

PROPOSED TECHNICAL SPECIFICATION CHANGES

ANO-1

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Vice President, Operations ANO shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation 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 QA Manual Operations.
- b. The Director, Operations 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, Operations ANO 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.

FACILITY STAFF

- 6.2.2 The Manager, Operations and Shift Supervisor shall hold a senior reactor operator license. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

- 6.2.2.1 Administrative controls shall be established to limit the amount of overtime worked by plant staff performing safety-related functions. These administrative controls shall be in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter 82-12).

6.3. FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for (1) the designated radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

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, Training and Emergency Planning and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager, Training and Emergency Planning and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 Plant Safety Committee (PSC) Function

- 6.5.1.1 The Plant Safety Committee shall function to advise the Director, Operations and Plant Manager, ANO-1 on all matters related to nuclear safety.

COMPOSITION

- 6.5.1.2 The Plant Safety Committee shall be composed of at least eight members of ANO onsite management organization at the superintendent level or above. The PSC Chairman shall ensure that adequate expertise is present during meetings to evaluate material before the PSC.

In addition, the Director, Operations shall designate in writing a PSC Chairman and at least one Alternate Chairman.

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

- 6.5.1.5 The minimum quorum of the PSC necessary for the performance of the PSC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

- 6.5.1.6 The Plant Safety Committee shall be responsible for:
- a. Review of 1) all procedures required by Specification 6.8 and changes in intent thereto, 2) any other proposed procedures or revisions thereto as determined by the Director, Operations or Plant Manager, ANO-1 to affect nuclear safety.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Appendix "A" Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Plant Manager, ANO-1, Director, Operations and to the Chairman of the Safety Review Committee.
 - f. Review of REPORTABLE EVENTS.
 - g. Review of facility operations to detect potential nuclear safety hazards.

- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager, ANO-1, Director, Operations or the Safety Review Committee.
- i. Review of the Plant Security Plan and implementing procedures and submittal of recommended changes to the Director, Operations and the Safety Review Committee.
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Director, Operations and the Safety Review Committee.
- k. Review of changes to the Offsite Dose Calculation Manual and the Process Control Program.

AUTHORITY

6.5.1.7. The Plant Safety Committee shall:

- a. Recommend in writing their approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President, Operations ANO and the Safety Review Committee of disagreement between the PSC and the Plant Manager, ANO-1 or the Director, Operations; however, the Director, Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Safety Committee shall maintain written minutes of each PSC meeting that, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Plant Manager, ANO-1, Director, Operations and Chairman of the Safety Review Committee.

6.5.2 Safety Review Committee (SRC)

FUNCTION

6.5.2.1 The Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- 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

- 6.5.2.2 The Safety Review Committee shall be composed of a Chairman and eight to twelve members which collectively have the experience and competence required by ANSI/ANS-3.1-1981 to review problems in the areas specified in Section 6.5.2.1, a-h.

The Vice President, Operations AND shall designate, in writing, the Chairman and all SRC members.

The Chairman shall designate, in writing, the alternate Chairman in the absence of the SRC Chairman.

ALTERNATES

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

CONSULTANTS

- 6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

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

QUORUM

- 6.5.2.6 The minimum quorum of the SRC necessary for the performance of the SRC review and audit functions of these technical specifications shall consist of the Chairman or his designated alternate and at least a majority of the SRC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of 10CFR50 Appendix "B", at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of unit operation considered appropriate by the SRC or the Vice President, Operations ANO.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- j. The Offsite Dose Calculation Manual and Process Control Program and implementing procedures at least once per 24 months.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

AUTHORITY

- 6.5.2.9 The SRC shall report to and advise the Vice President, Operations ANO 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:
 - a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Vice President, Operations ANO 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, Operations ANO 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, Operations ANO and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

6.6.1 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

6.6.2 The following actions shall be taken for REPORTABLE EVENTS:

- a. A report shall be submitted to the Commission pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PSC, and the results of this review shall be submitted to the SRC and the Vice President, Operations ANO.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least hot shutdown within one hour.
- b. The Nuclear Regulatory Commission shall be notified pursuant to 10 CFR 50.72 and a report submitted pursuant to the requirements of 10 CFR 50.36 and Specification 6.6.

