

A. SITE

1. Location

The Saxton site is a 1.148 acre tract of land which was deeded from the Pennsylvania Electric Company to the Saxton Nuclear Experimental Corporation and is located within the property of the Pennsylvania Electric Company near the Borough of Saxton, Pennsylvania, in Liberty Township, Bedford County, Pennsylvania. The Pennsylvania Electric Company property consists of approximately 150 acres along the Raystown Branch of the Juniata River.

2. Exclusion Areas (Figure 1)

The exclusion area shall consist of:

An area within the Saxton Nuclear Experimental Corporation property which is enclosed within a fence and contains the Containment Vessel.

3. Principal Activities

The principal activities carried on within the Pennsylvania Electric Company property are the headquarters for personnel associated with maintaining electric power distribution equipment and the transmission of electric power by the Pennsylvania Electric Company. Activity permitted within the Exclusion Area shall be routine and emergency inspections, maintenance associated with the possession of the Saxton Reactor Facility and characterization activities associated with the decommissioning of the facility.

B. ADMINISTRATIVE AND PROCEDURAL SAFEGUARDS

1. Administrative Organizations

- a. The General Manager of the Saxton Nuclear Experimental Corporation (SNEC) shall have the responsibility for administration of all SNEC functions and for assuring that the requirements of License No. DPR-4 and these Technical Specifications are implemented.
- b. 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.

## 2. Controls

- a. Except for authorized entry, the gate to the Exclusion Area surrounding the Containment Vessel shall be maintained locked, the Containment Vessel access door shall be maintained locked and shall be equipped with an intrusion alarm, the grating cover over the Auxiliary Compartment stairwell in the Containment Vessel shall be maintained locked, and the Rod Room door shall be maintained locked.
- b. Employees of the Pennsylvania Electric Company's Line Department headquartered on the Penelec property shall report to the SNEC General Manager or his designated representative any observed indication of change in the facility status as shown by smoke, fire, tornado, flood, or attempted break-in and take any immediate action authorized.
- c. 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.

## 3. Records

In addition to the records required by applicable NRC regulations, including subpart L of 10 CFR 20, 20.2101 through 20.2110 inclusive, SNEC shall keep the following:

- a. Records of inspection of the decommissioned facility including the results of surveys of radioactivity levels and as-found and as-left conditions of the facility.
- b. Records of entries into the Containment Vessel and reason for entry.
- c. Dates of quarterly inspections and evaluation of the results.
- d. Records showing radioactivity released or discharged into the air or water beyond the effective control of SNEC as measured at or prior to the point of such release or discharge.

- e. Records of design changes and maintenance necessary to maintain the decommissioned facility as described in the Saxton Decommissioning Plan and Safety Analysis Report as revised by SNEC letter dated May 31, 1974. Records of design changes and maintenance necessary to accomplish characterization activities associated with decommissioning will also be retained.
- f. Records of the results of characterization studies.

4. Periodic Inspections

- a. A definite inspection schedule shall be established for the facility that will be performed by personnel knowledgeable in nuclear radiation monitoring and the radiological hazards associated with the facility. Inspections will be conducted concurrently with radiation monitoring. The frequency of these inspections shall be no less than quarterly. The records of these inspections shall be maintained on file.
- b. The Health Physics inspection shall include a survey of radiation levels and surface contamination in the Containment Vessel. The filter on the ventilation "breather" pipe from the Containment Vessel shall also be changed and counted for activity as a measure of the activity available for release. The Containment Vessel shall be inspected at the lowest level for water. If water is found, a sample shall be taken and analyzed for the isotopic concentration of all significant radionuclides and shall as a minimum include gamma spectral analysis.
- c. All required maintenance and characterization work associated with the Containment Vessel shall be performed under Health Physics control to maintain any possible radiation exposure involved. If entry into the controlled area of the containment should be necessary, radiation levels, and airborne activity surveys shall be obtained prior to beginning work. All work shall be performed under control consistent with 10 CFR Part 20 requirements to minimize the radiation exposure of personnel and to prevent the release of radioactivity to the environment.
- d. All radiation surveys, tests, counting work, and radiation exposure control measures shall be performed in accordance with written instructions and procedures that conform with the requirements of the "Saxton Nuclear Facility Radiation Protection Plan." Facility inspections, access control, and emergency actions shall be in accordance with written procedures.

- e. 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.

5. Reports

In addition to those reports required by applicable NRC regulations, SNEC shall submit the following:

- a. A report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, SNEC shall promptly, within 24 hours of discovery, notify by telephone or telegraph, the Administrator of Region I, or designee, and the NRC Operations Center, and shall submit a written follow-up report to the Document Control Desk and the Administrator of Region I within 15 days, which describes the circumstances and the corrective action taken.

These reports shall include:

- (1) Any unplanned or uncontrolled release of radioactive material from the facility.
- (2) Conditions arising from natural or man-made events that affect the integrity of the Containment Vessel.
- (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.

- b. An annual report shall be submitted to the Document Control Desk and the Administrator of Region I, within 6 months after the end of the calendar year, of the status of the deactivated facility including:
- (1) Information relating to changes in those staff positions that are designated as being responsible for the deactivated facility.
  - (2) A summary of entries into the Containment Vessel and reasons for entry.
  - (3) A summary of maintenance and design changes made to the deactivated facility.
  - (4) Results of surveys of radioactivity levels and of water sample analyses.
  - (5) A review of the performance of access control and surveillance measures.