ENCLOSURE 5

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/OPERATING LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
PERFORMANCE BASED NUCLEAR ASSESSMENT PROGRAM

MARKED-UP TECHNICAL SPECIFICATION PAGES

INDEX

6.0 ADMINISTRATIVE CONTROLS

INDEX

ADMINISTRATIVE CONTROLS

6.2.3 ~~PROJECT ASSESSMENT (PA) SECTION~~ Deleted

FUNCTION

6.2.3.1 The PA Section shall function to examine unit operating characteristics, NRC issuances, industry advisories (including information forwarded by INPO from their evaluation of all industry LERs), and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The PA Section shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety, to appropriate levels of management, up to and including the Executive Vice President - Power Supply, if necessary.

COMPOSITION

6.2.3.2 The PA Section shall include at least five, dedicated, full-time engineers located on site. Each shall have a baccalaureate degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The PA Section shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the PA Section shall be prepared, maintained, and forwarded each calendar month to the Manager - Nuclear Assessment Department.

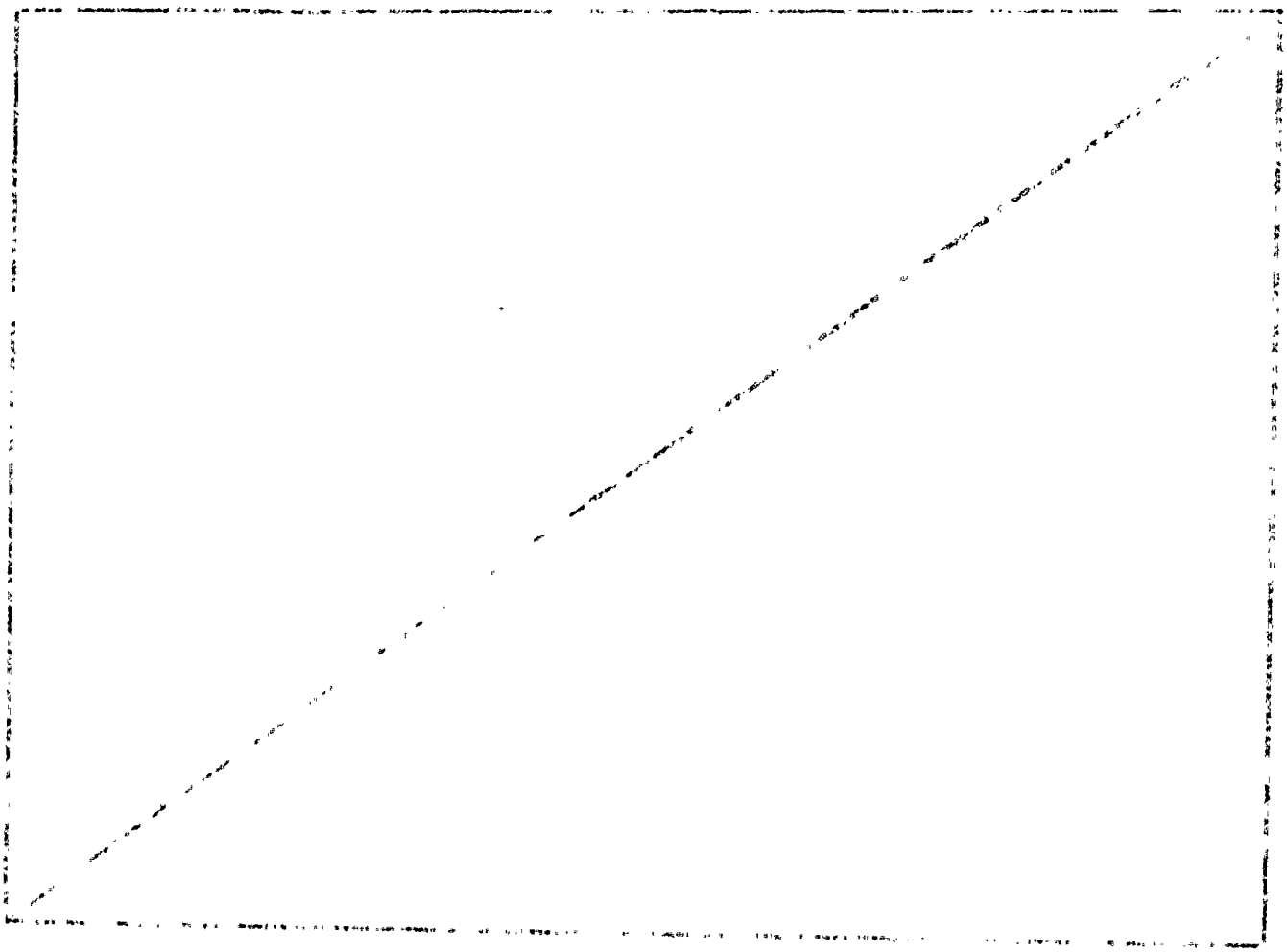
6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Foreman in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a baccalaureate degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 Deleted

