6.0 • ADMINISTRATIVE CONTROLS

6.1 <u>RESPONSIBILITY</u>

6.1.1 The Plant Manager, Ginna Station shall be responsible for overall on-site Ginna Station operation and shall delegate in writing the succession to this responsibility during his absence.

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ORGANIZATION

6.2

6.2.1 Onsite and Offsite Organization

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant. a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all Plant management positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts. These organization charts will be documented in the UFSAR and

b. The Vice President, Production and Engineering, shall have corporate responsibility for overall Plant nuclear safety, and shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the Plant so that continued nuclear safety is assured.

updated in accordance with 10CFR50.71.

c. The Plant Manager, Ginna Station shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the Plant.

Amendment No. 28

6.2-1

TRAINING

6.4

- 6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Division Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.
- 6.4.2 The training program shall meet or exceed NFPA No. 27, 1975 Section 40, except that (1) training for salvage operations need not be provided and (2) the Fire Brigade training sessions shall be held at least quarterly. Drills are considered to be training sessions.

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REVIEW AND AUDIT

6.5

Three separate organizational units shall be established for the purpose of review and audit of plant operations and safety-related matters. One of these will be an on-site operations review group, the Plant Operations Review Committee (PORC). A second is the Quality Assurance (Q.A.) group, responsible for the audit of safety-related activities associated with plant operations. A third is the independent audit and review group, the Nuclear Safety Audit and Review Board (NSARB). This group is responsible for the periodic review of the activities of the Plant Operations Review Committee, for directing audits and evaluating their results, and for the management evaluation of the status and adequacy of the Quality Assurance program.

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC) FUNCTION

6.5.1.1 The Plant Operations Review Committee shall function to advise the Plant Manager, Ginna Station on all matters related to nuclear safety and for referral of appropriate matters to the Nuclear Safety Audit and Review Board.

Corrected Amendment No. 16

6.5-1

COMPOSITION

6.5.1.2 The PORC shall be composed of the; <u>Chairman</u>: Superintendent, Ginna Production <u>Vice Chairman/Member</u>: Superintendent, Ginna Support Services <u>Vice Chairman/Member</u>: Operations Manager <u>Member</u>: Maintenance Manager <u>Member</u>: Maintenance Planning/Scheduling Manager <u>Member</u>: Maintenance Planning/Scheduling Manager <u>Member</u>: Instrument & Control Supervisor <u>Member</u>: Technical Manager <u>Member</u>: Results and Test Supervisor <u>Member</u>: Results and Test Supervisor <u>Member</u>: Reactor Engineer <u>Member</u>: Health Physics and Chemistry Manager <u>Member</u>: Nuclear Assurance Manager Member: Quality Control Engineer

ALTERNATES

6.5.1.3 Alternate members shall be designated by name, in writing by the Chairman.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman.

QUORUM

6.5.1.5 A quorum of the PORC shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two shall be alternates.

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RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of 1) all procedures required by Specification
 6.8 and changes thereto, 2) any other proposed
 procedures or changes thereto as determined by the
 Plant Manager, Ginna Station to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Vice President, Production and Engineering, and to the Chairman of the Nuclear Safety Audit and Review Board.
- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Safety Audit and Review Board.

Proposed

6.5-3

RESPONSIBILITIES (Continued)

- h. Review of the Plant Security Plan and shall submit recommended changes to the Chairman of the Nuclear Safety Audit and Review Board.
- i. Review of the Radiation Emergency Plan and shall submit recommended changes to the Chairman of the Nuclear Safety Audit and Review Board.
- j. Review of implementing procedures for the Plant Security Plan and the Radiation Emergency Plan and proposed changes thereto.
- k. Review of all Reportable Events.

AUTHORITY

- 6.5.1.7 The PORC shall:
 - a. Recommend in writing to the Plant Manager, Ginna Station approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether
 or not each item considered under 6.5.1.6(a) through
 (d) above constitutes an unreviewed safety question as
 defined in 10 CFR Section 50.59.

Amendment No. 4

6.5-4

c. Provide immediate written notification to the Vice President, Production and Engineering, and the Nuclear Safety Audit and Review Board of disagreement between the PORC and the Plant Manager, Ginna Station; however, the Plant Manager, Ginna Station shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each meeting and copies shall be provided to the Vice President, Production and Engineering, the Chairman of the Nuclear Safety Audit and Review Board, and such others as the Chairman may designate.

