

ATTACHMENT 1  
PROPOSED TECHNICAL SPECIFICATION CHANGES

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## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 Organization, Safety and Operation Review

#### Specification

- A. The Station Manager shall be responsible for the overall operation of the facility. In his absence, the Assistant Station Manager (Operations and Maintenance) shall be responsible for the safe operation of the facility. During the absence of both, the Station Manager will delegate in writing the succession to this responsibility.
  - 1. The offsite organization for facility management and technical support shall be as shown on TS Figure 6.1-1.
  
- B. The Station organization shall conform to the chart as shown on TS Figure 6.1-2.
  - 1. Each member of the facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft) for comparable positions, and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for the Supervisor - Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

2. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.
3. The Station Manager is responsible for ensuring that re-training and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5 of ANS 3.1 (12/79 Draft) and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the SEC Staff.
4. Each on-duty shift shall be composed of at least the minimum shift crew composition for each unit as shown in Table 6.1-1.
5. A health physics technician shall be on site when fuel is in the reactor.
6. All core alterations shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

C. Organization units to provide a continuing review of the operational and safety aspects of the nuclear facility shall be constituted and have the authority and responsibility outlined below:

1. Station Nuclear Safety and Operating Committee

a. Function

The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

b. Composition

The SNSOC shall be composed of the:

Chairman	Assistant Station Manager, Nuclear Safety and Licensing
Vice Chairman	Assistant Station Manager, Operations and Maintenance
Member	Superintendent-Operations
Member	Superintendent-Maintenance
Member	Superintendent-Technical Svcs.
Member	Supervisor-Health Physics

c. Alternates

All alternate members shall be appointed in writing by the SNSOC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SNSOC activities at any one time.

d. Meeting Frequency

The SNSOC shall meet at least once per calendar month and as convened by the SNSOC Chairman or his designated alternate.

e. Quorum

A quorum of the SNSOC shall consist of the Chairman or Vice Chairman and two members including alternates.

f. Responsibilities

The SNSOC shall be responsible for:

- (1) Review of a) all proposed normal, abnormal, and emergency operating procedures and all proposed maintenance procedures and changes thereto, b) any other proposed procedures or changes thereto as determined by the Station Manager which affect nuclear safety.
- (2) Review of all proposed test and experiment procedures that affect nuclear safety.
- (3) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- (4) Review of proposed changes to Technical Specifications and shall submit recommended changes to the Station Manager.
- (5) 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-Nuclear Operations, and to the Director-Safety Evaluation and Control.
- (6) Review of Events requiring 24 hour written notification to the Commission.
- (7) Review of facility operations to detect potential nuclear safety hazards.
- (8) Performance of special reviews, investigations or analyses and report thereon as requested by the Chairman of the SNSOC or Station Manager.

- (9) Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.
  - (10) Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the the Station Manager.
  - (11) Review of every unplanned onsite release of radioactive material to the environs exceeding the limits of Specification 3.11, including the preparation or reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President-Nuclear Operations and to the Director-Safety Evaluation and Control.
12. Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.

g. Authority

The SNSOC shall:

- (1) Provide written approval or disapproval of items considered under (1) through (3) above.
- (2) Render determinations in writing with regard to whether or not each item considered under (1) through (5) above constitutes an unreviewed safety question.
- (3) Provide written notification within 24 hours to the Vice President - Nuclear Operations and the Director - Safety Evaluation and Control of disagreement between SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.A above.

(6) Any other matter involving safe operation of the nuclear power stations which is referred to the Director-Safety Evaluation and Control.

