

JAN 19 1976

R. A. Purpla, Chief, ORR 1, RL

DUKE POWER COMPANY - OCONEE UNITS 1, 2 AND 3 - DOCKET NOS. 50-269/270/287

We have reviewed the subject licensee's letter with attachment to Mr. B. C. Rusche, dated December 5, 1975, relating to the Oconee Technical Specifications (TS). We consider the proposal to be at significant variance with requirements established in the Administrative Controls Section of the Standard TS and related industry guides/standards which have been adopted by a majority of licensees. In view of the operating record at Oconee, we do not believe that relaxation of administrative controls is warranted.

Our primary concern is that the licensee has eliminated the Station Review Committee (SRC) and has transferred its responsibility and authority to an individual (or group) from the independent review and audit body. Moreover, it appears that the review function previously performed by the SRC will now be accomplished by a single individual who may have maximum practical experience equivalent to one year at the facility. Based on discussions between G. G. Zack, RL, and members of my staff, we understand that action in the form of requirements for a multidiscipline review will be incorporated in the proposed TS. Such action should alleviate our concern in this matter.

In addition, minimum training and experience requirements are not established for nonprofessional personnel. Likewise, replacement and requalification training for all personnel is not addressed. We recommend that these items be addressed in the current TS change.

If you require additional information or wish to discuss this matter further, please contact me or F. J. Nolan on extension 27451.

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15/
J. H. Sniezak, Chief
Light Water Reactor Programs
Branch, IE

cc: R. H. Lewis, IE:II
R. E. Hall, IE
F. J. Nolan, IE
G. G. Zack, RL
JMMc McGough, RL

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ADMINISTRATIVE CONTROLS

6.1

ORGANIZATION, REVIEW, AND AUDIT

6.1.1

Organization

6.1.1.1

The station Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.1.2

In all matters pertaining to actual operation and maintenance and to these Technical Specifications, the station Manager shall report to and be directly responsible to the Vice President, Steam Production, through the Manager, Nuclear Production. The organization is shown in Figure 6.1-2.

6.1.1.3

Reducing amount
in FKG

The station organization for Operations, Technical Services and Maintenance shall be functionally as shown in Figure 6.1-1. Minimum operating shift requirements are specified in Table 6.1-1.

6.1.1.4

DO NOT
WEEK
PRODUCTION
ATTENTION

Incorporated in the staff of the station shall be supervisory and professional personnel meeting the minimum requirements encompassing the training and experience described in Section 4 of the ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

6.1.1.5

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Retraining and replacement of station personnel shall be in accordance with Section 5.5 of the ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

6.1.2

Technical Review and Control

6.1.2.1

Activities

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a. Procedures required by Technical Specification 6.4 and other procedures which affect station nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared by a qualified individual/organization. Each such procedure, or procedure change, shall be reviewed by an individual/group other than the individual/group which prepared the procedure, or procedure change, but who may be from the same organization as the individual/group which prepared the procedure, or procedure change. Such procedures and procedure changes may be approved for temporary use by two members of the station staff, at least one of whom holds a Senior Reactor Operator's License on the unit(s) affected. Procedures and procedure changes be approved prior to use or within seven days of receiving temporary approval for use by the station Manager; or by the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent, as previously designated by the station Manager.

b. Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be reviewed by an individual/group other than the individual/group which prepared the proposed change, but who may

c. Proposed modifications to station nuclear safety-related structures, systems and components shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to station nuclear safety-related structures, systems and components shall be approved prior to implementation by the station Manager; or by the Operating Superintendent, the Technical Services Superintendent, or the Maintenance Superintendent, as previously designated by the station Manager.

4. Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications shall be reviewed by the station manager; or by the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent, as previously designated by the station Manager.

Incidents reportable pursuant to Technical Specification 6.6.2.1 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the Director of the Nuclear Safety Review Board.

8. The station Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President, Steam Production.

b. The station security program, and implementing procedures, shall be reviewed at least annually. Changes determined to be necessary as a result of such review shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the Director of the Nuclear Safety Review Board.

1. The station emergency plan, and implementing procedures, shall be reviewed at least annually. Changes determined to be necessary as a result of such review shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the Director of the Nuclear Safety Review Board.

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