

5.0 ADMINISTRATIVE CONTROLS
5.2 Organization (Continued)

- h. Administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related functions. Administrative procedures shall reflect the personnel whose working hours will be affected.

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, or during extended periods of shutdown for refueling, major maintenance, or major plant modifications, on a temporary basis, the guidelines identified in the administrative procedures shall be followed.

Deviations from the guidelines shall be authorized by the Department Manager, Plant Manager, or their designated alternates, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Routine deviation from the administrative guidelines shall not be authorized.

5.3 Facility Staff Qualification

- 5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, with the exception of the Supervisor - Chemical and Radiation Protection (SCRCP) and the Shift Technical Advisor (STA). The SCRCP shall meet the requirements set forth in Regulatory Guide 1.8 dated September, 1975, entitled "Personnel Selection and Training". The SCRCP is considered to meet the educational and experience qualifications set forth in Regulatory Guide 1.8 with at least five years of experience in applied radiation protection and extensive formal training in radiation protection. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

5.9.1 Continued

work and job functions,^{3/} e.g., reactor operations and surveillance, inservice^{3/} inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling outages. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

- c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management Information and Program Control, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the appropriate Regional Office, to arrive no later than the fifteenth of each month following the calendar month covered by the report. This monthly report shall also include a statement regarding any challenges to the pressurizer power operated relief valves or safety valves occurring during the subject month.

5.9.2 Reportable Occurrences

Reportable occurrences, including corrective actions and measures to prevent reoccurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

- a. Prompt Notification With Written Followup. The types of events listed below shall be reported as expeditiously as possible, but within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the appropriate Region Office, or his designate no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

^{3/} This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20.

- (7) Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.
- (8) Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the technical specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.
- (9) Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or technical specifications bases; or discovery during plant life of conditions not specifically considered in the safety analysis report or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.
- (10) Failure of the pressurizer PORV's or safety valves.

Note: This item is intended to provide for reporting of potentially generic problems.

b. Thirty Day Written Reports. The reportable occurrences discussed below shall be the subject of written reports to the Director of the appropriate Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- (1) Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- (2) Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.

Note: Routine surveillance testing, instrument calibration or preventative maintenance which require system configurations as described in items 2.b(1) and 2.b(2) need not be reported except where test results themselves reveal a degraded mode as described above.

DISCUSSION

The Commission's Generic Letter 82-16 dated September 20, 1982 requested licensees to submit proposed Technical Specification (TS) changes for specific NUREG-0737 action items that have been implemented. The Omaha Public Power District's letter to the Commission (LIC-82-352) dated November 1, 1982 provided the results of the District's review of these items and identified two items requiring TS inclusion. These two items, I.A.1.3.1, "Limit Overtime", and II.K.3.3, "Reporting SV and RV Failures and Challenges", are included in this amendment application in a format consistent with the guidance provided in Generic Letters 82-12 and 82-16.

JUSTIFICATION FOR FEE CLASSIFICATION

In accordance with the definitions for class of amendments detailed in 10 CFR 170.22, the subject amendment application is deemed to be Class II, in that the changes are administrative in nature.