ENCLOSURE 5 TO SERIAL: HNP-99-092

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
TECHNICAL SPECIFICATIONS 6.5 ,6.8, AND 6.10

TECHNICAL SPECIFICATION PAGES

INDEX

6.0 ADMINISTRATIVE CONTROLS

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6.4 TRAINING

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6.4.1 A retraining and replacement training program for the unit staff shall be maintained and shall meet or exceed the requirements and recommendations of the September 1979 draft of ANS 3.1, with the exceptions and alternatives noted in Section 1.8 (Personnel Selection and Training) of the FSAR. The initial and requalification training for licensed personnel is through an accredited program based on the systematic approach to training, as allowed by 10 CFR 55.31, 10 CFR 55.59, and Generic Letter 87-07.

6.5 REVIEW AND AUDIT ← Delete Add → DELETED

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6.5.1 SAFETY AND TECHNICAL REVIEWS

6.5.1.1 General Program Control

6.5.1.1.1 A safety and a technical evaluation shall be prepared for each of the following:

a. All procedures and programs required by Specification 6.8, other procedures that affect nuclear safety, and changes thereto;

b. All proposed tests and experiments that are not described in the Final Safety Analysis Report; and

c. All proposed changes or modifications to plant systems or equipment that affect nuclear safety.

6.5.1.2 Technical Evaluations

6.5.1.2.1 Technical evaluations will be performed by personnel qualified in the subject matter and will determine the technical adequacy and accuracy of the proposed activity. If interdisciplinary evaluations are required to cover the technical scope of an activity, they will be performed.

6.5.1.2.2 Technical review personnel will be identified by the responsible Manager or his designee for a specific activity when the review process begins.

6.5.1.3 Qualified Safety Reviewers

6.5.1.3.1 The Plant General Manager shall designate those individuals who will be responsible for performing safety reviews described in Specification 6.5.1.4.

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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 Section (NAS) 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 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 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.

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6.5.2 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)

FUNCTION

6.5.2.1 The PNSC shall function to advise the Plant General Manager on all matters related to nuclear safety.

COMPOSITION

6.5.2.2 The PNSC will be composed of seven to nine members. Members and the Chairman shall be designated in writing by the Plant General Manager. The members shall represent the engineering, operations, maintenance, health physics/chemistry, nuclear assessment and regulatory affairs functions.

6.5.2.3 The Chairman may designate in writing other regular members who may serve as Acting Chairman of PNSC meetings. The Chairman shall have a bachelor's degree in an engineering or science field or equivalent, and, in addition, shall have 10 years of power plant experience of which 3 years shall be nuclear power plant experience. The other members (and any alternates) shall have a bachelor's degree in an engineering or science field or equivalent and, in addition, shall have a minimum of 5 years technical experience of which a minimum of 3 years shall be in one or more of the areas listed above. Members without an applicable bachelor's degree shall have a minimum of 10 years technical experience, of which a minimum of 3 years shall be in one or more of the areas listed above. No more than two alternates shall participate as voting members in PNSC activities at any one time.

MEETING FREQUENCY

6.5.2.4 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate. The PNSC must meet in session to perform its function under these Technical Specifications.

QUORUM

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

RESPONSIBILITIES

6.5.2.6 The PNSC shall be responsible for:

a. Review of proposed procedures or changes thereto that have been initially determined to constitute an unreviewed safety question or involve an unreviewed change to the Technical Specifications;

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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 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 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 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

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RESPONSIBILITIES (Continued)

b. Provide written notification within 24 hours to the Vice President - Harris Nuclear Plant 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 Plant and the Manager - Nuclear Assessment Section.

6.5.3 NUCLEAR ASSESSMENT SECTION INDEPENDENT REVIEW PROGRAM

FUNCTION

6.5.3.1 The Nuclear Assessment 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. Nondestructive testing,
f. Instrumentation and control,
g. Radiological safety,
h. Mechanical and electrical engineering,
i. Administrative controls,
j. Seismic and environmental,
k. Quality assurance practices, and
l. Other appropriate fields.

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ORGANIZATION (Continued)

6.5.3.3 The Manager - Nuclear Assessment Section shall have a bachelor 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 individuals performing independent safety reviews shall have a bachelor 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 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 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.

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 Section independent safety review program shall be conducted in accordance with written, approved procedures.

REVIEW

6.5.3.9 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 10CFR50.59(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 10CFR50.59(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 10CFR50.59(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:

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REVIEW (Continued)

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 10CFR50.73.

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 Carolina Power & Light Company.

RECORDS

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

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 Part 50.

