

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES  
RELATED TO  
SAFETY REVIEW COMMITTEE REORGANIZATION

January 6, 1982

POWER AUTHORITY OF THE STATE OF NEW YORK  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333

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- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- K. Civil/Structural Engineering
- l. Nuclear Licensing
- m. Emergency Planning
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant

MEMBERSHIP

6.5.2.2 The SRC shall be composed of the following voting members:

Chairman:	Manager-Nuclear Safety Evaluation	
Vice-Chairman:	Vice President-Quality Assurance	
Member:	Vice President Nuclear Support-BWR	
Member:	Vice President Nuclear Support-PWR	
Member:	Manager Radiological Health and Chemistry	
Member:	Director-Nuclear Design and Analysis	
Member:	Director-Electrical Design and Analysis	
Member:	Director of Environmental Programs	
Member:	Director-Civil/Structural Design and Analysis	
Member:	Director-Mechanical Design and Analysis	
Member:	Director-Piping and Process-Design and Analysis	
Member:	Manager Operational Analysis and Training	

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the SRC Chairman; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following initial fuel loading and at least once per six months, thereafter.

## QUORUM

6.5.2.6 A quorum of SRC shall consist of the Chairman or Vice-Chairman and four members, including alternates. No more than a minority of the quorum shall have a direct line responsibility for the operation of the plant.

## REVIEW

6.5.2.7 The SRC shall review:

- a. The safety evaluation for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications of this Operating License.
- e. Violations of code, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. Events requiring 24 hour written notification to the Commission.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meetings minutes of the Plant Operating Review Committee.

## AUDIT

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the SRC. These audits shall encompass:

- a. The conformance of facility 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 facility staff at least once per 12 months.

- c. The results of actions taken to correct deficiencies occurring in facility 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 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 24 months.
- f. The Facility Security Plan and implementing procedures at least once per 24 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Senior Vice President-Nuclear Generation.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. An independent fire protection and loss of prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

#### AUTHORITY

6.5.2.9 The SRC shall report to and advise the Senior Vice President-Nuclear Generation on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8

#### RECORDS

6.5.2.10 Records will be maintained in accordance with ANSI 18.7-1972. The following shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Senior Vice President-Nuclear Generation within 14 days after the date of the meeting.
- b. Reports of review encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President-Nuclear Generation within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President-Nuclear Generation and to the management positions responsible for the areas audited within 30 days after completion of the audit.

## CHARTER

6.5.2.11 Conduct of the committee will be in accordance with a charter approved by the Senior Vice President-Nuclear Generation setting forth the mechanism for implementation of the committee's responsibilities and authority.

### 6.6 REPORTABLE OCCURRENCE ACTION

(A) In the event of a Reportable Occurrence, the NRC shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.

(B) Each Reportable Occurrence requiring 24 hours notification to the NRC shall be reviewed timely by the PORC and a report submitted by the Resident Manager to the Senior Vice President-Nuclear Generation and the SRC.

### 6.7 SAFETY LIMIT VIOLATION

(A) If a safety limit is exceeded, the reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36 (c) (i).

(B) An immediate report of each safety limit violation shall be made to the NRC by the Resident Manager. The Senior Vice President-Nuclear Generation and Chairman of the SRC will be notified within 24 hours.

(C) The PORC shall prepare a complete investigative report of each safety limit violation and include appropriate analysis and evaluation of: (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility component systems or structures and (3) corrective action required to prevent recurrence. The Resident Manager shall forward this report to the Senior Vice President-Nuclear Generation, Chairman of the SRC and the NRC.

