

ENCLOSURE B

Proposed Amendments To Appendix A

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3.0 DEFINITIONS

As used in the proposed license conditions set forth herein:

- 3.1 Area Manager means the lowest supervisory position fully responsible for the specific activity or function with which the term is associated. The generic term "Area Manager" does not necessarily refer to the title of any specific position in General Electric's system of organization and position nomenclature.
- 3.2 Deleted.
- 3.3 Criticality Area means any physically identified area or location within which fissile materials are handled under the direction of a single area manager. A criticality area may include more than one criticality limit area.
- 3.4 Criticality Control means the administrative and technical requirements established to minimize the possibility of achieving inadvertent criticality in the environment analyzed.
- 3.5 Criticality Limit Area means a designated and physically identifiable locality within which a specific set of criticality control limits governs the use of fissile materials.
- 3.6 Deleted.
- 3.7 Deleted.
- 3.8 Deleted.

3.9 Deleted.

3.10 Deleted.

3.11 Deleted.

3.12 Nuclear Energy Operations means those components of the General Electric Company engaged in the various aspects of nuclear energy and does not refer to a specific component by title.

3.13 Nuclear Safety means that field of safety comprised of criticality safety and radiation safety.

3.14 Subcritical Area means a physically identified area or location involving special nuclear materials in quantities of less than 500 grams of U-235, 300 grams of U-233, or 300 grams of plutonium or a prorated combination of such materials under the direction of a single SNM custodian and which is unrelated to any other area where special nuclear materials are handled or an area in which is stored one (1) shipment of packages containing special nuclear material certified pursuant to 10CFR71. A subcritical area is considered unrelated when it meets the following isolation requirements and is not located in the same room: Two accumulations or arrays of accumulations may be considered as being nuclearly isolated from each other only if an edge-to-edge separation exists which is not less than one of the following or its nuclear equivalent:

1. Twelve inches of water.
2. The larger of 12 feet or the greatest distance across an orthographic projection of either accumulation or array on a plane perpendicular to a line joining their centers.

4.0 GENERAL ADMINISTRATIVE REQUIREMENTS

4.1 AREA MANAGERS

Operations and activities in a specific criticality area or radiation area shall be directed by the designated area manager. The responsibility for safe operation and control of activities in the area and for the safety of the environs as influenced by the activities conducted therein shall be vested in this position. An area manager shall be proficient in the application of the VNC radiation protection program as it relates to limitations and radiological controls on work activities in his assigned radiation or radioactive materials area. Additionally, each area manager of a criticality area shall be proficient in the application of criticality control procedures and be knowledgeable in the procedures applicable to the criticality area under his management.

4.2 CRITICALITY SAFETY COMPONENT

The criticality safety component is defined as that component of the Nuclear Energy Operations with designated responsibility to provide authoritative professional advice and counsel to area managers on matters of control against accidental criticality and to measure the effectiveness of the criticality control program.

4.2.1 The functions of the criticality safety component shall exclude direct responsibility for operations involving the use of fissile materials, and the criticality safety component shall not report to an area manager responsible for an area where fissile material is handled other than a subcritical area.

4.2.2 The criticality safety component shall include at least one technically trained person with a bachelor's degree in science or engineering and three years experience in the nuclear field.

4.3 RADIATION SAFETY COMPONENT

The radiation safety component is defined as that component of the Nuclear Energy Operations with designated responsibility to provide authoritative professional advice and counsel to area managers at the Vallecitos Nuclear Center on matters of radiation protection and ALARA and to measure the effectiveness of the radiation protection program.

4.3.1 The functions of the radiation safety component shall exclude direct responsibility for operations involving the manufacture of nuclear products or processing of nuclear materials. The radiation safety component shall be responsible to establish and maintain the radiation safety program to ensure the protection of employees at the Vallecitos Nuclear Center and of the community. The radiation safety program shall include as a minimum: the evaluation of release of radioactive effluents and materials from the site, establishment of procedures and training programs to control contamination and exposure to individuals, the review of calibration and maintenance activities for radiation detection instruments, maintenance of appropriate records and reports, review of radioactive material handling practices, and review of change procedures (see Section 4.6), including ALARA considerations.

4.3.2 The minimum qualifications of personnel assigned functional responsibilities in the radiation safety component shall be as follows:

4.5 COMPLIANCE POLICY

General Electric shall establish and maintain a policy statement in writing expressing requirements for compliance with the terms and conditions of special nuclear materials licenses and applicable NRC regulations. Each area manager shall know and understand the provisions of this policy.

