

December 28, 1989

Docket No. 50-443

Mr. Edward A. Brown
President and Chief Executive Officer
New Hampshire Yankee Division
Public Service Company of New Hampshire
Post Office Box 300
Seabrook, New Hampshire 03874

Dear Mr. Brown:

SUBJECT: REVISIONS TO SEABROOK TECHNICAL SPECIFICATIONS

We have made certain changes to the proposed Seabrook Technical Specifications (TS) to allow for proposed TS changes to be incorporated into the Seabrook full power license. Originally seven TS revisions were proposed. Subsequently your staff indicated that two changes will be held for later consideration after the full power license is issued. Those two changes concerned (1) Power Range Neutron Flux Trip Setpoint and (2) Diesel Generator Loading. The remaining five revisions are enclosed. Please review these revisions and certify that the proposed full power Technical Specifications (including these revisions) accurately reflect the as built plant, the FSAR and the staff's Safety Evaluation Report. As discussed with your staff, January 4, 1990 is the scheduled date by which you will formally submit your certification.

Sincerely,

/s/

Victor Nerses, Project Manager
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

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for
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MRushbrook
12/28/89

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VNerses:rw
12/28/89

PDI-3/D
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Adjudicatory File (2)
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TABLE 3.3-7

SEISMIC MONITORING INSTRUMENTATION

<u>INSTRUMENTS AND SENSOR LOCATIONS</u>	<u>MEASUREMENT RANGE</u>	<u>MINIMUM INSTRUMENTS OPERABLE</u>
1. Triaxial Time-History Accelerographs*		
a. 1-SM-XT-6700 Free Field Control Room East Air Intake, elevation 11' 6"	± 1g	1**
b. 1-SM-XT-6701 Containment Foundation, elevation -26' 0"	± 1g	1**
c. 1-SM-XT-6710 Containment Operating Floor, elevation 25' 0"	± 1g	1**
2. Triaxial Peak Accelerographs		
a. 1-SM-XR-6702 Accumulator Tank SI-TK-9C, elevation -6' 0"	0-20 Hz	1
b. 1-SM-XR-6703 Safety Injection Piping, elevation -24' 0"	0-20 Hz	1
c. 1-SM-XR-6704 PCCW Piping, Primary Auxiliary Building, elevation 47' 0"	0-20 Hz	1
3. Triaxial Seismic Switch#		
1-SM-XS-6709 Containment Foundation, elevation -26' 0"	0.025g to 0.25g	1**
4. Triaxial Response-Spectrum Recorders		
a. 1-SM-XR-6705 Containment Foundation, elevation -26' 0"	1-30 Hz	1**
b. 1-SM-XR-6706 Containment Foundation next to SI-TK-9C, elevation -26' 0"	1-30 Hz	1
c. 1-SM-XR-6707 Primary Auxiliary Building, elevation 25' 0"	1-30 Hz	1
d. 1-SM-XR-6708 Service Water Pump House, elevation 22'-0"	1-30 Hz	1

*Trigger mechanism in accelerograph unit activates recorders in control room when it senses a ground motion of 0.01g.

**With reactor control room indication

#Switch setpoint is 0.13g for horizontal and vertical axis.

TABLE 4.3-4

SEISMIC MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENTS AND SENSOR LOCATIONS</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>
1. Triaxial Time-History Accelerographs*			
a. 1-SM-XT-6700 Free Field Control Room East Air Intake,** elevation 11' 6"	M	R	SA
b. 1-SM-XT-6701 Containment Foundation,** elevation -26' 0"	M	R	N.A.
c. 1-SM-XT-6710 Containment Operating Floor,** elevation 25' 0"	M	R	N.A.
2. Triaxial Peak Accelerographs			
a. 1-SM-XR-6702 Accumulator Tank SI-TK-9C, elevation -6' 0"	N.A.	R	N.A.
b. 1-SM-XR-6703 Safety Injection Piping, elevation -24' 0"	N.A.	R	N.A.
c. 1-SM-XR-6704 PCCW Piping, Primary Auxiliary Building, elevation 47' 0"	N.A.	R	N.A.
3. Triaxial Seismic Switch			
1-SM-XS-6709 Containment Foundation,** elevation -26' 0"	M	R	N.A.
4. Triaxial Response-Spectrum Recorders			
a. 1-SM-XR-6705 Containment Foundation,** elevation -26' 0"	M#	R	N.A.
b. 1-SM-XR-6706 Containment Foundation next to SI-TK-9C, elevation -26' 0"	N.A.	R	N.A.
c. 1-SM-XR-6707 Primary Auxiliary Building, elevation 25' 0"	N.A.	R	N.A.
d. 1-SM-XR-6708 Service Water Pump House, elevation 22'-0"	N.A.	R	N.A.

