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12.0 CONDUCT OF OPERATIONS

12.1 ORGANIZATIONAL STRUCTURE

Exelon Generation Company, LLC is a limited liability company responsible for the safe, reliable, and efficient operation of its nuclear facilities. In addition, Exelon is responsible for appropriate standards, programs, processes, management controls, and support for the nuclear facilities. In keeping with these responsibilities, Exelon is committed to providing sufficient personnel having appropriate qualifications to both operate and technically support the facility.

12.1.1 Offsite Organization

The Exelon corporate organization and its functions and responsibilities are described in Chapter 1 of the Quality Assurance Topical Report NO-AA-10, as revised.

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12.1.3 QUALIFICATION OF NUCLEAR PLANT PERSONNEL

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 - 1978, "Standard for Selection and Training of Nuclear Power Plant Personnel," for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall also meet the requirements of 10 CFR 55. Individuals who do not meet ANSI/ANS 3.1 - 1978, Section 4.5, are not considered technicians or maintenance personnel for purposes of determining qualifications, but are permitted to perform work for which qualification has been demonstrated.

The management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 - 1977, "Personnel Selection and Training." Each radiological controls technician and supervisor shall meet or exceed the qualifications of ANSI N18.1 - 1971, paragraph 4.5.2/4.3.2, or be formally qualified through an NRC approved radiological controls training program. All radiological controls technicians will be qualified through training and examination in each area or specific task related to their radiological controls functions prior to their performance of those tasks.

The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline, with specific training in unit design, and response and analysis of transients and accidents.

Qualification requirements similar to those of other major engineering firms are used for staffing the Nuclear Services and Operations Support organizations. These organizations consist primarily of individuals having college degrees, or the equivalent, in appropriate science or engineering disciplines. In certain instances, technicians, who by virtue of formal education, training programs, or experience have acquired special expertise in particular areas are involved in providing technical support. In keeping with responsible management practices, the capabilities of individuals and supervisors are considered in making personnel assignments.

12.1.4 SAFETY REVIEWS

The safety review process defines how procedure changes, Technical Specification changes, Licensee Event Reports (LERs), plant modifications, and other documents are reviewed, approved, and implemented. This process spreads the responsibility for activity in these areas broadly across the organization. The process requires each director or manager to control the preparation, review, and reporting activities of each activity in their area which affects nuclear safety.

Each director or manager has the responsibility for ensuring that preparation, review and approval of procedures and other documents required by the activities within their area of responsibility are carried out properly. The subjects addressed include operating procedure changes, plant hardware modifications, security and radiological and environmental control activities, etc. In other words, all aspects of nuclear plant design and operation that are important to safe operation involve the safety review process. The main line of this preparation, review and approval process consists of a sequence of four (4) distinct activities: - preparation, technical review, independent safety review and implementing approval.

Responsibilities and Qualifications of Preparers, Reviewers and Approvers

The person assigned to prepare the document (Procedure Change, Design Modification, LER, etc.) must be knowledgeable and experienced in that technical area. The person is responsible for providing thoughtful, well written language which can easily be interpreted by users and reviewers. The preparer is responsible for soliciting input from knowledgeable people in other organizations, as appropriate, and resolving their comments. The preparer makes an initial determination as to whether or not: (a) a cross disciplinary review is necessary; and, (b) prior NRC approval is required; or, (c) a Technical Specification change is needed.

Technical Review

"Station Qualified Reviewers*" are charged with reviewing the document for safety and technical adequacy. They must be knowledgeable and experienced individuals, different from the preparer, but may be from the same organization as the individual who prepared the document.

These people must be qualified in accordance with the provisions of the Quality Assurance Topical Report (QATR). The responsible technical reviewers must also review and concur on the determination of: (a) the necessity for a cross disciplinary review, (b) prior NRC approval is required, and (c) the need for a Technical Specification change. This review and concurrence must be documented.

"Implementing approvers/Site Functional Area Managers" are responsible for releasing the document for its intended use (NRC Report, permanent procedure change, etc).