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AUDITS (Continued)

- g. The Facility Fire Protection Program and implementing procedures at least once per two years.
- h. An independent fire protection and loss prevention program inspection and audit performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program performed by non-licensee personnel at least once per 36 months. The personnel may be representatives of ANI, an insurance brokerage firm, or other qualified individuals.
- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
- 1. The Process Control Program and implementing procedures at least once per 24 months.
- m. Any other area of facility operation considered appropriate by the NSARB or the Vice President, Production and Engineering.

AUTHORITY

- 6.5.2.9 a. The Chairman of the Nuclear Safety Audit and Review Board is responsible to the President on all activities for which the Review Board is responsible.
 - b. The NSARB shall report to and advise the Vice President, Production and Engineering, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records of NSARB activities shall be prepared, approved, and distributed as indicated below:
 - a. Minutes shall be recorded of all meetings of this Board. Copies of the minutes shall be forwarded within 14 days following each meeting to the Corporate Chairman of the Board, Vice President, Production and Engineering and such others as the Chairman of the NSARB may designate.
 - b. Reports of reviews encompassed by Section 6.5.2.7 e,f,g and h above, shall be prepared, approved and forwarded to the Vice President, Production and Engineering within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Production and Engineering and to the management positions responsible for the areas audited within 30 days after completion of the audit.

Amendment No. 18

6.5-11

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6.6 · <u>REPORTABLE EVENT ACTION</u>

- 6.6.1 The following actions shall be taken for Reportable Events:
 - a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
 - b. Each Reportable Event shall be reviewed by the PORC and the results of this review shall be submitted to the NSARB and the Vice President, Production and Engineering.

7 SAFETY LIMIT VIOLATION

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
 - a. The provisions of 10 CFR Section 50.36(c)(1)(i) shall be complied with immediately.
 - b. The Safety Limit violation shall be reported to the Vice President, Production and Engineering, to the NSARB and to the Commission immediately.
 - c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
 - d. The Safety Limit Violation Report shall be submitted to the Commission, the NSARB, and the Vice President,
 Production and Engineering within two weeks of the violation.

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PROCEDURE

6.8

6.8.1

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

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. The radiological environmental monitoring program.
- h. Offsite Dose Calculation Manual implementation.
- i. Process Control Program implementation.
- 6.8.2 Each procedure and administrative policy of 6.8.1 above, the changes thereto, shall be reviewed by the PORC and approved by the Plant Manager, Ginna Station prior to implementation and reviewed periodically as set forth in the applicable procedures.
- 6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:
 - a. The intent of the original procedures is not altered.
 - b. The change is approved by two members of the plant management staff, at least one of whom is the Shift Supervisor who holds a Senior Reactor Operator's License.

6.8-1

c. The change is documented, reviewed by the PORC, and approved by the Plant Manager, Ginna Station within 10 ' days of implementation.

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a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and who will perform periodic radiation surveillance at the frequency specified in the HPWP. The surveillance frequency will be established by a plant Health Physicist.

b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1 a. above, and in addition locked doors shall be provided to prevent unauthorized entry into these areas and the keys to unlock these locked doors shall be maintained under the administrative control of the Shift Supervisor on duty.

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ATTACHMENT B

1.

This safety evaluation addresses a proposed revisions to Section 6 of the Ginna Technical Specifications concerning changes in titles for the corporate positions having responsibility for overall Plant safety. Specifically requested are changes in title from Senior Vice President, Production and Engineering or Vice President, Electric and Steam Production to Vice President, Production and Engineering. Additional changes requested are from Training Coordinator to Division Training Manager since this position now includes maintaining a retraining and replacement program; a change in title from Shift Foreman to Shift Supervisor which includes maintaining keys to the locked doors in high radiation areas; and change from the Plant Health Physicist to a plant Health Physicist since several individuals now have the title of Health Physicist.

The addition of the position of Plant Manager, Ginna Station is requested. This position has the responsibility for overall onsite operations at Ginna Station and replaces the titles of Superintendent, Ginna Production; and Station Superintendent, except that the position of Superintendent, Ginna Production continues as Chairman of the Plant Operations Review Committee (PORC). Another change requested is addition of the position of Maintenance Planning/Scheduling Manager as a member of the PORC.

