

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1

The Director, Oyster Creek Operations shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

6.2.1

The offsite organization for technical support shall be as shown on Figure 6.2.1.

FACILITY STAFF

6.2.2

The facility organization shall be as shown on Figure 6.2.2 and:

a. Each on duty shift shall include at least the shift staffing indicated on Figure 6.2.2.

b. At least one licensed operator shall be in the control room when fuel is in the reactor.

c. Two licensed operators shall be in the control room during all reactor startups, shutdowns, and other periods involving planned control rod manipulations.

d. ALL CORE ALTERATIONS shall be 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.

e. An individual qualified in radiation protection measures shall be on site when fuel is in the reactor.

f. A Fire Brigade of at least 5 members shall be maintained onsite at all time. The Fire Brigade shall not include the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.

g. The Shift Technical Advisor position need not be filled if the reactor is in the refuel or shutdown mode and the reactor is less than 212°F.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1

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The members of the facility staff shall meet or exceed the following qualifications:

Director, Oyster Creek Operations

Requirements: Ten years total power plant experience of which three years must be nuclear power plant experience. A maximum of four years of academic training may fulfill four of the remaining seven years of required experience. The Director must be capable of obtaining or possess a Senior Reactor Operator's License.

Manager, Operations

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two years of the remaining five years of required experience. The Manager, Operations must be capable of obtaining or possess a Senior Reactor Operator's License.

Manager, Plant Engineering

Requirements: Eight years of responsible positions related to power generation, of which three years shall be nuclear power plant experience. A maximum of four of the remaining five years of experience may be fulfilled by satisfactory completion of academic or related technical training.

Manager Administration

Requirements: Eight years total power plant experience of which four years must have been in nuclear power plant experience. The Manager should possess a four year college degree or equivalent in Business Administration or an Engineering discipline.

Plant Operations Manager

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two of the remaining five years of required experience. The Plant, Operations Manager must possess a Senior Reactor Operator's License.

Safety Review Manager

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two of the remaining five years of required experience.

Core Manager (Reactor Engineering and Physics)

At the time of initial core loading or appointment to the position, whichever is later, the responsible person shall have a Bachelor's Degree in Engineering or the Physical Sciences and four years experience or a graduate degree and three

years experience. Two of these years shall be nuclear power plant experience. The experience shall be in such areas as reactor physics, core measurements, core heat transfer, and core physics testing programs. Successful completion of a reactor engineering training program (such as the 12 week concentrated programs offered by NSS Vendors) may be equivalent to one year's nuclear power plant experience.

Manager Maintenance

Requirements: Seven years of total power plant experience of which one year must be nuclear power plant experience. Two years of academic or related technical training may fulfill two of the remaining six years of required experience.

Engineering Manager

The engineer in charge of technical support shall have a Bachelor's Degree in Engineering or the Physical Sciences and have three years of professional level experience in nuclear services, nuclear plant operation, or nuclear engineering, and the necessary overall nuclear background to determine when to call consultants and contractors for dealing with complex problems beyond the scope of owner-organization expertise.

Radiological Controls Manager (Reports Offsite)

Requirements: Bachelor's degree or the equivalent in a science or engineering subject, including some formal training in radiation protection. Five years of professional experience in applied radiation protection. (Master's degree equivalent to one year experience and Doctor's degree equivalent to two years experience where coursework related to radiation protection is involved.) Three years of this professional experience should be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations.

Chemistry Manager

Requirements: Five years experience in chemistry of which a minimum of one year shall be in radiochemistry at an operating nuclear power plant. A maximum of four years of this five year experience may be fulfilled by related technical or academic training.

6.3.2

Each member of the radiation protection organization for which there is a comparable position described in ANSI N18.1-1971 shall meet or exceed the minimum qualifications specified therein, or in the case of radiation protection technicians, they shall have at least one year's continuous experience in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, and shall have been certified by the Radiological Controls Manager, as qualified to perform assigned functions. This certification must be based on an NRC approved, documented program consisting of classroom training with appropriate examinations and documented positive findings by responsible

supervision that the individual has demonstrated his ability to perform each specified procedure and assigned function with an understanding of its basis and purpose.