* The "Station Qualified Reviewer" is so named to distinguish him/her from other people whom he or she might ask to provide cross-disciplinary assistance for the technical review. The "Station Qualified Reviewer" is accountable for the review; he/she is the one who must be qualified as specified in the QATR.

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Independent Safety Review

Independent safety review must be performed by an individual or group not having direct responsibility for the performance of the activities under review and, in most cases, may be performed after implementation. The Plant Operations Review Committee is typically responsible for independent safety review. The purpose of the independent safety review process is to assess the adequacy of the preparation and documentation provided on the need for prior NRC approval and the need for Technical Specification changes.

The function of the Plant Operations Review Committee (PORC) is to perform an independent verification of a document to the extent necessary to verify safety adequacy. Personnel performing PORC duties must satisfy the provisions of the QATR.

Nuclear Safety Review Board (NSRB)

A collegial body that (1) conducts independent reviews of each licensed Exelon Nuclear Station performance and operations to determine if the station affairs are being conducted in a manner that promotes nuclear safety and (2) provides feedback to the organization on suggested improvements.

Summary of Accountabilities

The directors and managers maintain responsibility for ensuring the preparation, review and approval of documents required by activities within their functional area of responsibility. These activities include (1) procedures and procedure changes that affect nuclear safety, (2) proposed changes to Technical Specifications, (3) proposed modifications of unit structures, systems and components that affect nuclear safety, (4) proposed tests and experiments that affect nuclear safety, (5) investigation of violations of the Technical Specifications, (6) events reportable to the NRC, and (7) security and emergency plans and their implementing procedures.

The directors and managers maintain responsibility for ensuring periodic independent safety review of subjects within their assigned area of safety review responsibility.

These subjects include:

- a. Written safety evaluations of changes to the facility as described in the Safety Analysis Report (SAR), of changes in procedures as described in the SAR, and of tests or experiments not described in the SAR;
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments which involve a change in the Technical Specifications or require NRC approval;
- c. Proposed changes to Technical Specifications or license amendments related to nuclear safety;
- d. Violations and reportable events which require written reports to NRC;

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- e. Written summaries of audit reports in certain areas involving safety related functions;
and
- f. Any other matters involving safe operation deemed appropriate for consideration.

The directors and managers are also responsible for putting procedures in place for carrying out these activities, as well as providing for training for individuals involved in the process.

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12.2 TRAINING

12.2.1 TRAINING PROGRAMS

The training programs include development, conduct and maintenance, of engineering support personnel, technical training, training support and operator training programs. Additional training programs are presented as needed. Training programs are prepared to include formal objectives and written lesson plans. During development of programs, close liaison is maintained with appropriate line managers to ensure that content, test material, mode of presentation, and schedule are appropriate. As additional training needs are identified, new training programs are developed to meet requirements not covered by existing programs. Approved training programs are described in Reference 2.

12.2.2 TECHNICAL TRAINING

Technical training programs include maintenance training, radiological controls training, and chemistry training.

12.2.2.1 Maintenance Training

Maintenance technicians undergo training and retraining on a scheduled basis. Training programs are normally conducted by permanent employees. Contractor support is used as deemed necessary. Equipment training conducted by vendors is used where appropriate. Specialized training programs are presented as needed.

12.2.2.2 Radiological Controls/Chemistry Training Programs

Radiological Controls and Chemistry technicians undergo training and retraining on a scheduled basis.

Radiological Controls and Chemistry training programs are normally conducted by permanent employees. Contractor support is used where necessary. Equipment training conducted by vendors is used where appropriate. Specialized training programs, such as the Radwaste Supervisor initial and retraining programs, are presented by the appropriate section as needed.

12.2.3 OPERATIONS TRAINING

12.2.3.1 Replacement Operator Training Program (AO/CRO/SRO)

The purpose of Replacement Operator Training is to prepare operator candidates for licensed and non-licensed operator (auxiliary operator) positions by providing a sound theoretical and practical background to ensure that personnel understand how and why they perform specific tasks, understand how their jobs impact plant and public safety, and how they can correctly respond to situations they might encounter during normal and abnormal situations.

The Replacement Operator Training Programs are accredited by the National Nuclear Accrediting Board and detailed in training program descriptions.

