PORC/PORC-SC-C

RW-001-210 REVISION 4 EFFECTIVE DATE

SAFETY-RELATED

ADMINISTRATIVE PROCEDURE PROCESS CONTROL PROGRAM

9012120276 901207 PDR ADOCK 05000382 PDC

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Attachment 6.3 (1 of 2)

PORC AND-PORC---S/C REVIEW AND APPROVAL SHEET REVIEW OF: RW-001-210nocess PORC 50 PORC + S/C D Control Program The PORC or PORC S/C has reviewed this item and determined that a Safety/ Commitment Review was performed, (if applicable) that a Safety Evaluation was performed (if applicalle), that an unreviewed safety question does not exist and that nuclea: safety is/was not adversely affected. PORC RECOMMENDED FOR APPROVAL MEMBER SIGNATURE DATE MEMBER NO Maintenance Superintendent Operations Superintendent Radiation Protection Superintendent Operations Quality Assurance Manager Plant Engineering Superintendent Assistant Plant Manager PORC-S/C Member PORC-S/C Member PORC~S/C Member PORC-S/C Chairman PORC Chairman Anan Meeting No. 90-074 Item No. VIII Date: 8 This item is recommended for approval? 🕱 YES 🗆 NO This item requires SRC/NRC review prior to implementation? 🗆 YES 🔯 NO If yes, ensure documentation supporting review is attached. PLANT MANAGER-NUCLEAR APPROVAL the Comments: nouden in the responses tur rec discusses Approved by 241 Date Manager-Nuclear UNT-001-004 Revision 12 Attachment 6.1 (1 of 1)

WATERFORD 3 SES PLANT OPERATING MANUAL Check Block Below 190 CHANGE/REVISION/DELETION REQUEST IMPORC | PORC-S/C Procedure No. RW-1-210 Title PROCESS CONTRol PROGRAM Effective Date APPROVAL 05 (if different from approval date) Complete A. 3, and C A. Change to NA []Permanent []Deviation Expiration Date_ B. Revision No. 4 C. Deletion ITYES KINO THE PROCESS CONTROL PROGRAM PROVIDES GUIDANCE to ASSURE COMPLIANCE WITH THE LICENSING AGENCIES' REQUIREMENTS. REASON FOR CHANGE, REVISION, OR DELETION INCORPORATING CHANGES REQUESTED BY LICENSING IN PEIER 20071 AS attined IN NEC GENERIC LETTER 89-01, GENERALLY THESE ARE INTENDED to ALLOW THE REMOVAL HANGES REQUREMENTS FROM THE W35ES PROCEDURE. BY INCORPORATING THEM INTO SPECIFICATIONS ADDRESSES THE NAME CHANGE THAT RESULTED This CHANGE ALSO WHEN LN TECHNOLOGIES WAS PURCHASED BY WESTINGHOUSE (AND PLUCED UNDER THEIR SCIENTIFIC ECOLOGY GROUP, INC. (SEG) BUSINESS UNIT. DATE 6-18-90 Tian k Darris AUTHOR DATE 6-28-90 SAFETY SCREENING/EVALUATION Tousere DATE 10-28-90 TECHNICAL REVIEW anneres DATE 7/5/90 GROUP HEAD REVIEW ALSON UL Ka/Sotte DATE TEMPORARY APPROVAL* (SRO) DATE TEMPORARY APPROVAL*

*Temporary approval must be followed by Plant Manager - Nuclear approval within 14 days.

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Attachment 6.5 (1 of 1)

Administrative Procedure

Process Control Program

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1.0 PURPOSE

1.1 The purpose of Waterford Steam Electric St ion - Unit Number 3 (Waterford 3) Process Control Program (PCP) is to describe the program which provides reasonable assurance of the complete stabilization and/or solidification, as ar licable of various radioactive "wet wastes" which may include lesin slurries and evaporator bottoms are in accordance with applicable Department of Transportation (DOT), Nuclear Regulatory Commission (NRC), State and licensed burial facilities acceptance criteria for packaging and shipment to an approved hurial site. Compliance with these criteria will be achieved through implementation of the PCP and related Waterford 3 and vendor supplied procedures. Containers engineered and built to comply with the stability requirement may be used. Waterford 3 SES typically relies on Vendor supplied systems and/or services for stabilization and solidification services.

