



Duquesne Light

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December 5, 1979

Mr. Boyce H. Grier, Director
United States Nuclear Regulatory Commission
Region I Office
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Sir:

Enforcement Conference No. 50-334/79-21

This is a response to your letter of November 1, 1979 regarding Enforcement Conference No. 50-334/79-21. The letter was received in this office November 8, 1979. On page one of the letter you requested comments and commitments addressing the following:

1. Actions planned or taken to place additional management emphasis and direction on identified problems and issues, problem escalation, and identification of internal responsibilities for action;
2. Actions planned or taken to ensure the completeness and quality of submittals made to the NRC;
3. Actions planned or taken to enhance the administration of commitments associated with license activities to assure successful implementation;
4. Actions taken or planned to review the progress and effectiveness of the various programs required by the facility license and to assure that license conditions are being met; and
5. Actions taken or planned to assure that administrative controls are properly implemented and adhered to, including those actions taken or planned to review and enhance the resolution of NRC inspection findings.

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Design Change Control Program

The initial discussion at the conference centered on the Design Control Program. Your letter identified five specific concerns (page 3). It also summarized the actions planned or taken to resolve these concerns and indicated the actions were responsive to the NRC's comments (page 4). My only clarifying comment on your summary is to reaffirm that station personnel will not do the engineering, design, final drawing changes, etc. associated with design change work. They might do the physical work and provide information as to what was done which will ultimately be part of the completed design change package. With this clarifying comment I would again acknowledge our intent to fulfill the commitments contained in your summary of our response. I believe these commitments and actions are responsive to Items 1-4 on page one of your letter. With regard to Item 5, I have asked our Quality Assurance Department to make a comprehensive audit of the design change work being conducted during the current shutdown. This audit is scheduled for February, 1980.

Management Control

The other general subject discussed at the conference was Management Control (Item b, page 4, of your letter). Six specific areas of concern were identified (pages 5-6) which I shall refer to as paragraphs 1 through 6.

Paragraphs 1 and 2

Duquesne Light Company will increase its staff so as to provide a more responsive management system. A new position, Director of Nuclear Operations, reporting to the General Superintendent of the Power Stations Department, will be established and filled. A copy of the revised Organization Chart and the job description are presented in Attachments A and B. This new position will manage only the nuclear activities associated with the operating facilities, including the future startup of the Beaver Valley No. 2 Unit. The position will be responsible to the General Superintendent of the Power Stations Department. The General Superintendent will retain direct administrative authority and responsibility (salary review, promotions, etc.) over nuclear personnel with due counsel with the Director. The change in no way changes the overall duties and responsibilities of the General Superintendent.

In addition, a new group called the Licensing and Compliance Section will be created. The Organization Chart is shown in Attachment C and job descriptions in Attachment D (other than Engineer and the clerical positions). The positions of Superintendent Licensing and Compliance, Senior Compliance Engineer, Environmental Coordinator and Senior Licensing Engineer are additional positions and will be filled with experienced personnel. The Health Physicist position existed previously. The remaining positions will be filled as the need is identified and qualified people are available. This section will serve both Beaver Valley No. 1 and ultimately will also serve the No. 2 Unit. It should be functioning by February 1, 1980.

The Superintendent, Licensing and Compliance, will be a member of the Off-site Review Committee. The position will provide another contact with the NRC Division of Operating Reactors for matters within their area of responsibility.

The Licensing and Compliance Section will be responsible for the preparation of all Technical Specification Change Requests, the preparation and submittal of the annual Consolidated Radiological Environmental Surveillance Report for both Beaver Valley and Shippingport, the preparation and submittal of the annual Consolidated Ecological Environmental Surveillance Report for Beaver Valley and Shippingport, the preparation and submittal of the annual report of the theoretical maximum calculated dose to the general population as a result of the operation of Beaver Valley Power Station. With regard to Unit No. 2 FSAR submittal, this group is responsible for the preparation of the Conduct of Operations (Chapter 13), the portions of the Radiological Protection Chapter (Chapter 12) that involve operation and maintenance, the portion of the Startup and Testing Chapter (Chapter 14), as well as the detailed review of all other chapters of the FSAR to assure that all commitments for inspection and Tests during the operating life of the station are necessary and can be performed with the existing design.

This group will also be responsible for coordination, review and approval of all work performed by contractors in obtaining, analyzing and summarizing the results of all environmental samples as required by the Technical Specifications and which form the basis for the annual environmental surveillance reports.

