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Std Tech Specs.*

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Manager-Radwaste shall be responsible for overall activities related to Radioactive Waste Management and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

CORPORATE

6.2.1 The Corporate Management and Technical Support Staff relative to Radioactive Waste Management shall be as shown on Figure 6.2-1.

RADIOACTIVE WASTE MANAGEMENT STAFF

6.2.2 The Radioactive Waste Management organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least 1 operator qualified per ANSI 18.1.
- b. An individual qualified in radiation protection procedures shall be on site whenever Radioactive Waste Management activities are in progress.

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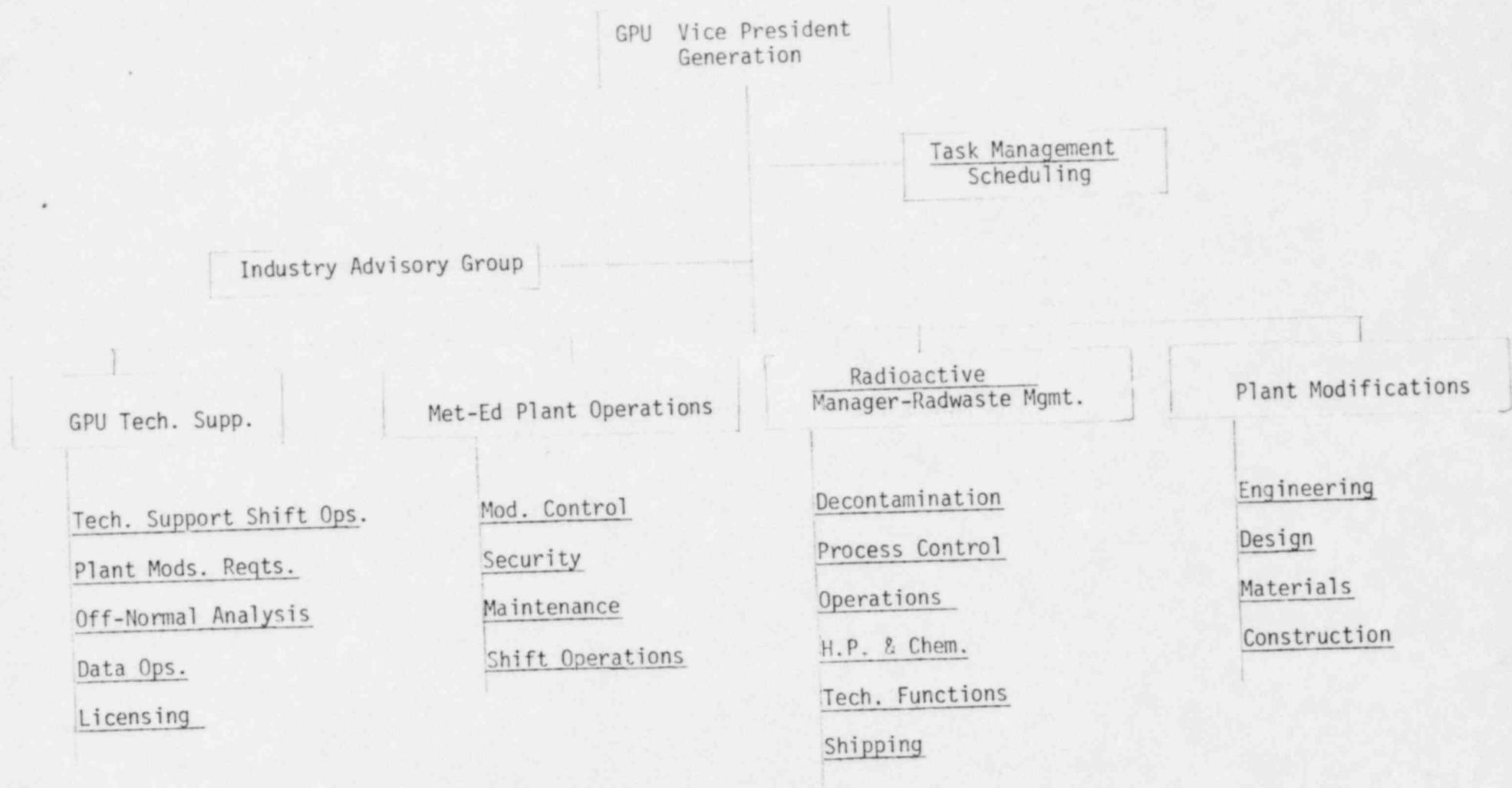
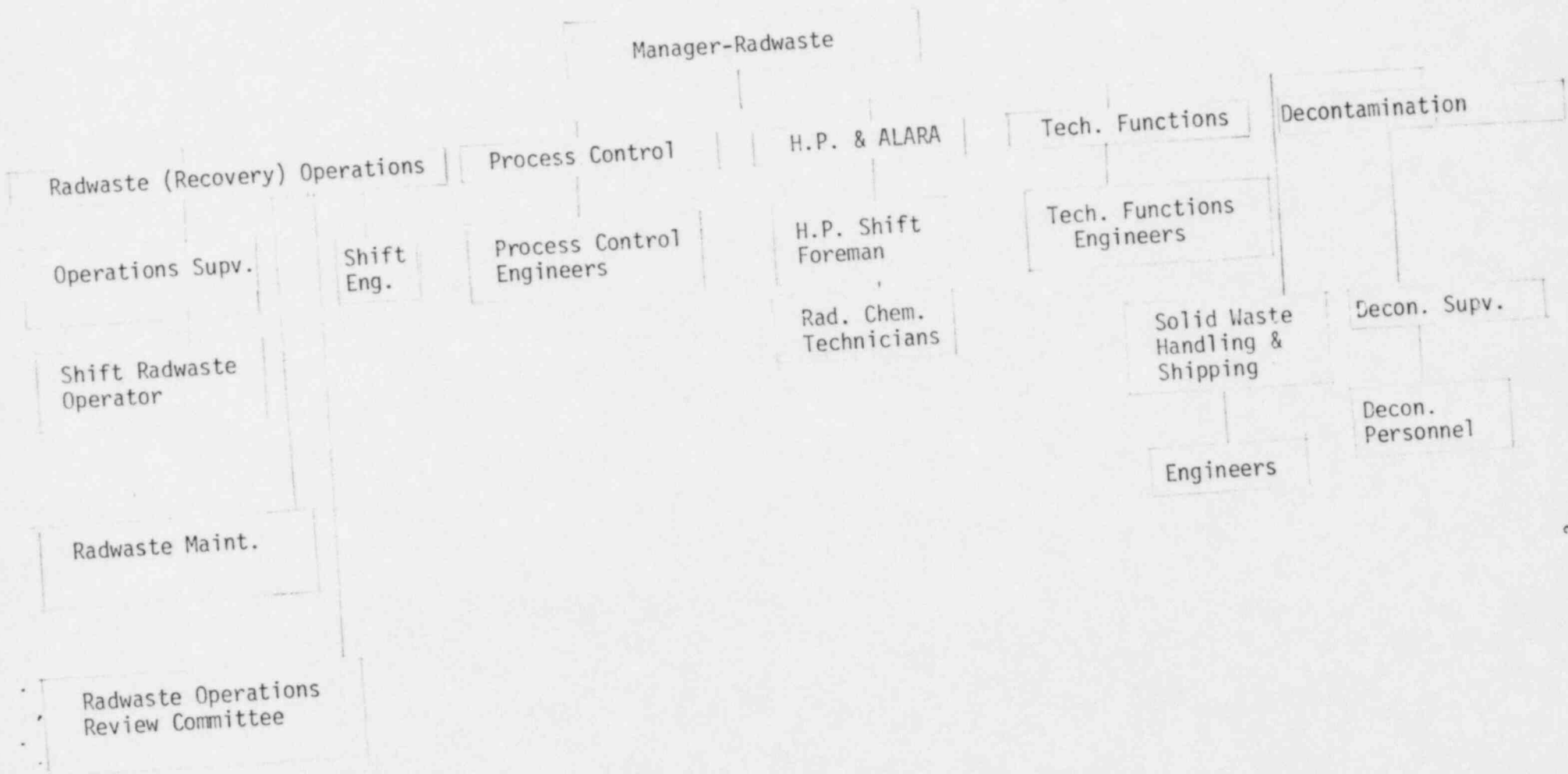


FIGURE 6.2-1 Corporate Management and Technical Support



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6.3 RADIOACTIVE WASTE MANAGEMENT STAFF QUALIFICATIONS

6.3.1 Each member of the Radioactive Waste Management staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Supervisor of Radiation Protection and Chemistry who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the Radioactive Waste Management staff shall be maintained under the direction of the Supervisor-Radwaste Training 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.