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This proposed amendment has been reviewed against the three factors of 10CFR50.92. It has been determined that the amendment does not involve a significant hazards consideration for the following reasons.

1. This change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed revision does not involve the physical modification of the Plant or equipment. The proposed change is administrative in nature and affects no analyses or responses of the Plant to accident conditions.

2. These changes will not create the possibility of a new or different kind of accident previously evaluated.

As indicated above, the proposed revision to the Technical Specifications does not involve a physical modification to the Plant that could result in the creation of an accident not previously analyzed.

3. This change does not involve a significant reduction in the margins of safety.

The proposed revision does not in any way alter RG&E's commitment to maintaining a management structure that contributes to the safe operation and maintenance of Ginna Station. A single corporate officer is responsible for Plant

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safety and with communicate and direct the lines of authority and responsibility for safe nuclear plant operations. This officer continues to report directly to the President. A single individual is responsible for overall safe unit operation and maintenance. The PORC function to advise this individual on all matters related to nuclear safety remains unchanged.

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DETAILED TECHNICAL SPECIFICATION CHANGES

Location

Page 6.1-1 Section 6.1.1

Page 6.2-1 Section 6.2.1c

Page 6.4-1 Section 6.4.1

Page 6.5-1 Section 6.5.1.1

Page 6.5-2 Section 6.5.1.2

Page 6.5-3 Section 6.5.1.6a

Page 6.5-3 Section 6.5.1.6e

Page 6.5-4 Section 6.5.1.7a

Page 6.5-4a

Page 6.5-4a Section 6.5.1.7c

Page 6.5-4a Section 6.5.1.8

Page 6.5-10 Section 6.5.2.8m

Page 6.5-11 Section 6.5.2.9b

Page 6.5-11 Section 6.5.2.10a

Description of Change

Changed Superintendent, Ginna Station to Plant Manager, Ginna Station Changed Superintendent, Ginna Station

to Plant Manager, Ginna Station

Changed Training Coordinator to Division Training Manager

Changed Superintendent, Ginna Station to Plant Manager, Ginna Station

Added Maintenance Planning/Scheduling Manager as a member of the Plant Operations and Review Committee

Changed Superintendent, Ginna Station to Plant Manager, Ginna Station

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

Changed Superintendent, Ginna Station to Plant Manager, Ginna Station

Added Page 6.5-4a

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering.

Changed Station Superintendent to Plant Manager, Ginna Station (2 places)

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

Change Vice President, Electric and Steam Production to Vice President, Production and Engineering

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Changed Vice President, Electric and b Steam Production to Vice President, Production and Engineering

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

<u>Reason for Change</u>

Organizational Change

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Organizational Change

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DETAILED TECHNICAL SPECIFICATION CHANGES

Location

Page 6.5-11 Section 6.5.2.10b

Page 6.5-11 Section 6.5.2.10c

Page 6.6-1 Section 6.6.1b

Page 6.7-1 Section 6.7.1b

Page 6.7-1 Section 6.7.1d

Page 6.8-1 Section 6.8.2

Page 6.8-1 Section 6.8.3b

Page 6.8-2 Section 6.8.3c

Page 6.13-2 Section 6.13.1a(3)

Page 6.13-2 Section 6.13.1b Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

Description of Change

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

Changed Vice President, Electric and Steam Production to Vice President, Production and Engineering

Changed Station Superintendent to Plant Manager, Ginna Station

Changed Shift Foreman to Shift Supervisor

Changed Station Superintendent to Plant Manager, Ginna Station

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Changed "the Plant Health Physicist" to "a plant Health Physicist"

Changed Shift Foreman to Shift Supervisor

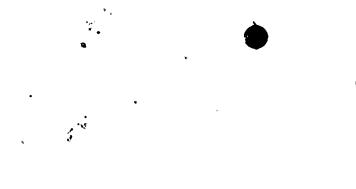
Reason for Change

Organizational Change

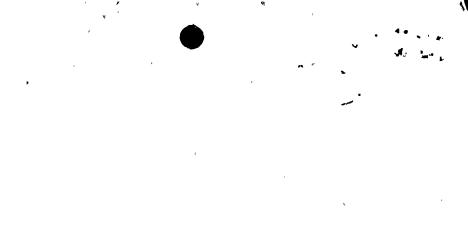
Several people now have the title of Health Physicist

Organizational Change

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