(7) Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

e. Authority

The Director-Safety Evaluation and Control shall report to and advise the Manager-Nuclear Programs and Licensing, who shall advise the Vice President-Nuclear Operations on those areas of responsibility specified in Section 6.1.C.2.e.

f. Records

Records of SEC activities required by Specification 6.1.C.2.e shall be prepared and maintained in the SEC files and a summary shall be disseminated each calendar month as follows:

- (1) Vice President-Nuclear Operations
- (2) Nuclear Power Station Managers
- (3) Manager-Nuclear Operations Support
- (4) Manager-Nuclear Programs and Licensing
- (5) Executive Manager-Quality Assurance
- (6) Others that the Director-Safety Evaluation and Control may designate

c. Records

Records of the Quality Assurance Department audits shall be prepared and maintained in the department files. Audit reports shall be disseminated as indicated below:

- (1) Vice President-Nuclear Operations
- (2) Nuclear Power Station Manager
- (3) Manager-Nuclear Operations Support
- (4) Executive Manager-Quality Assurance
- (5) Manager-Nuclear Programs and Licensing
- (6) Director-Safety Evaluation and Control
- (7) Supervisor of area audited
- (8) Nuclear Power Station Manager-Quality Assurance



- f. Entrance to areas with radiation levels in excess of 1 R/hr shall require the use of the "buddy system", whereby a minimum of two individuals maintain continuous visual and/or verbal communication with each other; or other mechanical and/or electrical means to provide constant communication with the individual in the area shall be provided.
  - g. A Radiation Work Permit system shall be used to authorize and control any work performed in high radiation areas.
  - h. All buildings or structures, in or around which a high radiation area exists, shall be surrounded by a chain-link fence. The entrance gate shall be locked under administrative control, or continuously guarded to preclude unauthorized entry.
  - i. Stringent administrative procedures shall be implemented to assure adherence to the restriction placed on the entrance to a high radiation area and the radiation protection program associated thereto.
2. Written procedures shall be established, implemented and maintained covering the activities referenced below:
- a. Process Control Program implementation.
  - b. Offsite Dose Calculation Manual implementation.
- C. All procedures described in A and B, and changes thereto, shall be reviewed and approved by the Station Nuclear Safety and Operating Committee prior to implementation.

D. All procedures described in Specifications 6.4.A and 6.4.B shall be followed.

E. Temporary changes to procedures described in Specifications 6.4.A and 6.4.B which do not change the intent of the original procedure may be made, provided such changes are approved prior to implementation by the persons designated below based on the type of procedure to be changed:

- |                       |   |
|-----------------------|---|
| 1. Administrative     | Cognizant Supervisor  |
| 2. Abnormal           | Shift Supervisor or<br>Assistant Shift Supervisor           |
| 3. Annunciator        | Shift Supervisor or<br>Assistant Shift Supervisor           |
| 4. Health Physics     | *Health Physicist   |
| 5. Emergency          | Shift Supervisor or<br>Assistant Shift Supervisor           |
| 6. Maintenance        | *Cognizant Supervisor                                       |
| 7. Operating          | Shift Supervisor or<br>Assistant Shift Supervisor           |
| 8. Periodic Test      | *Cognizant Supervisor                                       |
| 9. Start-up Test      | *Engineering Supervisor                                     |
| 10. Special Test      | *Engineering Supervisor                                     |
| 11. Quality Assurance | Manager, Quality Assurance or<br>Supervisor Quality Control |
| 12. Chemistry         | *Chemist  |

\*These procedures must have the approval of a licensed Senior Reactor Operator.

Such changes will be documented and subsequently reviewed and approved by the Station Nuclear Safety and Operating Committee within fourteen days.