This group is also responsible for reviewing the radiation control program of Beaver Valley including quantities of radioactive effluents, in-station radiation and contamination levels and radiation dose to workers. Based upon these reviews, recommendations would be

made to appropriate levels of management in accordance with the requirement that dose and effluents be made As Low As Reasonably Achievable (ALARA).

As appropriate, this group will be responsible for reviewing correspondence to outside agencies that is prepared for the signature of the Vice President, Operations.

This group will also be responsible for reviewing and evaluating amendments to the Code of Federal Regulations, revisions to and new issues of Regulatory Guides, etc. and submitting their evaluations of such documents, when necessary, to the appropriate departmental management personnel.

This group will assume responsibility for the performance of the audit requirements of the Off-site Review Committee (ORC) as set forth in Beaver Valley Technical Specification - Appendix A, Section 6.5.2.8. They will also attend NRC audit exit interviews, work with the station staff to resolve problem areas and prepare answers to audit findings. While not specifically identified as a duty, part of their audit responsibilities will be "preventive" nature; i.e., to review problems identified in one functional area in terms of its potential for being a problem in another area.

In summary, the added staff described above will help assure future submittals to the NRC will be more complete and will include the depth of detail necessary to permit your staff to perform the required engineering reviews or to understand the basis for any conclusions in safety evaluations which have been included in the response.

Paragraph 3

A computerized tracking system is being developed to assure that commitments are met in a timely manner. A monthly report will be issued to interested levels of Duquesne Light Company management to provide an awareness of both the magnitude of the effort in progress and the performance of the various Company divisions and departments. The first monthly report is due to be issued in January of 1980. The report will provide a measure of performance as to timely responses.

In the past we have found it extremely difficult to develop priorities for the numerous requests for information which are forwarded in the form of Bulletins, Circulars, Information Notices,

NRR Formal Requests for Information, and NRR Orders, in addition to the numerous verbal requests for information from NRR and I&E. We estimate that we have received over five dozen requests for information through the first eleven months of this year.

The complexity of many of these requests has led to the necessity of consulting with both our NSS vendor and our architect-engineers. Due to the generic nature of many of these requests, these organizations in turn have been hard pressed to respond to their many clients within the time limit requested by NRC.

We believe that the year of 1979 has been an extraordinary year. We anticipate that a sharp reduction in these requests will be experienced in the next year which will enable us to accomplish, with reasonable effort, the fulfillment of commitments and the resolution of open items.

Paragraph 4

A new group of Shift Technical Advisors will be established before December 31, 1979. As part of their duties, they will be responsible for reviewing and evaluating the performance and results of the Inservice Testing Program for Pumps and Valves, the Appendix J Leak Rate Testing Program and the Surveillance Program for Hydraulic Snubbers and Pipe Supports. This assignment will provide a review of these activities by individuals that are not engaged in the direct performance of the activities and will provide the Technical Advisory Group with an ongoing awareness of the condition of station equipment essential to safety. We have engaged a contractor to perform an independent review of the Beaver Valley Power Station Emergency Preparedness Plan and its implementing procedures. We are rewriting the entire Plan and the implementing procedures as required to achieve full compliance with Regulatory Guide 1.101. This activity will be completed prior to returning the plant to service following the refueling and modification outage which is presently in progress.

Paragraph 5

We do not believe that any relaxation of adherence to administrative controls has occurred during the extended plant outage that was recently experienced. However, our investigations into these matters have resulted in a decision to revise the Station Administrative Procedures. This revision will provide clarity and brevity and thus eliminate potential noncompliance caused by non-uniform interpretations

of the existing procedures by the station supervisory force. It is also our intention to remove numerous unnecessary administrative restrictions which reduced operating flexibility and imposed unnecessary requirements. These revised Administrative Procedures will be issued and implemented by July 1, 1980.

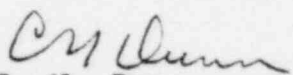
Paragraph 6

The revision of Station Administrative Procedures, as discussed previously, should result in improved implementation of station administrative controls. The addition of the Station Technical Advisory Group of shift reactor engineers will lead to improved performance and review of plant technical programs by providing an ongoing independent review of these activities. Again, we believe that our dedication to the successful closing of unresolved inspection findings has been impacted during the past year by the unusually heavy work load imposed on the station staff by the extremely large number of requests for information. The responses to many of these requests have resulted in a diversion of station personnel from the activities required to investigate and take corrective action associated with these items. We believe that the increased number of personnel provided by the new positions, as previously described, should greatly improve our ability to respond to these concerns.