6.4 TRAINING

6.4.1

A retraining program for operators shall be maintained under the direction of the Manager, Training and shall meet the requirements and recommendation of Appendix A of 10CFR Part 55. Replacement training programs, the content of which shall meet the requirements of 10CFR Part 55, shall be conducted under the direction of the Manager, Training for licensed operators and Senior Reactor Operators.

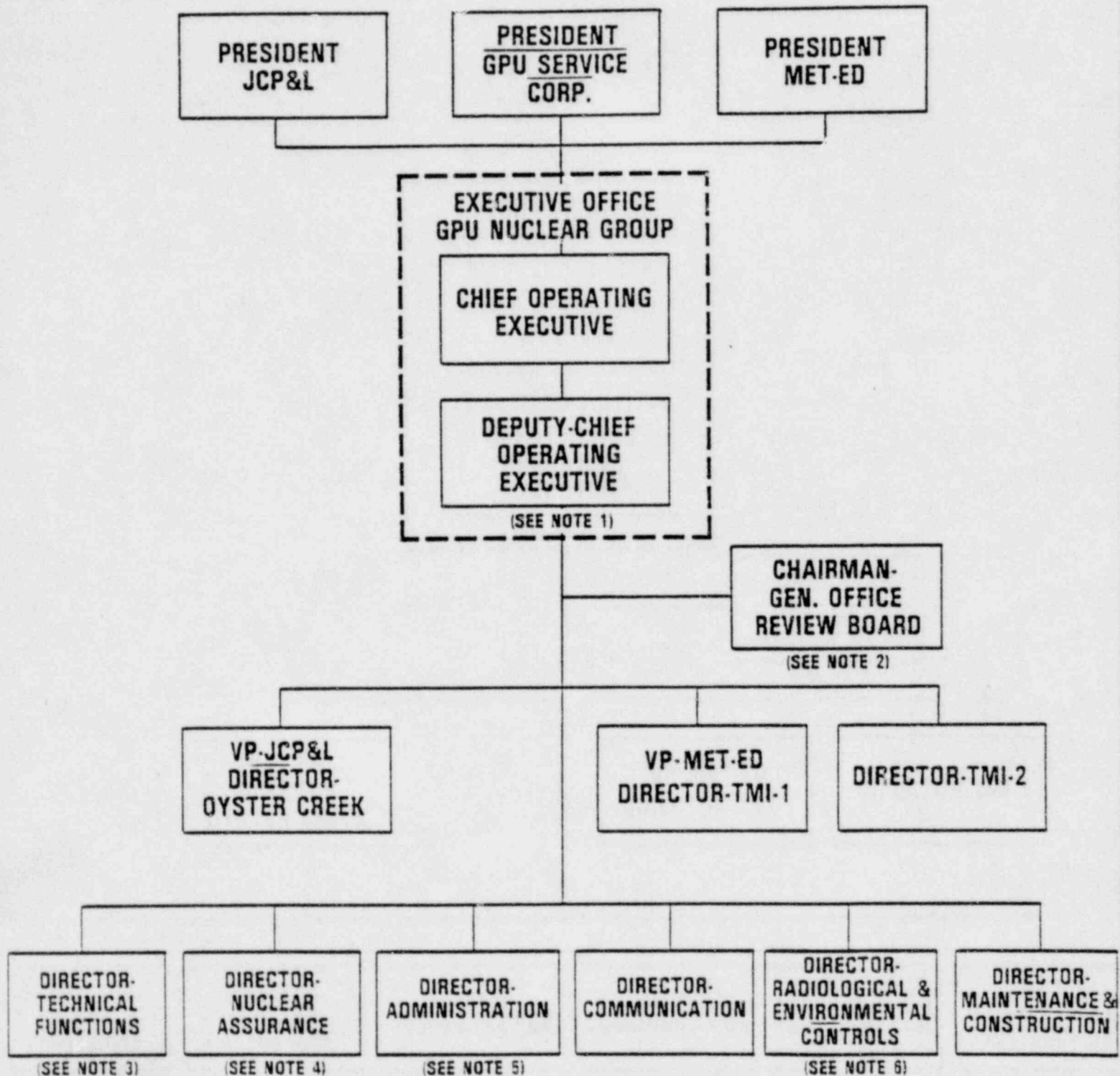
6.4.2

A training program for the Fire Brigade shall be maintained under the direction of the Manager, Training.