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6.5.3 RADWASTE OPERATIONS REVIEW COMMITTEE (RORC)

FUNCTION

6.5.3.1 The Radwaste Operations Review Committee (RORC) shall function to advise the Manager-Radwaste on all matters related to radioactive waste management.

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COMPOSITION

- 6.5.3.2 The Radwaste Operations Review Committee shall be composed of:
- a. Chairman - who shall have an academic degree in engineering or physical science field and a minimum of five years or applicable experience.
 - b. 1 Member - who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
 - c. 3 Members - who shall meet or exceed the qualifications of ANSI N18.1 - 1971.

The Manager-Radwaste shall designate the members of the Radwaste Operations Review Committee and shall appoint the Chairman and the Vice Chairman.

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.3.5 A quorum of the RORC shall consist of the Chairman and four members including alternates.

RESPONSIBILITIES

- 6.5.3.6 The Radwaste Operations Review Committee shall be responsible for:
- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Manager-Radwaste to affect radioactive waste management.
 - b. Review of all proposed tests and experiments that affect radioactive waste management.
 - c. Review of proposed changes to Technical Specifications relating to Radioactive Waste Management activities.
 - d. Review of all proposed changes or modifications to radwaste systems or equipment that affect radioactive waste management.

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RESPONSIBILITIES (Continued)

- e. Investigation of violations of the Technical Specifications relating Radioactive Waste Management activities and systems including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager-Radwaste, and the Radwaste Review Committee (RRC).
- f. Review of radwaste related events requiring 24 hour notification to the Commission.
- g. Review of radwaste operations to detect potential radiological hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Manager-Radwaste.
- i. Review of the radioactive waste management portions of the Recovery Operations Plan and implementing procedures and shall submit recommended changes to the Manager-Radwaste.
- j. Review of the Radiation Protection Plan and implementing procedures and shall submit recommended changes to the Manager-Radwaste.

AUTHORITY

6.5.3.7 The Radwaste Operations Review Committee shall:

- a. Recommend to the Manager-Radwaste in writing, approval or disapproval of items considered under 6.5.3.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.3.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President-Generation and the RRC Chairman of disagreement between the RORC and the Manager-Radwaste; however, the Manager-Radwaste shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.3.8 The Radwaste Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Manager-Radwaste and the RRC Chairman.

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6.5.4 RADWASTE REVIEW COMMITTEE (RRC)

FUNCTION

6.5.4.1 The Radwaste Review Committee (RRC) shall function to provide independent review and audit of radwaste activities in the areas of:

- a. Radioactive waste management
- b. Chemistry and radiochemistry
- c. Metallurgy
- d. Instrumentation and control
- e. Radiological safety
- f. Mechanical and electrical engineering
- g. Quality assurance practices

COMPOSITION

6.5.4.2 The RRC shall be composed of at least five members including the Chairman, appointed in writing by the Vice President-Generation. RRC members and alternates may be appointed from within the corporate organization or from external sources.

QUALIFICATIONS

6.5.4.3 Each RRC member and alternate shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of five years of technical experience, of which a minimum of three years shall be in one or more of the areas specified in 6.5.4.1.

ALTERNATES

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

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CONSULTANTS

6.5.4.5 Consultants shall be utilized as determined by the RRC Chairman to provide expert advice to the RRC.

MEETING FREQUENCY

6.5.4.6 The RRC shall meet at least once per calendar quarter.

QUORUM

6.5.4.7 A quorum of RRC shall consist of the Chairman or his designated alternate and at least 4 RRC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.4.8.1 The RRC shall review:

- a. The safety evaluations for 1) changes to radioactive waste procedures, equipment or systems and 2) radioactive waste 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.
- b. Violations of codes, regulations, orders, Technical Specifications, license requirements, or internal procedures or instructions involving radioactive waste and having safety significance
- c. Significant operating abnormalities or deviations from normal and expected performance of radwaste equipment that affect safety.
- d. Events relating to Radwaste activities requiring 24 hour written notification to the Commission.
- e. All recognized indications of an unanticipated deficiency in some aspects of design or operation of radioactive waste structures, systems, or components that could affect safety.
- f. Reports and meetings minutes of the RORC.

