#### 6.1 RESPONSIBILITY

- 6.1.1 The GGNS General Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.2 The Shift Superintendent or, during his absence from the Control Room, a designated individual shall be responsible for the Control Room command function. A management directive to this effect signed by the Vice President, Nuclear Operations shall be reissued to all station personn for an annual basis.

### 6.2 ORGANIZATION

# INSERT

### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit organization and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- 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. These requirements shall be documented in the UFSAR and updated at least annually.
- b. The GGNS General Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
  - c. The Vice President, Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant 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 onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

## 6.2.2 UNIT STAFF

The unit organization shall be subject to the following:

- a. Each or duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the restor is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed enior Reactor Operator shall be in the Control Room.

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# INDEPENDENT SAFETY ENGINEERING GROUP (ISEG) (Continued)

## RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit vities to provide independent verification\* that these activities are med correctly and that human errors are reduced as much as practical.

## AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities operations activities or other means of improving unit safety to the Vice President, Nuclear Operations.

INSERT)

## 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide technical support to the Shift Superintendent in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to safe operation of the u it.

## 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Superintendent, Radiation Control and Shift Technical Advisor, who shall meet or exceed the education and experience requirements of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, 1987, and licensed personnel who shall meet or exceed the criteria of the accredited license training program; and those members of the Independent Safety Engineering Group used for meeting the minimum complement specified in Section 6.2.3.2, each of whom shall have a Bachelor of Science degree or be registered as a Professional Engineer and shall have at least two years experience in their field, at least one year of which experience shall be in the nuclear field.

## 6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Manager, Nuclear Training shall meet or exceed INPO accreditation criteria and 10 CFR Part 55, and shall include familiarization with relevant industry operational experience.

## 6.5 REVIEW AND AUDIT

## 6.5.1 PLANT SAFETY REVIEW COMMITTEE (PSRC)

## FUNCTION

6.5.1.1 The PSRC shall function to advise the GGNS General Manager on all matters related to nuclear safety.

<sup>\*</sup>Not responsible for sign-off function.

#### AUDITS

- 5.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRC. These audits shall encompass:
  - a. The conformance of unit operation to provisions contained within the Appendix A Technical Specifications and applicable license conditions at least once per 22 months.
  - b. The performance, training and qualifications of the entire unit staff at least once per 12 months.
  - c. The results of actions taken to correct deficiencies occurring in unit 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 Emergency Plan and implementing procedures at least once per 12 months.
  - The Security Plan and implementing procedures at least once per 12 months.

INSERT

- 9. Any other area of unit operation considered appropriate by the SRC or the Vice President, Nuclear Operations.
- h. The Fire Protection Program and implementing procedures at least once per 24 months.
- An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months 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 36 months.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- 1. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, February 1979, at least once per 12 months.

#### AUTHORITY

INSERT)

6.5.2.9 The SRC shall report to and advise the Vice President, Nuclear Operations on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

### RECORDS

6.5.2.10 Records of SRC activities shall be prepared, approved and distributed as indicated below:

INSERT

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

## 6.5.3 TECHNICAL REVIEW AND CONTROL

### ACTIVITIES

- 6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:
  - Procedures required by Technical Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures shall be approved as delineated in writing by the GGNS General Manager. The GGNS General Manager shall approve administrative procedures, security implementing procedures and emergency plant implementing procedures. Temperary approval to procedures which clearly do not change the intent of the approved procedures may be made by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License. Temporary changes shall be reviewed by the reviewing authority within 14 days of being issued. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change. b.

INSERT

Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Vice President, Nuclear Operations: Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Implementation of proposed modifications to plant nuclear safety-related structures, systems and components shall be approved by the GGNS General Manager.

## ACTIVITIES (Continued)

- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment.
- d. Events reportable pursuant to Section 50.73 to 10 CFR Part 50 shall be investigated and a report prepared which evaluates the event and which provides recommendations to prevent recurrence. Such report shall be approved by the GGNS General Manager.
- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c and 6.5.3.1.d shall meet or exceed the qualification requirements of Section 4.4 of ANSI 18.1, 1971, as previously designated by the Vice President, Nuclear Operations or GGNS General Manager, as applicable. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
  - f. Each review shall include a determination of whether or not an unreviewed safety question is involved.
  - g. Records of the above activities shall be provided to the GGNS General Manager, PSRC and/or as necessary for required reviews.

## 6.6 REPORTABLE EVENT ACTION

- 6.6.1 The following actions shall be taken for REPORTABLE EVENTS:
  - a. The Commission shall be notified pursuant to the requirements of Section 50.72 to 10 CFR Part 50, and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
  - b. Each REPORTABLE EVENT shall be reviewed by the PSRC and submitted to the SRC and the Vice President, Nuclear Operations.

# 6.7 SAFETY LIMIT VIOLATION (INSERT)

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
  - a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President, Nuclear Operations and the SRC shall be notified within 24 hours.
  - b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PSRC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems or structures, and (3) corrective actions taken to prevent recurrence.

## SAFETY LIMIT VIOLATION (Continued)

- C. The Safety Limit Violation Report shall be submitted to the Commission, the SRC and the Vice President, Nuclear Operations within INSERT
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

## 6.8 PROCEDURES AND PROGRAMS

- 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:
  - a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
  - b. Refueling operations.
  - c. Surveillance and test activities of safety related equipment.
  - d. Security Plan implementation.
  - e. Emergency Plan implementation.
  - f. Fire Protection Program implementation.
  - g. PROCESS CONTROL PROGRAM implementation.
  - h. OFFSITE DOSE CALCULATION MANUAL implementation.
  - Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 4.15, February 1979.
- 6.8.2 Each procedure of 5.8.1 above, and changes thereto, shall be reviewed as required by 6.5, above, prior to implementation and shall be reviewed periodically as set forth in administrative procedures.
- 6.8.3 The following programs shall be established, implemented, and maintained:
  - a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the:

- RCIC system outside containment containing steam or water, except the drain line to the main condenser.
- RHR system outside containment containing steam or water, except the line to the LRW system and headers that are isolated by manual valves.
- 3. HPCS system.
- 4. LPCS system.
- Hydrogen analyzers of the combustible gas control system.