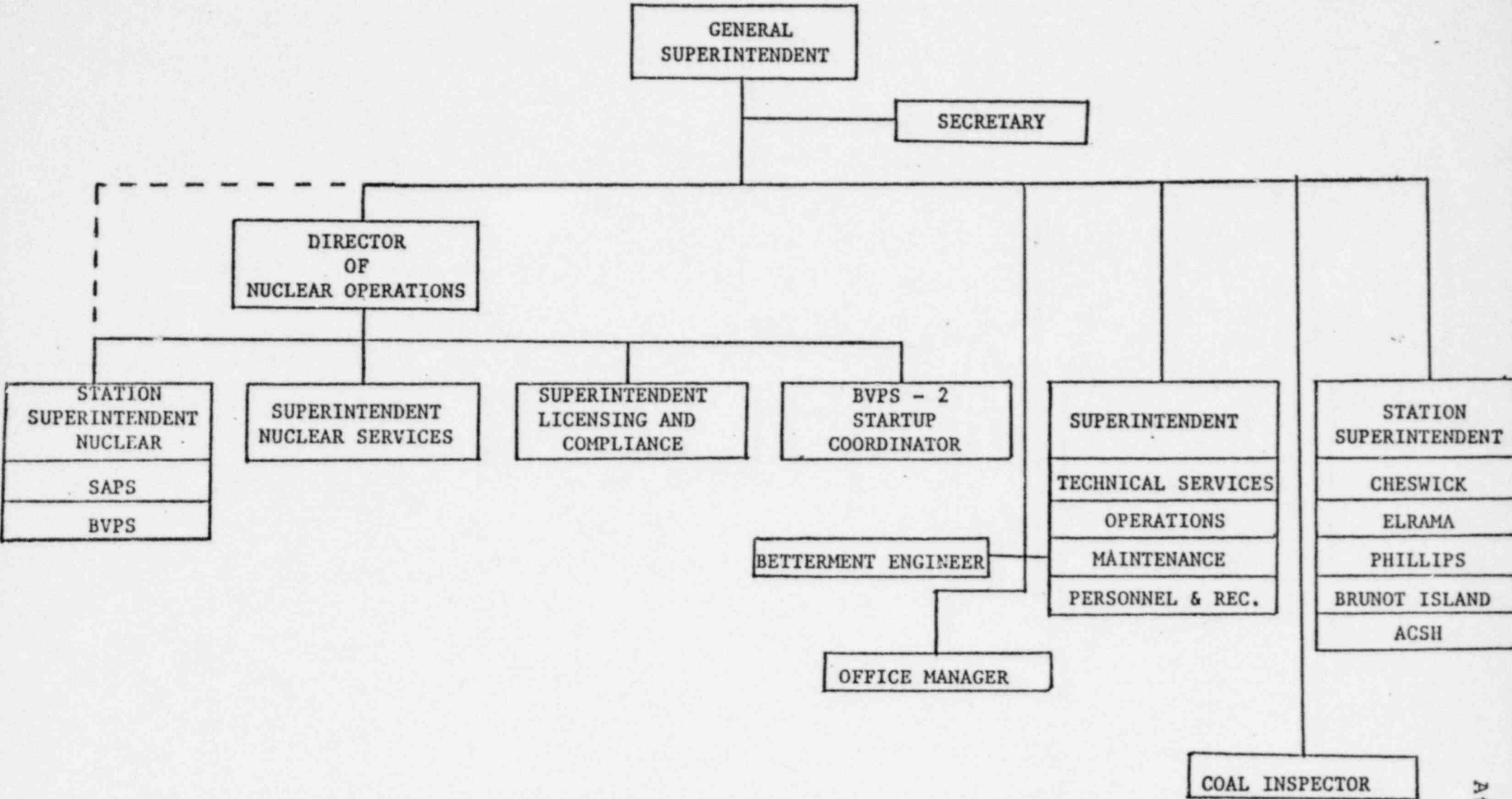
Summary

Duquesne re-affirms the actions planned or taken to resolve the NRC concerns in the areas of design change work. Duquesne will expand its organization by creating many new positions which will place additional management effort and direction to the problem solving activity. These new positions should lead to a higher quality of information submitted to the NRC. A new system of tracking commitments will be established to provide a higher degree of assurance that all commitments are handled properly. The newly formed Licensing and Compliance Section will provide a group dedicated to the review and effectiveness of the various programs required by the facility license and provide a greater assurance that license conditions are being met. Finally, the Quality Assurance Department will conduct a comprehensive audit of our design control activities in February, 1980 to assure administrative controls are properly implemented and adhered to; the new Licensing and Compliance Section will perform similar functions through the Off-site Review Committee and will enhance the resolution of NRC inspection findings.

