

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SACRAMENTO MUNICIPAL UTILITY DISTRICT

DOCKET NO. 50-312

RANCHO SECO NUCLEAR GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE (POSSESSION ONLY)

Amendment No. 121 License No. DPR-54

- The U.S. Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by Sacramento Municipal Utility District (the licensee) dated January 19, 1993, and supplemented May 14, and December 22, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission regulations set forth in 10 CFR Chapter I;
 - B. The facility will be maintained in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the regulations of the Commission;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the regulations of the Commission and all applicable requirements have been satisfied.

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- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License (Possession Only) No. DPR-54 is hereby amended to read as follows:
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 121, are hereby incorporated in the license. Sacramento Municipal Utility District shall maintain the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Seymons H. Weiss

Seymour H. Weiss, Director Non-Power Reactors and Decommissioning Project Directorate Division of Operating Reactor Support Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: February 23, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 121

FACILITY OPERATING LICENSE (POSSESSION ONLY) NO. DPR-54

DOCKET NO. 50-312

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

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D6.0 ADMINISTRATIVE CONTROLS

D6.1 RESPONSIBILITY

D6.1.1 The Manager, Plant Closure & Decommissioning (Plant Manager) shall be responsible for the management of the overall facility, the operation and maintenance of the plant, and ensuring the safe storage of irradiated core components, and shall delegate in writing the succession of his responsibilities during his absences.

D6.1.2 The Shift Supervisor (or a qualified, designated individual) shall be responsible for the control room command function. A management directive to that effect, signed by the Plant Manager, shall be issued to all plant personnel on an ANNUAL basis.

D6.2 ORGANIZATION

D6.2.1 CORPORATE AND ON-SITE ORGANIZATIONS

Corporate and on-site organizations shall be established for corporate management and facility operation respectively during the PERMANENTLY DEFUELED MODE. The organizations shall include the positions responsible for activities affecting the safe storage of irradiated core components and the overall safety of the facility.

- 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 of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. The organization and responsibilities shall be documented in the Defueled Safety Analysis Report (DSAR).
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those on-site activities necessary for safe operation and maintenance of the plant.
- c. The General Manager (GM): through the Assistant General Manager (AGM) and Chief Operations Officer and the Deputy AGM, Operations, shall have corporate responsibility for overall safe operation of the facility and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the facility 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 on-site manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures. The Quality organization has the authority to take any issue concerning the quality of operations at Rancho Seco to the Deputy AGM, Operations.

ADMINISTRATIVE CONTROLS (Continued)

D6.2.2 FACILITY STAFF

The facility organization shall be as shown in the DSAR, and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table D6.2-1.
- b. At least one individual qualified to stand watch in the Control Room (a Non-Certified Shutdown Control Room Operator or a Certified Fuel Handler) shall be in the Control Room when fuel is in the spent fuel pool.
- c. An individual qualified in radiation protection practices and procedures shall be on site during fuel handling operations when fuel is in the spent fuel pool.
- d. All fuel handling operations shall be directly supervised by a Certified Fuel Handler.
- e. Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform functions important to the safe storage of irradiated fuel assemblies; e.g., Certified Fuel Handlers, radiation protection personnel, non-certified operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal shift schedule. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

- a. An individual should not be permitted to work more than 16 hours straight. excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, including shift turnover time.
- d. The use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or designee, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

ADMINISTRATIVE CONTROLS (Continued)

FACILITY STAFF (Continued)

f. The individual who directly supervises the Shift Supervisors shall be a Certified Fuel Handler.

TABLE D6.2-1

POSITION	NUMBER FOR PERMANENTLY DEFUELED MODE		
Shift Supervisor**	1		
Non-Certified Operator	1		
Minimum Total Personnel	2		

MINIMUM SHIFT CREW REQUIREMENTS*

In the event that any member of a minimum shift crew is absent or incapacitated due to illness or injury, a qualified replacement shall be designated to report on site within 2 hours. Under these circumstances, the remaining shift crew member must stay in the control room until the replacement shift crew member arrives in the control room.

** The Shift Supervisor shall be a Certified Fuel Handler.

D6.3 FACILITY STAFF QUALIFICATIONS

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the individual assigned the function of the Radiation Protection Manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8. September 1975.

D6.4 TRAINING

A training program for the unit staff shall be maintained under the direction of the Plant Manager and meet or exceed the requirements and recommendations of ANSI N18.1-1971, Section 5.5. A retraining and replacement training program for the Certified Fuel Handlers shall be conducted in accordance with a NRC approved training program.