*Each accelerometer has a triaxial trigger to activate the recorder.

**With reactor control room indications.

#CHANNEL CHECK to consist of turning the test/reset switch and verify all lamps illuminate on 1-SM-XR-6705.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

3/4.0 APPLICABILITY

BASES

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Conditions for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action.

SPECIAL TEST EXCEPTIONS

3/4.10.6 REACTOR COOLANT LOOPS

LIMITING CONDITION FOR OPERATION

3.10.6 The limitations of Specification 3.4.1.2 may be suspended during the performance of natural circulation testing for up to 8 hours in MODE 3 provided (1) at least two reactor coolant loops as listed in Specification 3.4.1.2 are OPERABLE, (2) no operations are permitted that would cause dilution of the reactor coolant system boron concentration, (3) the reactor trip breakers are open, and (4) core outlet temperature is maintained at least 10°F below saturation temperature.

APPLICABILITY: During performance of natural circulation testing.

ACTION:

With less than the above required reactor coolant loops OPERABLE during performance of natural circulation testing comply with the provisions of the ACTION statements of Specification 3.4.1.2.

SURVEILLANCE REQUIREMENTS

4.10.6 At least the above required reactor coolant loops shall be determined OPERABLE within 4 hours prior to initiation of natural circulation testing and at least once per 4 hours during natural circulation testing by verifying correct breaker alignments and indicated power availability and by verifying secondary side narrow range water level to be greater than or equal to 14%.

REACTOR COOLANT SYSTEM

REACTOR COOLANT LOOPS AND COOLANT CIRCULATION

HOT STANDBY

LIMITING CONDITION FOR OPERATION

3.4.1.2 At least two of the reactor coolant loops listed below shall be OPERABLE with two reactor coolant loops in operation when the Reactor Trip System breakers are closed and one reactor coolant loop in operation when the Reactor Trip System breakers are open:*

- a. Reactor Coolant Loop A and its associated steam generator and reactor coolant pump,
- b. Reactor Coolant Loop B and its associated steam generator and reactor coolant pump,
- c. Reactor Coolant Loop C and its associated steam generator and reactor coolant pump, and
- d. Reactor Coolant Loop D and its associated steam generator and reactor coolant pump.

APPLICABILITY: MODE 3.**

ACTION:

- a. With less than the above required reactor coolant loops OPERABLE, restore the required loops to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.
- b. With only one reactor coolant loop in operation and the Reactor Trip System breakers in the closed position, within 1 hour open the Reactor Trip System breakers.
- c. With no reactor coolant loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System and immediately initiate corrective action to return the required reactor coolant loop to operation.

*All reactor coolant pumps may be deenergized for up to 1 hour provided: (1) no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration, and (2) core outlet temperature is maintained at least 10°F below saturation temperature.

**See Special Test Exception Specification 3.10.6

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Station Manager shall be responsible for overall station operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Superintendent (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Executive Director-Nuclear Production shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions for departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR and updated in accordance with the requirements of 10 CFR 50.71.
- b. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Executive Director - Nuclear Production shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine station operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of station design and operating experience information, including units of similar design, which may indicate areas for improving station safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving station safety to the Senior Vice President.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of station activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Senior Vice President.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Control Room Commander in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the station.

6.3 TRAINING

6.3.1 A retraining and replacement licensed training program for the station staff shall be maintained under the direction of the Training Manager 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 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the NRC letter dated March 28, 1980 to all licensees, and shall include familiarization with relevant industry operational experience.

*Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.4.1.6 (Continued)

- c. Review of all proposed changes to Appendix "A" Technical Specifications;
- d. Review of all proposed changes or modifications to station systems or equipment that affect nuclear safety;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Executive Director - Nuclear Production and to the Nuclear Safety Audit Review Committee (NSARC);
- f. Review of all REPORTABLE EVENTS;
- g. Review of station operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Station Manager or the NSARC;
- i. Review of the Security Plan and implementing procedures and submittal of recommended changes to the NSARC;
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the NSARC;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Executive Director - Nuclear Production and to the NSARC;
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and the Radwaste Treatment System; and
- m. Review of the Fire Protection Program and implementing instructions and submittal of recommended changes to the NSARC.

6.4.1.7 The SORC shall:

- a. Recommend in writing to the Station Manager approval or disapproval of items considered under Specification 6.4.1.6a. through d;
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.4.1.6a. through e. constitutes an unreviewed safety question; and
- c. Provide written notification within 24 hours to the Executive Director - Nuclear Production and the NSARC of disagreement between

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.4.1.7 (Continued)

the SORC and the Station Manager however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.4.1.8 The SORC shall maintain written minutes of each SORC meeting that, at a minimum, document the results of all SORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Executive Director-Nuclear Production and the NSARC.

