6.0 ADMINISTRATIVE CONTROLS

Administrative controls are the written rules, orders; instructions, procedures, policies, practices, and the designation of authorities and responsibilities by the management to obtain assurance or safety and quality of operation and maintenance of a nuclear power reactor. These controls shall be adhered to.

6.1 RESPONSIBILITY

- 6.1.1 The Plant Superintendent shall be responsible for overall safe and efficient facility operation and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.2 In all matters relating to the operation of the plant and to these Technical Specifications, the Plant Superintendent shall report to and be directly responsible to the Manager of Operations in the Yankee Atomic Electric Company.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization 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 duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
 - b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
 - c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
 - d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. Operating crew personnel trained in radiation protection procedures fill this requirement.
 - e. All CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Operator or Senior Operator Limited to Fuel Handling who has no other concurrent responsibilites during this operation.

WESTBORO OFFICE OF THE YANKEE ATOMIC ELECTRIC COMPANY (NSD) Vice President Vice President ATO Assistant Vice President Assistant Treasurer Vice President Operations Director Computer ATO Director Manager of Operational QCA Manager of of Manager of Applications of Engineering Security Engineering Operations Plant al. Ctl. Envtl. Engr. Reactor Engr. Engineering Manager Manager Plant Construction Aud. Mgr. Manager Manager of Projects Superint endent Manager Asst. Const Manager Figure 6.2.1 CORPORATE ORGANIZATION

FIGURE 6.2.2 - FACILITY ORGANIZATION

TABLE 6.2-1

MINIMUM SHIFT CREW	CONDITIONS						
PERSONNEL & LICENSE REQUIREMENTS	NORMAL OPERATION	PLANT STARTUP	COLD SHUTDOWN				
Shift Supervisor	(1)	(1)	(1)				
Control Room Operator	(2)	(2)	(1)				
Auxiliary Operator	(2)	(2)	(1)				
Extra Operator		(1)					
Senior Operators License	(1)	(1)	(1)				
Reactor Operators License	(2)	(2)	(1)				

Normal operations crew requirements shall suffice for a plant restart within four hours from a plant shudown for which the cause has been clearly established.

6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each key supervisory member of the facility staff listed below shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.
 - a. Flant Superintendent
 - b. Assistant Plant Superintendent
 - c. Chemistry and Health Physics Supervisor
 - d. Operations Supervisor
 - e. Reactor Engineer
 - f. Maintenance Supervisor
 - g. Ir ument and Controls Supervisor
 - h. Shift Supervisors
 - i. Realth Physicist

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATION REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The Plant Operation Review Committee shall function to advise the Plant Superintendent on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operation Review Committee shall be composed of the:

Chairman: Plant Superintendent

Vice Chairman: Assistant Plant Superintendent

Member: Operations Supervisor

Member: Maintenance Supervisor

Member: Reactor Engineer

Member: Chemistry and Health Physics Supervisor

Member: Instrument and Control Supervisor

Member: Health Physicist

ALTERNATES

6.5.1.3 Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall be counted for a quorum at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or Vice Chairman.

QUORUM

- 6.5.1.5 A querum shall consist of a minimum of five people as follows:
 - a. The Chairman or Vice Chairman plus four members, or
 - b. The Chairman and Vice Chairman plus three members.

RESPONSIBILITIES

- 6.5.1.6 The Plant Operation Review Committee shall be responsible for:
 - a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Superintendent to affect nuclear safety.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Technical Specifications.
 - d. Review of all proposed changes to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications and preparation of a report covering evaluation and recommendations to prevent reoccurences. Such Report shall be submitted to the Manager of Operations and to the Chairman of Nuclear Safety Audit and Review Committee.
 - f. Review of facility operations to detect potential safety hazards.
 - g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Safety Audit and Review Committee.
 - h. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Manager of Security.

and audit is assured by the cross section of disciplines required of the Committee membership as described in Section 6.5.2.2.

COMPOSITION

- 6.5.2.2 The Committee shall consist of at least six (6) persons:
 - a. Chairman
 - b. Vice Chairman
 - c. Four technically qualified persons who are not members of the plant staff.

d. The Committee membership and its Chairman and Vice Chairman shall be appointed by the Yankee Atomic Electric Company Vice President or such person as he shall designate.

