SAXTON NUCLEAR EXPERIMENTAL CORPORATION

GENERAL PUBLIC UTILITIES SYSTEM

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Metropolitan Edison Company

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C301-93-2008
SNEC-93-0034
December 20, 1993

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen,

Subject: Saxton Nuclear Experimental Corporation
Operating License No. DPR-4
Docket No. 50-146
Response to Request for Additional Information Regarding Technical Specification Change Request 54 and Resultant Supplement

The purpose of this letter is to transmit the responses to the questions resulting from the NRC's review of Technical Specification Change Request (TSCR) No. 54. In addition to the responses to the specific questions, a revised description of characterization is provided to expand the scope of activities that will be needed for characterization.

As a result of the effort to respond to the review questions, revisions have been made to the existing TS pages. Because the supplemental wording is administrative in nature and does not change the conclusions made in the previously submitted Safety Evaluation, that Safety Evaluation for TSCR 54 remains valid.

Attachment 1 contains the response to the questions and expanded description of intended characterization activities is addressed in Attachment 2. Attachment 3 contains the revised TS pages.

Sincerely,

J. E. Hildebrand
President

WGH
Attachments: 1) Response to Request for Additional Information
2) Revised Description of Characterization Activities
3) Revised TS pages

A001

cc: Administrator, Region I
NRC Project Engineer, Region I
NRC Project Engineer NRR
NRC Project Scientist, Region I
Mr. William Dornsife
Mr. Richard Rice
Mr. Donald Weaver

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

SAXTON NUCLEAR FACILITY

Operating License No. DPR-4
Docket No. 50-146
Response to Request for Additional information:
Technical Specification Change Request No. 54

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-4 for Saxton Nuclear Facility. As a part of this request, proposed replacement pages for Appendix A are also included.

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY: J E Hildebrand
President SNEC

Sworn and subscribed to before me
this 20th day of December, 1993.

Diana M. DeBlasio
Notary Public

DIANA M. DeBLASIO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 6/5/96

Question 1 Administrative Organization

The Saxton Nuclear Experimental Corporation (SNEC) is a subsidiary of General Public Utilities (GPU). SNEC is a non-profit corporation whose ownership is divided among three electrical generating companies of GPU on a percentage basis as follows: Jersey Central Power and Light (44%), Metropolitan Edison (32%), and Pennsylvania Electric Company (24%). SNEC is maintained by GPU Nuclear Corporation (GPUNC) under a service agreement dated May 21, 1982 between GPUNC and SNEC with written agreement of the Pennsylvania Public Utilities Commission. The SNEC Board of Directors is comprised of the Presidents of each of the operating companies and GPUNC.

The SNEC Board of Directors elects a President and Vice President from GPUNC to carry out the responsibilities of the Corporation. Technical support functions such as quality assurance, radiation protection, and independent safety review are also provided by GPUNC. The SNEC organization is shown in the included figure.

The radiation protection function is the responsibility of the Radiation Safety Officer or RSO. This position is independent of all other organizational responsibilities and reports directly to the SNEC President.

The audit function is provided through GPUNC. The audit functions are conducted independently of SNEC line management responsibilities.

Independent review for SNEC is provided as described in the response to question 4. This group reports directly to the President - GPUNC.

Responsibilities of various management positions are briefly described as follows:

SNEC President - Provides management oversight for all Saxton activities. Reports to the SNEC Board of Directors.

SNEC Vice President and General Manager - Provides for management of and is responsible for all SNEC activities and for assuring that the requirements of License No. DPR-4 and the TS are met. The position reports directly to the SNEC President.

SNEC Site Manager (Technical Support) - Provides on-site management and continuing oversight of production activities. Interfaces closely with the Radiation Safety Officer (RSO) on radiological control matters. May provide direction on radiological matters not related to Radiation Safety such as data gathering activities. Reports directly to the SNEC Vice President.