* Not responsible for sign-off function.

Delete (applicable to the deleted material above)



Qualified Safety Reviewers (Continued)

These individuals shall have a baccalaureate degree in an engineering or related field or equivalent, and 2 years of related experience. Such designation shall include the disciplines or procedure categories for which each individual is qualified. Qualified individuals or groups not on the plant staff may be relied upon to perform safety reviews if so designated by the Plant General Manager.

6.5.1.4 Safety Evaluations and Approvals

6.5.1.4.1 The safety evaluation prepared in accordance with Specification 6.5.1.1.1 shall include a written determination, with basis, of whether or not the procedures or changes thereto, proposed tests and experiments and changes thereto, and modifications constitute an unreviewed safety question as defined in Paragraph 50.59 of 10 CFR Part 50, or whether they involve a change to the Final Safety Analysis Report, the Technical Specifications, or the Operating License.

6.5.1.4.2 The safety evaluation shall be prepared by a qualified individual. The safety evaluation shall be reviewed by a second qualified individual.

6.5.1.4.3 A safety evaluation and subsequent review that conclude that the subject action may involve an unreviewed safety question, a change to the Technical Specifications, or a change to the Operating License, will be referred to the Plant Nuclear Safety Committee (PNSC) for their review in accordance with Specification 6.5.2.6. If the PNSC recommendation is that an item is an unreviewed safety question, a change to the Technical Specifications, or a change to the Operating License, the action will be referred to the Commission for approval prior to implementation. Implementation may not proceed until after review by the Nuclear Assessment ~~Department~~ Section in accordance with Specification 6.5.3.9.

6.5.1.4.4 If a safety evaluation and subsequent review conclude that the subject action does not involve an unreviewed safety question, a change to the Technical Specification, or a change to the Operating License, the action may be approved by the Plant General Manager or his designee or, as applicable, by the Manager of the primary functional area affected by the action. The individual approving the action shall assure that the reviewers collectively possess the background and qualification in all of the disciplines necessary and important to the specific review for both safety and technical aspects.

6.5.1.4.5 A safety evaluation and subsequent review that conclude that the ~~subject action involves~~ modifications, procedures, tests or experiments which constitute a change to the facility as described in the Final Safety Analysis Report shall be referred to the Nuclear Assessment ~~Department~~ Section for review in accordance with Specification 6.5.3.9, but implementation may proceed prior to the completion of that review.

6.5.1.4.6 The individual approving the procedure, tests, or experiment or change thereto shall be other than those who prepared the safety evaluation or performed the safety review.

RESPONSIBILITIES (Continued)

b. Review of all proposed tests and experiments that affect nuclear safety and that have been initially determined to appear to constitute an unreviewed safety question or involve an unreviewed change to the Technical Specifications;

c. Review of all proposed changes to Appendix "A" Technical Specifications;

d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety and that have been initially determined to appear to constitute an unreviewed safety question as defined in 10 CFR 50.59 or involve a change to the Technical Specifications;

e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President - Harris Nuclear ~~Project and to the Manager - Nuclear Assessment Department~~; Plant

f. Review of all REPORTABLE EVENTS;

g. Review of unit operations to detect potential hazards to nuclear safety;

h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Manager - Nuclear Assessment ~~Department~~; Section

i. Review of the Security Plan;

j. Review of the Emergency Plan;

k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Harris Nuclear ~~Project and the Manager - Nuclear Assessment Department~~; Plant

l. Review, prior to implementation, of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, the Radwaste Treatment Systems, and the Technical Specification Equipment List Program.