Qualifications:

Membership to the Committee requires that an individual possess formal training and/or experience in at least one of the following disciplines:

- a. Nuclear Fower Plant Technology
- b. Reactor Operations
- c. Utility Operations
- d. Power Plant Design
- e. Reactor Engineering
- f. Radiation Safety
- g. Safety Analysis
- h. Instrumentation and Control
- i. Metallurgy

ALTERNATES

6.5.2.3 NA

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSAR Chairman to provide additional expert advice, when needed, to the NSAR Committee.

MEETING FREQUENCY

- 6.5.2.5 a. The Committee shall hold a minimum of two regularly scheduled meetings per year.
 - b. Special meetings may be held when deemed necessary by Company management or by the Chairman of the Committee, or, in the absence of the Chairman, by the Vice Chairman.

QUORUM

6.5.2.6 A quorum shall consist of a minimum of five people as follows:

.

- a. The Chairman or Vice Chairman plus four members, or
- b. The Chairman and Vice Chairman plus three members.

Those personnel from the organization reporting to the Manager of Operations shall always be in the minority.

REVIEW

- 6.5.2.7 The NSAR Committee shall review:
 - a. The safety evaluation for 1) changes to equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question.
 - b. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
 - Proposed changes in Technical Specifications or licenses.
 - d. Violation of Technical Specifications and license requirements.
 - e. Unusual occurrences and incidents which are reportable under the provisions of 10CFR20 and 10CFR50.
 - f. Abnormal Occurrences, as defined in Appendix A, Section E.4 of these Technical Specifications.
 - g. Reports and meeting minutes of the Plant Operation Review Committee.
 - h. Perform special reviews and investigations and render reports thereon as requested by the Assistant Vice President of Operations.

AUDITS

6.5.2.8 The Nuclear Safety Audit and Review Committee is responsible for auditing Quality Assurance activities that have a direct effect upon the operating plant.

In areas where other groups normally conduct periodic audits, the Committee may 1) audit those audits; 2) perform an independent audit of the same areas; or 3) implement a combination of these methods.

In areas that are not otherwise audited, the Committee forms a subcommittee to carry out the audit. The subcommittee reports its findings to the Committee for review. The Committee will review the results of the audit program at or prior to the next scheduled regular Committee meeting, and will make recommendations, as are deemed necessary, to the Company Vice President.

Regularly scheduled audits will be performed by the Committee at least once per two years and will encompass, as a minimum, those areas listed below:

- a. In Plant Audit Program
- b. Control Room Plant Operations Log Book
- c. Plant Design Charges
- d. Engineering Design Changes
- e. Action Taken on Material Purchase & Sorvice Requests
- f. Action Taken on Abnormal Occurrences
- g. Action Taken on PORC Recommendations
- h. Action Taken in Response to NRC Enforcement Letters
- Action Taken on Porposed Changes to the FSAR and Technical Specifications.

AUTHORITY

6.5.2.9 The NSAR Committee shall report to and advise the Company Vice President on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Minutes of each NSARC meeting shall be prepared and forwarded to the Company Vice President within 20 working days following each meeting. The meeting minutes shall include, where applicable, reports of reviews encompassed by Section 6.5.2.7; and reports of audits included in Section 6.5.2.8. The minutes of each regularly scheduled and special meeting of the Committee shall be approved no later than the next regularly scheduled Committee meetings.

6.6 ABNORMAL OCCURRENCE ACTION

For abnormal occurrence actions, reference Appendix A, Section E.4 to Facility License DPR-3.

6.7 SAFETY LIMIT VIOLATIONS

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
 - a. The provisions of 10 CFR 50.36 (c)(1.)(i) shall be complied with immediately.
 - b. The Safety Limit violation shall be reported to the Commission and Manager of Operations immediately.
 - c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Operation Review Committee. 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, the Nuclear Safety Audit and Review Committee and the Manager of Operations within two weeks following the violation.

6.8 PROCEDURES

- 6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33 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 Operation Review Committee and approved by the Plant Superintendent prior to implementation and reviewed periodically as set forth in each document.
- 6.8.3 Temporary changes to procedures of 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 plant management staff, at least one of whom holds a senior Reactor Operator's License.
 - c. The change is documented, reviewed by the Plant Operation Review Committee and approved by the Plant Superintendent

6.9 REPORTING REQUIREMENTS

For reporting requirements, reference Appendix A, Section E to Facility License DPR-3.