2.0 REFERENCES

2.1 Waterford 3 Documents

2.1.1 FSAR Chapter 11.4, Solid Waste Management System

2.1.2 FSAR Chapter 13.4, Review and Audit

2.1.3 FSAR Chapter 13.2, Training

2.1.4 FSAR Chapter 13.5, Plant Procedures

2.1.5 Nuclear Operations Management Manual, Section VI, Chapter 5

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- 2.2 Vendor Controlled Documents
 - 2.2.1 LN Technologies Corporation, TR002, Topical Report on 10CFR61 Qualified Radioactive Waste Forms, May 1984
 - 2.2.2 LN Technologies Corporation FI-013, Process Control Program for Dewatering Liner with LN Technologies Corporation Internals, LN Technologies Corporation
 - 2.2.3 Scientific Ecology Group, Inc., OP-4.34, Process Control Program for Dewatering Bead or Powdered Resin with Quick Dry Dewatering System No 8814.
 - 2.2.4 Scientific Ecology Group, Inc., OP-4.31, Operating Procedure for SEG Rad Waste Solidification System.
 - 2.2.5 Scientific Ecology Group, Inc., OP-4.30, Process Control Program for Rad Waste Solidification Service
 - 2.2.6 RW-2-401, Use of Radman Operating Program
 - 2.2.7 RW-2-411, Use of Radman Data Base Manager and Recover
 - 2.2.8 RW-2-110, Waste Sample Collection and Isotope Evaluation
- 2.3 Other Documents
 - 2.3.1 10CFR61, Licensing Requirements for Land Disposal of Radioactive Waste
 - 2.3.2 10CFR20.311, Transfer for disposal and manifests
 - 2.3.3 10CFR71.91, Records

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3.0 DEFINITIONS

- 3.1 Stability means structural stability as per 10CFR61.2
- 3.2 Solidification means the immobilization of wet radioactive wastes such as evaporator bottoms, spent resins, sludges, and reverse osmosis concentrates as a result of a process of mixing the waste type with a solidification agent(s) to meet the requirements of the licensed disposal site and 10CFR61.

4.0 RESPONSIBILITIES

- 4.1 Radiation Protection Superintendent
 - 4.1.1 The Radiation Protection Superintendent is responsible for the overall effective management of the plant Process Control Program. The Radiation Protection Superintendent ensures that changes are initiated to the Process Control Program procedures when necessary and that appropriate Health Physics support is provided.
- 4.2 Lead Supervisor-Radwaste
 - 4.2.1 The Lead Supervisor-Radwaste who reports to the Radiation Protection Superintendent holds key responsibilities for implementation of the Process Control Program such as:
 - 4.2.1.1 The preparation, review and approval of the Process Control Program procedures pertaining to the processing and packaging, of radioactive materials;
 - 4.2.1.2 Data collection, trend analysis, long-term planning, and problem solving for the plant Process Control Program;

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- 4.2.1.3 Managing radwaste stabilization, dewatering and packaging;
- 4.2.1.4 Preparing procedures for stabilization, dewatering and packaging;
- 4.2.1.5 Interfacing with other groups as necessary to analyze and resolve problems relating to the Process Control program such as the design of Radwaste Systems and Equipment;
- 4.2.1.6 Preparing periodic reports summarizing the Process Control Program;
- 4.2.1.7 Procurement of materials and supplies required for implementation and maintenance of the Process Control Program;
- 4.2.1.8 That personnel receive appropriate training and are qualified for their respective duties;
- 4.2.1.9 Adequate staffing and sufficient resources for efficient and economic operation of the Process Control Program.

4.3 Operations Superintendent

4.3.1 The Operations Superintendent is responsible for the effective operations of permanent plant radwaste systems and will coordinate radwaste activities with the radwaste department.

4.4 Plant Chemist

4.4.1 The Plant Chemist is *teep*onsible for interfacing with the Radwaste Engineer on items or problems relating to radwaste processes and chemistry controls or chemical reactions and performing chemical and radiochemical analyses of samples of radioactive waste or materials.