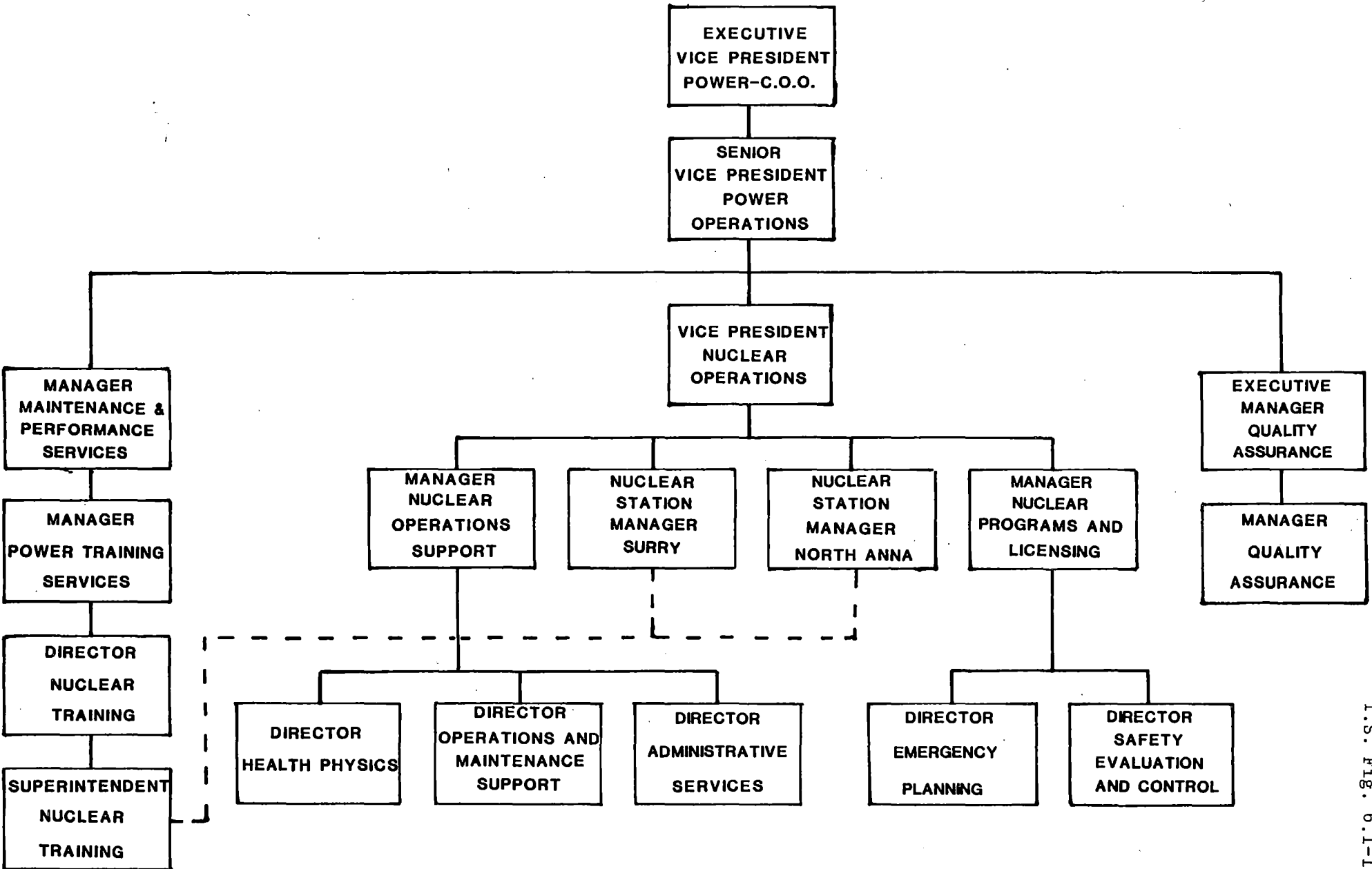
F. Temporary changes to procedures described in A and B which change the intent of the original procedures may be made, provided such changes are approved prior to implementation by the person designated below based on the type of the procedure to be changed.