6.5 SAFETY REVIEW AND AUDIT

The Director Oyster Creek Operations and three organizational units, the Plant Operations Review Committee (PORC), the Independent Safety Review Groups (ISRG) and the General Office Review Board (GORB) function to accomplish nuclear safety review and audit of the Oyster Creek Station.

Organization Chart GPU Nuclear Group



NOTES TO FIGURE

1. The Chief Operating Executive of the GPU Nuclear Group is a Senior Vice President of Met-Ed and will be a Vice President of JCP&L. The Deputy Chief Operating Executive will be a Vice President of both JCP&L and Met-Ed.
2. The General Office Review Board reports to and gets general direction from the Executive Office - GPU Nuclear Group. However, the GORB have direct access to the Presidents, Chief Executive Officers and Boards of Directors of the Companies involved.
3. The project engineering, the shift technical advisors, and licensing functions assigned to each nuclear plant site will report to the Director - Technical Functions.
4. The quality assurance, emergency planning and training functions assigned to each nuclear plant site will report to the Director - Nuclear Assurance.
5. The security, materials management, personnel and general administrative functions assigned to each nuclear plant site will report to the Director - Administration.
6. The radiological and offsite environmental control functions assigned to each nuclear plant site will report to the Director - Radiological and Environmental Controls.