4.5 Quality Assurance

4.5.1 Quality Assurance is responsible for:

4.5.1.1 Assessing the implementation and effectiveness of the quality assurance aspects of the Process Control Program through regular audits and selective monitoring of activities.

4.6 Director Operations Support & Assessment

- 4.6.1 The Director of Operation Support & Assessment is responsible for providing the following services:
 - 4.6.1.1 State-of-the-art technical advise, support, and assistance as required;
 - 4.6.1.2 Licensing and regulatory compliance support; and
 - 4.6.1.3 Appraising the Waterford-3 Process Control Program and recommending improvements.
- 4.6.2 The Operations Support and Assessment staff interfaces directly with the plant staff in providing these services.

5.0 PROCEDURE

5.1 Program Description

2

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5.1.1 Solidification System Description:

Waterford 2 utilizes vendor supplied portable solidification equipment for radioactive waste solidification. References 2.2.1, 2.2.4 and 2.2.5 provide a general description of respective vendor solidification processes and process control features; Reference 2.2.6 describes the method which will be utilized to classify wastes in accordance with 10CFR61; and Reference 2.1.1 through 2.1.5 are Waterford 3 documents which either implement or describe activities which provide reasonable assurance that wastes are solidified or dewatered in accordance with all applicable regulations and criteria.

5.1.2 Sources of Waterford 3 Stabilization/Solidification Feeds: The Cement solidification will be used to stabilize resins, evaporator bottoms and boric acid concentrates. During resin stabilization, vendor equipment will be connected to the Resin Waste Management System outlet to allow for the transfer of resin. Vendor equipment will be connected to the Solid waste Management System outlet when evaporator bottoms from the radwaste evaporator and boric acid concentrates from the Boron Management System evaporator are to be stabilized. Solidifcation using Aquaset/Petroset media will be used to process resins, oil, water/acid, evaporator bottoms and boric acid concentrates. This process will not be connected to any plant waste systems and will be processed on a batch basis.

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5.2 Solidification Process Parameters:

- 5.2.1 Solidification formulas and solidification process parameters are incorporated into the applicable vendor process control program. No exceptions or deviations from vendor supplied procedures or topical reports are anticipated for stabilized waste. The formulas are used to calculate the ratio of waste, cement, water and other reagents required to achieve an acceptable solidified product. Compatibility requirements of the waste stream with respect to the solidification media are described in the vendor process controls program. Waste stream parameters are adjusted as necessary to meet these requirements.
- 5.2.2 Test solidifications are performed on waste stream samples to verify vendor calculated solidification formulas.
- 5.2.3 Radioactive wastes shall be solidified or dewatered in accordance with the process control program to meet shipping and transportation requirements during transit, and disprsal site requirements when received it the disposal site.
- 5.2.4 With solidification or devatering not meeting disposal site and shipping and transportation requirements, suspend shipment of the inadequately processed wastes and correct the process control program, the procedures, and/or the solid waste system as necessary to prevent recurrence.
- 5.2.5 With solidification or dewatering not performed in accordance with the process control program, test the improperly processed waste in each container to ensure that it meets burial ground and shipping requirements and perform appropriate corrective action if required.

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- 5.2.6 Solidification of at least one representative test specimen from at least every tenth batch of each type of wet radioactive wastes (e.g., filter sludges, spent resins, evaporator bottoms, boric acid solutions and sodium sulfate solutions) shall be verified in accordance with the vendor's process control program.
- 5.2.7 If the initial test specimen from a batch of waste fails to verify solidification, the process control program shall provide for the collection and testing of representative test specimens from each consecutive batch of the same type of wet waste until at least three consecutive initial test specimens demonstrate solidification. The process control program may be modified if practical to assure solidification of subsequent batches of waste.
- 5.2.8 If any test specimen fails to verify solidification, the solidification of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternative solidification parameters can be determined in accordance with the vendors process control program, od a subsequent test verifies solidification. Solidification of the batch may then be resumed using the alternative solidification parameters determined by the process control program.