ADMINISTRATIVE CONTROLS (Continued)

D6.5 REVIEW AND AUDIT

D6.5.1 PLANT REVIEW COMMITTEE (PRC)

FUNCTION

D6.5.1.1 The PRC shall function to advise the Plant Manager on matters related to NUCLEAR SAFETY.

COMPOSITION

D6.5.1.2 The PRC shall be composed of a Chairman and a minimum of four members.

MEMBERSHIP

D6.5.1.3 Membership of the PRC shall be as defined below:

- a. A list of members made up of personnel filling positions in the Nuclear Organization and others who meet or exceed the minimum qualifications of ANSI N18.1-1971, Section 4.2 or 4.4, shall be developed and approved by the Deputy AGM, Operations.
- A list of alternate members of the PRC shall be developed and approved by the Deputy AGM. Operations.
- c. The Chairman of the PRC shall be appointed by the Deputy AGM, Operations. When a meeting is scheduled or an emergency meeting is necessary, and the PRC Chairman will be absent, an alternate Chairman may be designated by the PRC Chairman or the Deputy AGM. Operations from among the PRC members in Specification D6.5.1.2.

MEETING FREQUENCY

D6.5.1.4 The PRC shall meet at least once per calendar month or more frequently as convened by the PRC Chairman, or as directed by the Plant Manager.

QUORUM

D6.5.1.5 A Quorum of the PRC shall consist of a majority of the members in Specification D6.5.1.2 including the Chairman or alternate Chairman. No more than two alternates shall participate in PRC activities at any one time for the purpose of establishing a quorum.

ADMINISTRATIVE CONTROLS (Continued)

RESPONSIBILITIES

D6.5.1.6 The PRC shall be responsible for review of:

- a. The required safety evaluation of: (1) all procedures and programs required by Specification D6.8 and changes thereto, and (2) any other proposed procedures or programs or changes thereto which are as determined by the Plant Manager to affect NUCLEAR SAFETY.
- b. The safety evaluations of proposed tests and experiments that affect NUCLEAR SAFETY.
- Proposed changes to the Technical Specifications or the Facility Operating License (Possession Only).
- d. All safety evaluations of proposed changes or modifications to plant systems or equipment that affect NUCLEAR SAFETY. Items which are determined by a qualified reviewer as not involving an unreviewed safety question, a change of Technical Specifications, or a change in a licensing basis document need not be reviewed by the PRC.
- e. Investigations of all violations of the Technical Specifications to determine adequacy of corrective action and to detect any degrading trend.
- Facility operations to detect potential safety hazards.
- g. Events requiring a Licensee Event Report as defined by 10 CFR 50.73 and NUREG-1022 to determine adequacy of corrective action and to detect any degrading trend. (See Specification D6.9.5.)
- h. Special investigations and reports thereon as requested by the Plant Manager.
- i. The Physical Security Plan and changes thereto.
- j. The Emergency Plan and changes thereto.
- k. The Fire Protection Plan Program and changes thereto.
- Changes to the PROCESS CONTROL PROGRAM, the OFF-SITE DOSE CALCULATION MANUAL and the RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM MANUAL. (See Specifications D6.13 and D6.14.)
- m. Major changes to the Radioactive Waste Treatment Systems (Liquid, Gaseous and Solid).
- n. Review of any accidental, unplanned, or uncontrolled release of radioactive material to the environs, including the preparation and forwarding of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence. The PRC shall forward these reports to the Plant Manager and the MSRC.

ADMINISTRATIVE CONTROLS (Continued)

AUTHORITY

D6.5.1.7 The PRC shall:

- Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification D6.5.1.6.
- b. Render determinations in writing with regard to whether or not each item considered under Specifications D6.5.1.6a through e, and m above constitutes an unreviewed safety question.
- c. Provide immediate written notification to the MSRC Chairman of disagreement between the PRC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification D6.5.1.1.

RECORDS

D6.5.1.8 Minutes of each PRC meeting, including appropriate documentation of reviews encompassed by Specification D6.5.1.6e and g, shall be prepared, approved, and forwarded to the Plant Manager and to the MSRC Chairman within 14 days following each meeting.