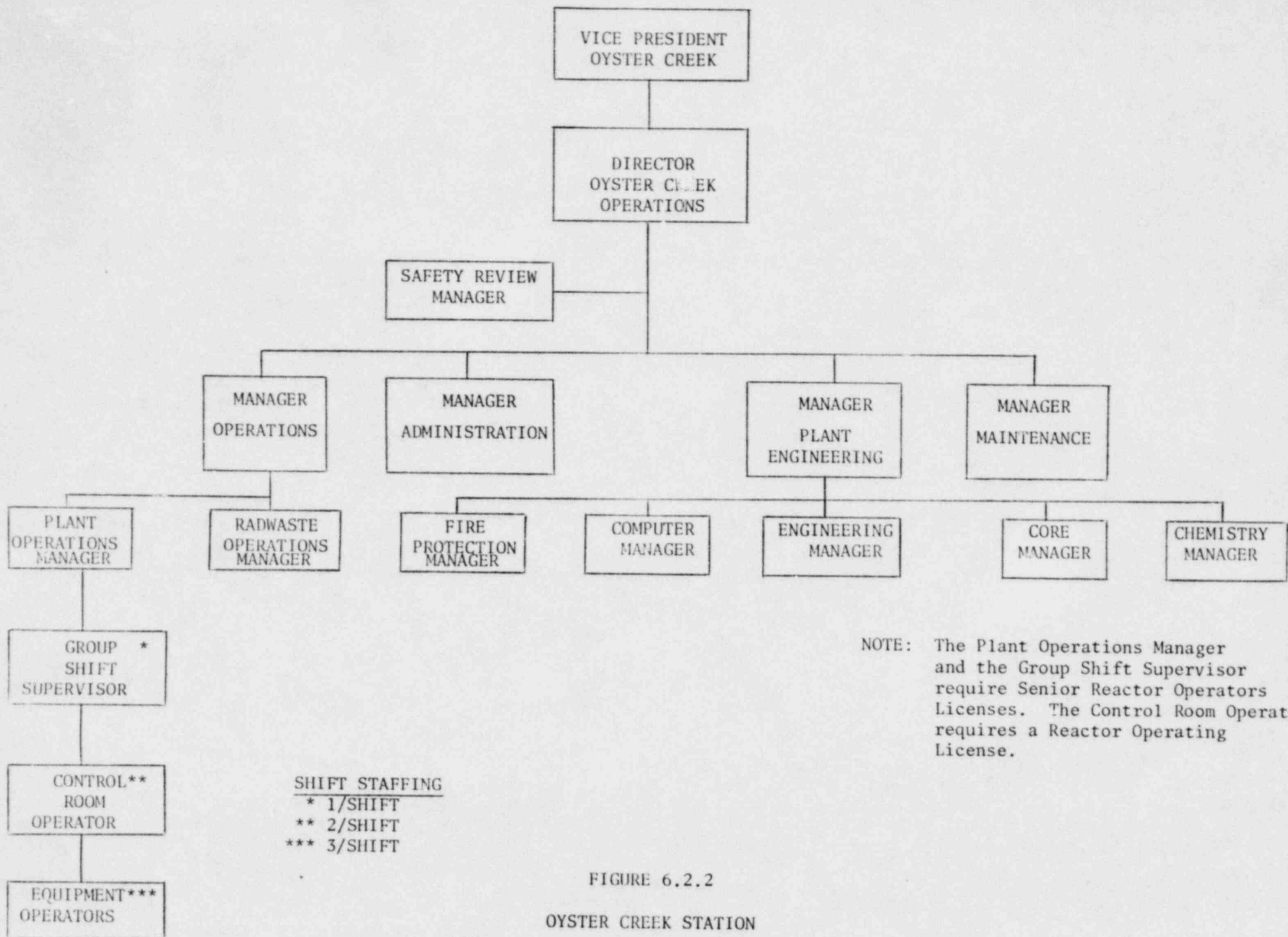


FIGURE 6.2.2
 OYSTER CREEK STATION
 CONDUCT OF OPERATIONS CHART

6.5.1 Director Oyster Creek Operations (DOCO)

FUNCTION

6.5.1.1

The Director Oyster Creek Operations shall ensure that:

a. All proposed changes to equipment or systems have been evaluated to determine if they constitute a change to the facility or procedures as described in the Safety Analysis Report.

b. All proposed changes to equipment or systems that constitute a change of the facility or procedures as described in the Safety Analysis Report have been evaluated to determine whether they involve an unreviewed safety question as defined in paragraph 50.59, Part 50, Title 10, Code of Federal Regulations.

c. All proposed tests and experiments have been evaluated to determine whether or not they involve unreviewed safety questions as defined in paragraph 50.59, Part 50, Title 10, Code of Federal Regulations.

AUTHORITY

6.5.1.2

The Director Oyster Creek Operations has the authority to:

a. Make a determination as to whether proposed changes to equipment, or systems involve a change to the procedures or facility as described in the Safety Analysis Report.

b. Make a determination as to whether or not proposed tests or experiments and changes to equipment or systems involve an unreviewed safety question.

c. Direct the Plant Operations Review Committee to review safety evaluations of proposed changes to equipment or systems and safety evaluations of proposed tests and experiments to determine whether or not such changes, tests or experiments involve unreviewed safety questions.

NOTE: Each determination that a proposed test, experiment, or change to a system or equipment that does not involve an unreviewed safety question shall be reviewed by the Independent Safety Review Groups to verify that the determination was correct. This review shall be documented but is not a pre-requisite of the test, experiment, or change to a system or equipment.

RECORDS

6.5.1.3

Any safety evaluations done in accordance with 6.5.1.1 (b) and (c) and any determinations made pursuant to 6.5.1.2(b) must be documented. Copies of these determinations shall be provided to the ISRG Coordinator and the Chairman of the General Office Review Board. Records of all tests and experiments performed and all changes to equipment or systems made under the provisions of 10 CFR Part 50.59 shall also be maintained at the station.

6.5.2 Plant Operations Review Committee (PORC)

FUNCTION

6.5.2.1

The PORC shall function to advise the Director, Oyster Creek Operations

COMPOSITION

6.5.2.2

The PORC shall consist of the following plant personnel:

Safety Review Manager
Manager Operations
Manager Plant Engineering
Manager Maintenance
Radiological Controls Manager

The Director Oyster Creek Operations shall designate the Chairman and Vice-Chairman from among the PORC members.

ALTERNATES

6.5.2.3

Alternate members shall be appointed in writing by the PORC Chairman and will have the type of experience and training required of regular members. However, they need not have the extensive longevity in the designated fields as long as in the opinion of the Chairman, their experience and judgement are adequate.

MEETING FREQUENCY

6.5.2.4

The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or the Director Oyster Creek Operations.

QUORUM

6.5.2.5

A quorum of the PORC shall consist of the Chairman or Vice Chairman

and three members/alternates. No more than two alternate members shall be counted in establishing a quorum.

RESPONSIBILITIES

6.5.2.6

The responsibilities of the PORC are included in Table 6.5.1.