6.5.2.7 The PNSC shall:

a. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.2.6a. through e. constitutes an unreviewed safety question; and

RESPONSIBILITIES (Continued)

b. Provide written Plant notification within 24 hours to the Vice President - Harris Nuclear ~~Project, and the Manager - Nuclear Assessment Department~~ of disagreement between the PNSC and the Plant General Manager. However, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.2.8 The PNSC shall maintain written minutes of each PNSC meeting that, at a minimum, document the results of all PNSC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President - Harris Nuclear ~~Project~~ and the Manager - Nuclear Assessment ~~Department~~ Section. Plant

6.5.3 NUCLEAR ASSESSMENT ~~DEPARTMENT~~ Section INDEPENDENT REVIEW PROGRAM

FUNCTION

6.5.3.1 The Nuclear Assessment ~~Department~~ Section shall function to provide independent review of plant changes, tests, and procedures; verify that REPORTABLE EVENTS are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer.

ORGANIZATION

6.5.3.2 The individuals assigned responsibility for independent reviews shall be technically qualified in a specified technical discipline or disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:

a. Nuclear power plant operations,
b. Nuclear engineering,
c. Chemistry and radiochemistry,
d. Metallurgy,
~~e.~~ f Instrumentation and control,
~~f.~~ g Radiological safety,
~~g.~~ h Mechanical and electrical engineering,
~~h.~~ i Administrative controls, j. Seismic and enviornmental,
~~i.~~ k Quality assurance practices,
~~j.~~ e Nondestructive testing, and
~~k.~~ L Other appropriate fields ~~associated with the unique characteristics.~~

ORGANIZATION (Continued)

6.5.3.3 The Manager - Nuclear Assessment ~~Department~~ Section shall have a ~~baccalaureate~~ bachelors degree in an engineering or related field and, in addition, shall have a minimum of 10 years' related experience, of which a minimum of 5 years shall be in the operation and/or design of nuclear power plants.

6.5.3.4 The independent safety review program reviewers shall each have a ~~baccalaureate~~ bachelors degree in an engineering or related field or equivalent and, in addition, shall have a minimum of 5 years' related experience.

6.5.3.5 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment ~~Department~~ Section, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

~~6.5.3.6 At least three individuals, qualified as discussed in Specification 6.5.3.2 above shall review each item submitted under the requirements of Specification 6.5.3.9.~~

Replace with New 6.5.3.6 attached.

6.5.3.7 Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.

6.5.3.8 The Nuclear Assessment ~~Department~~ Section independent safety review program shall be conducted in accordance with written, approved procedures.

REVIEW Replace with 6.5.3.9 attached

~~6.5.3.9 The Nuclear Assessment Department shall perform reviews of the following:~~

~~a. Written safety evaluations for all procedures and programs required by Specification 6.8 and other procedures that affect nuclear safety and changes thereto, and proposed tests or experiments and proposed modifications, any of which constitute a change to the Final Safety Analysis Report. Implementation may proceed prior to completion of the review;~~

~~b. All procedures and programs required by Specification 6.8 and other procedures that affect nuclear safety and changes thereto that constitute an unreviewed safety question as defined in Paragraph 50.59 of 10 CFR Part 50 or involve a change to the Technical Specifications;~~

~~c. All proposed tests or experiments that constitute an unreviewed safety question as defined in Paragraph 50.59 of 10 CFR Part 50 or involve a change to the Technical Specifications prior to implementation;~~

~~d. All proposed changes to the Technical Specifications and Operating License;~~

INSERT TO PAGE 6-12.

6.5.3.6 The documents submitted under 6.5.3.9 shall be reviewed by individuals meeting the requirements of 6.5.3.2 and 6.5.3.4 to ensure disciplines are encompassed. Multiple reviews will be conducted on documents where required to meet applicable disciplines of 6.5.3.2.

REVIEW (Continued) Replace with 6.5.3.9 attached

e. Violations, which require written notification to the Commission, of applicable codes, regulations, orders, Technical Specifications, license requirements, internal procedures or instructions having nuclear safety significance, significant operating abnormalities or deviations from normal and expected performance of plant safety-related structures, systems, or components;

f. All REPORTABLE EVENTS;

g. All proposed modifications that constitute an unreviewed safety question as defined in Paragraph 50.59 of 10 CFR Part 50 or involve a change to the Technical Specifications;

h. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Department deems appropriate for consideration or which is referred to the Manager - Nuclear Assessment Department by the onsite operating organization or other functional organizational units within Carolina Power & Light Company;

i. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and

j. Reports and minutes of the PNSC.