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12.2.3.2 Licensed Operator Regualification Training Program (CRO/SRO)

The goal of the operator requalification program is to enhance nuclear plant safety and reliability by maintaining a high level of skill and knowledge in licensed senior operators and licensed operators.

The operator requalification program is designed to be sufficiently broad in scope to review areas of knowledge necessary for safe plant operation and flexible enough to cover recent operating experience and operational changes so that proficiency can be enhanced and operational safety maintained. This program satisfies the requirements of 10CFR55.59, "Requalification," and is described in a training program description.

The Licensed Operator Regualification Training program is accredited by the National Nuclear Accrediting Board and was developed using the "systematic approach to training."

12.2.3.3 Shift Technical Advisor (STA) Training Program

The purpose of the STA training program is to prepare candidates for the STA job by providing a sound theoretical and practical background to ensure that personnel understand how and why they perform specific tasks, understand how their jobs impact plant and public safety and how they can correctly advise the operating crew during situations they might encounter during normal and abnormal situations.

Following completion of the initial training program, incumbents are provided with continuing training designed to maintain their knowledge and skills.

The STA Training Program is accredited by the National Nuclear Accrediting Board and was developed using the "systematic approach to training."

12.2.3.4 Auxiliary Operator (AO) Regualification Training Program

The goal of the auxiliary operator requalification program is to enhance nuclear plant safety and reliability by maintaining a high level of skill and knowledge in the auxiliary operators.

The auxiliary operator requalification program is designed to be sufficiently broad in scope to review areas of knowledge necessary for safe plant operation and flexible enough to cover recent operating experience and operational changes so that proficiency can be enhanced and operational safety maintained. This program is described in a training program description.

The auxiliary operator Regualification Training Program is accredited by the National Nuclear Accrediting Board and was developed using the "systematic approach to training."

12.2.4 TRAINING SUPPORT

Training Support programs include General Employee Training (GET), fire protection training, and emergency preparedness training.

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12.2.4.1 General Employee Training Programs

General Employee Training is conducted for all non-visitor personnel (company and contractors) at Three Mile Island Unit 1. All personnel receive instruction on topics such as use of procedures, security, emergency preparedness, quality assurance, industrial safety, worker and community right to know laws, fitness for duty, radiation effects and risks and basic radiation protection. Employees who enter radiation work permit required areas receive additional training on topics such as federal standards, and radiological protection practices and procedures. Employees required to wear respiratory protection devices receive training in respiratory protection.

Practical factors training is conducted for radiation workers and for wearers of respiratory protection devices. In order to maintain continuing access to the specified areas of the station, all workers must successfully complete an appropriate refresher program.

12.2.4.2 Fire Protection Training Program

The Fire Protection Training Program is designed to meet the requirements of Section 600 of the NFPA Code-1996, and the Fire Protection Program as described in Section 9.9. All fire protection training evolutions shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the training interval.

The Fire Brigade Training Program consists of initial training, retraining, practical training, fire brigade team leader training, and drills. Participants in this program include designated members of the Unit I Operations and Work Management Divisions.

The initial training program includes subjects such as fire fighting procedures, fire chemistry and behavior, fire fighting equipment pre-plans, detection and suppression systems, fire hazards and practical hands on training, including extinguishing actual fires. The retraining program is scheduled to provide quarterly instruction and is designed to repeat the classroom portion of the initial program over a two year period. Practical hands-on training is conducted annually and includes extinguishing actual fires using portable extinguishers and hoses. Quarterly instruction also includes topics such as plant modifications, drill problems, pre-plan changes, and other fire related subjects.

Fire Brigade Team Leaders receive additional training on managing fire control operations.

Fire drills are conducted quarterly for each shift fire brigade. The drills test the fire brigade's response, method of fire control and extinction (simulated), as well as the team leader's ability to coordinate the event. Annually, the offsite volunteer fire companies are invited to participate in an onsite fire drill. During this drill, the coordination between the fire brigade and the volunteer fire companies is analyzed and evaluated.