AUTHORITY

6.5.2.7

a. The PORC shall be advisory to the Director Oyster Creek Operations. Nothing herein shall relieve the Director Oyster Creek Operations of his responsibility or authority for overall safety operations including taking immediate emergency action. Determinations on Items a and b of Table 6.5-1 shall be documented in writing.

b. The PORC Chairman shall immediately notify the Vice President Oyster Creek and the Chairman of the GCRB of any disagreements between the PORC and the Director Oyster Creek Operations. However, the Director Oyster Creek Operations shall have the responsibility for resolution of such disagreements pursuant to 6.1.1.

RECORDS

6.5.2.8

The PORC shall maintain written minutes of each meeting and copies of minutes and determinations shall be provided to the Director Oyster Creek Operations; Vice President Oyster Creek; ISRG Coordinator and the Chairman of the GCRB.

6.5.3 Independent Safety Review Groups (ISRG)

FUNCTION AND COMPOSITION

6.5.3.1

The ISRG shall function under the direction of an ISRG Coordinator, who shall be appointed by the Vice President -Oyster Creek to provide safety reviews. The Coordinator shall have available the competence to review problems in the following area:

- a. Nuclear Power Plant Operations
- b. Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological Safety
- g. Mechanical and Electrical Engineering
- h. Quality Assurance Practices

The Coordinator shall establish, as needed, groups of two or more individuals with the expertise required for each topic to be reviewed.

CONSULTANTS

6.5.3.2

Consultants shall be utilized as necessary to supplement the expertise

available in the Company.

RESPONSIBILITIES

6.5.3.3

The specific responsibility to ensure accomplishment of independent safety review of the Director of Oyster Creek Operations determinations involving safety questions is assigned to the ISRG Coordinator and is accomplished by utilizing, as necessary, the full scope of expertise available in the generation department staff, consultants, contractors and vendors as appropriate. Table 6.5-1 defines the specific independent safety review responsibilities.

AUTHORITY

6.5.3.4

The ISRG advises the Vice President-Oyster Creek. It has the authority to conduct reviews and investigations, which will be documented.

AUDITS

6.5.3.5

Audits of facility activities shall be performed under the cognizance of the Manager, Operational Quality Assurance. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.
- c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The Facility Emergency Plan and implementing procedures at least once per two years.
- e. The Facility Security Plan and implementing procedures at least once per two years.
- f. Any other area of facility operation considered appropriate by the GORB or the Vice President-Oyster Creek.

RECORDS

6.5.3.6

Written documentation of all independent safety reviews and

investigations will be forwarded to the Director Oyster Creek Operations, Vice President-Oyster Creek and the Chairman of the General Office Review Board. In addition, any reportable occurrence or item involving an unreviewed safety question which is identified by the ISRSG will be documented and reported immediately to the above mentioned persons.

The audit findings which result from all audits conducted in accordance with Section 6.5.3.5 shall be documented and reported to the above mentioned persons within 30 days after completing the audit. Reports documenting corrective action will receive the same distribution and they will also be forwarded to the ISRSG Coordinator.

6.5.4 General Office Review Board (GORB)

FUNCTION

6.5.4.1

The technical and administrative function of the GORB is to provide independent review of major safety issues, to foresee potentially significant nuclear and radiation safety problems, and to advise the Company President on these matters.

COMPOSITION

6.5.4.2

Members of the General Office Review Board shall possess extensive experience in their individual specialities and collectively have the competence in the following areas:

- a. Nuclear Power Plant Operations
- b. Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological Safety
- g. Mechanical and Electrical Engineering

The Chairman and Vice Chairman shall be appointed by the Company President. (Neither shall be an individual with line responsibility for operation of the plant).

The Chairman shall designate a minimum of six additional members. No more than a minority of the Board shall have line responsibility for operation of Oyster Creek Nuclear Generating Station.

ALTERNATES

6.5.4.3

Alternate members shall be appointed in writing by the GORB Chairman and will have the type of experience and training required of regular

members, however, they need not have the extensive longevity in the designated fields as long as, in the opinion of the Chairman, their experience and judgement are adequate.

MEETING FREQUENCY

6.5.4.4

The GORB shall meet at least semi-annually and any time at the request of the Chairman or the Company President.

QUORUM

6.5.4.5

A quorum shall consist of the Chairman or Vice Chairman and three members/alternates. No more than one alternate member shall be counted when establishing a quorum and no more than a minority of the quorum shall hold line responsibility for operations of the Oyster Creek Station.