6.4.2 NUCLEAR SAFETY AUDIT REVIEW COMMITTEE (NSARC)

FUNCTION

6.4.2.1 The NSARC shall function to provide independent review and audit of designated activities in the areas of:

- 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, and
- h. Quality assurance practices.

The NSARC shall report to and advise the Senior Vice President on those areas of responsibility specified in Specifications 6.4.2.7 and 6.4.2.8.

COMPOSITION

6.4.2.2 The NSARC shall be composed of at least five (5) individuals. The Chairman, Vice Chairman and members, including designated alternates, shall be appointed in writing by the Senior Vice President. Collectively, the individuals appointed to the NSARC should be competent to conduct reviews identified by Specification 6.4.2.1. Each member shall meet the qualifications of ANSI 3.1-1978, Section 4.7.

ALTERNATES

6.4.2.3 All alternate members shall be appointed in writing by the Senior Vice President to serve on a temporary basis; however, no more than a minority shall participate as voting members in NSARC activities at any one time.

CONSULTANTS

6.4.2.4 Consultants shall be utilized as determined by the NSARC to provide expert advice to the NSARC.

ADMINISTRATIVE CONTROLS

AUDITS

5.4.2.8 (Continued)

provided the combined time interval for any three consecutive intervals shall not exceed 3.25 times the specified interval. These audits shall encompass:

- a. The conformance of station operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training, and qualifications of the entire station staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in station equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year;
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months;
- k. The Emergency Plan and implementing procedures at least once per 12 months;
- l. The Security Plan and implementing procedures at least once per 12 months; and
- m. Any other area of station operation considered appropriate by the NSARC or the Senior Vice President.

ADMINISTRATIVE CONTROLS

RECORDS

6.4.2.9 Records of NSARC activities shall be prepared and distributed as indicated below:

- a. Minutes of each NSARC meeting shall be prepared and forwarded to the Senior Vice President within 14 days following each meeting;
- b. Reports of reviews encompassed by Specification 6.4.2.7 shall be included in the minutes where applicable or forwarded under separate cover to the Senior Vice President within 14 days following completion of the review; and
- c. Audit reports encompassed by Specification 6.4.2.8 shall be forwarded to the Senior Vice President and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5 REPORTABLE EVENT ACTION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC and the results of this review shall be submitted to the NSARC and the Executive Director-Nuclear Production.

6.6 SAFETY LIMIT VIOLATION

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

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Executive Director-Nuclear Production and the NSARC shall be notified within 24 hours;
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SCRC. 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 NSARC, and the Executive Director-Nuclear Production within 14 days of the violation; and
- d. Operation of the station shall not be resumed until authorized by the Commission.

ADMINISTRATIVE CONTROLS

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.8.1.4 (Continued)

to show conformance with 40 CFR Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operation." Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1, October 1977.

The Semiannual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM and the ODCM, pursuant to Specifications 6.12 and 6.13, respectively, as well as any major change to Liquid, Gaseous, or Solid Radwaste Treatment Systems pursuant to Specification 6.14. It shall also include a listing of new locations for dose calculations and/or environmental monitoring identified by the Land Use Census pursuant to Specification 3.12.2.

The Semiannual Radioactive Effluent Release Reports shall also include the following: an explanation as to why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Specification 3.3.3.9 or 3.3.3.10, respectively; and description of the events leading to liquid holdup tanks or gas storage tanks exceeding the limits of Specification 3.11.1.4 or 3.11.2.6, respectively.

MONTHLY OPERATING REPORTS

6.8.1.5 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attn: Document Control Desk, with a copy to the NRC Regional Administrator, no later than the 15th of each month following the calendar month covered by the report.

RADIAL PEAKING FACTOR LIMIT REPORT

6.8.1.6 The F_{xy} limits for RATED THERMAL POWER (F_{xy}^{RTP}) shall be provided to the U.S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attn: Document Control Desk, with a copy to the NRC Regional Administrator, for all core planes containing Bank "D" control rods and all unrodded core planes and the plot of predicted ($F_q^T \cdot P_{Rel}$) vs Axial Core Height with the limit envelope at least 60 days prior to each cycle initial criticality unless otherwise approved by the Commission by letter. In addition, in the event that the limit should change requiring a new substantial or an amended submittal to the Radial Peaking Factor Limit Report, it will be submitted 60 days prior to the date the limit would become effective unless otherwise approved by the Commission by letter. Any information needed to support F_{xy}^{RTP} will be by request from the NRC and need not be included in this report.