Very truly yours,


C. N. Dunn
Vice President, Operations

DUQUESNE LIGHT COMPANY
Power Stations Department



DUTIES:

Serves as a staff member to the General Superintendent of Power Stations and under general supervision, is responsible for the start-up, testing, operation, maintenance, and refueling of nuclear generating stations and the direction of offsite departmental nuclear staff activities required to provide technical support to the nuclear generating stations.

1. Directs the preparation and review of all correspondence to the Nuclear Regulatory Commission that is submitted over the signature of the Vice-President, Operations.
2. Directs and schedules the conduct of technical audits of station activities for the Off-Site Review Committee to comply with station Technical Specifications.
3. Coordinates through the Superintendents of Operation, Maintenance, and Technical Services the performance of other Power Stations Department activities required to support the operation of nuclear generating stations.
4. Serves as the primary Duquesne Light Company contact with the Nuclear Regulatory Commission for operating units.
5. Evaluates the impact of all proposed changes to the code of Federal Regulations and prepares letters of comment for appropriate signature in significant cases.
6. Acts as Power Stations Department interface with Engineering Department, Beaver Valley Project Manager, and Construction Department's Superintendent of Nuclear Construction on matters concerning nuclear generating stations.
7. Serves as the Chairman of the Off Site Review Committee.
8. Consults with the equipment vendors and consultants as required to improve nuclear station availability and capacity.
9. Establishes and maintains cost control system and accountability of all outside consultants engaged in performing work for nuclear stations.
10. Establishes and reconciles budgets associated with nuclear stations.

QUALIFICATIONS:

1. Minimum B.S. degree in science or engineering.
2. Ten (10) years experience in power station design, testing, operation, or maintenance at least four (4) years of which shall be nuclear.

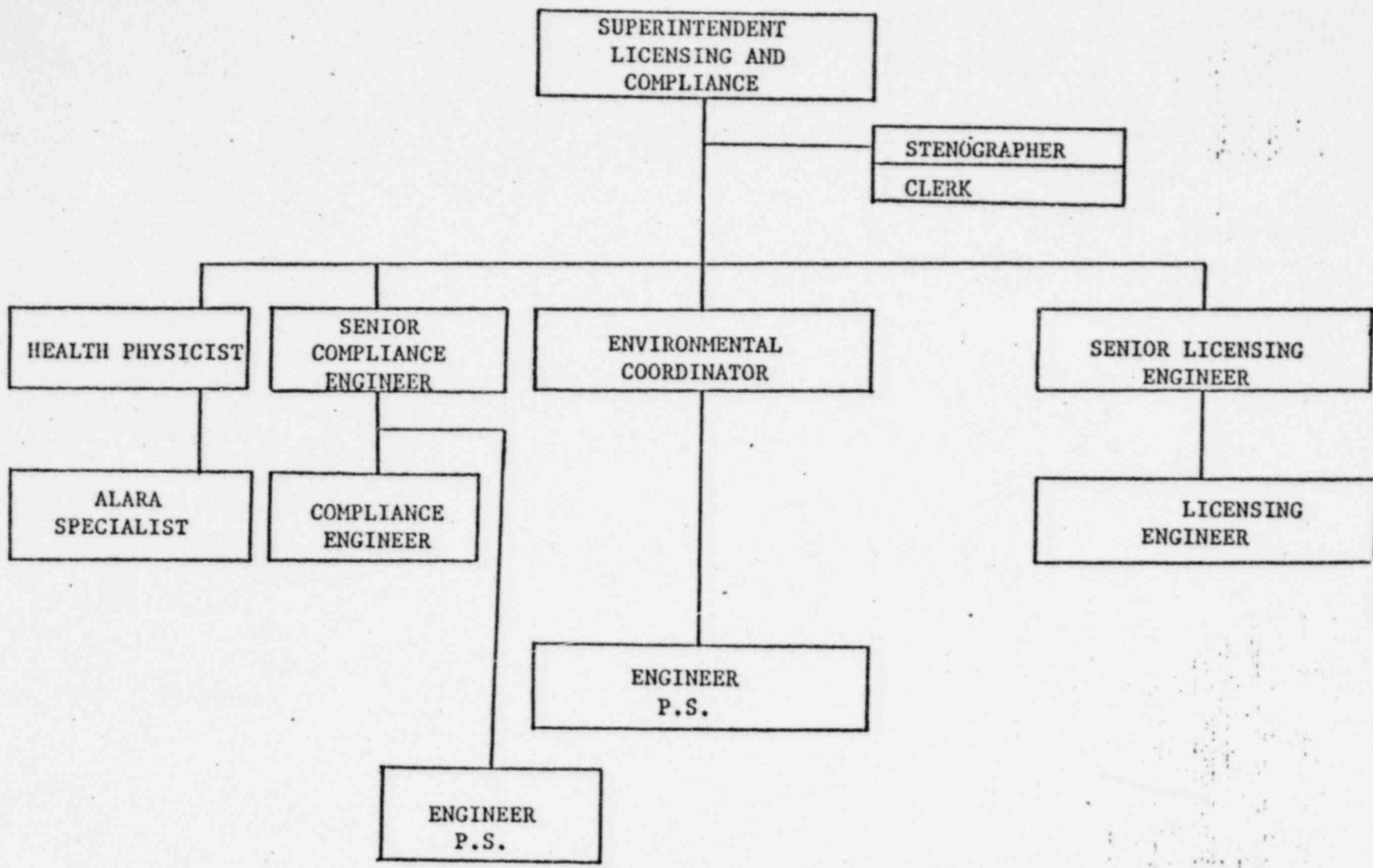
Qualifications (continued):