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- 6.5.4.8.2 At least one cognizant member of the RRC shall review:
- a. Proposed changes to procedures, equipment or systems which the RORC had determined may involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
 - b. Proposed tests or experiments which the RORC has determined may involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
 - c. Proposed changes to the Technical Specifications relating to rad-waste activities.

AUTHORITY

6.5.2.9 The RRC shall report to and advise the Vice President-Generation on those areas of responsibility specified in Sections 6.5.4.1.

RECORDS

- 6.5.2.10 Records of RRC activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each RRC meeting shall be prepared, approved and forwarded to the Vice President-Generation and Manager-Radwaste within 14 days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.8 above, shall be prepared, approved and forwarded to the Vice President-Generation and Manager-Radwaste within 14 days following approval of the review.

6.6 REPORTABLE OCCURRENCE ACTION

- 6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:
- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
 - b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the RORC and a report submitted to the RRC Chairman and the Manager-Radwaste.
 - c. Each monthly and quarterly report required pursuant to Specification 6.9.1.10 shall be reviewed by the RORC and a copy shall be submitted to the RRC Chairman and the Manager-Radwaste.

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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. Recovery Operations Plan implementation in areas relating to Radwaste.
- c. Radioactive Waste Management surveillance and test activities.
- d. Radiation Protection Plan implementation.

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6.8 PROCEDURES (Continued)

- e. RECOVERY MODE implementation, specifically RECOVERY MODE procedures which involve a reduction in the margin of safety, including those which:
 - 1. Could increase the likelihood or magnitude of radiological releases.
 - 2. Could increase the likelihood of failures in radwaste systems important to safety.
 - 3. Alter the distribution or processing of significant quantities of stored radioactivity or radioactivity being released through known flow paths in radwaste systems.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the Radwaste Operations Review Committee and approved by the Manager-Radwaste prior to implementation and reviewed periodically as set forth in administrative procedures. Each procedure of 6.8.1 a through e above, and changes thereto, shall be submitted to the NRC prior to implementation; these procedures and changes thereto, shall be subject to approval by the NRC prior to implementation. The Manager-Radwaste shall have responsibility for determining which procedures are in the 6.8.1 a through e category.

6.8.3.1 Temporary changes to procedures of 6.8.1 a through d above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the radioactive waste management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the Radwaste Operations Review Committee and approved by the Radwaste Manager within 14 days of implementation.
- d. The change is submitted to the NRC within 72 hours for review.

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6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

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 Director of the Regional Office of Inspection and Enforcement unless otherwise noted.

ANNUAL REPORTS

6.9.1.4 Annual reports covering the activities of the unit as described below during the previous calendar year shall be submitted prior to March 1 of each year.

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr. and their associated man rem exposure according to work and job functions, ^{2/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

^{1/} A single tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

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REPORTABLE OCCURRENCES

6.9.1.7 The REPORTABLE OCCURRENCES of Specifications 6.9.1.8 and 6.9.1.9, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP

6.9.1.8 The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the Regional Office, or his designate no later than the first working day following the event, with a written followup report within 30 days. The written followup report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Operation of the radwaste systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the Technical Specifications.
- b. Failure or malfunction of one or more components which prevents or could prevent by itself, the fulfillment of the functional requirements of radwaste system(s) used to cope with accidents analyzed in the SAR.
- c. Conditions arising from natural or man-made events that, as a direct result of the event abnormally degrades the operation of radwaste systems, or other protective measures required by technical specifications.
- d. Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or technical specifications bases relative to radwaste activities; or discovery during unit life of conditions not specifically considered in the safety analysis report or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition relative to radwaste activities.

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THIRTY DAY WRITTEN REPORTS

6.9.1.9 The types of events listed below shall be the subject of written reports to the Director of the Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of the licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation relative to radwaste activities.
- b. Observed inadequacies in the implementation of radwaste administrative or procedural controls which threaten to cause reduction of degree of safety provided in radioactive waste treatment systems.
- c. Abnormal degradation of radwaste systems designed to contain radioactive material resulting from the fission process.

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SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report.

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of radwaste operation.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to radwaste systems.
- c. ALL REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Safety Analysis Report.

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- b. Records of unit radiation and contamination survey.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of training and qualification for current members of the radwaste staff.
- f. Records of Quality Assurance activities required by the Operating Quality Assurance Plan.
- g. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- h. Records of meetings of the RORC, and the RRC.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and the NRC approved Radiation Protection Plan; these procedures shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area shall be controlled as specified in the Radiation Protection Plan.