The offsite fire companies which support TMI Unit 1 are invited to receive training on response procedures, radiological protection, and site familiarization in accordance with the Emergency Plan. Other fire training courses are provided to the offsite fire companies upon the request of the fire company chief.

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Fire Watch Training is conducted annually for those personnel who are assigned "hot work" fire watch duties. This training includes instruction in fire watch duties/responsibilities, basic fire chemistry, fire classification, and the type and operation of portable fire extinguishers.

For selected personnel of the Operations, Rad Con, and Maintenance Groups, periodic training is provided to familiarize them with their support role of the fire brigade.

12.2.4.3 Emergency Preparedness Training Programs

Emergency preparedness training is intended to prepare all personnel to successfully perform their emergency duties as outlined in the Emergency Plan and the Emergency Plan Implementing Document.

All personnel receive a familiarization with the salient features of the Emergency Plan as part of General Employee Training. The training includes identification of specific emergency conditions and associated alarms, and proper employee responses. Retraining is conducted annually.

Personnel who have specific emergency related duties receive specialized emergency preparedness training. That training is tailored to the specific emergency duty positions and emergency response roles. Retraining is conducted annually.

12.2.4.4 Not Used

12.2.5 ENGINEERING SUPPORT PERSONNEL (ESP) TRAINING PROGRAM

The ESP Training Program provides orientation, position specific and continuing training intended to supplement job experience and educational background. It provides staff members with a general knowledge of plant operation, as well as a guideline to perform position specific tasks.

The ESP Training Program is applicable to TMI Unit 1 personnel, Manager level and below, who are assigned technical duties which will involve them in the support of plant operations. The ESP Training Program has been designed to provide a new employee with the basic knowledge needed to work more efficiently in a nuclear plant environment.

12.2.6 TRAINING RECORDS

Records showing the training provided by the Training Department to members of the plant staff are prepared by the Training Division and are submitted to the Information Management Center (IMC) for retention for the life of the license.

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12.3 PROCEDURES

Written procedures are established, implemented and maintained covering the items referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Surveillance and test activities of equipment that affects nuclear safety and radioactive waste management equipment.
- c. Refueling Operations.
- d. Security Plan Implementation.
- e. Fire Protection Program Implementation.
- f. Emergency Plan Implementation.
- g. Process Control Program Implementation.
- h. Offsite Dose Calculation Manual Implementation.
- i. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.15, Revision 1.
- j. Deleted.

Further, each procedure required by the above, and substantive changes thereto shall be reviewed and approved prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

Temporary changes to procedures above may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the licensee's management staff knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision holding a Senior Reactor Operator's License on the unit.
- c. The change is documented, reviewed and approved within 14 days of implementation.

12.3.1 ADMINISTRATIVE CONTROLS

The administrative controls require that:

- a. Operations, maintenance, repairs, and modification in the nuclear related portions of the unit be performed to written approved procedures.

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- b. Independent checks and audits be made to verify that the procedures are followed.
- c. Changes to the unit be strictly controlled to assure that they do not result in degradation in the nuclear safety of the unit.

12.3.1.1 Normal Operations

During normal operations, including testing, the Vice President - TMI Unit 1 has the responsibility and authority to operate the station within the limits of the facility operating license. The operation of safety-related portions of the unit are performed according to written procedures. These procedures are written and maintained by the TMI Unit 1 staff, Exelon or the corporate engineering staff, or their consultants, and vendors. Procedures will be prepared, reviewed and approved through the approved Review and Approval process and, when applicable, the 10CFR50.59 review process. Changes to these procedures require the same review and approval as defined in written administrative procedures. In addition, Nuclear Oversight conducts periodic audits of unit operation. In performing this function, Nuclear Oversight assigns the audit task to a qualified person or persons having no direct line responsibility for execution of day-to-day operation of the unit.

12.3.1.2 Routine Maintenance, Repairs and Refueling

Routine maintenance and repairs will be performed by the unit maintenance force under the direction of the Director - Maintenance. Outside personnel may be brought in to supplement the unit personnel for some large maintenance jobs, but will work under the supervision of the unit personnel.