Radiation Safety Officer (RSO) - The SNEC RSO is directly responsible for the conduct and oversight of all Saxton Radiation Safety Activities through implementation of the SNEC Radiation Protection Plan. The RSO may employ a Group Radiological Controls Supervisor (GRCS) to supervise day to day site activities as required. Reports directly to the SNEC President.

Group Radiological Controls Supervisor (GRCS) - Employed as required to directly supervise site Radiation Safety activities. Reports directly to the RSO.

Project Team (Technical Support) - SNEC management is supported by a project team which provides technical support and project management.

The responsibilities of the General Manager are contained in TS B.1.a. and the Radiation Safety Officer position will be added as TS B.1.b. as follows:

> The SNEC Radiation Safety Officer (RSO) shall have the responsibility for the conduct and oversight of all Saxton Radiation Safety Activities through implementation of the SNEC Radiation Protection Plan.

With the addition of the description of the RSO above, the organization identified in the TS is commensurate with the level of work to be performed during characterization. A more detailed organization description will be submitted as a part of the decommissioning plan.

Question 2 Staffing to Support Entry and Characterization Activities

The following wording has been added as section B.2.c. of the TS to describe the minimum staffing required to perform entry and characterization activities in the containment building:

> Initial Containment Vessel entry shall be performed in accordance with written procedures. The minimum staffing for initial entry and characterization activities shall require at least two people, who shall be knowledgeable in radiation monitoring and the radiological hazards associated with the facility.
>
> Entry and/or work within the Containment Vessel shall require that the Radiation Safety Officer (RSO) or qualified designee be present on site.

Question 3 Selection and Training of Personnel

Radiological Control Technicians shall meet or exceed the qualification requirements of ANSI-N 18.1-1971 or shall be formally qualified through the NRC approved Radiological Controls training program. The Saxton Group Radiological Controls Supervisor (GRCS) shall be a TMI qualified GRCS. All personnel conducting Containment Vessel characterization activities will be briefed on SNEC site specific conditions and the requirements of the "Characterization Plan".

Those personnel conducting characterization activities inside the Containment Vessel who are not experienced radiation workers or Health Physics professionals will require escort by such personnel.

Question 4 Review and Audit

The independent review function for SNEC is provided by a committee which currently exists for the Three Mile Island nuclear station (TMI), called the General Office Review Board (GORB). The GORB is part of the Independent Safety Review function shown in Figure 1 and reports directly to the President of GPUNC. The committee has persons with extensive experience in oversight review of nuclear, radiological, occupational, and environmental safety. The committee is composed of key internal corporate management and external consultants, however, all are independent of line management responsibilities of SNEC.

A written charter describes the review responsibilities of the GORB. There are quarterly meetings at which the activities reviewed by the SNEC Committee are reported and documented in the meeting minutes. Since the requirement establishing the GORB is not included in the TMI Technical Specifications, it should not be added to the SNEC Technical Specifications.

The audit function is provided within GPUNC and is independent of the SNEC management. Audits are conducted of Technical Specification activities and regulatory requirements at the request of the SNEC President.

Question 5 Radiation Safety

The following wording has been added as section B.1.b. of the TS to describe the positions having responsiblity for radiation safety and the authority to interdict or terminate safety-related activities:

> The SNEC Radiation Safety Officer (RSO) shall have the responsibility for the conduct and oversight of all Saxton Radiation Safety Activities through implementation of the SNEC Radiation Protection Plan.

All radiological controls personnel (RSO, GRCS, technician) shall have "stop work" authority in all matters relating to or which could impact radiation safety. All SNEC management personnel shall have "stop work" authority on any safety related matter.

Question 6 Procedures

The following wording has been added as section B.4.e. of the TS to address written procedures, their review and approval, and the methodology for making changes:

> Work conducted inside the containment vessel; which could affect containment integrity; or which requires a radiation work permit (RWP) shall be performed in accordance with written procedures and/or plans. Written plans and procedures shall be developed, reviewed and approved under a system approved by the SNEC - President and documented in SNEC

administrative procedures. Procedures and changes thereto shall be reviewed by technically qualified persons, other than the preparer, and approved by the implementing authority for the subject activity.