6.8 PROCEDURES

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, November, 1972.
- 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. New and spent fuel storage.
- h. Offsite Dose Calculation Manual and Process Control Program implementation at the site.
- i. Post accident sampling (includes sampling of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and the containment atmosphere).

- 6.8.2 Each procedure of 6.8.1 above, and changes in intent thereto, shall be reviewed by the PSC and approved by the Director, Operations, Plant Manager, ANO-1 or responsible General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.
- 6.8.3 Changes to procedures of 6.8.1 above may be made and implemented prior to obtaining the review and approval required in 6.8.2 above provided:
- a. The intent of the original procedure is not altered.
 - b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license on Unit 1.
 - c. The change is documented, reviewed by the PSC, and approved by the Director, Operations, Plant Manager, ANO-1 or responsible General Manager, within 14 days of implementation.

PROPOSED TECHNICAL SPECIFICATION CHANGES

ANO-2

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President, Operations ANO shall be responsible for overall facility operations and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation 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 QA Manual Operations.
- b. The Director, Operations 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, Operations ANO 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 FACILITY STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.

- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A site Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- g. Administrative control shall be established to limit the amount of overtime worked by plant staff performing safety-related functions. These administrative controls shall be in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter No. 82-12).
- h. The Manager, Operations and Shift Supervisor shall hold a senior reactor operator license.

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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 (1) the designated radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and (2) the Shift Technical Advisor who shall have a bachelors degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

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, Training and Emergency Planning and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager, Training and Emergency Planning and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975, except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT SAFETY COMMITTEE (PSC)

FUNCTION

6.5.1.1 The Plant Safety Committee shall function to advise the Director, Operations and Plant Manager, ANO-2 on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Safety Committee shall be composed of at least eight members of ANO onsite management organization (except as discussed under 6.5.1.3) at the superintendent level or above. The PSC Chairman shall ensure that adequate expertise is present during meetings to evaluate material before the PSC.

In addition, the Director, Operations shall designate in writing a PSC Chairman and at least one Alternate Chairman.

6.5.1.3 If Core Protection Calculator (CPC) Software is being reviewed a nuclear software expert shall be present as a voting member. If one of the members of the Plant Safety Committee meets the qualification requirements for this position, the requirement to have this member is satisfied. This membership may be filled by two appropriately qualified individuals who shall ballot with a single combined vote. Generic qualifications for this membership shall be as follows:

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One Individual

The Nuclear Software Expert shall have as a minimum a Bachelor's degree in Science or Engineering, Nuclear preferred (in accordance with ANSI N18.1). In addition, he shall have a minimum of four years of technical experience, of which a minimum of two years shall be in Nuclear Engineering and a minimum shall be in Software Engineering. (Software Engineering is that branch of science and technology which deals with the design and use of software. Software Engineering is a discipline directed to the production and modification of computer programs that are correct, efficient, flexible, maintainable, and understandable, in reasonable time spans, and at reasonable costs.) The two years of technical experience in Software Engineering may be general software experience not necessarily related to the software of the Core Protection Calculator System. One of these two years of experience shall be with certified computer programs.

Two Individuals

One of the individuals shall meet the requirements of the Nuclear Engineering portion of the above. The second individual shall have a Bachelor of Science degree (digital computer speciality) and meet the Software Engineering requirements of the above.

The membership (the Nuclear Software Expert or the Digital Computer Specialist) shall be knowledgeable of the Core Protection Calculator System with regard to:

- a. The software modules, their interactions with each other and with the data base.
- b. The relationship between operator's module inputs and the trip variables.
- c. The relationship between sensor input signals and the trip variable.
- d. The design basis of the Core Protection Calculator System.
- e. The approved software change procedure and documentation requirements of a software change.
- f. The security of the computer memory and access procedures to the memory.

