

PROPOSED CHANGES TO  
APPENDIX B  
TO OPERATING LICENSE  
NO. DPR-50

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## 5.0 Administrative Controls

### 5.1 Responsibility

Corporate responsibility for implementation of the Environmental Technical Specifications, and for assuring that station operations are controlled to provide protection for the environment and for coordination of Environmental Technical Specifications with Safety Technical Specifications has been assigned by the President GPU Nuclear Corporation to the Vice President Radiological and Environmental Controls Division.

Management responsibilities at the station level, for compliance with the Environmental Technical Specifications, rest with the Vice President Unit 1/Unit 2.

Management responsibilities for the Environmental Monitoring Program required by the Environmental Technical Specifications rest with the Manager Environmental Controls TMI.

When organizations other than GPU Nuclear Corporation are utilized to establish and execute portions of these Environmental Technical Specifications in such instances shall remain the responsibility of GPU Nuclear Corporation.

### 5.2 Organization

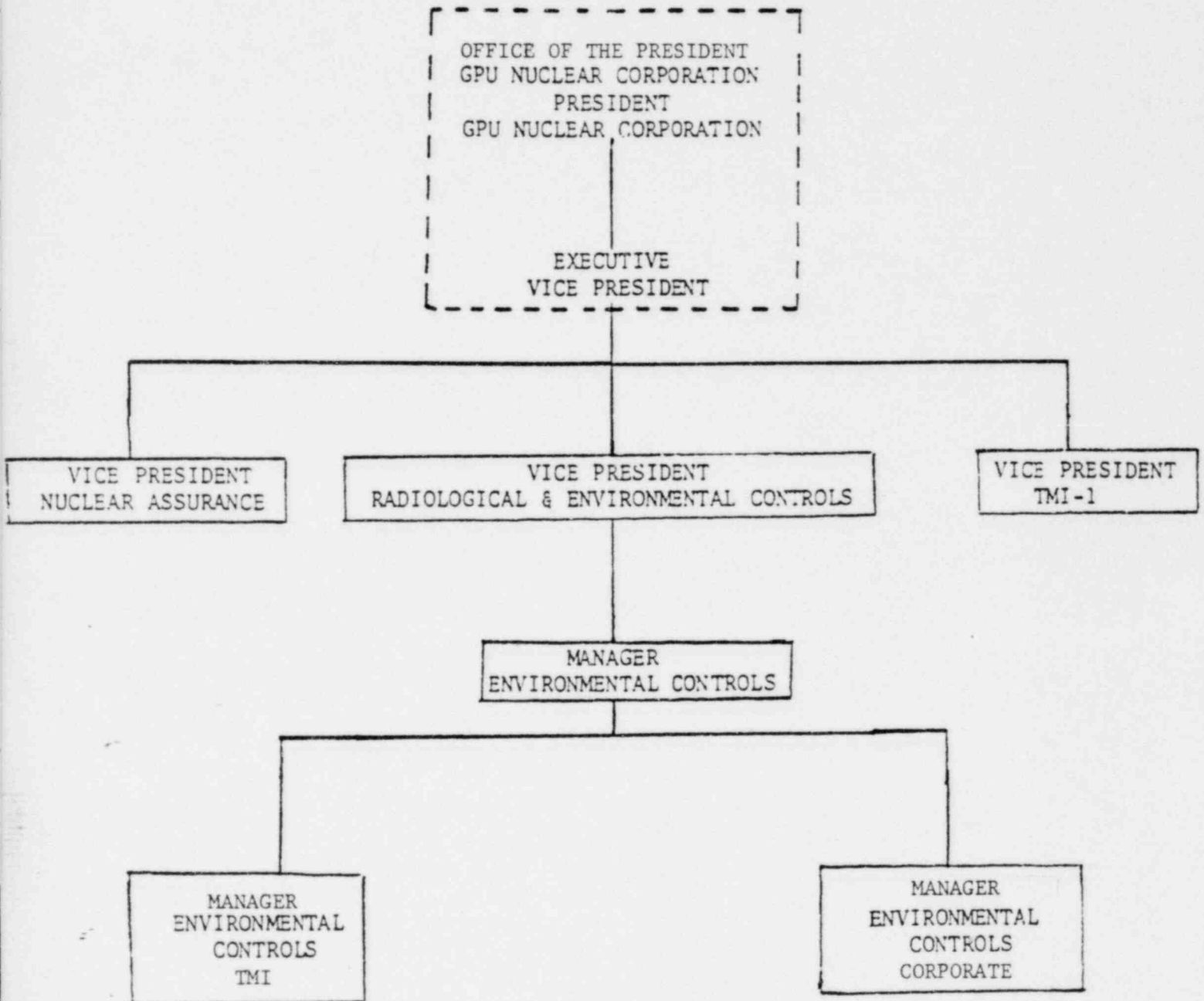
Organization of the personnel responsible for implementation, audit and review of these Environmental Technical Specifications including the Corporate level is as shown on Figure 8 of these Environmental Technical Specifications. In all matters pertaining to compliance with these Environmental Technical Specifications, the Vice President, TMI-1 shall report to and be directly responsible to the Office of the President.