D6.5.2 MANAGEMENT SAFETY REVIEW COMMITTEE (MSRC)

FUNCTION

D6.5.2.1 The MSRC shall function to provide independent review and audit of designated activities in the areas of:

- a. Facility Operation
- b. Engineering Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Radiological Safety
- e Quality Assurance Practices

COMPOSITION

D6.5.2.2 The MSRC shall be composed of a Chairman and a minimum of four members. The MSRC membership shall be made up of direct reports to the Plant Manager or above as shown on the Nuclear Organization or of other personnel meeting or exceeding the minimum qualifications of ANSI/ANS 3.1-1981, Section 4.7.2.

ADMINISTRATIVE CONTROLS (continued)

MEMBERSHIP

D6.5.2.3 The Chairman of the MSRC shall be appointed by the AGM & Chief Operations Officer. A current list of members and alternates as described in Specification D6.5.2.2 shall be developed and approved by the AGM & Chief Operations Officer and maintained by the MSRC Secretary. In the absence of the Chairman, an Alternate Chairman may be designated by the MSRC Chairman or the AGM & Chief Operations Officer. The Alternate Chairman shall be selected from among the MSRC members in Specification D6.5.2.2.

MEETING FREQUENCY

D6.5.2.4 The MSRC shall meet at least once per calendar quarter and as convened by the MSRC Chairman or as directed by the Deputy AGM. Operations.

QUORUM

D6.5.2.5 A quorum of MSRC shall consist of a majority of the members in Specification D6.5.2.2, including the Chairman or alternate Chairman. No more than two alternates shall participate in MSRC activities at any one time for the purpose of establishing a quorum. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

D6.5.2.6 The MSRC shall be responsible for review of:

- a. The safety evaluation for (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provisions of 10 CFR 50.59 to verify that such actions do not constitute on unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Proposed changes in Technical Specifications or the Facility Operating License (Possession Only).
- e. Violations of applicable statutes, codes, 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. LICENSEE EVENT REPORTS as defined by 10 CFR 50.73 and NUREG-1022.

Amendment No. 121

ADMINISTRATIVE CONTROLS (Continued)

REVIEW (Continued)

- h. Any indication of an identified significant deficiency in the design or operation of safety-related structures, systems, or components.
- Reports and meeting minutes of the PRC.
- j. Any facility activity brought to the attention of the MSRC by the District's executive management which may be indicative of conditions adverse to NUCLEAR SAFETY.
- k. The MSRC shall provide oversight review of:
 - The District Quality Program, including the Audit Program content, implementation and audit reports,
 - The Radioactive Waste Control Program, and
 - Effectiveness of the LICENSEE EVENT REPORT Program per Specification D6.6.

AUTHORITY

D6.5.2.7 The MSRC shall:

- a. Report to and advise the Deputy AGM, Operations of those areas of responsibility specified in Specification D6.5.2.6.
- Recommend to the Deputy AGM. Operations other areas of facility operation for which the MSRC has determined the need for additional auditing per Specification D6.5.4g.
- Advise the Deputy AGM, Operations of the need for independent auditing of facility operations.

RECORDS

D6.5.2.8 Minutes of each MSRC meeting and separate documentation of reviews encompassed by Specifications 6.5.2.6d through h shall be prepared, approved, and forwarded to the Deputy AGM. Operations within 14 days following each meeting.

ADMINISTRATIVE CONTROLS (Continued)

D6.5.3 TECHNICAL REVIEW AND CONTROL

Activities which affect NUCLEAR SAFETY shall be conducted as follows:

a. Procedures, plans, manuals, and programs required by Specification D6.8 and other procedures, plans, manuals, and programs which affect plant NUCLEAR SAFETY, and changes thereto, shall be prepared, reviewed and approved. Each such procedure, plan, manual, and program or change thereto shall be reviewed by an individual(s) other than the preparer, but who may be from the same organization as the preparer of the procedure, plan, manual and program or change thereto. Programs, plans, manuals, and procedures other than plant administrative procedures will be approved as delineated in writing by the Plant Manager, but not lower than a direct report to the Plant Manager. Such procedures, plans, manuals and programs shall be reviewed periodically in accordance with administrative procedures.

The Plant Manager will approve plant administrative procedures, Security Plan Implementing Procedures and Emergency Plan Implementing Procedures.

Approval of temporary procedure changes which clearly do not change the intent of the approved procedure can be made by two members of the plant management staff, at least one of whom is a Certified Fuel Handler. The change shall be documented, reviewed and approved by the procedure's approval authority within 14 days of implementation.