RESPONSIBILITIES

6.5.4.6

a. The primary responsibility of the GORB is to foresee potentially significant nuclear and radiation safety problems and to recommend to the Company President how they may be avoided or mitigated.

b. Carry out the specific independent safety review responsibilities listed in Table 6.5-1.

AUTHORITY

6.5.4.7

The GORB shall be advisory to the Company President and shall have the authority to conduct reviews, audits, and investigations requested by the Company President or as deemed necessary by the GORB in the fulfillment of its responsibilities.

AUDITS

6.5.4.8

The report of the management review of the QA Plan, initiated by the Vice President, Oyster Creek in accordance with the Operational Quality Assurance Plan, shall be reviewed by the GORB with respect to safety and administrative safety issues.

RECORDS

6.5.4.9

TABLE 6.5-1

SAFETY REVIEW RESPONSIBILITIES

ITEM	INITIAL ACTION	PORC	INDEPENDENT REVIEW	
			ISR	GORB
a) Proposed change to equipment, or systems subject to the Provisions of Section 50.59, Part 50, Title 10 Code of Federal Regulations	Initiator: Must prepare a complete description of the proposed changes and ensure a safety evaluation of the change is included. Director Oyster Creek Operations (1) Must determine if the item is an actual change to equipment or systems as described in the FSAR. (2) Must determine if the item involves an unreviewed safety question. (3) May request the PORC to assist in the above determinations.	Must review items to determine whether or not an unreviewed safety question is involved, if required by the Director Oyster Creek Operations.	Must review all determinations by the Director Oyster Creek Operations	May review any determination, but must review those for which the Director Oyster Creek Operations has requested GORB review.
b) Proposed tests and experiments, (subject to provisions of) 50.59, Part 50, Title 10, Code of Federal Regulations.	Initiator: Must prepare a complete description of the proposed test or experiment and ensure a safety evaluation of the test or experiment is included. Director Oyster Creek Operations (1) Must determine if the item involves an unreviewed safety question. (2) May request the PORC to assist in the above determinations.	Must review item to determine whether or not an unreviewed safety question is involved, if requested by the Director Oyster Creek Operations.	As above	As above.
c) Proposed changes in Technical Specifications or in the NRC Operating License.	Initiator: Must prepare a complete description of the proposed change and ensure a safety evaluation of the change is included.	(1) Must review the item for nuclear and radiological safety. (2) Must make recommendations to the Director Oyster Creek Operations as to whether or not the change is safe.	Must review change and PORC recommendation prior to submittal to the NRC.	May review any item but must review those for which the Director Oyster Creek Operations or his supervisor have requested GORB review.

TABLE 6.5-1 (CON'T)
SAFETY REVIEW RESPONSIBILITIES

ITEM	INITIAL ACTION	PORC	INDEPENDENT REVIEW	
			ISRG	GORB
d) Reportable occurrences	Director Oyster Creek Operations: Must have investigations performed for all Reportable Occurrences and a report prepared including the safety significance of the incident.	Must review Reportable Occurrences Report for safety significance and make recommendations to the Director Oyster Creek Operations on how to avoid recurrence.	Must review Reportable Occurrence Reports for safety significance and review PORC recommendations.	As above
e) Facility operations including Security Plan, Emergency Plan and Implementing procedures; review is to detect potential safety hazards.		Continuing responsibility.	See item i below.	As above
f) Significant operation abnormalities or deviations from normal and expected performance.	Director, Oyster Creek Operations: Report such matters to the PORC ISRG Coordinator and the Chairman GORB.	Review matter and report evaluation of safety significance to the ISRG and GORB.	Perform independent review of PORC evaluation.	As above
g) Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.	As above	As above	As above	As above
h) PORC minutes and reports.			Review to determine if any matters discussed involve unrelated safety questions.	As above
i) Audit Reports and NRC Inspection Reports.			Review to determine if any matters reported involve Violations of Technical Specifications, license require-	The report of the management review of the QA Plan, initiated by the Vice President,

TABLE 6.5-1 (Cont'd)
SAFETY REVIEW RESPONSIBILITIES

ITEM	INITIAL ACTION	PORC	ISRG	GORB
			ments or regulations or have any nuclear or radiation safety implications.	Oyster Creek in accordance with the Operational Quality Assurance Plan, shall be reviewed by the GORB with respect to technical and administrative safety issues.

