

ATTACHMENT A

NPF-38-104

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FDR ADOCK 05000362
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EXISTING

TABLE 4.4-5

REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM - WITHDRAWAL SCHEDULE

<u>CAPSULE NUMBER</u>	<u>VESSEL LOCATION</u>	<u>LEAD FACTOR</u>	<u>WITHDRAWAL TIME (FFPY)*</u>
1	83°	1.50	Standby
2	97°	1.50	4.0 EFPY
3	104°	1.50	11.0 EFPY
4	284°	1.50	18.0 EFPY
5	263°	1.50	Standby
6	277°	1.50	Standby

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*Withdrawal time may be modified to coincide with those refueling outages or plant shutdowns most closely approaching the withdrawal schedule.

ADMINISTRATIVE CONTROLSUNIT STAFF (Continued)

- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room.
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. 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.
- e. Administrative procedures shall be developed and implemented to limit the working hours of individuals of the nuclear power plant operating staff who are responsible for manipulating plant controls or for adjusting on-line systems and equipment affecting plant safety which would have an immediate impact on public health and safety.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

1. An individual shall not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours shall be allowed between work periods, including shift turnover time.

*The Health Physics Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

EXISTING

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Senior Vice President-Nuclear Operations and the SRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. 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.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the SRC and the Senior Vice President-Nuclear Operations within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 and those required for implementing the requirements of NUREG-0737.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. Modification of Core Protection Calculator (CPC) Addressable Constants, including independent verification of modified constants.

NOTES:

- (1) Modification to the CPC addressable constants based on information obtained through the Plant Computer - CPC data link shall not be made without prior approval of the PORC.
- (2) Modifications to the CPC software (including algorithm changes and changes in fuel cycle specific data) shall be performed in accordance with the most recent version of CEN-39(A)-P, "CPC Protection Algorithm Software Change Procedure," that has been determined to be applicable to the facility. Additions or deletions to CPC Addressable Constants or changes to Addressable Constant software limits values shall not be implemented without prior NRC approval.
- h. Administrative procedures implementing the overtime guidelines of Specification 6.2.2f., including provisions for documentation of deviations.
- i. PROCESS CONTROL PROGRAM implementation.

ATTACHMENT B

NPF-38-104

PROPOSED

TABLE 4.4-5

REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM - WITHDRAWAL SCHEDULE

<u>CAPSULE NUMBER</u>	<u>VESSEL LOCATION</u>	<u>LEAD FACTOR</u>	<u>WITHDRAWAL TIME (EFPY)*</u>
1	83°	1.50	Standby
2	97°	1.50	4.0 EFPY
3	104°	1.50	11.0 EFPY
4	284°	1.50	18.0 EFPY
5	263°	1.50	Standby
6	277°	1.50	Standby

ADD
6
4
5
DELETE

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*Withdrawal time may be modified to coincide with those refueling outages or plant shutdowns most closely approaching the withdrawal schedule.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, and 4, at least one licensed Senior Operator shall be in the control room.
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. 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.
- e. Administrative procedures shall be developed and implemented to limit the working hours of individuals of the nuclear power plant operating staff who are responsible for manipulating plant controls or for adjusting on-line systems and equipment affecting plant safety which would have an immediate impact on public health and safety.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

- 1. An individual shall not be permitted to work more than 16 hours straight, excluding shift turnover time.
- 2. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
- 3. A break of at least 8 hours shall be allowed between work periods, including shift turnover time.

*This requirement tolerates Health Physics Technician unexpected absences for not more than 2 hours, provided management takes immediate action to fill the required Health Physics Technician position.

rewritten to eliminate fire brigade contingency

PROPOSED

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Senior Vice President-Nuclear Operations and the SRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. 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.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the SRC and the Senior Vice President-Nuclear Operations within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 and those required for implementing the requirements of NUREG-0737.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. Modification of Core Protection Calculator (CPC) Addressable Constants, including independent verification of modified constants.

NOTES:

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 - h. Administrative procedures implementing the overtime guidelines of Specification 6.2.2f, including provisions for documentation of deviations.
DELETE → 6.2.2f → *ADD* → 6.2.2e
 - i. PROCESS CONTROL PROGRAM implementation.