The procedures required by the Technical Specifications for performing maintenance and repairs are prepared and maintained by the unit staff, and reviewed and approved through the approved Review and Approval process and when applicable, the 10CFR50.59 review process. Changes to the procedures require the same review and approval.

The written repair and maintenance procedures specifically indicate the inspections and checks which must be performed, and also indicate the records and data which must be kept. The procedures also indicate where independent verification of inspections or checks should be performed by specified personnel other than those performing the maintenance.

Materials and parts utilized in the repair and maintenance of nuclear-related portions of the unit will be of the same quality as, or better than, the original materials. The procurement documents will be selectively reviewed by Nuclear Oversight personnel in accordance with the TMI Unit 1 Operational Quality Assurance Plan to ensure that appropriate quality control requirements are fulfilled.

Storage and material-identification procedures assure that purchased materials and parts do not deteriorate in storage and are properly identified prior to their installation or use.

The Director - Maintenance or his designee reviews all maintenance records to ensure that required maintenance is performed and that the necessary records of maintenance and repairs are kept.

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The refueling procedures are prepared under the cognizance of the unit staff, and reviewed and approved through the approved Review and Approval process and, when applicable, the 10CFR50.59 review process. Changes to the refueling procedures require the same review and approval. The refueling procedures indicate items which require verification by specified personnel other than those performing the operation.

12.3.1.3 Modifications

Proposed modifications to the unit are prepared by Site Engineering, corporate engineering, or an authorized contractor, and are reviewed by the Safety Review process. The design of modifications is performed using the same (or upgraded) codes and requirements as used in the original design.

12.3.2 OPERATING PROCEDURES

12.3.2.1 Normal Operating Procedures

Detailed written procedures and checkoff lists are prepared by the unit staff for the operation of nuclear safety related systems. The operating procedures cover start-up, normal operation, and shutdown of the systems. Supplementary procedures cover abnormalities in operation, especially as induced by failure of interrelated systems. Both sets of procedures contain, where applicable, normal setpoints, limiting safety system settings, and safety limits. These procedures will be prepared, reviewed and approved through the approved Review and Approval process, in accordance with TMI-1 Technical Specifications Chapter 6, "Administrative Controls," and, when applicable, the 10CFR50.59 review process.

12.3.2.2 Emergency and Alarm Response Procedures

Emergency procedures to cope with failure of system components are reviewed by the Safety Review process, and approved by the cognizant manager.

In addition to the emergency procedures, alarm response procedures are written for all annunciators for safety-related systems. The alarm response procedures convey to the operator the necessary, immediate corrective action required to return the affected component or system to a safe condition. All safety related alarm response procedures are reviewed and approved in accordance with TMI-1 Technical Specifications Chapter 6, "Administrative Controls."

Operators are required to demonstrate from memory their familiarity with the immediate actions of emergency procedures.

12.3.2.3 Maintenance Procedures

Maintenance procedures are developed as outlined in Subsection 12.3.1.2.

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12.4 PLANT MODIFICATIONS

The Director - Site Engineering is responsible for controlling design changes and the administering of design control activities including design interfaces for modifications that affect nuclear safety of structures, components, and systems. The design of modifications is accomplished using the same (or upgraded) codes and requirements as used in the original plant design.

12.4.1 MODIFICATIONS

Plant modifications are designed in accordance with approved Engineering procedures by Site Engineering or corporate engineering personnel, or an authorized contractor. The procedures comply with the TMI Unit 1 Operational Quality Assurance Plan and other applicable codes and standards.

Plant modifications are installed in accordance with the TMI Unit 1 work management system, or by outside personnel under TMI Unit 1 supervision and/or management. In addition, plant modifications are installed by plant personnel.

The installation of modifications is accomplished in accordance with approved procedures consistent with the design package. The procedures also comply with the TMI Unit 1 Operational Quality Assurance Plan. The procedures ensure:

- a. Post Installation Testing;
- b. Compilation of installation records and record retention and;
- c. Monitoring of installation by the Quality Verification group.