Minutes of each GORB meeting shall be recorded and approved by the GORB Chairman. Copies of approved minutes will be forwarded to the Company President, Vice President-Oyster Creek, Director Oyster Creek Operations, PORC Chairman and others designated by the GORB Chairman. GORB recommendations to the Company President will be documented in a letter from the GORB Chairman to the President. Included with each letter will be any dissenting opinions of members of the Board.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1

The following actions shall be taken in the event of a Reportable Occurrence:

a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.

b. Each Reportable Occurrence Report submitted to the Commission shall be reviewed by the Plant Operations Review Committee and submitted to the ISRG Coordinator, Director Oyster Creek Operations, Vice President Oyster Creek.

6.7 SAFETY LIMIT VIOLATION

6.7.1

The following actions shall be taken in the event a Safety Limit is violated:

a. If any Safety Limit is exceeded, the reactor shall be shut down immediately until the Commission authorizes the resumption of operation.

b. The Safety Limit violation shall be reported to the Commission and the Vice President-Oyster Creek.

c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Operations Review Committee and submitted to the Director Oyster Creek Operations, and Vice President-Oyster Creek. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components systems or structures, and (3) corrective action taken to prevent recurrence.

d. The Safety Limit Violation Report shall be submitted to the Commission within 10 days of the violation. It shall also be submitted to the ISRG Coordinator.

6.8 PROCEDURES

6.8.1

Written procedures shall be established, implemented, and maintained

that meet or exceed the requirements of Section 5.1 and 5.3 of American National Standard N18.7-1972 and Appendix "A" of the Nuclear Regulatory Commission's Regulatory Guide 1.33-1972 except as provided in 6.8.2 and 6.8.3 below.

6.8.2

Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the Plant Operations Review Committee and approved by the Director Oyster Creek Operations prior to implementation and periodically as specified in the Administrative Procedures.

6.8.3

Temporary changes to procedures 6.8.1 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 supervisory staff, at least one of whom possesses a Senior Reactor Operator's License.
- c. The change is documented, subsequently reviewed by the Plant Operations Review Committee and approved by the Director Oyster Creek Operations as specified in the Administrative Procedures.

- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- j. Records of meetings of the Plant Operations Review Committee and the General Office Review Board.

6.10.3 Quality Assurance Records shall be retained as specified by the Quality Assurance Plan.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 (Deleted)

6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10CFR20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).^{*} An individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a pre-set integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e. qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive exposure control over the activities within the area and who will perform periodic radiation surveillance at the frequency specified in the RWP. The surveillance frequency will be established by the Radiological Controls Manager.

5.0 ADMINISTRATIVE CONTROLS

This section describes administrative and management controls established by the Applicant to provide continuing protection to the environment and to implement the environmental technical specifications.

5.1 Responsibility

Corporate responsibility for implementation of the Oyster Creek Environmental Technical Specifications and for assuring that plant operations are controlled in such a manner as to provide continuing protection of the environment has been assigned by the President of JCP&L to the Vice President, Oyster Creek.

The responsibility for conducting the studies as set forth in Section 3.1 (Non-Radiological Surveillance) and all of Section 4.0 (Special Surveillance Programs) rests with the GPUSC Manager, Environmental Controls.

Administrative measures are defined in Section 5.3 which provide that the individual or group responsible for auditing or otherwise verifying that an activity has been correctly performed is independent of the individual or group responsible for performing the activity.

5.2 Organization

The organization of the personnel responsible for implementation audit, and review of the OCETS is shown in Figure 5-1.

5.3 Review and Audit

Independent audit and review functions for environmental matters are the responsibility of the GPUSC Manager, Environmental Controls. This department reports directly to the GPUSC Vice President, Radiological and Environmental Controls Generation and is independent of line responsibility for the operation of the plant. The independent reviews and audits of the OCETS will be carried out by personnel from the Environmental Controls Department or by other personnel from JCP&L, GPUSC, outside contractors or consultants at the request of the Environmental Controls Department.