3. A minimum of five (5) years responsible administration experience as Superintendent or reporting directly to Superintendent.
4. Has necessary qualifications to apply for Senior Reactor Operators examination after short refresher course (90-days or less).

IMMEDIATE SUPERVISOR

General Superintendent - Power Stations Department

DUQUESNE LIGHT COMPANY
Power Stations Department
LICENSING AND COMPLIANCE SECTION



COMPLIANCE RECORDS

JOB DESCRIPTION

SUPERINTENDENT OF LICENSING AND COMPLIANCE

Power Stations Department
General Office

Exempt - Supervisor

DUTIES:

Serves as a staff member of the Power Stations Department reporting to the Director-Nuclear Operations and is the primary Duquesne Light Company contact with the NRC Division of Operating Reactors.

Under general supervision, he directs the Off-Site Environmental Surveillance Programs both radiological and ecological, and is responsible for the preparation and issuance of the annual reports of these activities. Is responsible for the supervision of the overall radiological control program for the Power Stations Department.

1. Reviews and prepares for signature of Vice President, Operations all requests for Amendment to the Operating License.
2. Serves on the Off-Site Review Committee and through the Senior Compliance Engineer, directs and is responsible for the performance of all Off-Site Review Committee audits and provides recommended corrective action to station and Department personnel.
3. Directs special engineering studies as required to respond to NRC requests for information.
4. Supervises the administration of the off-site environmental surveillance programs in the areas of radiological, aquatic and terrestrial.
5. Coordinates with Department of Energy, Naval Reactors Division the resolution of issues relative to Shippingport Atomic Power Station as relates to the annual environmental reports.
6. Is responsible for the preparation and timely submittal of the annual environmental reports including review and approval of all data.
7. Directs the preparation of FSAR Amendments required under the Operating License.
8. Responsible for preparation and submittal of description of design changes which involve changes to the station Technical Specifications as required by the Code Of Federal Regulations.
9. Is responsible for preparation of responses to NRC requests for information from Vice President, Operations and technical accuracy of information provided.
10. Testifies as required in licensing hearings and technical presentations before the NRC and other governmental agencies as required.

JOB DESCRIPTION

SUPERINTENDENT OF
LICENSING AND COMPLIANCE

Power Stations Department
General Office

Exempt - Supervisor

11. Coordinates with the Engineering Department Nuclear Engineer all Power Stations Department activities related to FSAR preparation, review and submittal.
12. Directs and coordinates with the Engineering Department Nuclear Engineer the implementation of the Duquesne Light Company ALARA program.
13. Conducts special engineering studies related to station design, operation and maintenance as required to respond to NRC generic safety reviews.
14. Acts as Director of Nuclear Operations in his absence.
15. Prepares Bid Specifications for contract performance of the Radiological, Aquatic and Terrestrial Environmental Surveillance Contracts.
16. Conducts technical audits of facilities of contractors engaged in conducting the Duquesne Light Company Environmental Surveillance programs.

QUALIFICATIONS

1. B.S. degree in Engineering or Science preferred.
2. Minimum of ten (10) years practical engineering or technical experience including a minimum of five (5) years in nuclear power station operations, maintenance, or testing.
3. Demonstrated ability to supervise and work with others.
4. Demonstrate ability to prepare and present technical reports.
5. Is familiar with nuclear station design, technical specifications, procedures, plans, programs, and other appropriate documents.

IMMEDIATE SUPERVISOR

Director - Nuclear Operations

Power Stations Department
General Office

Exempt-Professional

DUTIES:

Under general supervision to the Superintendent of Licensing and Compliance plans, analyzes, and performs departmental evaluations of the Duquesne Light Company nuclear power stations health physics and environmental programs.