6.5.3.10 Review of items considered under Specification 6.5.3.9.e, h and j above shall include the results of any investigations made and the recommendations resulting from these investigations to prevent or reduce the probability of recurrence of the event.

RECORDS

6.5.3.11 Records of Nuclear Assessment Department reviews performed under Specification 6.5.3.9, including recommendations and concerns, shall be prepared and distributed as indicated below:

a. Copies of documented reviews shall be retained in the NAD files.

b. Recommendations and concerns shall be submitted to the Plant General Manager and Vice President - Harris Nuclear Project within 14 days of completion of the review. A report summarizing the reviews encompassed by Specification 6.5.3.9 shall be provided to the Plant General Manager and the Vice President - Harris Nuclear Project every other month.

c. A summation of recommendations and concerns of the Nuclear Assessment Department shall be submitted to the Chairman/President and Chief Executive Officer and other appropriate senior management personnel at least every other month.

INSERT TO PAGES 6-12 AND 6-13.

6.5.3.9 REVIEW

The Nuclear Assessment Section shall perform reviews of the following:

a. Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report, and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). These reviews are to verify that such changes, tests, or experiments do not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.

b. Proposed changes in procedures required by these Technical Specifications, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the Technical Specifications or an unreviewed safety question pursuant to 10 CFR 50.59 (a)(2) prior to implementation.

c. Proposed changes to the Technical Specifications or this Operating License prior to implementation.

d. Violations, deviations and REPORTABLE EVENTS, which require reporting to the NRC in writing, such as:

   1. violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance,

   2. significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components, and

   3. REPORTABLE EVENTS as specified in 10 CFR 50.73.

e. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.

f. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Section deems appropriate for consideration or which is referred to the Manager - Nuclear Assessment Section, by the on-site operating organization, Plant Nuclear Safety Committee (PNSC) or by other functional organizational units within CP&L.

INSERT TO PAGES 6-12 AND 6-13 (CONTINUED).

RECORDS

6.5.3.10 Results of Nuclear Assessment Section independent safety reviews shall be documented and retained.

6.5.4 NUCLEAR ASSESSMENT ~~DEPARTMENT AUDIT~~ Section Assessment PROGRAM

Replace with 6.5.4 attached

AUDITS

6.5.4.1 Audits of unit activities shall be performed by the Nuclear Assessment Department. These audits shall encompass:

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions, at least once per 12 months;

b. The training, qualifications, and performance as a group, of the entire unit staff, at least once per 12 months;

c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;

d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;

e. The fire protection programmatic controls including the implementing procedures, at least once per 24 months, by qualified licensee QA personnel;

f. The Radiological Environmental Monitoring Program and the results thereof, at least once per 12 months;

g. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures, at least once per 24 months;

h. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes, at least once per 24 months;

i. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring, at least once per 12 months;

j. The Emergency Plan and implementing procedures, at least once per 12 months;

k. The Security Plan and implementing procedures, at least once per 12 months; and

l. Any other area of unit operation considered appropriate by the Nuclear Assessment Department or the Vice President - Harris Nuclear Project.

6.5.4.2 Personnel performing the quality assurance audits shall have access to the plant operating records.

INSERT TO PAGE 6-14.

6.5.4 Nuclear Assessment Section Assessment Program

6.5.4.1 Assessments of facility activities shall be performed by the Nuclear Assessment Section. Assessments will be performance based and will be scheduled based on plant performance and importance to safety but at a frequency not to exceed 24 months. These assessments shall encompass:

a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training and qualifications of the entire facility staff.

c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.

d. The performance of activities required by the QA Program to meet the criteria of Appendix B, 10 CFR 50.

e. Any other area of facility operation considered appropriate by the Vice President - Harris Nuclear Plant.

f. The Fire Protection Program and implementing procedures.

g. The Radiological Environmental Monitoring Program and the results thereof.

h. The OFF-SITE DOSE CALCULATION MANUAL and implementing procedures.

i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes.