1.	Administrative	Station Manager
2.	Abnormal	Superintendent - Operations
3.	Annunciator	Superintendent - Operations
4.	Health Physics	Supervisor - Health Physics
5.	Emergency	Superintendent - Operations
6.	Maintenance	Mechanical Supervisor Electrical Supervisor Instrument Supervisor
7.	Operating	Superintendent - Operations
8.	Periodic Test	Engineering Supervisor
9.	Start-up Test	Engineering Supervisor
10.	Special Test	Engineering Supervisor
11.	Quality Assurance	Resident Quality Control Engineer
12.	Chemistry	Supervisor - Chemistry

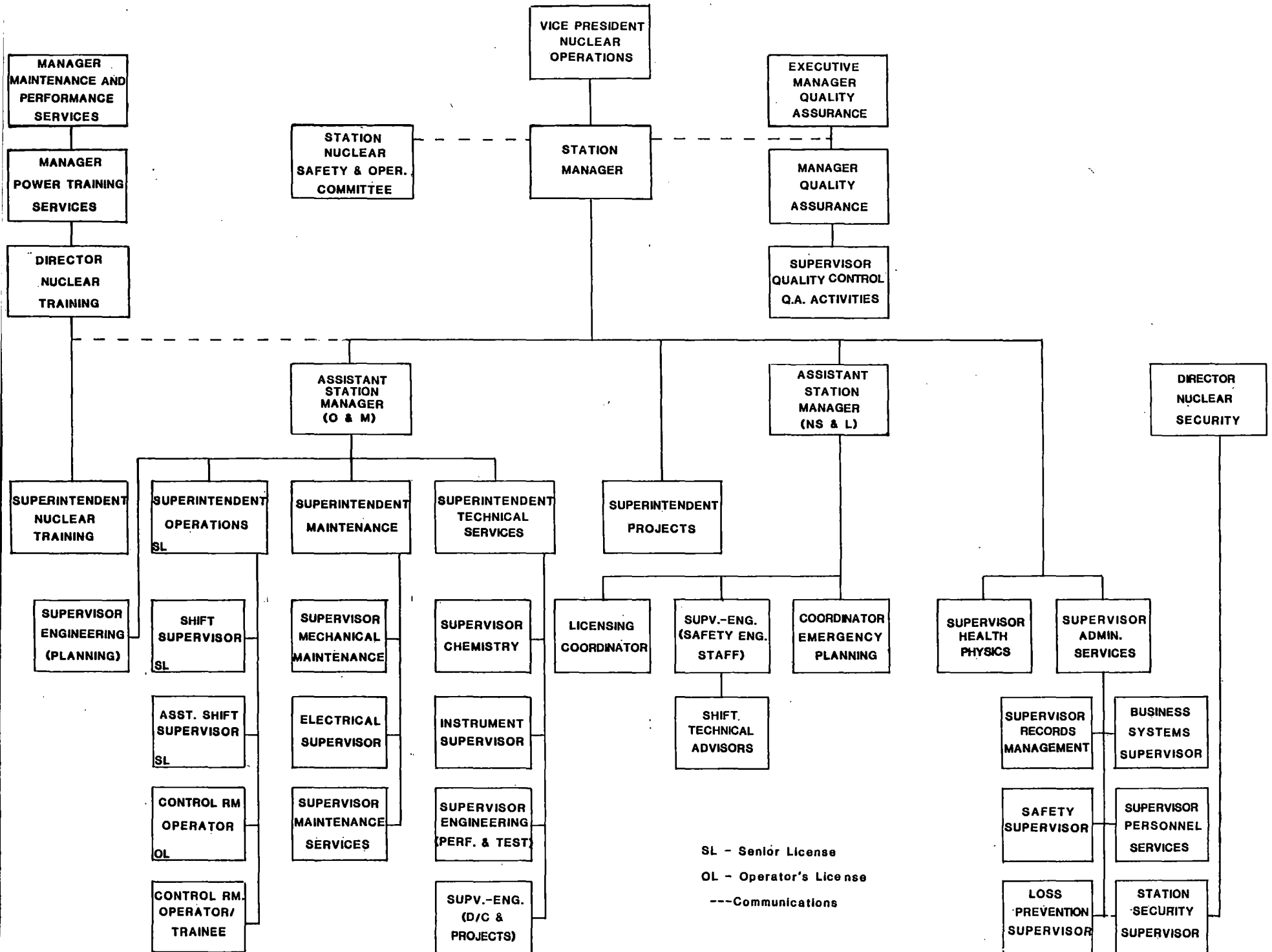
Such changes will be documented and subsequently reviewed and approved by the Station Nuclear Safety and Operating Committee.