1. Plans the health physics program and reviews changes to the nuclear power stations health physics manual(s).
2. Reviews the nuclear power stations personnel radiation program, including training and conducts periodic evaluation of the program to assure that it is effective and complies with regulatory requirements.
3. Evaluates effectiveness of station's ALARA programs.
4. Reviews quarterly personnel radiation exposure data and station work practices to ascertain compliance with regulatory requirements.
5. Serves on audit and review committees of the nuclear power stations in the areas of health physics and radiological environmental surveys and results.
6. Participates in the preparation and revision to the Emergency Preparedness Plan with the assistance of the Results Coordinators, and assists the Station Superintendents in the implementation of the Emergency Preparedness Plan.
7. Is responsible for the constant review of the various radioactivity shipping containers and contents to determine containment adequacy to comply with State and Federal shipping regulations.
8. Provides technical or specialized assistance to station personnel in matters pertaining to radiation shielding, radiochemistry, industrial hygiene and radiation safety.
9. Audits the activities of outside consultants in matters associated with the operating phases of the radiological environmental program.
10. Advises the Superintendent of Licensing and Environment on matters pertaining to health physics and the nuclear power station environmental program in dealing with outside agencies.
11. In all matters involving radiation safety, he shall have direct access to the Station Superintendents.
12. Responsible for evaluating all radiological environmental data and identifying abnormal or questionable results to the Environmental Coordinator

Power Stations Department
General Office

Exempt-Professional

13. Evaluates radiological results as summarized in contractor quarterly and annual reports and provides the Environmental Coordinator with comments or recommendations.
14. Reviews meteorological deposition data and milch animal surveys, and recommends dairy farms which should be included in the milk sampling program per requirements of the Beaver Valley Power Station, Environmental Technical Specifications.
15. Prepare final text material for the Annual Radiological Report summarizing and evaluating analytical results for all sampling media.
16. Prepares radiological reports, effluent summaries, etc. as required by the Beaver Valley Power Station Environmental Technical Specifications.
17. Performs other work related to the above as required or assigned.
18. Supports Quality Assurance for conducting radiological control audits.

QUALIFICATIONS

1. College degree in Science
2. Five (5) or more years of power production work with at least two (2) years experience in radiation safety work with a sound knowledge of government standards in regard to radiation exposure.
3. Ability to direct the work of others.
4. Health physics certification is desirable.

IMMEDIATE SUPERVISOR

Superintendent - Licensing and Compliance

Power Stations Department
General Office

Exempt - Supervisor

DUTIES:

Under general supervision is responsible to the Superintendent of Licensing and Compliance for administering the environmental monitoring program.

1. Administers the environmental monitoring program for both the Beaver Valley Power Station and the Shippingport Atomic Power Station and ensures that sampling, laboratory analyses, and reports are conducted in accordance with schedules and requirements noted in the Beaver Valley Power Station Environmental Technical Specifications.
2. Reviews effluent data (onsite programs) for both Beaver Valley Power Station and Shippingport and takes appropriate action in cases where abnormalities or deficiencies are discovered.
3. Reviews environmental data (offsite program) and obtains independent reviews by technically qualified personnel in areas of radiological, aquatic, and terrestrial monitoring.
4. Compiles the Annual Radiological Environmental Report (Vol. #2) which combines both Shippingport and Beaver Valley effluent and off-site data. Reviews and amends annual ecological reports as submitted by the ecological contractor(s) and issues the Annual Non-Radiological Report (Vol. #1).
5. Coordinates environmental monitoring activities performed by the contractor(s) in areas of sampling, laboratory analyses, and reporting of data.
6. Prepares and maintains the BVPS-SAPS Off-Site Environmental Monitoring Procedures Manual.
7. Prepares detailed environmental monitoring program bid packages as required for issue to qualified contractors who will provide the appropriate sampling, laboratory analyses, and reporting services.
8. Prepares changes to the Environmental Technical Specifications relating to the off-site environmental monitoring program.
9. Authorizes payments for services rendered by environmental contractors, and maintains cost control.
10. Reviews radiological deficiency and/or abnormal analytical results reports as submitted by the Health Physicist and implements the appropriate corrective action. Prepares ecological deficiency and/or abnormal analytical results reports relating to the aquatic and terrestrial ecological programs.

Power Stations Department

General OfficeExempt - Supervisor

11. Arranges for changes in dairy farm sampling program to reflect latest meteorological data and milch animal surveys.
12. Performs other work related to the above as required or assigned.