6.10 RECORD RETENTION

- 6.10.1 The following records shall be retained for at least five years:
 - a. Records and logs of facility operation covering time interval at each power level.
 - b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
 - c. ABNORMAL OCCURRENCE Reports.
 - d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
 - e. Records of reactor tests and experiments.
 - f. Records of changes made to Operating Procedures.
 - g. Records of radioactive shipments.
 - h. Records of sealed source leak tests and results.
 - i. Records of annual physical inventory of all source material of record.
- 6.10.2 The following records shall be retained for the duration of the Facility Operating License:
 - a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
 - b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
 - c. Records of facility radiation and contamination surveys.
 - Records of radiation exposure for all individuals entering radiation control areas.
 - e. Records of gaseous and liquid radioactive material released to the environs.

- Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activites required by the OA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the (PORC) and the (NSARC).

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 RESPIRATORY PROTECTION PROGRAM (OPTIONAL)

ALLOWANCE

- 6.12.1 Pursuant to 10 CFR 20.103(c)(1) and (3), allowance may be made for the use of respiratory protective equipment in conjunction with activities authorized by the operating license for this facility in determining whether individuals in restricted areas are exposed to concentrations in excess of limits specified in Appendix B, Table I, Column 1, of 10 CFR 20, subject to the following conditions and limitations:
 - a. The limits provided in Section 20.103(a) and (b) shall not be exceeded.
 - b. If the radioactive material is of such form that intake through the skin or other additional route is likely, individual exposures to radioactive material shall be controlled so that the radioactive content of any critical organ from all routes of intake averaged over 7 consecutive days does not exceed that which would result from inhaling such radioactive material for 40 hours at the pertinent concentration values provided in Appendix B, Table I, Column 1, of 10 CFR 20.

c. For radioactive materials designated "Sub" in the "Isotope" column of Appendix B, Table I, Column 1 of 10 CFR 20, the concentration value specified shall be based upon exposure to the material as an external radiation source. Individual exposures to these materials shall be accounted for as part of the limitation on individual dose in \$20.101. These materials shall be subject to applicable process and other engineering controls.

PROTECTION PROGRAM

- 6.12.2 In all operations in which adequate limitation of the inhalation of radioactive material by the use of process or other engineering controls is impracticable, the licensee may permit an individual in a restricted area to use respiratory protective equipment to limit the inhalation of airborne radioactive material, provided:
 - a. The limits specified in 6.12.1 above, are not exceeded.
 - b. Respiratory protective equipment is selected and used so that the peak concentrations of airborne radioactive material inhaled by an individual wearing the equipment do not exceed the pertinent concentration values specified in Appendix B, Table I, Column 1, of 10 CFR 20. For the purposes of this subparagraph, the concentration of radioactive material that is inhaled when respirators are worn may be determined by dividing the ambient airborne concentration by the protection factor specified in Table 6.12-1 for the respirator protective equipment worn. If the intake of radioactivity is later determined by other measurements to have been different than that initially estimated, the later quantity shall be used in evaluating the exposures.
 - c. The licensee advises each respirator user that he may leave the area at any time for relief from respirator use in case of equipment malfunction, physical or psychological discomfort, or any other condition that might cause reduction in the protection afforded the wearer.
 - d. The licensee maintains a respiratory protective program adequate to assure that the requirements above are met and incorporates practices for respiratory protections consistent with those recommended by the American National Standards Institute (ANSI-Z88.2-1969). Such a program shall include:

- Air sampling and other surveys suffi ient to identify the hazard, to evaluate individual exposures, and to permit proper selection of respiratory protective equipment.
- Written procedures to assure proper selection, supervision, and training of personnel using such protective equipment.
- 3. Written procedures to assure the adequate fitting of respirators; and the testing of respiratory protective equipment for operability immediately prior to use.
- 4. Written procedures for maintenance to assure full effectiveness of respiratory protective equipment, including issuance, cleaning and decontamination, inspection, repair, and storage.
- Written operational and administrative procedures for proper use of respiratory protective equipment including provisions for planned limitations on working times as necessitated by operational conditions.
- Bioassays and/or whole body counts of individuals (and other surveys, as appropriate) to evaluate individual exposures and to assess protection actually provided.
- e. The licensee shall use equipment approved by the U. S.
 Bureau of Mines/National Institute for Occupation Safety &
 Health (NIOSH) under its appropriate Approval Schedules
 as set forth in Table 6.12-1. Equipment not approved under
 U.S. Bureau of Mines/National Institute for Occupation
 Safety & Health (NIOSH) Approval Schedules shall be used
 only if the licensee has evaluated the equipment and can
 demonstrate by testing, or on the basis of reliable test information,
 that the material and performance characteristics of the equipment
 are at least equal to those afforded by U.S. Bureau of Mines
 approved equipment of the same type, as specified in Table
 6.12-1.
- f. Unless otherwise authorized by the Commission, the licensee shall not assign protection factors in excess of those specified in Table 6.12-1 in selecting and using respiratory protective equipment.

REVOCATION

6.12.3 The specifications of Section 6.12 shall be revoked in their entirety upon adoption of the proposed change to 10 CFR 20, Section 20.103, which would make such provisions unnecessary.

6.13 HIGH RADIATION AREA (OPTIONAL)

- 6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:
 - a. 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 issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
 - Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1(a) above, and in addition locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative controls of the (Shift Supervisor) on duty.

TABLE 6.12-1
PROTECTION FACTORS FOR RESPIRATORS

	DESCRIPTION	MODES1	PROTECTION FACTORS ² PARTICULATES AND VAPORS AND GASES EXCEPT TRITIUM OXIDE ³	GUIDES TO SELECTION OF EQUIPMENT BUREAU OF MINES APPROVAL SCHEDULES* FOR EQUIPMENT CAPABLE OF PROVIDING AT LEAST EQUIVALENT PROTECTION FACTORS *or schedule superseding for equipment of type listed	
I.	AIR-PURIFYING RESPIRATORS Facepiece, half-mask4,7 Facepiece, full7	NP NP	5 100	21B 30 CFR § 14.4(b)(4) 21B 30 CFR § 14.4(b)(5); 14F 30 CFR 13	
	ATMOSPHERE-SUPPLYING RESPIRATOR 1. Airline respirator Facepiece, half-mask Facepiece, full Facepiece, full Facepiece, full Hood Suit	CF CF D PD CF CF	100 1,000 100 1,000 5	19B 30 CFR \$ 12.2(c)(2) Type C(i) 19B 30 CFR \$ 12.2(c)(2) Type C(i) 19B 30 CFR \$ 12.2(c)(2) Type C(ii) 19B 30 CFR \$ 12.2(c)(2) Type C(iii) 6	
	2. Self-contained breathing apparatus (SCBA) Facepiece, full? Facepiece, full Facepiece, full	D PD R	100 1,000 100	13E 30 CFR s 11.4(b)(2)(i) 13E 30 CFR s 11.4(b)(2)(ii) 13E 30 CFR s 11.4(b)(1)	
	Any combination of air- purifying and atmosphere- supplying respirator		Protection factor for type and mode of opera- tion as listed above	19B CFR s 12.2(e) or applicable schedules as listed above	

^{1, 2, 3, 4, 5, 6, 7 [}These notes are on the following pages.]

TABLE 6.12-1 (Continued)

1 See the following symbols:

CF: continuous flow

D: demand

NP: negative pressure (i.e., negative phase during inhalation)

PD: pressure demand (i.e., always positive pressure)

R: recirculating (closed circuit)

2(a) For purposes of this specification the protection factor is a measure of the degree of protection afforded by a respirator, defined as the ratio of the concentration of airborne radioactive material outside the respiratory protective equipment to that inside the equipment (usually inside the facepiece) under conditions of use. It is applied to the ambient airborne concentration to estimate the concentration inhaled by the wearer according to the following formula:

Concentration Inhaled = Ambient Airborne Concentration
Protection Factor

- (b) The protection factors apply:
 - only for trained individuals wearing properly fitted respirators used and maintained under supervision in a well-planned respiratory protective program.
 - (ii) for air-purifying respirators only when high efficiency (above 99.9 percent removal efficiency by U.S. Burer of Mines type dicctyl phthalate (DOP) test) particulate filters and/or sorbents appropriate to the hazard are used in atmospheres not deficient in oxygen.
 - (iii) for atmosphere-supplying respirators only when supplied with adequate respirable air.

