



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 47
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated July 13, 1990, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate 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 Commission's regulations;
 - 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 Commission's regulations and all applicable requirements have been satisfied.
2. 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 No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 47, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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PDR ADOCK 05000352
P PNU

3. This license amendment is effective 90 days from date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects - I/11

Attachment: Changes to the Technical
Specifications

Date of Issuance: October 4, 1990

PDI-2/LA
MO'Brien
10/17/90

PDI-2/PM
RClark
10/03/90

OGC
cpw
09/27/90

PDI-2/D
WButler
10/14/90

WB

* See previous concurrence.

90 days from

3. This license amendment is effective [^]as of ~~its~~ date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler, Director
Project Directorate 1-2
Division of Reactor Projects - 1/11

Attachment:
Changes to the Technical
Specifications

Date of Issuance:

[Signature]
PDI-2/LA
NQ Brien
/90

PDI-2/PM
RClark *[Signature]*
08/20/90

OGC *[Signature]*
9/27/90

PDI-2/D *[Signature]*
WButler
10/3/90

ATTACHMENT TO LICENSE AMENDMENT NO. 47

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.*

<u>Remove</u>	<u>Insert</u>
xxvii	xxvii
xxviii	xxviii*
6-7	6-7*
6-8	6-8
6-11	6-11*
6-12	6-12
-	6-12a
-	-
6-13	6-13
6-14	6-14*
6-19	6-19
6-20	6-20*

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ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of site training organization and shall meet or exceed the requirements of ANSI/ANS 3.1-1978 and 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:	Superintendent - Operations
Member:	Superintendent - Technical
Member:	Superintendent - Maintenance/Instrumentation and Controls
Member:	Superintendent - Plant Services
Member:	Assistant Superintendent - Operations
Member:	Regulatory Engineer
Member:	Technical Engineer
Member:	Shift Superintendent
Member:	Maintenance Engineer

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. DELETED.
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, Plant Manager or the Chairman of the Nuclear Review Board;
- j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and
- k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.
- l. Review of every unplanned onsite 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 to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.
- m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. constitutes an unreviewed safety question.

ADMINISTRATIVE CONTROLS

REVIEW (Continued)

- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

AUDITS

- 6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NRB. These audits shall encompass:
- a. The conformance of unit 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 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 Part 50, at least once per 24 months;
 - e. The Emergency Plan and implementing procedures at least once per 12 months.
 - f. The Security Plan and implementing procedures at least once per 12 months.
 - g. Any other area of unit operation considered appropriate by the NRB or the Executive Vice President - Nuclear.
 - h. The Fire Protection Program and implementing procedures at least once per 24 months.
 - i. 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.

AUDITS (Continued)

- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures 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, December, 1977, at least once per 12 months.

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Superintendent designated by Administrative Procedures as the responsible Superintendent for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Superintendent or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

ADMINISTRATIVE CONTROLS

6.5.3.3 If the responsible Superintendent determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Superintendent shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ), and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Superintendents shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified 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 PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

6.7 SAFETY LIMIT VIOLATION

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 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

SAFETY LIMIT VIOLATION (Continued)

- 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. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed periodically as set forth in Administrative Procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Superintendent designated by Administrative Procedures as the responsible Superintendent for that procedure within 14 days of implementation.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

6.8.4 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 core spray, high pressure coolant injection, reactor core isolation cooling, residual heat removal, post-accident sampling system, safeguard piping fill system, control rod drive scram discharge system, and containment air monitor systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis, and
3. Provisions for maintenance of sampling and analysis equipment.

ADMINISTRATIVE CONTROLS

6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit 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. ALL REPORTABLE EVENTS.
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
- e. Records of changes made to the programs and procedures required by Specification 6.8.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.6.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Section 6.10.2.
- j. 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 PORC and the NRB.
- l. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date.

6.11 RADIATION PROTECTION PROGRAM

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

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/h but less than 1000 mrem/h shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

*Health physics personnel or personnel escorted by health physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PHILADELPHIA ELECTRIC COMPANY
DOCKET NO. 50-353
LIMERICK GENERATING STATION, UNIT 2
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 10
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated July 13, 1990, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate 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 Commission's regulations;
 - 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 Commission's regulations and all applicable requirements have been satisfied.
2. 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 No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 10, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective 90 days from date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/s/

Walter R. Butler, Director
Project Directorate 1-2
Division of Reactor Projects - 1/11

Attachment: Changes to the Technical
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OGC
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09/27/90

PDI-2/D
WButler
10/14/90

LB

See previous concurrences

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

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler, Director
Project Directorate 1-2
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9/21/90

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FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director
Project Directorate 1-2
Division of Reactor Projects - I/II

Attachment: Changes to the Technical
Specifications

Date of Issuance: October 4, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 10

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

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ADMINISTRATIVE CONTROLS

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6.5 REVIEW AND AUDIT

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6.5.1.2 The PORC shall be composed of the:

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- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, Plant Manager or the Chairman of the Nuclear Review Board;
- j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and
- k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.
- l. Review of every unplanned onsite 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 to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.
- m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. constitutes an unreviewed safety question.

ADMINISTRATIVE CONTROLS

REVIEW (Continued)

- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

AUDITS

- 6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NRB. These audits shall encompass:
- a. The conformance of unit 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 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 Part 50, at least once per 24 months;
 - e. The Emergency Plan and implementing procedures at least once per 12 months.
 - f. The Security Plan and implementing procedures at least once per 12 months.
 - g. Any other area of unit operation considered appropriate by the NRB or the Executive Vice President - Nuclear.
 - h. The Fire Protection Program and implementing procedures at least once per 24 months.
 - i. 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.

AUDITS (Continued)

- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures 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, December, 1977, at least once per 12 months.

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Superintendent designated by Administrative Procedures as the responsible Superintendent for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Superintendent or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

ADMINISTRATIVE CONTROLS

6.5.3.3 If the responsible Superintendent determines that a new program, procedure, change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Superintendent shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ) and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Superintendents shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified 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 PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

6.7 SAFETY LIMIT VIOLATION

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 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

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SAFETY LIMIT VIOLATION (Continued)

- 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. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed periodically as set forth in Administrative Procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Superintendent designated by Administrative Procedures as the responsible Superintendent for that procedure within 14 days of implementation.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

6.8.4 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 core spray, high pressure coolant injection, reactor core isolation cooling, residual heat removal, post-accident sampling system, safeguard piping fill system, control rod drive scram discharge system, and containment air monitor systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis, and
3. Provisions for maintenance of sampling and analysis equipment.

ADMINISTRATIVE CONTROLS

6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit 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. ALL REPORTABLE EVENTS.
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
- e. Records of changes made to the programs and procedures required by Specification 6.8.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.6.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Section 6.10.2.
- j. 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 PORC and the NRB.
- l. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date.

6.11 RADIATION PROTECTION PROGRAM

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

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/h but less than 1000 mrem/h shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

*Health physics personnel or personnel escorted by health physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.