- b. Proposed changes or modifications to plant systems or equipment that affect NUCLEAR SAFETY shall be reviewed by an individual(s) other than the individual(s) who designed the modification, but who may be from the same organization as the individual(s) who designed the modifications. Such modifications shall be approved by the Plant Manager or his designee as delineated in writing, but not lower than a direct report to the Plant Manager.
- c. Proposed tests and experiments which affect plant NUCLEAR SAFETY and are not addressed in the DSAR shall be reviewed by an individual(s) other than the individual(s) who prepared the proposed test or experiment. Such tests or experiments shall be approved by the Plant Manager or his designee as delineated in writing, but not lower than a direct report to the Plant Manager.
- d. Individuals responsible for reviews performed in accordance with Specification D6.5.3a, b and c shall meet or exceed the qualification requirements of Section 4.4 of ANSI N18.1-1971. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such a review shall be performed by the review personnel of the appropriate discipline. A list of qualified reviewers for the independent reviews described in D6.5.3a, b and c above shall be established by the Plant Manager.

ADMINISTRATIVE CONTROLS (Continued)

TECHNICAL REVIEW AND CONTROL (Continued)

e. Events reportable pursuant to Specification D6.9.5 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the event and which provides recommendations to prevent recurrence. Such reports shall be reviewed by the PRC and forwarded to the Plant Manager and the MSRC Chairman.

D6.5.4 AUDITS

Audits of facility activities shall be performed under the cognizance of the Quality organization supervisor. 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 year.
- b. The performance and qualifications of the entire Rancho Seco facility technical staff at least once per year.
- c. The result of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect NUCLEAR SAFETY at least once per 6 MONTHS for those changes not previously audited.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of 10 CFR 50, Appendix B at least once per 2 years.
- e. The Facility Emergency Plan and implementing procedures at least once per year.
- f. The Facility Security Plan and implementing procedures at least once per year.
- g. Any other area of facility operation considered appropriate by the Plant Manager or the Deputy AGM, Operations.
- Compliance with fire protection requirements and implementing procedures at least once per 2 years.
- i. An independent fire protection and loss prevention inspection and audit shall be performed ANNUALLY using either qualified off-site 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.
- k. The Radiological Environmental Monitoring Program (REMP) and the results thereof at least once per year.
- The ODCM and implementing procedures at least once per 2 years.

ADMINISTRATIVE CONTROLS (Continued)

AUDITS (Continued)

- The PCP and implementing procedures for processing and packaging of radioactive m wastes from liquid systems at least once per 2 years.
- The performance of activities required by the Quality Assurance Program for Effluent n. Control and Environmental Monitoring at least once per year.

Audit reports of reviews encompassed by Specification D6.5.4 shall be forwarded to the Deputy AGM, Operations, the Plant Manager, the MSRC Chairman, and the management positions responsible for the areas reviewed within 30 days after completion.

D6.6 LICENSEE EVENT REPORT ACTION

The following actions shall be taken for events which are reportable as LICENSEE EVENT

- The Commission shall be notified and a report submitted per Specification D6.9.5, 3. pursuant to the requirements of 10 CFR 20.405, 50.73, and appropriate portions of 73.71 (as described in the Rancho Seco Physical Security Plan) and
- Each LICENSEE EVENT REPORT shall be reviewed by the PRC and the results of this b review submitted to the MSRC. Each LICENSEE EVENT REPORT shall be reviewed and approved by the Plant Manager or designee.

D6.7 -NOT USED-

D6.8 PROCEDURES, PLANS, MANUALS, AND PROGRAMS

D6.8.1 Written procedures, plans, manuals, and programs shall be established, implemented and maintained covering the activities referenced below:

- The applicable procedures recommended in Appendix "A" of Safety Guide 33, November a
- Irradiated Core Component Storage, Fuel Movement Operations, Decommissioning, and b. Decontamination
- Surveillance and test activities on equipment required for long-term safe storage of C. irradiated core components
- d Security Plan implementation
- Emergency Plan implementation e.
- Fire Protection Program Plan implementation f.
- and. PCP implementation
- ODCM implementation
- **REMP MANUAL** implementation İ.
- Quality Assurance Program for Effluent Control and Environmental Monitoring using the 1. guidance of Regulatory Guide 4.15, Revision 1, February 1979 Certified Fuel Handler Training Program implementation k
- ł.
- Quality Assurance Program implementation m.
- Radiation Protection Program implementation

ADMINISTRATIVE CONTROLS (Continued)

PROCEDURES, PLANS, MANUALS, AND PROGRAMS (Continued)

D6.8.2 Each procedure, plan, manual, and program of Specification D6.8.1 above and changes thereto shall be reviewed and approved as set forth in Specification D6.5.