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5.3 Administrative Controls

- 5.3.1 Administrative controls utilized to insure compliance with applicable state and federal regulations and burial site criteria are detailed in the radioactive waste solidification surveillance procedure(s). These implementing document(s) for radioactive waste solidification and dewatering describes the requirements which must be met prior to processing radioactive waste, as well as the condition of the solidified or dewatered waste. Test solidifications, full scale calculations and operation of the solidification equipment are performed by vendor personnel. Dewatering operations will be performed by vendor personnel or by qualified Plant staff. Plant staff provides Health Physics and Quality Assurance coverage, operates plant radioactive waste systems, collects waste stream samples and performs isotopic analyses. Copies of all referenced documents are available on site for use by personnel engaged in solidification activities.
- 5.3.2 Changes to this Process Control Program shall be described in the semi-annual Radioactive Effluent Release Report for the period in which the change is made.
- 5.4 Waste Characterization and Classification
 - 5.4.1 Waste Classification

-

5.4.1.1 Solidified wastes are classified in accordance with the requirements of IOCFR61.55, as implemented by reference 2.2.6 and plant waste classification and characterization procedure(s).

5.4.1.2 Annual analysis will be performed on the waste streams to determine the isotopic abundance of gamma emitting isotopes in the streams as described in Reference 2.2.8. Scaling factors for the non-gamma emitting and transuranic constituents will be developed from this annual analysis using References 2.2.6 and 2.2.7. The activity of each radionuclide in the solidified waste will be determined by a core sample or a calculational method employing the percent abundance and scaling factors with a dose to curie conversion factor as described in Reference 2.2.6.

5.4.2 Waste Characteristics

- 5.4.2.1 Solidified wastes will meet the characteristics of 10CFR61.56(a). Stabilized wastes will meet the characteristics of 10CFR61.56(b). Waste containers will be labelled to identify the waste class.
- 5.4.2.2 The manifesting requirements of 10CFR20.311 are implemented and records are maintained in accordance with 10CFR71.91.

5.5 Quality Assurance

5.5.1 Quality Assurance related activities for the Radioactive Waste Program are implemented as described in the Nuclear Operations Management Manual (Reference 2.1.5). These activities provide verification that the solidified wastes meet applicable state and federal regulations and burial site criteria.

6.0 ATTACHMENTS

NONE

		and the first of the state
ASSIGNED TECHNICAL REVIEWER		
TECHNICAL REVIEW SUBCOMMITTEE FORMED YES IN NO		
 Is this procedure, revision, change, or deletion technically and administratively correct? 	NT VES	1 <u>-</u> 1 NO
 Is this procedure, revision, or change capable of being performed? 	VES	1_1 NO
3. Is this procedure, revision, change or deletion compatible with other plant procedures?	YES	1_1 NO
Does this procedure, revision, or change reference and adequately implement (or in the case of a deletion, adequately compensate for) commitments (CMS Report) made in the FSAR, SER, and other licensing documents?	IV VES	J∵ji NQ
. Is this procedure, revision, change or deletion correctly numbered, formatted and prepared in accordance with approved procedures?	I VES	1_1 NO
. Does this procedure, revision, change, or deletion adequately address and/or reference Technical Specifications and other matters that may affect nuclear safety?	IN YES	וקן אס
. Was the Safety Screening adequately performed?	IT YES	ITI NO
. Was the Safety Evaluation, if applicable, adequate to determine whether or not an unreviewed safety question exists?	I YES	1] NO 🕅
Does the procedure maintain the level of Fire Protection as outlined in the approved Fire Protection Procedure?	I_I YES	
have reviewed this procedure and all items checked "NO" about solved with the Author (or responsible Group Head) and document Review Comment sheets	ve have be mented on	en
D V	1/2	ala

SUM ARY INFORMATION FOR 10CFR50.59 AND ENVIRONMENTAL IMPACT SCREENING AND EVALUATION

A dvir Title: _____ RW-1-210 Process Control Program

1. Description of the proposed change

Remove Tech, Spec. references requested by licensing in PEIR 20071 as

outlined in NRC Generic Letter 89+01. Also address Vendor name changes.

2. Documents and FSAR sections reviewed

Technical Specifications 6,13 and FSAR 11.4.

3. Function of affected equipment/procedure

Procedure provides reasonable assurance of the complete stabilization

and/or solidification as applicable of various radioactive "wet wastes"

in order to comply with DOT. NRC and licensed burial site facilities acceptance criteria.