When individuals in the Environmental Controls Department of GPUSC perform any function relating to the OCETS other than independent audit and review, the Vice President Radiological and Environmental Controls will ensure that an independent review and audit of that work is performed by another individual in the Environmental Controls Department or some other group who is not directly responsible for the specific activity being reviewed and audited.

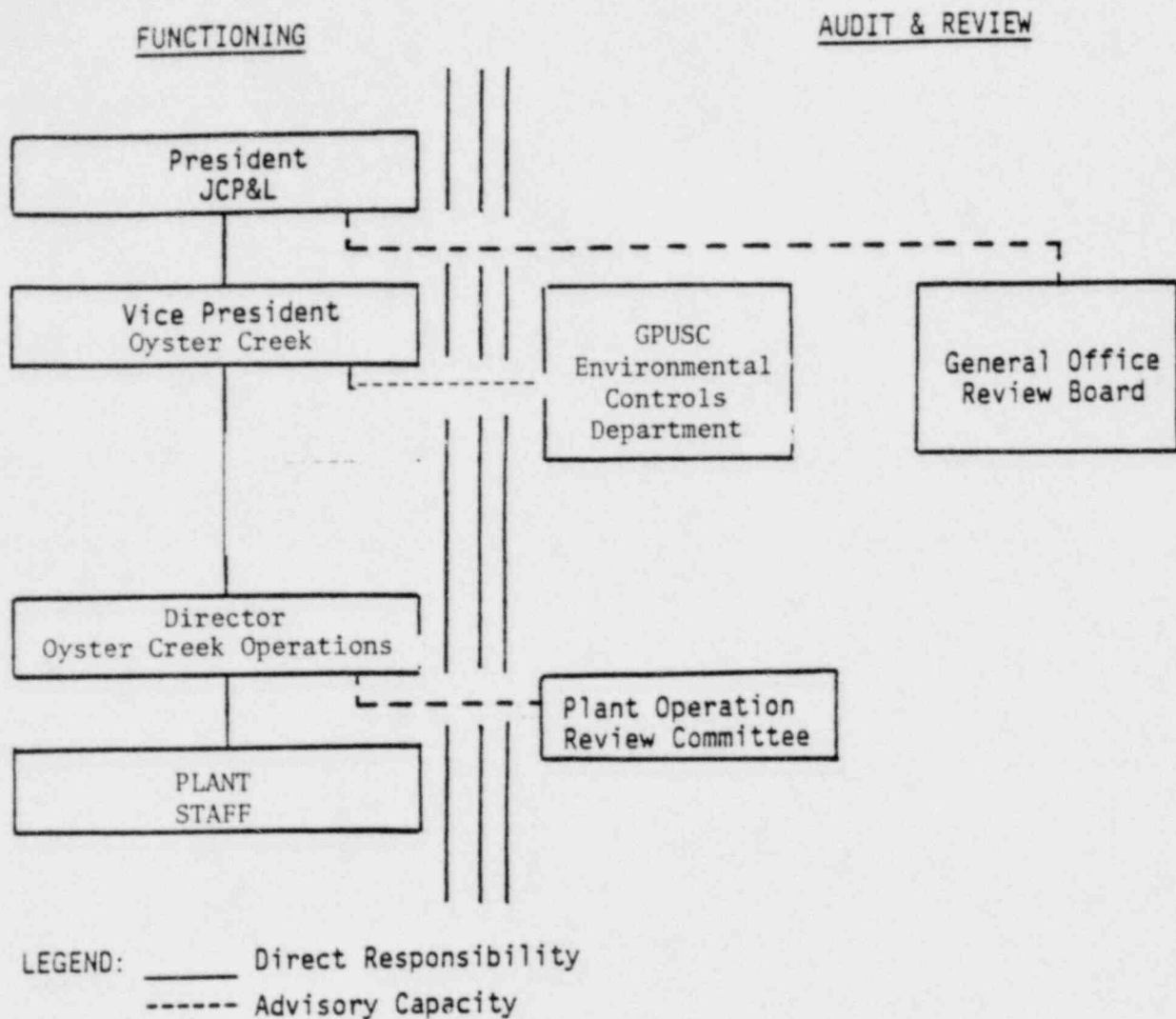


FIGURE 5-1
ORGANIZATION FOR THE IMPLEMENTATION OF
THE ENVIRONMENTAL TECHNICAL SPECIFICATIONS