### 5.3 Audit and Review

Independent review functions for environmental matters will be performed under the direction and control of the Vice President, Radiological and Environmental Controls. Independent review of environmental matters relating to these Environmental Technical Specifications will be conducted by the Corporate Environmental Controls Section reporting to the Manager-Environmental Controls. Their review will be audited by or under the direction of the Vice President, Nuclear Assurance. These audits and reviews will encompass:

FIGURE 8

ORGANIZATION FOR IMPLEMENTATION OF  
ENVIRONMENTAL TECHNICAL SPECIFICATIONS



- A. Coordination of Environmental Technical Specifications development with the Safety Technical Specifications to avoid conflicts and maintain consistency.
- B. Proposed changes to the Environmental Technical Specifications and the evaluated impact of the change.
- C. Evaluation of proposed changes conducted in compliance with 5.1B and 5.1C.
- D. Results of the Environmental Monitoring Programs prior to their submittal in each Annual Environmental Monitoring Report.
- E. Reports of investigations of reported instances of violation of Environmental Technical Specifications and associated corrective action.

5.4 Action to be Taken if a Limiting Condition for Operation is Exceeded

Follow any remedial action permitted by the Technical Specification until the limiting condition can be met.

All instances of exceeding a Limiting Condition for Operation will be promptly investigated.

A report of each occurrence of a violation of the provisions in specifications of the Limiting Conditions for Operation of these Environmental Technical Specifications will be prepared as specified in Section 5.6.2.

5.5 Procedures

- 5.5.1 The following written procedures will be prepared to ensure compliance with various activities involved in carrying out the Environmental Technical Specifications. Procedures will include applicable check lists and instructions, sampling, instrument calibration, analysis, and actions to be taken when limits are approached or exceeded. Testing frequency of any alarms will be included. These frequencies will be determined from experience with similar instruments in similar environments and from manufacturers' technical manuals.

- A. Operation of mechanical draft cooling towers.
- B. Operation of chlorination system.
- C. Discharge of neutralized regenerant wastes.
- D. Analysis for chlorine concentration, dissolved solids concentration, suspended solids concentration and pH at the plant discharge.
- E. Calibration of chlorine monitor.

5.5.2 The following plant operating procedures shall include provisions to ensure the related systems and components are operated in compliance with the Limiting Conditions for Operation established as part of the Environmental Technical Specifications.

- A. Circulating water and natural draft cooling tower operating procedure.
- B. Mechanical draft cooling tower operating procedure.
- C. Circulating water chlorination system operating procedure.
- D. River water chlorination system operating procedure.
- E. Discharge of neutralized regenerant wastes operating procedure.
- F. Industrial waste treatment plant operating procedure.
- G. Sump pump and drainage system operating procedure.

5.5.3 All procedures described above and all changes thereto will be reviewed periodically under the cognizance of the VP-Rad & Environ. Controls however, temporary changes to these procedures which do not change the intent of the original procedure may be made providing such changes are approved as described in Appendix A Technical Specifications, Section 6.8. Such procedure change approval will be documented.

## 5.6 Plant Reporting Requirements

### 5.6.1 Routine Reports

#### A. Annual Environmental Operating Report

Nonradiological Report. A report on the environmental surveillance programs for the previous 12 months of operation shall be submitted to the Director of the NRC Regional Office (with a copy to the Director, Office of Nuclear Reactor Regulation) as a separate document within 90 days after January 1 of each year. The report shall include summaries, interpretations, and statistical evaluation of the results of the nonradiological environmental surveillance activities as deemed appropriate by the licensee and the environmental monitoring programs required by limiting conditions for operation for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of irreversible damage are detected by the monitoring, the licensee shall provide an analysis of the problem and a proposed course of action to alleviate the problem.

5.6.2 Non Routine Reports

Nonradiological

In the event a Limiting Condition for Operation is exceeded, a report will be made within 24 hours by telephone and telegraph to the Office of Inspection and Enforcement-Region 1 followed by a written report within two weeks (cc to the Director of Nuclear Reactor Regulation).

The written report and, to the extent possible, the preliminary telephone and telegraph report, will:

1. Describe, analyze and evaluate the occurrence including extent and magnitude of the impact;
2. Describe the cause of the occurrence; and
3. Indicate the corrective action taken (including any significant changes made in procedures) to preclude repetition of the occurrence and to prevent similar occurrences involving similar components or systems.

5.6.2.4 Changes

- A. When a change to the plant design, to the plant operation or to the procedures described in Section 5.5 is planned which would have a significant adverse effect on the environment or which involves an environmental matter or question not previously reviewed and evaluated by the NRC, a report on the change will be made to the NRC prior to implementation. The report will include a description and evaluation of the change including a supporting benefit-cost analysis.
- B. Changes or additions to permits and certificates required by Federal, State, local and regional authorities for the protection of the environment will be reported. When the required changes are submitted to the concerned agency for approval, they will also be submitted to USNRC for information. The submittal will include an evaluation of the environmental impact of the change.
- C. Requests for changes in Environmental Technical Specifications will be submitted to the USNRC for prior review and authorization. The request will include an evaluation of the impact of the change, including a supporting benefit-cost analysis.

5.6.2.5 Other

If harmful effects or evidence of irreversible damage are detected by the monitoring programs, the licensee shall provide an analysis of the problem and shall develop a course of action to be taken to

alleviate the problems.

5.7 Records Retention

5.7.1 Records and logs relative to the following areas will be retained for the life of the plant.

1. Records and drawing changes reflecting plant design changes made to systems and equipment as described in Section 5.6.2.4.
2. Records of environmental surveillance data.
3. Records to demonstrate compliance with the Limiting Conditions for Operation in Section 2.

5.7.2 All other records and logs relating to the Environmental Technical Specifications shall be retained for 5 years.