Where the installation of modifications is performed by an outside contractor, the contractor may utilize the TMI Unit 1 Operational Quality Assurance Plan pertaining to modifications, or may utilize his defined quality control plan accepted by the Nuclear Oversight and construction procedures. The contractor's defined quality control and construction procedures must comply with intent of the above and will require review and approval by Nuclear Oversight. The performance of the contractor is monitored by the Quality Verification group.

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12.5 RECORDS

Records of plant operations, maintenance, and other activities shall be maintained in accordance with Technical Specification 6.10 for the periods indicated.

TMI-1 has no safety related snubbers connected to a common hydraulic fluid reservoir. Addition to the plant of this type of snubber would require a Technical Specification revision.

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12.6 QUALITY ASSURANCE DURING THE OPERATIONS PHASE

The licensee is responsible for the operation and maintenance of TMI Unit 1. These activities are presently conducted in accordance with the NRC approved Quality Assurance Topical Report (QATR) which describes the formal and comprehensive control methods established to assure compliance with 10 CFR 50, Appendix B.

The QATR describes how the Quality Assurance Program is to be functionally implemented with due regard to the safety and health of the public and the personnel on site. The TMI Unit 1 Quality Assurance Program as described by the QATR is incorporated herein by reference.

12.7 EMERGENCY PLAN

The prime objectives of emergency planning are to: (1) Develop a plan and implementing procedures that will provide the means for mitigating the consequences of emergencies (including very low probability events) in order to protect the health and safety of the general public and site personnel and to prevent damage to property, and (2) Ensure operational readiness of emergency preparedness capabilities.

The Emergency Plan for Three Mile Island Nuclear Station assures that all emergency situations, including those which involve radiation or radioactive material are handled logically and efficiently. It covers the entire spectrum of emergencies from minor, localized emergencies to major emergencies involving action by offsite emergency response agencies and organizations.

The Emergency Plan Implementing Document provides a single source of pertinent and significant information and data and the procedures that would be required by or useful for various emergency response agencies and organizations in the event of an emergency.

The Emergency Plan Implementing Document consolidates and integrates specific material detailed in documents such as the Emergency Plan, the State Plans, and the Various County Plans.

This Emergency Plan has been developed in accordance with the provisions of 10CFR50, Appendix E, and 10CFR50.47 and is consistent with the guidelines given in (1) Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants," Revision 3 and (2) "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG 0654/FEMA-REP-1, dated November 1, 1980.

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12.8 PHYSICAL SECURITY

The physical security program for TMI is in accordance with the applicable portions of 10CFR73. The detailed security program as required by 10CFRPart50 is described in a separate document that is withheld from public disclosure in accordance with 10CFR73.21.

12.8.1 Security Training Program

The Security Force Training Program is designed to train the site protection personnel to perform their assigned duties as identified in the Security Personnel Training and Qualification Plan. Security Force Training is presented as an initial training program and an annual retraining program. Initial training includes topics on basic security skills, site security procedures, the Safeguards Contingency Plan, specific security tasks identified in the Security Personnel Training and Qualification Plan, and weapons training. Annual retraining provides refresher training on special topics of security skills, security plan and procedures, assigned security tasks, and weapons qualification at least once per year. Security Force Training is accomplished through classroom instruction, hands-on performance, demonstrations, and practical field exercises.

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12.9 FIRE PROTECTION

The Fire Protection Program for TMI Unit 1 was developed in accordance with the provisions of 10CFR50.48, 10CFR50 Appendix R Parts III. G, J, K.1 thru K.8, L and O and the NRC's Generic Letter No. 86-10. Details of the Fire Protection Program and the facility are addressed in the Fire Hazards Analysis Report (FHAR), which includes a point-by-point comparison with each requirement of the NRC's Branch Technical Position APCS 9.5-1. The Fire Protection Program is composed of the description found in Section 9.9 of this document, the FHAR, and AP-1038 a plant administrative procedure entitled "Administrative Controls - Fire Protection Program". The program is authorized by the Chairman of the Management Committee and CNO, and the Vice President – TMI Unit 1 to assure that the appropriate levels of management are directly involved in the program.

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12.10 REFERENCES

1. TMI Unit 1 Training Department Administration Manual.
2. TMI Unit 1 Training Programs Manual.