- G. In cases of emergency, operations personnel shall be authorized to depart from approved procedures where necessary to prevent injury to personnel or damage to the facility. Such changes shall be documented, reviewed and approved by the Station Nuclear and Operating Committee.

# OFF-SITE ORGANIZATION FOR FACILITY MANAGEMENT AND TECHNICAL SUPPORT



SURRY POWER STATION - ORGANIZATION CHART



The proposed change to the referenced ANSI standard on facility staff qualifications and training in Section 6.1 reflects the ANS standard specified in Vepco's QA Topical Report, "Quality Assurance Program Operations Phase", Amendment 4, regarding Vepco's position of NRC Regulatory Guide 1.8-"Personnel Qualification and Training". The QA Topical Report was approved by NRC on October 6, 1982. Thus, the change amends the Technical Specifications to make them consistent with the NRC approved Topical Report. The specific change replaces ANSI N 18.1-1971 with ANSI/ANS 3.1-(Draft 12/79). ANS 3.1-(Draft 12/79) meets or exceeds the requirements of the older ANSI N 18.1-1971.

Because this proposed change is comprehensive in nature and combines the previously proposed Technical Specification changes pertaining to reorganization, summaries of the discussions supporting those changes are provided here.

The proposed change summarized below was originally submitted on October 27, 1983, (Serial No. 606).

A reorganization within the Nuclear Operations Department and the Performance Services Department will aid in the quality of training activities at the power stations. Although the Superintendent, Nuclear Training will continue to have communications with the Station Manager, he will now report to the Director, Nuclear Training in the Maintenance and Performance Services Department. The Director, Nuclear Training reports to the Manager, Power Training Services, who reports to the Manager, Maintenance and Performance Services, who ultimately reports to the Senior Vice President-Power Operations. The consolidation of training activities will assure that effective and efficient technical training is provided to Nuclear Operations personnel.

The proposed change summarized below was originally submitted on June 30, 1983 (Serial No. 339).

A reorganization within the Nuclear Operations Department eliminated the position of Manager, Nuclear Operations and Maintenance. The Technical Analysis and Control group was disbanded and its functions assumed within the Safety Evaluation and Control Staff, NOD, and within the Engineering and Construction Division. The Manager, Nuclear Technical Services was retitled Manager, Nuclear Operations Support and assumed the responsibilities of the Manager, Nuclear Operations and Maintenance. The new Fuel Operations group also reports to him.

Several other title and reporting changes took place: The title of Executive Vice President was changed to Executive Vice President and Chief Operating Officer. The Director, Administrative Services now reports directly to the Vice President-Nuclear Operations.

A reorganization within the Security Department also took place. Although the Station Security Supervisor will continue to have communications with the Supervisor, Administrative Services at the station, he now reports to the Corporate Director, Nuclear Security.

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

The proposed Technical Specification changes reflect the most recent reorganization within the Nuclear Operations Department, and combine those changes from previously proposed reorganization changes not yet approved by the NRC.

The most recent reorganization within the Nuclear Operations Department created two new management level positions: Manager-Nuclear Programs and Licensing, and Assistant Station Manager (Nuclear Safety and Licensing). The Manager-Nuclear Programs and Licensing assumes certain authorities and responsibilities previously held by the Manager-Nuclear Operations Support in the areas of emergency preparedness, licensing and independent safety reviews. The new Assistant Station Manager (Nuclear Safety and Licensing) assumes certain authorities and responsibilities previously held by both the Station Manager and the Assistant Station Manager (Operations and Maintenance) regarding the operation of the Station Nuclear Safety and Operating Committee (SNSOC), licensing, safety engineering, and emergency planning. The change does not create any new authorities or responsibilities within the Nuclear Operations Department; rather by reducing the span of control of the affected managers (both new and existing), management control and effectiveness in the areas of concern have been enhanced. Thus, more management attention will be focused on significant issues.