4. Impact of change on function of equipment/procedure

Same requirements that were in the Technical Specifications are included

in the procedure.

5. Brief summary of screening/evaluation results

A change to the Technical Specifications will be required to effect

this change.

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ATTACHMENT 7.1

PAGE 1 of 4

SCREENINGS

Screening Instructions: Attachment 7.5, "Guidelines for Performance of 10CFR50.59 Safety and Environmental Impact Evaluations, " should be referred to when performing the screening. Assumptions, references and technical bases used in answering the screening criteria should be documented in sufficient detail so that an independent reviewer can reach the same conclusions.

Answer PART A. If the answer to any of the questions is YES, further screenings are not necessary and no 10CFR50.59 evaluations should be made. However, a submittal to NRC requesting approval of the activity may need to be prepared (Questions 3, 6, 7) with the assistance of Nuclear Licensing and Regulatory Affairs. If all are NO, additional screenings per PARTs B. C and D must be made.

Answer PART B. If the answer to any of the questions is YES, a 10CFR50.59 safety evaluation must be performed per Attachment 7.2 to determine if an unreviewed safety question (USQ) exists. If all answers are NO, then the proposed change or activity does not require a 10CFR50.59 safety evaluation.

Answer PART C. If the answer to either question is YES, an Environmental Impact Evaluation per Attachment 7.3 must be performed. If both are NO, no evaluation is needed. Answer PART D. If the answer to this question is YES, a Radioactive Waste Systems Additional

Safety Evaluation per Attachment 7.4 must be made. If it is answered NO, no evaluation needed.

PART A - PRELIMINARY 10CFR50.59 SCREENING

Does the proposed change or activity represent:

- YES X NO (1) A change or activity which, in its entirety, has received prior NRC approval?
- YES ____ NO X__ (2) A change or activity which, in its entirety, is addressed by an existing approved 10CFR50.59 evaluation?
- YES ____ NO X (3) A change or activity which, in its entirety, constitutes a change to the QA Program, Emergency Plan, Security Plan or Operator Regualification Program?
- YES ____ NO X (4) A change to correct a typographical error?
- YES ____ NO X (5) A correction of a nonconformance which results in preserving any applicable licensing basis?
- YES ____ NO X (6) A change to the Technical Specifications and/or Operating License?
- YES ____ NO X (7) A change to the approved fire protection program which would adversely affect the ability to achieve and maintain safe shutdown in the event of a fire, or a significant change to the basemat cracking surveillance program?

Provide an explanation and references for any YES answer below:

This procedure change is in accordance with NRC Generic Letter 89-01.

This revision will become effective after NRC Review and Approval of the

change to Technical Specifications (TSCR #89-07). The NRC Review will

include review of this procedure.

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ATTACHMENT 7.1 PAGE 2 of 4

PART B - FINAL 10CFR50.59 SCREENING

Does the proposed change or activity represent:

YES	_ NO	_ (1)	A change to the facility which alters, or has the potential to alter, the information, operation, function, or ability to perform the function of a system, structure, or component described in the SAR? Explain:
N/A			
YES	_ NO _	_ (2)	A change to a procedure which alters, or has the potential to alter, a procedure described, outlined or summarized in the SAR? Explain:
N/A			
YES _	NO	(3)	A test or experiment not described in the SAR or which requires that a system be operated in an abnormal manner that is not described or previously analyzed in the SAR? Explain:
N/A			

ATTACHMENT 7.1 PAGE 3 of 4

PART C - ENVIRONMENTAL IMPACT EVALUATION SCREENING

. Joes the proposed change or activity represent:

YES	_ NO	(1)	A change to the Environmental Protection Plan (EPP)? Provide the basis for the answer below:
N/A			
YES _	_ NO	_ (2)	Measurable non-radiological effects not confined to onsite areas previously disturbed during site preparation and construction? Provide the basis for the answer below:
N/A			
		PAI	T D - RADIOACTIVE WASTE SYSTEMS SCREENING
YES _	_ NO _	. Do	es the proposed change or activity alter or affect a radioactive waste system (eg. Gaseous, Liquid, Resin, or Solid Waste Management, Airborne Radioactivity Removal, Post Accident Sampling, Process Radiation Monitoring)? Provide the basis for the answer below:
N/A			
		_	poil all
Prepare	er/Date	p	108 aly 8/9/90
Review	ver/Date_		Jang & group 8/9/30
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NOP-013 REV.1.0

the the DOCUMENT REVIEW COMMENTS Page | of / DOCUMENT NO. RW-1-210 REVISION NO. 4 DRAFT NO. NA TITLE: Rocess Control 1 no cram COMMENT RES NO. COMMENT RESOLUTION NO. Second sheet signed OBTAIN comments 1 £ ... RESOLVED By SIGNAM On Dennis Spannes' comment sheet pace 2082-PURPose L.I. The 2 2. Revision of the 1st FIRST Sumpance is sontence will be considered during fature revisioned. excessiven Land. STOP 5.2.5. Decere 3 The LAST 2 WORDS Rearines IF The 3. Per Tele con du cuisin Dewarenne is NOT performed ... Then left as is .) will be Some Type of connertive WILL be REWVIND, QA Review. 1. Reviewed By: 2. Competents Resolved By: Reviewer (Print) Cilloud Barling 7-17-90 Reviewer (Signature) Date 3. Resolution of Comments Accepted By: Karling Pell 7/23/ per

UNT-001-003 Revision 12

Attachment 6.6 (1 of 1)

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DOCUMENT REVIEW COMMENTS Page 1 of Z DOCUMENT NO. RW-1-210 REVISION NO. 4 DRAFT NO. TITLE: PROCESS CONTROL PROBRAM COMMENT RES COMMENT NO. NO. RESOLUTION shadd References 2.1.1 and 2.1.2 be deleted References deleted (1) 0 Reperences 2.2.5 and 2 à Agreed deleted and most Rev- 2- 401, clas of RADMINN OPEIDLISK Ridgiann; Rau-2-411, Ux g Rithman' Data Base Maniager and Recover - Riv-2-110, would sample Belichion and Ist tote Evaluation Comments Resolved By: 1. Reviewed By: 6/26/0 Dennis Stevens Reviewer (Print) uthor Dennis Stevens 6/19/20 Reviewer (Signature) Date 3. Resolution of Comments Accepted By: fevers 6(28/90) Date nnis Reviewer

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Attachment 6.6 (1 of 1)

DOCUMENT REVIEW COMMENTS Page 2 of 2 DOCUMENT NO. RWD-1-210 REVISION NO. 4 DRAFT NO. TITLE: PROCESS CONTROL PROBRAM COMMENT RES NO. COMMENT NO. RESOLUTION step 4.7 should be Comment measurated 3 3 changed to Derected approximis support. and Assement Ð Reference deleted step stil delife Reference 2.2.7 Step 53.2 delett 3 Comment incorporated 5 Technical Specification 6.13". Step 5.4.1.1. Delete @ Reference delited (6) Reference 22.7 stip 5.11.12 should @ connect meorporated Q Represence Ru-2-110. 1. Reviewed By: omments Resolved By: Dennis Stevens Reviewer (Print) Date Gligho Dennis Stullen Reviewer (Signature) 3. Resolution of Comments Accepted By: Dennis Steens 6/26/90 Reviewer Date

UNT-001-003 Revision 12

Attachment 6.6 (1 of 1)

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approxibilities	- Process Control	PORC - S/C		
management HM	; reviewed this it erformed, (if appl cable), that an un ear safety is/was	tem and det licable) th previewed s not advers	ermined that a S at a Safety Eval afety question d ely affected.	afety uation oes
PORC MEMBER	MEMBER SIGNATURE	RECOMMENT	DED FOR APPROVAL NO	DAT
Maintenance Superintendent	Dono & Elharpe	-		8-16.
Operations Superintendent				
Radiation Protection Superintendent	Space Ranny	-		8-16
Operations Quality Assurance Manager	an Balton	4		8/16
Plant Engizeering Superintenden:	3x Annach	/		8/16
Assistant Plant Manager				
PORC-S/C Member				
PORC-S/C Member				
PORC-S/C Member		and a second sec		
PORC-S/C Chairman	1			
PORC Chairman	VI. A	/		8/1

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