

Ref: LCR 90-05

ATTACHMENT 2

INSERTS AND MARKED-UP PAGES

9101080297 901228
PDR ADOCK 05000354
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INSERTS FOR PROPOSED CHANGE TO
ADMINISTRATIVE CONTROLS TECHNICAL SPECIFICATIONS

INSERT 1

nominal**

INSERT 2 (Footnote)

** The shift schedule is based upon a 12 hour shift with a work week of either 36 hours or 48 hours.

INSERT 3

Section 4.1 and 4.7

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator shall be in the control room;
- c. A Radiation Protection Technician* shall be on site when fuel is in the reactor;
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation; and
- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions e.g., licensed Senior Reactor Operators, licensed Reactor Operators, radiation protection technicians, equipment operators, and key maintenance personnel.
- f. The Operations Manager, Operating Engineer, Senior Nuclear Shift Supervisors, Nuclear Shift Supervisors, and Senior Operating Supervisor shall hold a senior reactor operator license. The Nuclear Control Operators shall hold a reactor operator license.

INSERT 1

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a ~~40-hour~~ 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the appropriate department manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the General Manager—Hope Creek Operations or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

*The Radiation Protection Technician may be unavailable for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

INSERT 2

ADMINISTRATIVE CONTROLS

cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate designated review personnel. The Station Qualified Reviewers shall meet or exceed the qualifications described in ~~Section A.4~~ of ANS 3.1, 1981.

INSERT 3

- d. If the Department Manager determines that the documents involved contain significant safety issues, the documents shall be forwarded for SORC review and also to NSR for an independent review to determine whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions or requiring Technical Specification changes shall be obtained prior to implementation.

NON-PROCEDURE RELATED DOCUMENTS

6.5.3.3 Tests or experiments, and changes to equipment or systems shall be forwarded for SORC review and also to NSR for an independent review to determine whether or not an unreviewed safety question is involved. The results of NSR reviews will be provided to SORC. Recommendations for approval are made by SORC to the General Manager - Hope Creek Operations. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions or requiring Technical Specification changes shall be obtained prior to implementation.

RECORDS

6.5.3.4 Written records of reviews performed in accordance with item 6.5.3.2a above, including recommendations for approval or disapproval, shall be maintained. Copies shall be provided to the General Manager - Hope Creek Operations, SORC, NSR, and/or NRC as necessary when their reviews are required.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified pursuant to the requirements of Section 50.72 to 10 CFR Part 50 and a report submittal pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the NSR and the Vice President and Chief Nuclear Officer.

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 and Chief Nuclear Officer and the General Manager - NSR shall be notified within 24 hours.