In order to implement the proposed corporate and station organizational changes into the Surry Technical Specifications, several revisions to Section 6.0, Administrative Controls, are required. Specifically, the new Assistant Station Manager (Nuclear Safety and Licensing) is designated as Chairman, Station Nuclear Safety and Operating Committee, replacing the Station Manager. The existing Assistant Station Manager is redesignated as Assistant Station Manager (Operations and Maintenance). The responsibilities and authorities of the SNSOC are clarified. The proposed changes will allow the SNSOC to recommend Technical Specification changes to the Station Manager instead of just reviewing proposed changes. Previously, the Chairman SNSOC reviewed and approved recommended changes to the Plant Security Plan and implementing procedures and Emergency Plan and implementing procedures. After approval of the proposed changes, the SNSOC will review changes to the Plant Security Plan and implementing procedures and Emergency Plan and implementing procedures and submit recommended changes to the Station Manager.

Specification 6.4.C previously required that each procedure in 6.4 A and B, and changes thereto, be reviewed by the SNSOC and approved by the Station Manager prior to implementation. The proposed changes are to have each procedure reviewed and approved by the SNSOC prior to implementation. Specification 6.4.E previously required temporary changes to procedures to be provided to and reviewed by SNSOC and approved by the Station Manager within 14 days of implementation. The proposed change would allow SNSOC to review and approve temporary changes to procedures within 14 days of implementation.

The authority of the new Manager, Nuclear Programs and Licensing is identified and he is designated to receive records of Safety Evaluation and Control (SEC) activities and Quality Assurance (QA) audits. Figures 6.1-1 and 6.1-2, showing both corporate and station organizations, are revised accordingly. The Figures also incorporate the organizational changes previously submitted and are further discussed below.

The proposed change summarized below was originally submitted on June 28, 1982 (Serial No. 255).

A reorganization within the Quality Assurance Department resulted in the Manager, Quality Assurance at the station reporting directly to the Executive Manager, Quality Assurance. The position of Director-Emergency Planning was created within the Nuclear Operations Department. The changes were to enhance the quality assurance and emergency preparedness programs of the company.

Two corrections to the June 28, 1982, letter were submitted.

A proposed change submitted on August 9, 1982 (Serial No. 473) corrected an inadvertent administrative error submitted in Vepco's letter of August 3, 1982 (Serial No. 446). In turn, the August 3, 1982, letter had been submitted to correct administrative errors in our application dated June 28, 1982.

The proposed change summarized below was originally submitted on March 16, 1982 (Serial No. 567).

A reorganization within the Nuclear Operations Department resulted in the transfer of responsibilities from the Manager-Nuclear Operations and Maintenance to the Vice President-Nuclear Operations. The corporate organizational structure specified in the Technical Specifications previously indicated that the Nuclear Station Manager reported to the Manager-Nuclear Operations and Maintenance, who in turn reported to the Vice President-Nuclear Operations. As a result of the proposed revision, the Station Managers will now report directly to the Vice President-Nuclear Operations. The Vice President-Nuclear Operations is responsible for coordinating the technical services activities and the operational/maintenance activities of the nuclear units. The transfer of responsibilities to the Vice President-Nuclear Operations will provide continued assurance of adequate management involvement and will enhance management attention of safety activities for the units.

The Manager-Nuclear Operations and Maintenance will continue to have responsibility for supervising the operational and maintenance activities of the Company's operating units.

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Because the reorganizations only result in a redistribution of existing authorities and responsibilities to enhance management controls in selected areas, these changes are considered administrative in nature. Thus, because the change is administrative in nature, no unreviewed safety question is involved.

Similarly, because the proposed amendment is administrative in nature, and is similar to Example (i) of the examples specified in the Federal Register, 48 FR 14870, which lists examples of amendments that are considered not likely to involve significant hazards considerations, no significant hazards consideration is involved.