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

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

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

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6.5.4 NUCLEAR ASSESSMENT SECTION ASSESSMENT PROGRAM (Continued)

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

6.5.4.2 Assessments of activities prescribed by Title 10 of 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))

c. Radiation Protection (per 10 CFR 20.1101(c))

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.

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 Plant and the Manager - Nuclear Assessment Section.

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PROCEDURES AND PROGRAMS (Continued)

g. Quality Assurance Program for effluent and environmental monitoring; and

h. Fire protection program implementation.

i. Technical Specification Equipment List Program.

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6.8.2 Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved in accordance with Specification 6.5.1 prior to implementation and reviewed periodically as set forth in administrative procedures. — Delete

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6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided: — Delete

a. The intent of the original procedure is not altered;

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and

c. The change is documented, reviewed in accordance with Specification 6.5.1, and approved within 14 days of implementation by the Plant General Manager or by the Manager of the functional area affected by the procedure.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage, to as low as practical levels, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include:

1. Residual Heat Removal System and Containment Spray System, except spray additive subsystem and RWST,

2. Safety Injection System, except boron injection recirculation subsystem and accumulator,

3. Portions of the Chemical and Volume Control System:

   a. Letdown subsystem, including demineralizers,
   b. Boron re-cycle holdup tanks, and
   c. Charging/safety injection pumps,

4. Post-Accident Sample System,

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6.9.1.6 CORE OPERATING LIMITS REPORT (Continued)

6.9.1.6.3 The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.

6.9.1.6.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements, shall be provided, upon issuance for each reload cycle, to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the NRC in accordance with 10CFR50.4 within the time period specified for each report.

6.10 RECORD RETENTION — Delete Add → DELETED

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

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

a. Records and logs of unit operation covering time interval at each power level;

b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;

c. All REPORTABLE EVENTS;

d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications;

e. Records of changes made to the procedures required by Specification 6.8.1;

f. Records of radioactive shipments;

g. Records of sealed source and fission detector leak tests and results; and

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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;

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 date. This should include procedures

RECORD RETENTION (Continued)

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

o. Records of facility radiation and contamination surveys;

p. Records of independent reviews; and

q. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

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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 Superintendent-Shift Operations on duty and/or health physics supervision. Doors shall remain

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HIGH RADIATION AREA (Continued)

locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area. During emergency situations that involve personal injury or actions taken to prevent major equipment damage, continuous surveillance and radiation monitoring of the work area by a qualified individual may be substituted for the routine RWP procedure.

For accessible individual high radiation areas, with radiation levels of greater than 1000 mR/h, that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3p. This documentation shall contain: FSAR Section 17.3 (Add) Delete .

   1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

   2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective after review and acceptance by the PNSC and the approval of the Plant General Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3p. This documentation shall contain: FSAR Section 17.3 (Add) Delete

   1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

6.0 ADMINISTRATIVE CONTROLS

SECTION PAGE

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained and shall meet or exceed the requirements and recommendations of the September 1979 draft of ANS 3.1, with the exceptions and alternatives noted in Section 1.8 (Personnel Selection and Training) of the FSAR. The initial and requalification training for licensed personnel is through an accredited program based on the systematic approach to training, as allowed by 10 CFR 55.31, 10 CFR 55.59, and Generic Letter 87-07.

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PROCEDURES AND PROGRAMS (Continued)

g. Quality Assurance Program for effluent and environmental monitoring; and

h. Fire protection program implementation.

i. Technical Specification Equipment List Program.

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6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage, to as low as practical levels, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include:

1. Residual Heat Removal System and Containment Spray System, except spray additive subsystem and RWST,

2. Safety Injection System, except boron injection recirculation subsystem and accumulator,

3. Portions of the Chemical and Volume Control System:

   a. Letdown subsystem, including demineralizers,
   b. Boron re-cycle holdup tanks, and
   c. Charging/safety injection pumps,

4. Post-Accident Sample System,

6.9.1.6 CORE OPERATING LIMITS REPORT (Continued)

6.9.1.6.3 The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.

6.9.1.6.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements, shall be provided, upon issuance for each reload cycle, to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the NRC in accordance with 10CFR50.4 within the time period specified for each report.

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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 Superintendent-Shift Operations on duty and/or health physics supervision. Doors shall remain

HIGH RADIATION AREA (Continued)

locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area. During emergency situations that involve personal injury or actions taken to prevent major equipment damage, continuous surveillance and radiation monitoring of the work area by a qualified individual may be substituted for the routine RWP procedure.

For accessible individual high radiation areas, with radiation levels of greater than 1000 mR/h, that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by FSAR Section 17.3. This documentation shall | contain:

   1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

   2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective after review and acceptance by the PNSC and the approval of the Plant General Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by FSAR Section 17.3. This documentation shall | contain:

   1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and