ADMINISTRATIVE CONTROLS

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.6 The minimum quorum of the PSC necessary for the performance of the PSC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.7 The Plant Safety Committee shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes in intent thereto, 2) any other proposed procedures or changes thereto as determined by the Director, Operations or Plant Manager, ANO-2 to affect nuclear safety.
- 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. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendation to prevent recurrence to the Plant Manager, ANO-2, Director, Operations and to the Chairman of the Safety Review Committee.

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- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses, and reports thereon as requested by the Plant Manager, ANO-2, Director, Operations or the Safety Review Committee.
- i. Review of the Plant Security Plan and implementing procedures and submittal of recommended changes to the Director, Operations and the Safety Review Committee.
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Director, Operations and Safety Review Committee.
- k. Review of changes to the Offsite Dose Calculation Manual and Process Control Program.

AUTHORITY

- 6.5.1.8 The Plant Safety Committee shall:
- a. Recommend in writing their approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
 - c. Provide written notification within 24 hours to the Vice President, Operations ANO and the Safety Review Committee of disagreement between the PSC and the Plant Manager, ANO-2 or the Director, Operations; however, the Director, Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

- 6.5.1.9 The Plant Safety Committee shall maintain written minutes of each PSC meeting that, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Plant Manager, ANO-2, Director, Operations and Chairman of the Safety Review Committee.

ADMINISTRATIVE CONTROLS

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- 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

6.5.2.2 The Safety Review Committee shall be composed of a Chairman and eight to twelve members which collectively have the experience and competence required by ANSI/ANS-3.1-1981 to review problems in the areas specified in Section 6.5.2.1, a-h.

The Vice President, Operations ANO shall designate, in writing, the Chairman and all SRC members.

The Chairman shall designate, in writing, the alternate Chairman in the absence of the SRC Chairman.

ADMINISTRATIVE CONTROLS

AUDITS

6.5.2.8 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 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, structure, 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 10 CFR 50, Appendix "B", at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of unit operation considered appropriate by the SRC or the Vice President, Operations ANO.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program 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. The Offsite Dose Calculation Manual and Process Control Program and implementing procedures at least once per 24 months.
- k. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

AUTHORITY

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

ADMINISTRATIVE CONTROLS

RECORDS

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

- a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Vice President, Operations ANO 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, Operations ANO 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, Operations ANO and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. A report shall be submitted to the Commission pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PSC and, the results of this review shall be submitted to the SRC and the Vice President, Operations ANO.

ADMINISTRATIVE CONTROLS

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The unit shall be placed in at least HOT STANDBY within one hour.
- b. The Vice President, Operations ANO and the SRC shall be notified within 24 hours.
- c. The Nuclear Regulatory Commission shall be notified pursuant to 10CFR50.72 and a report submitted pursuant to the requirements of 10CFR50.36 and Specification 6.6.

6.8 PROCEDURES

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. Modification of Core Protection Calculator (CPC) Addressable Constants. These procedures should include provisions to assure that sufficient margin is maintained in CPC Type I addressable constants to avoid excessive operator interaction with the CPCs during reactor operation.

NOTE: Modifications to the CPC software (including changes of algorithms and fuel cycle specific data) shall be performed in accordance with the most recent version of "CPC Protection Algorithm Software Change Procedure," CEN-39(A)-P that has been determined to be applicable to the facility. Additions or deletions to CPC addressable constants or changes to addressable constant software limit values shall not be implemented without prior NRC approval.

- h. New and spent fuel storage.
- i. ODCM and PCP implementation.
- j. Postaccident sampling (includes sampling of reactor coolant, radioactive iodines and particulates in plant gaseous effluent, and the containment atmosphere).

6.8.2 Each procedure of 6.8.1 above, the changes in intent thereto, shall be reviewed by the PSC and approved by the Director, Operations, Plant Manager, ANO-2 or responsible General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

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6.8.3 Changes to procedures of 6.8.1 above may be made and implemented prior to obtaining the review and approval required in 6.8.2 above provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on Unit 2.
- c. The change is documented, reviewed by the PSC and approved by the Director, Operations, Plant Manager, ANO-2 or responsible General Manager within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

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

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.