Question 7 Reports

The following wording has been added to section B.5.a. of the TS to require reporting the violation of license conditions and the discovery of the conditions in TS B.2.b.:

(3) Any event described under section B.2.b.

(4) Any violation of a requirement or condition of the facility license or the Technical Specifications.

Question 8 Records

GPUN agrees that characterization activities may result in temporary or permanent changes to the facility described in the Saxton Decommissioning Plan and Safety Analysis Report as revised by SNEC letter dated May 31, 1974. GPUN also agrees to maintain records of the results of the characterization studies. As a result, Section 3 of the Saxton TS has been revised by addition of words to section B.3.e. and the addition of section B.3.f. as follows:

3.e. .... Records of design changes and maintenance necessary to accomplish characterization activites associated with decommissioning will also be retained.

3.f. Records of the results of characterization studies.

Question 9 Revision to 10 CFR Part 20

The reference to 10 CFR Part 20 was updated by revision to paragraph B.3. as follows:

Replacing the words "... Section 20.401 of 10 CFR 20..." with the words ... "subpart L of 10 CFR 20, 20.2101 through 20.2110 inclusive, ...

Question 10 Characterization Activities

Characterization activities have been included as work to be performed under the control of Health Physics by revision of TS section B.4.c. as follows:

"All required maintenance and characterization work associated with the Containment Vessel...."

Question 11 Shield Block Removal

It is intended to replace the shield blocks at the conclusion of characterization activities. If conditions develop which would prevent block replacement other means to prevent access to this area would be implemented and recorded in accordance with TS B.3.e.