QUALIFICATIONS

1. B. S. Degree in Biology or Science
2. Five (5) or more years experience in biological field or related science.
3. Indicated ability to direct and supervise the work of others.

IMMEDIATE SUPERVISOR

Superintendent - Licensing and Compliance

Power Stations Department

Exempt - Supervisor

DUTIES:

Under general supervision is responsible to the Superintendent of Licensing and Compliance for preparation of all responses to the NRC Division of Operating Reactors concerning the Beaver Valley Power Station.

1. Prepares responses to NRC Division of Operating Reactors requests for information.
2. Prepares responses to NRC Bulletins and Circulars as required.
3. Assists in preparation of Final Safety Analysis Report sections that are the responsibility of the Operations Division.
4. Prepares amendments to the FSAR as required.
5. Prepares requests for amendments to the Operating License and Technical Specification changes.
6. Prepares Safety Evaluations for requests for license amendments.
7. Reviews all proposed Technical Specifications to assure that all action statements can be met with the existing station design features.
8. Prepares submittals to the NRC for proposed design modifications which involve changes to the Station Technical Specifications.
9. Assist in reviewing the Beaver Valley No. 2 Unit Final Safety Analysis Report to assure that commitments related to station operation and surveillance testing will not restrict plant availability.
10. Participates in special engineering studies concerning generic safety issues as required.
11. Assists in performance of independent review of station procedures as requested to assure conformance with license commitments and technical specification requirements.
12. Reviews proposed changes to the Code of Federal Regulations; Regulatory Guides and National Standards to assess impact on nuclear station operation. Prepares letters of comment for signature of appropriate level of corporate management for significant proposed changes.

Power Stations Department

Exempt - Supervisor

QUALIFICATIONS

1. B.S. Degree in Engineering or Science.
2. At least five years experience in nuclear power plant design, operation, maintenance or testing.
3. Demonstrated ability to prepare technical reports.
4. Familiarity with Title 10 and 40 Code of Federal Regulations.

IMMEDIATE SUPERVISOR

Superintendent of Licensing and Compliance

Power Stations Department

Exempt - ProfessionalDUTIES:

Under semi-direct supervision is responsible for performing investigations associated with licensing submittals and assisting in preparation of technical reports.

1. Reviews drawings, instruction manuals and the FSAR to obtain information required to respond to the NRC Division of Operating Reactors requests.
2. Assists in review of Final Safety Analysis Report and Amendments.
3. Assists in preparation of Safety Evaluations related to requests for Amendment to Operating License.
4. Maintains records of all changes to station equipment and procedures which are not in accordance with the description provided in the FSAR.
5. Assists in conduct of special engineering studies related to station operating, maintenance or testing.

QUALIFICATIONS

1. B.S. Degree in Engineering or Science.
2. At least three years experience in nuclear power station testing.
3. Demonstrated ability to prepare technical reports.

IMMEDIATE SUPERVISOR

Senior Licensing Engineer

Power Stations Department
General Office

Exempt - Professional

DUTIES:

Under general supervision, plans, analyzes, and performs evaluations of the departmental ALARA (As Low As Reasonably Achievable) program.

1. Participates in planning, development, and initial preparation of the power stations ALARA program.
2. Responsible for developing and maintaining auditable records to confirm ALARA reviews.
3. Assists in the preparation of station procedures to implement the power stations ALARA program.
4. Assists in integrating management philosophy and regulatory requirements, along with goals and specific objectives into the ALARA programs for Duquesne Light Company nuclear power stations.
5. Participates in design reviews for facilities and equipment that can effect potential radiation exposures.
6. Identifies locations, operations, and conditions within a Duquesne Light Company nuclear power station that have the potential for causing significant exposure to radiation.
7. Assists station(s) in developing and implementing an exposure control program.
8. Responsible for establishing and implementing an effective measurement system to determine the degree of success by station operations in achieving ALARA program goals and specific objectives.
9. Assists station health physics supervision in developing plans, procedures, practices, and methods for keeping radiation exposure of station personnel ALARA.
10. Reviews and provides input to training programs related to work in radiation areas or involving radioactive materials as necessary to implement ALARA.
11. Assists the station(s) in developing effective methods of data and information collection for use in analysis and evaluation of ALARA practices.
12. Provide technical support to station(s) or perform field studies as necessary to maintain personnel exposure, radioactive material dissemination, and plant radioactive effluents ALARA.

POOR ORIGINAL

Power Stations Department
General Office

Exempt - Professional

13. Assists the Health Physicist in review of the effectiveness of station radiological control programs.
14. Provides technical assistance and operational experience input to E&C Department ALARA program for incorporation into future plant design and construction.
15. Provides technical support for implementing the radioactive waste management programs.
16. Assists in the review of dosimetry and radiation measurement practices.
17. Performs duties related to above as directed or assigned.