D6.8.3 The following programs shall be established, implemented, and maintained:

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBER(S) OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by Administrative. Chemistry, and Operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- Limitations on the operability of racioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM.
- 4) Limitations on the annual and quarterly doses or dose commitment to MEMBER(S) OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR 50.
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days.
- 6) Limitations on the OPERABILITY and use of the gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR 50.

ADMINISTRATIVE CONTROLS (Continued)

PROCEDURES, PLANS, MANUALS, AND PROGRAMS (Continued)

- 7) Limitations on the OPERABILITY and use of the liquid effluent treatment system to ensure that the appropriate portions of this system are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 8 1/3 percent (1/12) of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR 50.
- 8) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR 20, Appendix B, Table II, Column 1,
- 9) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50.
- 10) Limitations on the annual and quarterly doses to a MEMBER(S) OF THE PUBLIC from Tritium and all radioniclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50.
- 11) Limitations on the annual dose or dose commitment to MEMBER(S) OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

b. Radiological Environmental Monitoring Program (REMP)

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the REMP MANUAL, (2) conform to the guidance of Appendix I to 10 CFR 50, and (3) include the following:

- Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the REMP MANUAL.
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

ADMINISTRATIVE CONTROLS (Continued)

PROCEDURES, PLANS, MANUALS, AND PROGRAMS (Continued)

3) Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

D6.8.4 Each program in Specification D6.8.3 and changes thereto shall be reviewed and approved as set forth in Specification D6.5 and D6.14.

D6.9 REPORTING REQUIREMENTS

D6.9.1 ROUTINE REPORTS

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Region V Office unless otherwise noted.

D6.9.2 ANNUAL RADIOLOGICAL REPORTS

Annual reports covering the activities of the unit, as described below, for the previous calendar year shall be submitted as follows:

D6.9.2.1 Annual Occupational Radiation Exposure Report

The Annual Occupational Radiation Exposure Report for the previous calendar year shall be submitted to the Commission within the first calendar quarter of each calendar year in compliance with 10 CFR 20.407.

D6.9.2.2 Annual Exposure Report

The Annual Exposure Report for the previous calendar year shall be submitted to the Commission within the first calendar quarter of each calendar year in accordance with the guidance contained in Regulatory Guide 1.16.

D5.9.2.3 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM, (2) the REMP MANUAL, and (3) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR 50.

ADMINISTRATIVE CONTROLS (Continued)

D6.9.3 SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

The Semiannual Radioactive Effluent Release Report covering the operation of the unit during the previous 6 months shall be submitted within 60 days after January 1 and July 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR 50.

D6.9.4 ANNUAL REPORT

A routine report consisting of shutdown statistics, a narrative summary of shutdown experience, major maintenance of structures, systems, and components required for long-term safe storage of irradiated fuel assemblies, and tabulations of facility changes, tests or experiments required pursuant to 10 CFR 50.59(b) shall be submitted on an annual basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Office, postmarked no later than 30 days following the twelve month period covered by the report.

D6.9.5 LICENSEE EVENT REPORT

The types of events listed in 10 CFR 20.405, 50.73 and the appropriate portions of 73.71 (as described in the Rancho Seco Physical Security Plan) shall be the subject of LICENSEE EVENT REPORTS, submitted to the U.S. Nuclear Regulatory Commission (NRC), Document Control Desk, Washington, D.C. 20555, within the time requirements of 10 CFR 20.405, 50.73 and 73.71. An additional copy shall also be submitted to the Regional Administrator of the Region V Office. The written report shall include a completed copy of a LICENSEE EVENT REPORT form, pursuant to 10 CFR 20.405, 50.73 and 73.71 and the guidance of NUREG-1022, and a description of corrective actions and measures to prevent recurrence. Supplemental reports may be required to fully describe final resolution of the occurrence. For corrected or supplemental reports, a LICENSEE EVENT REPORT shall be completed and reference shall be made to the original report date, pursuant to the requirements of 10 CFR 20.405, 50.73 or

D6.9.6 ENVIRONMENTAL REPORTS

a. When a change to the plant design or to the plant operation is planned which would have a significant adverse effect on the environment or which involves an environmental matter or question not previously reviewed and evaluated by the NRC, a report on the change will be made to the NRC prior to implementation. The report will include a description and evaluation of the change, including a supporting benefit-cost analysis.

