Attachment A

- 5. Records of gaseous and liquid radioactive material released to the environs.
- 6. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- Records of training and qualification for current members of the plant staff.
- Records of in-service inspections performed pursuant to these Technical Specifications.
- 9. Records of Quality Assurance activities required by the QA Manual.
- Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- 11. Records of meetings of the ORC and the NSRAC.

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)

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6.13 HIGH RADIATION AREA (OPTIONAL)

- 6.13.1 In lieu of the "control device" or "alarm signal" required by papagraph 20.203(c)(2) of 10 CFR 20, 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*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by 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 present integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
 - c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the unit Health Physicist in the Radiation Work Permit.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of this assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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6.13.2 The requirements of 6.13.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or the unit Health Physicist.

6.14 FIRE PROTECTION PROGRAM

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The following inspections and audits shall be performed:

- An independent fire protection inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- An inspection and audit by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.