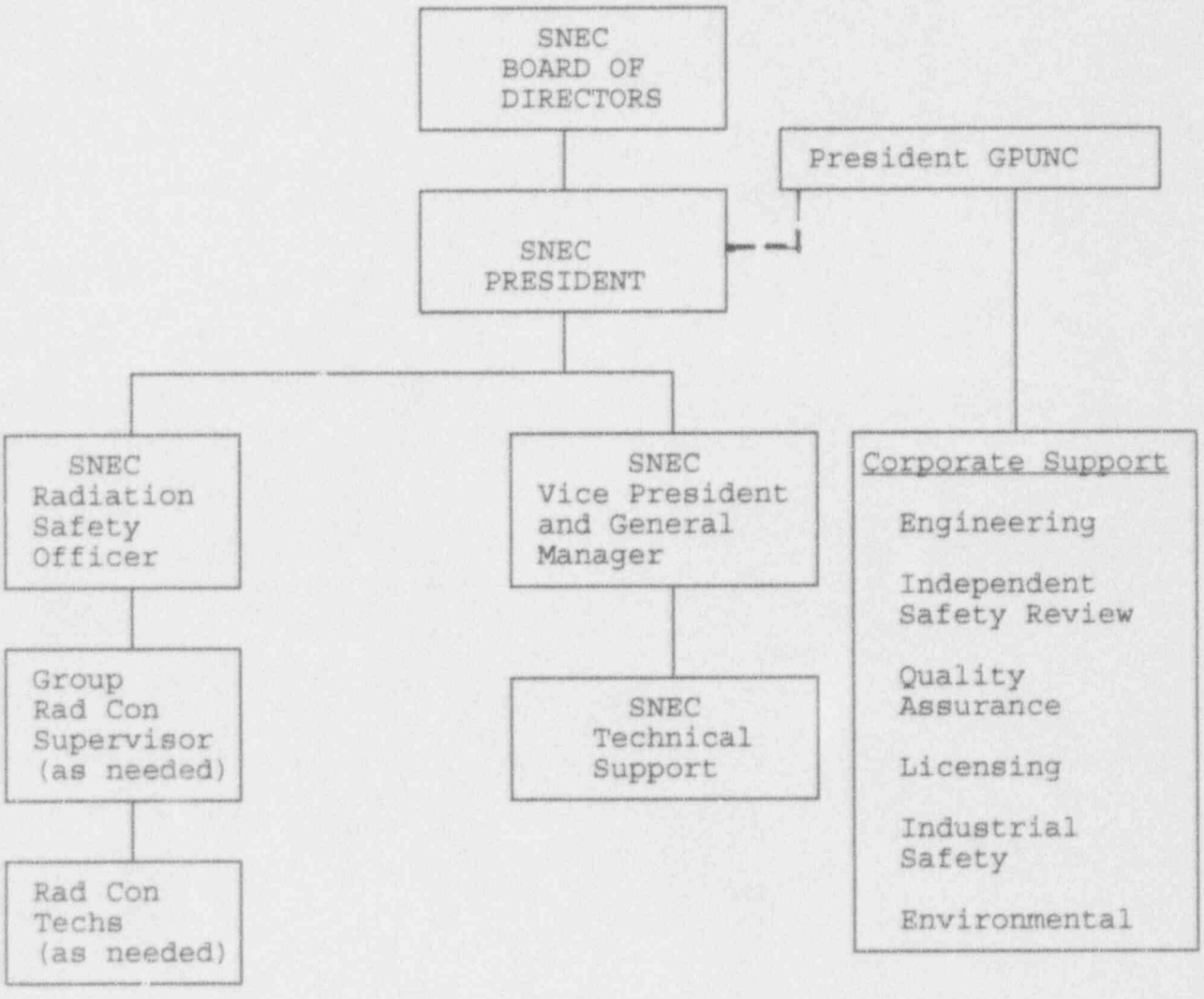
Question 12 Industrial Hazards

All work involving potentially toxic/hazardous materials will be conducted under the auspices of the "GPU Nuclear Safety & Health Manual" and the "GPU Nuclear Industrial Safety & Health Policy & Procedure Manual." All such hazards will be reviewed by a competent individual within the cognizant organization.

Figure 1

SAXTON NUCLEAR EXPERIMENTAL CORPORATION (SNEC)

ORGANIZATION



Revised Description of Characterization Activities

GPUN letter C301-93-2005 stated:

> "No permanent changes or modifications to the facility, except for the core bores and the addition of equipment to support rigging activities, will take place."

Based on the results of further radiological surveys, if external system characterization indicates internal samples are needed, the current wording of the statement prevents such activities as cutting system piping to obtain the samples and modifications to repower and reactivate the overhead crane.

SNEC is revising the characterization description to permit opening of systems at any desired location and if determined viable, to permit reactivation of the crane. Therefore, the description of characterization activities delineated in C301-93-2005 is revised as follows (bold face type denotes additional wording and bold face in ()s indicates a deletion):

"3) Component disassembly, **cutting of piping systems** and shield block removal to permit access for the sample/survey activities described above. No dismantlement or component removal will occur beyond that required to permit characterization. No permanent changes or modifications to the facility, except for core bores, pipe cutting, and the addition **or reactivation** of equipment to support rigging activities will take place. **The overhead crane may be temporarily reactivated to support rigging activities. Temporary reactivation of the crane may require permanent changes to the facility as well as replacement or refurbishment of crane components.**

"4) Inspection and evaluation of the material/physical condition of the facility (ie. Containment Vessel and overhead crane to permit **(conceptual)** design **(modification)** engineering, **modification** and refurbishment planning) activities in support of **characterization** and decommissioning. **Extensive radiological and toxic/hazardous material characterization, as described above, is necessary to provide data indicative of current plant conditions relative to these concerns. The information is key to the development of a practical decommissioning plan for SNEC since appropriate work practices and the extent of contaminated/radioactive waste resulting from the decommissioning activity will be determined from this data.**

As revised, these characterization activities, performed in accordance with approved procedures, will not produce any effect which would cause a release of radiological material in excess of 10 CFR 20 limits.