ADMINISTRATIVE CONTROLS (Continued)

ENVIRONMENTAL REPORTS (Continued)

b. Changes or additions to permits and certificates required by Federal, State, local and regional a thorities for the protection of the environment will be reported. When the required changes are submitted to the concerned agency for approval, they will also be submitted to the NRC for information. The submittal will include an evaluation of the environmental impact of the change.

D6.9.7 SPECIAL REPORTS

Special reports shall be submitted to the Regional Administrator of the Region V Office within the time period specified for each report.

D6.10 RECORD RETENTION

D6.10.1 The following records shall be retained for at least 5 years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to NUCLEAR SAFETY.
- C. LICENSEE EVENT REPORTS.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to Operating Procedures.
- g. Records of radioactive shipments.
- h. Records of sealed source leak tests and results.
- Records of annual physical inventory of all sealed source material of record.
- j. Records and logs of facility activities in the PERMANENTLY DEFUELED MODE.

D6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Updated Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

ADMINISTRATIVE CONTROLS (Continued)

RECORD RETENTION (Continued)

- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant operating staff.
- h. Records of in-service inspections previously performed pursuant to the Appendix A Technical Specifications.
- 1. Records of quality assurance activities required by the QA Manual.
- Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PRC and MSRC.
- Records of the environmental qualification of safety related electrical equipment previously generated pursuant to the Appendix A Technical Specifications.
- m. Records for the Radiological Environmental Monitoring Program.
- n. Records of the service lives of all hydraulic and mechanical snubbers, including the date at which the service life commences, and associated installation and maintenance records.
- Records of reviews performed for changes made to the ODCM, REMP MANUAL, and the PCP.
- p. Records of Plant Closure and Decommissioning activities performed.

D6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 19 and 10 CFR 20, and shall be approved, maintained and adhered to for all operations involving personnel radiation

ADMINISTRATIVE CONTROLS (Continued)

D6.12 HIGH RADIATION AREA

D6.12.1 In lieu of the "control device" or "alarm signal" required by 10 CFR 20.203(c)(2).

- a. Each High Radiation Area in which the intensity of radiation is equal to or greater than 100 mrem/hr but less than 1,000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area, and entrance thereto shall be controlled by issuance of a Radiation Work Permit. Any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. Each High Radiation Area in which the intensity of radiation is equal to or greater than 1,000 mrem/hr shall be subject to the provisions of Specification D6.12.1a above, and, in addition, locked doors shall be provided to prevent unauthorized entry into such area. The keys shall be maintained under the administrative control of the on duty Shift Supervisor. In lieu of locked doors, certain areas within the Reactor Building, where no enclosure exists for the purpose of locking, and where no enclosure can be reasonably constructed, shall be barricaded, conspicuously posted, and a conspicuous visible or audible signal shall be activated such that an individual is made aware of the presence of the High Radiation Area (>1,000 mrem/hr).

D6.13 PROCESS CONTROL PROGRAM (PCP)

- D6.13.1 The required content of the PCP is defined in Specification D1.6.
- D6.13.2 Licensee-initiated changes to the PCP:
- a. Shall be documented and records of reviews performed shall be retained as required by Specification D6.10.2.0. This documentation shall contain:
 - Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - A determination that the change will maintain the overall conformance of the processed waste product to existing requirements of Federal, State, or other applicable regulations.
- Shall become effective after review and acceptance by the PRC and approval by the Plant Manager.

ADMINISTRATIVE CONTROLS (Continued)

D6.14 OFF-SITE DOSE CALCULATION AND RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM MANUALS

D6.14.1 The required content of the ODCM is defined in Specification D1.7.

D6.14.2 The required content of the REMP MANUAL is defined in D1.10.

D6.14.3 Licensee-initiated changes to the ODCM or REMP MANUAL:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification D6.10.2.0. This documentation shall contain:
 - Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent dose or setpoint calculations.
- Shall become effective after review and acceptance by the PRC and approval by the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM and/or REMP MANUAL as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM and/or REMP MANUAL was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.