

6.2.3 ONSITE SAFETY REVIEW SUBGROUP (OSRS)

FUNCTION

6.2.3.1 The Independent Safety Engineering Group (ISEG) section of OSRS shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.

The Operations' Assessment Section (OAS) of OSRS shall function to identify risks which are/or may be too high by performing independent review of the activities listed in 6.2.3.3.b., including the areas of:

- a. nuclear power plant operation
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.2.3.2 The OSRS is composed of two sections, the ISEG and OAS. The ISEG includes at least five full-time engineers located on site. Each member of ISEG shall have a bachelor's degree in engineering or related science and at least two years professional level experience in his field. The OAS, supplemented through outside consultants or organizations, includes sufficient expertise for reviews of operational phase activities.

RESPONSIBILITIES

6.2.3.3.

- a. The ISEG shall be responsible for the following:
 1. Reviewing and assessing plant activities to identify areas with significant risk potential.

2. Evaluating the technical adequacy and clarity of selected plant procedures and their consistency with related procedures.
 3. Evaluating the effectiveness of Quality Assurance activities to meet QA program objectives and commitments.
 4. Reviewing unplanned plant transients, personnel errors and safety-related equipment failures to identify root causes and potential risks and to make recommendations, if appropriate to reduce risks.
- b. The OAS shall be responsible for the following:
1. Reviewing safety evaluations for 1) changes to procedures, equipment or systems, and 2) tests or experiments completed under the provision of section 50.59, 10CFR, to verify that such actions did not involve an unreviewed safety question.
 2. Reviewing proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in section 50.59, 10CFR.
 3. Reviewing proposed tests or experiments which involve an unreviewed safety question as defined in section 50.59, 10CFR.
 4. Reviewing proposed changes to Technical Specifications or the Operating License.
 5. Reviewing violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions, having nuclear safety significance.
 6. Reviewing all recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
 7. Reviewing significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.

AUTHORITY

6.2.3.4 The OSRS shall make detailed recommendations for revised procedures, equipment modification, maintenance activities, operations activities or other means of improving plant safety to the Nuclear Project Support Group Manager. In addition, the OAS shall report identified risks which it determines to be significant to the SRC.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC is responsible to the Senior Vice President-Operations, for identifying and evaluating significant risks which contribute to the potential for nuclear accidents and radiation exposure. For risks which are judged by it to be too high or too uncertain, the SRC will recommend what steps should be taken to further evaluate and/or to reduce them to acceptable levels.

The SRC will examine and judge the effectiveness of the overall Waterford 3 system for controlling risks, including the effectiveness of PORC, the Onsite Safety Review Subgroup and quality assurance activities.

COMPOSITION

6.5.2.2 The Senior Vice President-Operations shall appoint, and may remove, the Chairman of the SRC. The Chairman shall appoint, and may remove, the Vice Chairman, SRC members and a permanent SRC Secretary, and shall establish a plan for implementing SRC functions.

The SRC will have no less than 9, nor more than 12, members. No more than a minority of the members will have direct line responsibility for operation of the Waterford 3 SES. The Waterford 3 SES Plant Manager-Nuclear, Project Support Manager-Nuclear, Quality Assurance Manager, Training Director-Nuclear, and the Onsite Safety Review Subgroup Engineering Supervisor

will be members of the SRC. At least 2 members shall be from outside the LP&L employee group, or that of its parent or sister organizations. Other members will be selected from within LP&L or its parent or sister organizations.

The objective of member selection shall be to encourage competent critical review of Waterford 3 safety. Minimum qualifications of SRC members who are in line positions in LP&L will be those of their respective line positions. Members other than those in line positions must have a Bachelor's degree or equivalent in engineering, science, or the discipline he represents, plus at least eight years of related professional experience, five of which have been in connection with nuclear power plants. The Chairman may make exceptions if he determines a potential member has equivalent skills, knowledge, and training.

ALTERNATES

6.5.2.3 In the interest of preserving member continuity and contact, and recognizing the overview stature of the Committee, no alternate members shall be appointed.

CONSULTANTS

6.5.2.4 The SRC Chairman has the authority to engage the services of others, inside and outside of LP&L, to conduct investigations needed to carry out SRC responsibilities.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once every six months thereafter.

6.5.2.6 The presence of the Chairman or Vice Chairman is required at any meeting of the SRC. The quorum required to constitute a scheduled meeting is the physical presence in the same place of half of the members plus one.

REVIEW

6.5.2.7 The SRC shall:

a. Review:

1. Those operating abnormalities or deviations from normal and expected performance of unit equipment determined to be significant by the OSRS.
2. Events requiring 24-hour written notification to the Commission determined to be significant by the PORC.
3. Reports forwarded to the SRC by the PORC.
4. Selected results of reviews included in 6.5.2.7.b for the purpose of carrying out its responsibilities under that section.

b. Maintain cognizance of, evaluate the adequacy of, and recommend improvements (as appropriate) in the LP&L processes for review of the following:

1. The safety evaluations for (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question;
2. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;

3. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
4. Proposed changes to Technical Specifications or this Operating License;
5. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
6. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety, except as noted in 6.5.2.7.a;
7. Events requiring 24-hour written notification to the Commission, except as noted in 6.5.2.7.a;
8. 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
9. Reports and meeting minutes of the PORC.

AUTHORITY

6.5.2.8 The SRC shall report to, and advise, the Senior Vice President-Operations in accordance with responsibility specified in Sections 6.5.2.1 and 6.5.2.7.

RECORDS

6.5.2.9 Summary minutes will be prepared for each meeting and will be approved by the SRC within six (6) weeks after the meeting.

In each instance where the SRC perceives that action should be taken to reduce a risk or to improve the Waterford 3 risk control process, it will make a formal written recommendation to this effect. Formal SRC recommendations will be addressed to the SVP-O and the VP-NO.

6.5.3 Quality Assurance

AUDITS

6.5.3.1 The Quality Assurance Organization audits plant activities for conformance with regulations, programs, plans, procedures, codes and other specified requirements. Results shall be reported to the line manager responsible for the area audited. Significant non-conformance shall be reported to the Senior Vice President-Operations and the SRC. These audits shall include:

- 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 50, at least once per 24 months.

- e. Any other area of unit operation considered appropriate by the SRC or the Senior Vice President-Operations. The Fire Protection Program and implementing procedures at least once per 24 months.
- f. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- g. 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.
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- i. The Offsite Dose Calculation Manual (ODCM) and implementing procedures at least once per 24 months.
- j. The Process Control Program and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- k. 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.

6.5.3.2 The SRC will review the results of the annual management audit of the Waterford 3 QA Program which is performed by a management audit group appointed by the SVP-O and is independent of the LP&L QA section.