect current organizational titles and functional responsibilities.
- 3) Changes are proposed to TS 6.1.G.2 to clarify the distribution requirements of reports, reviews, investigations and recommendations that have been prepared and performed as part of the Onsite Review and Investigative Function. Currently TS 6.1.G.2a lists the responsibility of the Onsite Review and Investigative Function. Of the list of 12 items, several specify that recommendations should be submitted and reports forwarded to specific groups or individuals. However, TS 6.1.G.2c(1) also requires that reports, reviews, investigations and recommendations be documented and sent to several individuals. TS 6.1.G.2c(1) requires distribution to more people than TS 6.1.G.2a. Therefore, to remove any ambiguity, we propose deleting the distribution listings from TS 6.1.G.2a and thereby allowing TS 6.1.G.2c(1) to address the distribution requirements.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARD CONSIDERATIONS

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The proposed Technical Specification amendment requests several changes. The first change involves the removal of organizational Figures 6.1-1 and 6.1-2 and the revision of TS 6.1.A, 6.1.B, and 6.1.C in accordance with the guidance provided in Generic Letter 88-06. The second proposed revision corrects several position titles that changed due to corporate reorganization. The third change clarifies the distribution requirements for onsite review documentation discussed in TS 6.2.

None of the proposed changes are initiating events for an accident, therefore, the probability of an occurrence of an accident is not affected. Even though the organizational figures are being removed, TS 6.1.A is being revised to require the organizational figures, functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions be maintained for the Quality Assurance manual or the Management Plan for Operations, Sections 3 and 6. Therefore, safe plant operation is not affected and the consequence of any accidents presented in the UFSAR are not imparted by the first change. The remaining changes address organizational changes, and clarification for documentation distribution. All these changes are administrative in nature and the consequences of an accident as described in the UFSAR are not affected.

The proposed changes do not revise any functional or design parameters used at the Station. These changes do not modify any equipment or systems or cause the unit to be operated in a different manner. Therefore, the possibility of a new or different kind of accident is not created.

All the proposed changes are administrative or editorial and, as such, do not affect any margins of safety. The proposed organization changes do not affect safe operation of the plant. Updating position titles, clarifying documentation distribution requirements, editorial and typographical changes, facilitate plant operations but do not affect safe operations.

For the preceding reasons, Commonwealth Edison believes all the changes proposed for the Technical Specification amendment do not involve any significant hazards considerations.

ATTACHMENT D

SAFETY EVALUATION AND ENVIRONMENTAL ASSESSMENT

Typically onsite and offsite organizations are defined by organization charts included under administrative control requirements of the Technical Specification (TS). This requires the processing of a license amendment to change an organization chart before implementing a change in organizational structure. The guidance provided in Generic Letter 88-06 addresses amendments that may be proposed for removing organization charts from the administrative control requirements of the TS.

The staff has previously determined that with appropriate changes to these administrative control requirements, the onsite and offsite organization charts may be removed. The changes involve the addition of general requirements that capture the essential aspects of the organizational structure that are defined by existing onsite and offsite organization charts. Enclosure 1 to Generic Letter 88-06 provides guidance for license amendment requests to remove organization charts from TS.

Enclosure 2 to Generic Letter 88-06 provides an example of this change that was made to the administrative control requirements of the existing Westinghouse Standard Technical Specifications (STS). The staff has found that this change will not reduce plant safety and it is generically applicable to all power reactors.

The removal of organization charts is a line item improvement that was proposed on a lead-plant basis for the Shearon Harris plant and was endorsed by the Westinghouse Owners Group. This change was reviewed as part of the NRC's program for improvements in TS. The objectives of that program were established by the Commission's Interim Policy Statement on Technical Specification Improvements. The staff concludes that the removal of organization charts from TS will provide greater flexibility for licenses to implement changes in both the onsite and offsite organizational structure, consistent with Commission policy.

Commonwealth Edison has evaluated the proposed amendment against the criteria for and identification of licensing and regulatory actions requiring environment assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided for under 10 CFR 1.22(c)(9). This determination was based on the fact that changes are being proposed as an amendment to a license issued pursuant to 10 CFR 50. The changes are of an administrative nature only. The changes involve no significant hazards, there are no significant changes in the types or amounts of off-site effluents, and there are no significant increases in individual or cumulative occupational exposure.