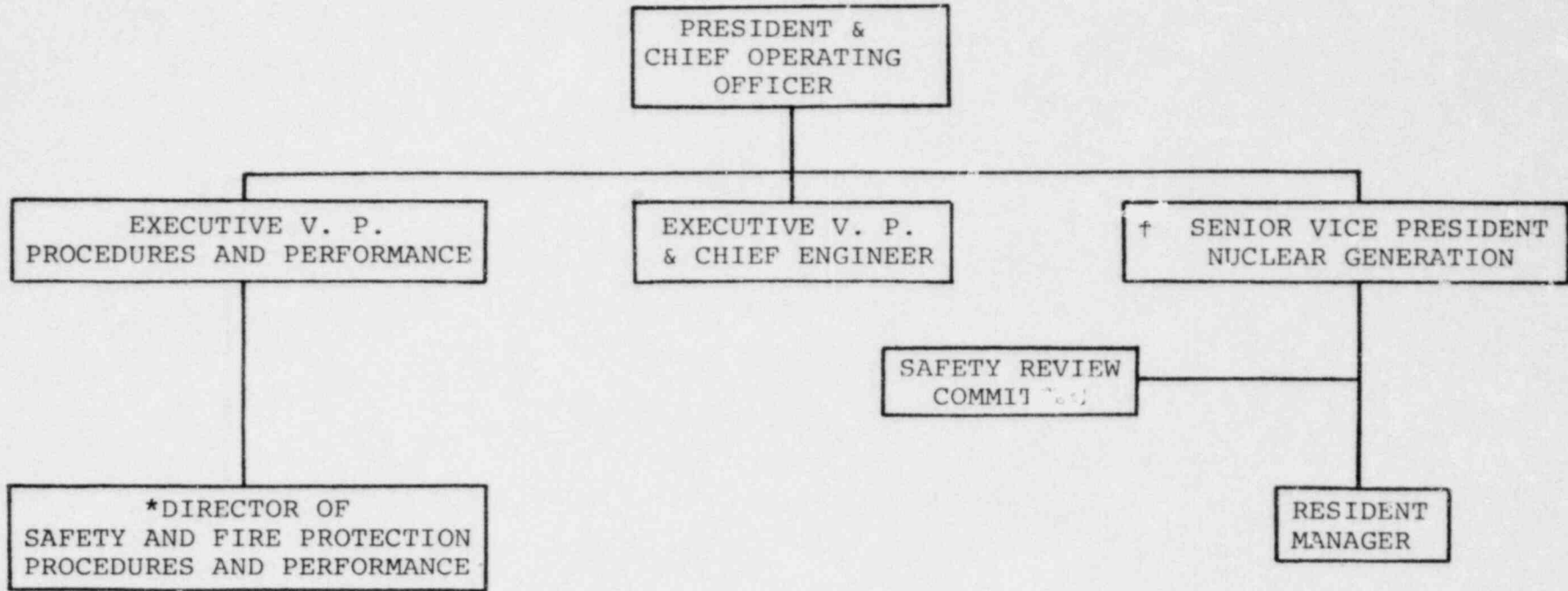
### 6.8 PROCEDURES

(A) Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Appendix A of Regulatory Guide 1.33, November 1972. In addition, procedures shall be established, implemented and maintained for the Fire Protection Program.

(B) Those procedures affecting nuclear safety shall be reviewed by PORC and approved by the Resident Manager prior to implementation.

(C) Temporary changes to nuclear related procedures may be made provided:

1. The intent of the original procedure is not altered.



†The Senior Vice President Nuclear Generation is responsible for administering the fire protection program.

\*The Director of Safety and Fire Protection is the off-site management position responsible for assessing the effectiveness of the fire protection programs by conducting reviews and audits.

FIGURE 6.1-1

MANAGEMENT ORGANIZATION CHART  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT

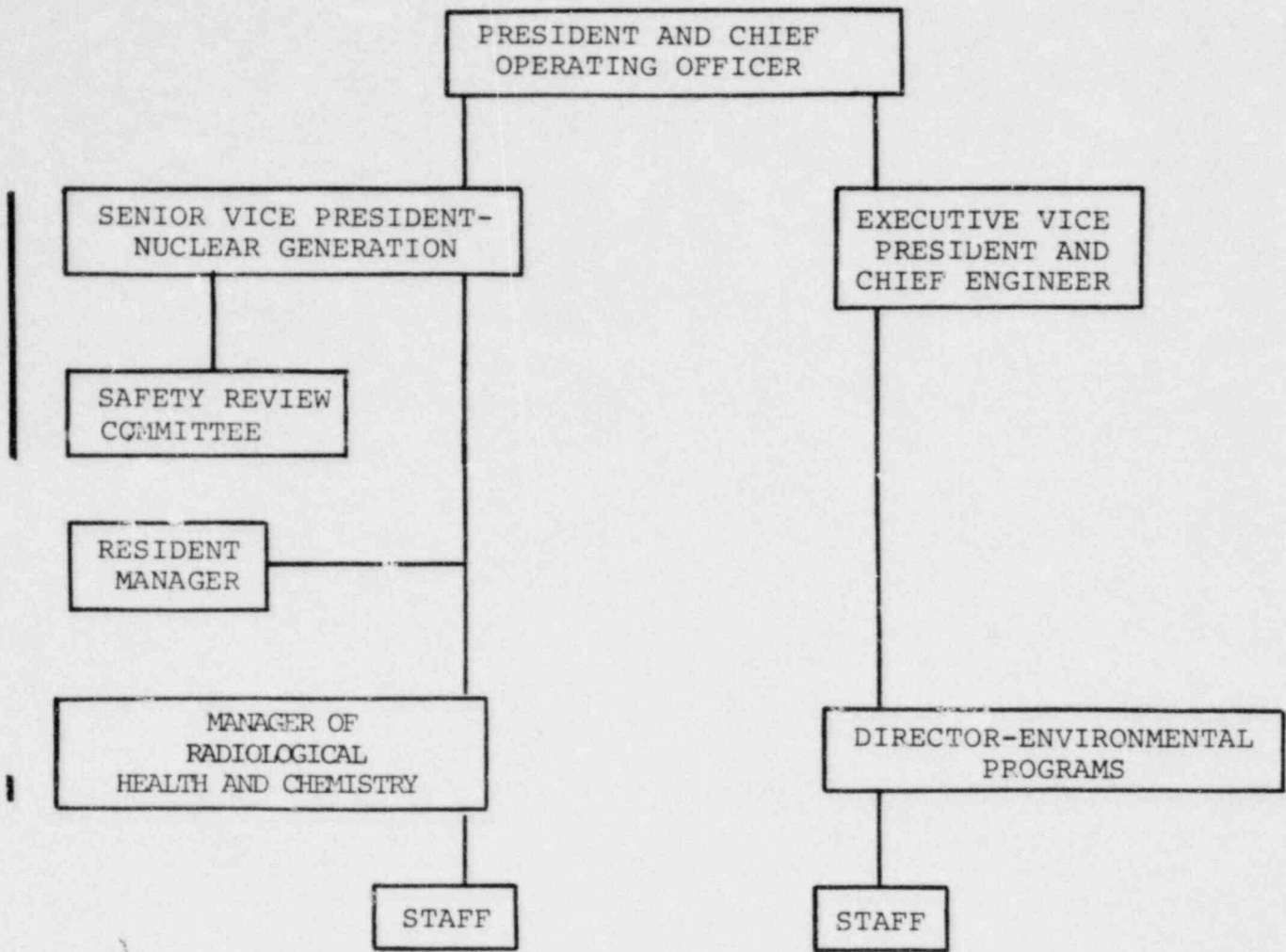


Figure 5.2-2  
 Management Organization-Offsite  
 Radiological Environmental  
 James A. FitzPatrick Nuclear  
 Power Plant

ATTACHMENT II  
SAFETY EVALUATION  
RELATED TO  
SAFETY REVIEW COMMITTEE REORGANIZATION

January 6, 1982

POWER AUTHORITY OF THE STATE OF NEW YORK  
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## SECTION I - Description of Modification

The proposed changes to Appendix A (Technical Specifications) of the James A. FitzPatrick Operating License seeks to amend Section 6.5.2, "Safety Review Committee (SRC)." The proposed changes make the Safety Review Committee reportable to the Senior Vice President - Nuclear Generation. Previously, the SRC reported to the President and Chief Operating Officer. The change to pages 252a, 253 and 259 is, in essence, a replacement of the word 'President' with 'Senior Vice President - Nuclear Generation.' Similarly, Figure 6.1-1 (Management Organization Chart) on page 259 of Appendix A and Figure 5.1-2 (Management Organization - Offsite Radiological Environmental) on page 44 of Appendix B is revised to show the SRC reporting to the Senior Vice President - Nuclear Generation. In addition, the titles of the SRC members have been changed to reflect the recent Authority headquarters office reorganization. The SRC quorum has been changed to agree with the Commission's standard technical specifications.

## Section III - Purpose of the Modification

This realignment of responsibility unifies nuclear-related technical matters under a single Nuclear Generation Department. It will eliminate the division of authority which existed under the former organizational structure. It will further improve communications between the SRC and those Authority personnel having responsibility in matters concerning nuclear safety. Since the SRC will report to the Senior Vice President - Nuclear Generation, this position has been deleted from the SRC membership roster. The SRC will remain an independent review group comprised of Authority personnel from both inside and outside the Nuclear Generation Department and meets the requirements for competence of Section 6.5.2.1 of Appendix A.

These changes also update the titles of SRC members to conform to a recent reorganization of the Authority's headquarters office.

By reducing the SRC quorum from six to four members, this requirement will agree with the Commission's standard technical specifications.

### Section III - Impact of the Change

These proposed changes will not impact operations at FitzPatrick or the implementation of the emergency plan. The emergency plan will be revised to reflect the new management titles and responsibilities.

### Section IV - Implementation of the Modification

Since these changes affect only headquarters office organizations these changes will not impact the ALARA or Fire Protection Program at FitzPatrick.

### Section V - Conclusion

The incorporation of these modifications: a) will not change the probability nor the consequence of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; and c) will not reduce the margin of safety as defined in the basis for any Technical Specification, and d) does not constitute an unreviewed safety question.

Section VI - References

1. James A. FitzPatrick FSAR, Section 13.1 (Conduct of Operations - General)
2. James A. FitzPatrick Facility Operating License; Appendix A (Technical Specifications), Section 6.2 (Plant Staff Organization); Appendix B (Environmental Technical Specifications, Section 5.2 (Administrative Controls - Organization)
3. Safety Evaluation - Authority Organization and Management Title Changes, NSE-NYO-013 dated December 11, 1981