6.5.4.2 Assessments of activities prescribed by the Code of Federal Regulations will be performed at the frequencies prescribed by the applicable regulation. These assessments shall encompass:

a. Emergency Preparedness (per 10 CFR 50.54(t))

b. Security (per 10 CFR 50.54(p))

INSERT TO PAGE 6-14 (CONTINUED).

6.5.4.3 The NAS shall include at least three individuals to perform the Independent Safety Engineering Group (ISEG) function. Each reviewer shall have a bachelor's degree in engineering or related science or equivalent and at least two years professional level experience in his field, at least one year of which shall be in the nuclear field.

6.5.4.3.1 The NAS shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design information which may indicate areas of improving unit safety. Review responsibilities shall also include plant operations, modifications, maintenance, and surveillances to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical.

RECORDS Replace with 6.5.4 attached

6.5.4.3 Records of audits shall be prepared and retained.

6.5.4.4 Audit reports encompassed by Specification 6.5.4.1 shall be prepared, approved by the Manager - Nuclear Assessment Department, and forwarded, within 30 days after completion of the audit, to the Executive Vice President - Power Supply, Senior Vice President - Nuclear Generation, Vice President - Harris Nuclear Project, Plant General Manager, and the management positions responsible for the areas audited.

AUTHORITY

6.5.4.5 The Manager - Nuclear Assessment Department shall be responsible for the following:

a. Administering the Nuclear Assessment Department Audit Program.

b. Approval of the individuals selected to conduct quality assurance audits.

6.5.4.6 Audit personnel shall be independent of the area audited.

6.5.4.7 Selection of personnel for auditing assignments shall be based on experience or training that establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting audit personnel, consideration shall be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.

6.5.4.8 Qualified outside consultants, or other individuals independent from those personnel directly involved in plant operation, shall be used to augment the audit teams when necessary.

6.5.5 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.5.1 An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months using either qualified offsite licensee personnel or an outside fire protection firm.

6.5.5.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

6.5.5.3 Copies of the audit reports and responses to them shall be forwarded to the Vice President - Harris Nuclear Project and the Manager - Nuclear Assessment Department.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

REPORTABLE EVENT ACTION (Continued)

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 PNSC, and the results of this review shall be submitted to the Manager - Nuclear Assessment ~~Department~~ Section and the Vice President - Harris Nuclear ~~Project~~ Plant.

6.7 SAFETY LIMIT VIOLATION

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

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President - Harris Nuclear ~~Project and the Manager - Nuclear Assessment Department~~ Plant shall be notified within 24 hours;

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSC. 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;

c. The Safety Limit Violation Report shall be submitted, within 14 days of the violation, to the Commission, the Manager - Nuclear Assessment ~~Department~~ Section, and the Vice President - Harris Nuclear ~~Project~~ Plant; and

d. Operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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, Revision 2, February 1978;

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;

c. Security Plan implementation;

d. Emergency Plan implementation;

e. PROCESS CONTROL PROGRAM implementation;

f. OFFSITE DOSE CALCULATION MANUAL implementation;

RECORD RETENTION (Continued)

h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;

b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;

c. Records of radiation exposure for all individuals entering radiation control areas;

d. Records of gaseous and liquid radioactive material released to the environs;

e. Records of transient or operational cycles for those unit components identified in Table 5.7-1;

f. Records of reactor tests and experiments;

g. Records of training and qualification for current members of the unit staff;

h. Records of inservice inspections performed pursuant to these Technical Specifications;

i. Records of quality assurance activities required by the Corporate Quality Assurance Program;

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;

k. Records of meetings of the PNSC ~~and of the independent reviews performed by the Nuclear Assessment Department~~;

l. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.8 including the date at which the service life commences and associated installation and maintenance records;

m. Records of secondary water sampling and water quality;

n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later data. This should include procedures

RECORD RETENTION (Continued)

effective at specified times and QA records showing that these procedures were followed; and

o. Records of facility radiation and contamination surveys.

P. Records of Independent Review

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to Paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technicians) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device that continuously indicates the radiation dose rate in the area; or

b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or

c. An individual qualified in radiation protection procedures, with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and who shall perform periodic radiation surveillance at the frequency specified by the Radiation Control Supervisor in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, accessible areas with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift Foreman on duty