QUALIFICATIONS

1. Four (4) years of formal schooling in science or engineering.
2. Four (4) years of applied radiation protection experience at a nuclear facility.
3. Four (4) years of operational or technical experience/training in nuclear power.
4. Any combination of the above totaling four (4) years.

IMMEDIATE SUPERVISOR

Health Physicist

Power Stations Department
General Office

Exempt - Supervisor

DUTIES:

Under general supervision of the Superintendent of Licensing and Compliance, plans, coordinates, and supervises all audits of nuclear operations as defined by the Technical Specifications for review and action by the Off-Site Review Committee relating to conduct of operations, training, deficiencies, emergency plan, security plan, special nuclear material accountability, fire protection, and loss prevention programs.

1. Maintains current records concerning the status of facility operations, licenses and restrictions, technical specifications, applicable laws, regulations, codes, standards, technical bulletins, and regulatory guides relating to the construction and operation of nuclear power plants and the use, storage and shipment of radioactive and special nuclear materials.
2. Develops audit and inspection plans for regular audits required by the Technical Specifications or as directed by the Off-Site Review Committee through the Superintendent of Nuclear Services.
3. Develops a long term audit schedule and arranges for the assistance of in-house or consultant personnel when special expertise is required.
4. Conducts the major audits required by the Technical Specifications related to Off-Site Review Committee responsibility and supervises the preparation of written reports of the findings.
5. Makes recommendations to the Off-Site Review Committee through the Superintendent of Nuclear Services regarding the methods of conducting nuclear operations, maintenance, training, testing, nuclear material accountability, security, and fire protection.
6. Obtains current information on the status of plant operations and maintenance, changes to rules, regulations, license conditions and technical specifications, and conducts timely inspections to insure the plant operations, procedures, controls, and methods comply with such changing conditions or limitations.
7. Attends exit interviews with NRC inspectors and DLC QA Inspectors and, coordinating with the station staff, develops recommendations for achieving compliance in noted areas of deficiencies.
8. Coordinating with nuclear plant personnel, generates answers to NRC inspection and deficiency reports.
9. Maintains records of all audits, inspections, and surveys and findings and the results thereof.

Power Stations Department
General Office

Exempt - Supervisor

10. Follows up noted deficiencies to produce timely compliance.
11. Reviews and audits all responses to NRC Bulletins and Circulars for accuracy and technical content.

QUALIFICATIONS:

1. B.S. Degree in Engineering preferred.
2. Five (5) years experience of which three shall be nuclear experience.
3. Thorough knowledge of nuclear plant systems and principles of operation and codes, standards, regulations, limitations, and rules relating to the operation, maintenance, testing, and training associated with nuclear power plants.
4. Demonstrated ability to conduct thorough examinations and to prepare concise and accurate written reports.
5. Demonstrated ability to direct the work of others.

IMMEDIATE SUPERVISOR:

Superintendent of Licensing and Compliance

Power Stations Department
General Office

Duties:

Under direct supervision of the Senior Compliance Engineer, assists in the planning, coordination and conduct of all audits of nuclear operations as defined by the Technical Specifications for review and action by the Off-Site Review Committee relating to conduct of operations, training, deficiencies, emergency plan, security plan, special nuclear material accountability, fire protection, and loss prevention programs.

1. Assists the Senior Compliance Engineer in the maintenance of current records concerning the status of facility licenses and restrictions, technical specifications, applicable laws, regulations, codes, standards and regulatory guides relating to the construction and operation of nuclear power plants and the use, storage, and shipment of nuclear materials.
2. Assists in the development of audit and inspection guides for regular audits required by the Technical Specifications or as directed by the Senior Compliance Engineer.
3. Assists in the development of a long term audit plan.
4. Conducts or assists in the conduct of regular or follow-up audits.
5. Assists the Senior Compliance Engineer in obtaining information regarding changes in plant status and/or procedures, regulations limitations or rules.
6. Assists or prepares audit reports and findings.
7. Assists in the maintenance of records of audits, inspections, surveys and findings and the results thereof.
8. Other duties as assigned.

QUALIFICATIONS:

1. B.S. Degree in Engineering (preferred).
2. Basic knowledge of nuclear plant systems, principles of operation and regulations.
3. Three (3) years experience at least two of which shall be nuclear experience.
4. Thorough work habits and demonstrated ability to write clear and concise reports.

IMMEDIATE SUPERVISOR:

Senior Compliance Engineer