4.6 CHANGE PROCEDURES

Activities which do not involve a change in license conditions but which require procedures, facilities, or equipment substantially different from those previously used shall not be initiated until the radiation safety component has completed a review and technical evaluation to assure adequacy of health and safety features and compliance with license conditions and ALARA policy where applicable.

In a criticality limit area, such activities shall not be initiated until the criticality safety component has completed a criticality analysis or a review of the existing criticality analysis for the proposed activity. Such changed activities shall be initiated in accordance with written procedures issued by the area manager. For new/revised analyses for areas other than subcritical areas, NRC approval must be obtained.

5.0 CRITICALITY CONTROL ADMINISTRATIVE REQUIREMENTS

5.1 PROCEDURES

Area managers shall develop and maintain written criticality control procedures incorporating limitations established by the criticality safety component and shall assure that these procedures are made readily available to concerned personnel through posting of limits or other appropriate notifications.

5.2 ANALYSIS REQUEST

A request for criticality analysis or review shall be prepared in writing by, or under the direction of, an area manager for any activity or change in activity requiring a change in criticality controls or changes in environment of possible consequence to criticality safety. The activity or change shall not be initiated until receipt of an approved criticality analysis.

5.3 CRITICALITY CONTROL ANALYSIS

Qualified individuals of the criticality safety component shall be responsible for the establishment of subcritical areas. Analyses performed for other areas must be approved by the NRC prior to implementation.

5.4 Deleted.

5.5 Deleted.

5.6 RECORDS

Records of criticality control analyses shall be maintained in sufficient detail and form to permit independent review of the method of calculation and results. Such records shall be retained for a period of at least six months following the cessation of activities to which they apply.

5.7 CRITICALITY CONTROL INSPECTIONS

5.7.1 The radiation safety component shall be responsible for inspecting each criticality area on an ongoing basis to assure compliance with criticality control procedures. Items to be inspected shall include, but not be limited to, the posting of criticality control limits, the labeling of SNM containers with information needed for criticality control purposes, the movement of SNM, and general criticality safety work practices.

5.7.2 A program of inspection shall be performed by the criticality safety component to determine that actual operations conform to the physical situations on which the calculations of criticality limits have been based. Inspection reports shall be furnished to area managers. Where situations are identified which require corrective action, such reports shall so indicate. Corrective or follow-up action shall be

taken in accordance with VNC Safety Standards and/or site nuclear safety procedures.

Operations other than subcritical areas shall be inspected on a quarterly basis. All operations shall be inspected on an annual basis.

5.8 TRAINING PROGRAM

Area managers shall assure that new employees receive instruction in criticality safety and plant operating and emergency procedures prior to their working with special nuclear materials. A criticality control training program, approved by the criticality safety component, shall be maintained to emphasize the need for following criticality control procedures and to aid personnel in understanding the various parameters which are essential to the maintenance of subcritical conditions. The program may be conducted by the criticality safety component or some other portion of the nuclear safety component and may be combined with radiation safety training. A written test shall be completed by each employee taking the course. The test shall be evaluated and the results forwarded to the appropriate area manager.

5.9 MONITOR ALARM SYSTEM

Exemption from the requirements of 10CFR70.24 is hereby granted.

6.0 CRITICALITY CONTROL CONDITIONS -
TECHNICAL AND ANALYTICAL REQUIREMENTS

(Deleted)

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APPENDIX A

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Amends Sect. (s) _____

8.6 EXPOSURE DETECTION

Personnel dosimeters shall be capable of detecting gamma, beta, and x-ray radiation. Additional neutron detection capability shall be available as appropriate.

8.7 INSTRUMENT CALIBRATION

Monitoring instruments shall be calibrated upon initial acquisition, after major maintenance, and at least annually.

8.8 LABORATORY COUNTING INSTRUMENTS

Control charts indicating background and efficiency using standard sources shall be maintained on all laboratory instruments used for counting health physics samples.

8.9 INSTRUMENT CHECK SOURCES

Field check sources shall be available for use in functional response checks of portable radiation measuring instrumentation.

8.10 LIQUID WASTE DISPOSAL

Liquid wastes shall be retained in quarantine, sampled and analyzed before release to unrestricted areas.

8.11 AIRBORNE EFFLUENT CONTROL

Potentially contaminated airborne effluents shall be released through HEPA filter systems which shall be at least 99.95% efficient for 0.3-micrometer particles. Such effluents shall be limited at the point of release to the atmosphere so that the annual average concentration at the site boundary does not exceed the concentrations specified in 10CFR20, Appendix B, Table II,