Excluding radioactive contaminants that present an absorption or submersion hazard. For tritium oxide approximately half of the intake occurs by absorption through the skin so that an overall protection factor of not more than approximately 2 is appropriate when atmosphere-supplying raspirators are used to protect against tritium oxide. Airpurifying raspirators are not recommended for use against tritium oxide. See also footnote⁵, below, concerning supplied-air suits and hoods.

*Under chin type only. Not recommended for use where it might be possible for the ambient airborne concentration to reach instantaneous values greater than 50 times the pertinent values in Appendix B, Table I, Column 1 of 10 CFR Part 20.

- ⁵Appropriate protection factors must be determined taking account of the design of the suit or hood and its permeability to the containment under conditions of use. No protection factor greater than 1,990 shall be used except as authorized by the Commission.
- No approval schedules currently available for this equipment. Equipment must be evaluated by testing or on basis of available test information.
- Only for shaven faces.
- NOTE 1: Protection factors for respirators, as may be approved by the U.S. Bureau of Mines according to approval schedules for respirators to protect against airbrone radionuclides, may be used to the extent that they do not exceed the protection factors listed in this Table. The protection factors in this Table may not be appropriate to circumstances where chemical or other respiratory hazards exist in addition to radioactive hazards. The selection and use of respirators for such circumstances should take into account approvals of the U.S. Bureau of Mines in accordance with its applicable schedules.
- NOTE 2: Redioactive contaminants for which the concentration values in Appendix B, Table I of this part are based in internal dose due to inhalation may, in addition, present external exposure hazards at high concentrations. Under such circumstance limits ions on occupancy may have to be governed by external dose limits.

POOR ORIGINAL

Standard . Specification Number							
6.2.2 d.	Added qualifying statement that operating crew personnel trained in radiation protection procedures fill this requirement.						
	Reason: Clarification of this statement is required to be consistent with facility Organization and continuous shift coverage.						
6.5.1.2	Added the position of Vice Chairman.						
	Reason: Provides needed flexibility to convene the Plant Operations Review Committee in the absence of the Chairman (i.e., Plant Superintendent).						
6.5.1.3	Deleted " shall participate in PORC activities" and replaced with " shall be counted for a quorum"						
	Reason: On many occasions the participation of additional alternate members in PORC activities is desirable.						
6.5.1.4	Added Vice Chairman.						
	Reason: Same as stated under 6.5.1.2.						
6.5.1.5	Reworded to include the position of Vice Chairman.						
	Reason: Same as stated under 6.5.1.2.						
6.5.1.7 c.	Deleted notification of the Nuclear Safety Audit and Review Committee.						
	Reason: The NSAR Committee is not a line management function within the Yankee Atomic Electric Company corporate structure. Therefore, immediate notification is no required.						
6.5.2	Nuclear Safety Audit and Review Committee						
6.6	To be submitted at later date.						
	Reason: Yankee Atomic Flectric Company Barrel Classic						

Reason: Yankee Atomic Electric Company, Proposed Change 118, (reference 4) which specifically addresses this specification has been pending Commission review since December 1974. Upon resolution of the Commission's position on Abnormal Occurrences, a submittal will be issued to incorporate same in the standardized Technical Specification formal

Standard
Specification
Number
6.7.1 b.

Deleted reference to Chairman of the NSARC.

Reason: Same as stated under 6.5.1.7 c.

6.7.1 d. Changed reporting requirements from 10 days to within two weeks following the violation.

Reason: Two weeks (10 working days) is a more reasonable time frame for the extensive evaluation and preparation of this report.

6.8.3 c. Changed frequency of review and approval from 7 days to 30 days.

Reason: On a 7 day frequency combined with the number of minor changes required on a day-to-day basis the number of POPS meetings required would be unreasonable. The 3J day period is consistent with the frequency requirements of specification 6.5.1.4.

. 6.9 To be submitted at a later date.

Reason: Same as stated under 6.6

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL (TEMPORARY FORM)

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1 - ASLB 1 - CONSULTANT

1 - CONSULTANTS

1 - PDR-SAN/LA/NY

1 - BROOKHAVEN NAT LAB

1 - G. ULRIKSON ORNL