

weekend, the Radiation/Chemistry Technicians report to the Shift Engineer in the absence of Radiation Protection Supervision of the site.

13.1.3 Qualifications of Nuclear Plant Personnel

13.1.3.1 Qualification Requirements

The guidelines of Regulatory Guide 1.8 are generally followed by LSCS management for personnel selection and training. For some positions, alternate qualifications are utilized based upon operating experience. Table 13.1-1 lists plant staff positions and designates ANSI N18.1, 1971 equivalent titles

13.1.3.2 Qualification of Plant Personnel

The qualifications of the initial personnel on the LSCS staff holding key managerial and supervisory positions are provided in the résumés included in this chapter.

INSERT A HERE

~~The Rad/Chem technician at LSCS will be qualified for this position as required by ANSI N18.1, 1971, except that individuals in training will perform work for which qualification has been demonstrated in order to obtain the experience required by the ANSI standard.~~

The LSCS technical specifications require that ~~the shift crew include an individual qualified in radiation protection procedures.~~ An individual shall be considered qualified in radiation protection procedures upon certification by the licensee that he is capable of successfully accomplishing the following activities:

- a. Conduct special and routine radiation, contamination and airborne radioactivity surveys and evaluate the results.
- b. Establish protective barriers and post appropriate radiological signs.
- c. Establish means of limiting exposure rates and accumulated radiation doses, including the use of protective clothing and respiratory protection equipment.
- d. Perform operability checks of radiation monitors and survey meters.
- e. Recommend appropriate immediate actions in the event of a radiological problem and perform necessary activities until the arrival of health physics personnel.

A HEALTH PHYSICS TECHNICIAN SHALL BE ON SITE WHEN FUEL IS IN THE REACTOR

- f. Conduct other routine radiological duties (e.g., Technical Specification surveillance items) as may be required on backshifts or weekends.

~~Individuals assigned to a shift crew who do not meet the experience requirements of ANSI N18.1, 1971, may perform radiation chemistry activities for which qualification has been demonstrated provided that the results of analyses performed by the individual are reviewed by:~~

- ~~a. a technician who meets the requirements of ANSI N18.1, 1971, Section 4.5.2, or~~
- ~~b. a supervisor not requiring an NRC license who meets the requirements of ANSI N18.1, 1971, Section 4.5.2, or~~
- ~~c. an individual who meets the requirements of ANSI N18.1, 1971, Section 4.4.3, "Chemistry and Radiochemistry."~~

INSERT B HERE

FSAR Section 13.1.3.2

INSERT A

The ANSI N18.1-1971 qualification requirements for Rad/Chem Technician may also be met by either of the following alternatives:

- 1) Individuals who have completed the Rad/Chem Technician training program and have accrued one year of working experience in the specialty, or
- 2) Individuals who have completed the Rad/Chem Technician training program, but have not yet accrued one year of working experience in the specialty, who are supervised by on-shift health physics supervision who meet the requirements of ANSI N18.1-1971 Section 4.3.2, Supervisor Not Requiring AEC Licenses, or Section 4.4.4, Radiation Protection.

FSAR Section 13.1.3.2

INSERT B

All Radiation/Chemistry Technicians on the backshift shall be trained per the Rad/Chem Technician Training Program. All such Technicians shall also have satisfactorily completed the following emergency response training:

- (i) Tasks to be performed during the first 60 minutes of a serious emergency on the backshift;
- (ii) Post-accident sampling and analysis for the first three hours of an emergency;
- (iii) In-plant radiation surveys during an accident;
- (iv) Use and interpretation of both portable and fixed area radiation monitoring equipment, such as the Eberline PING-3 and SAM-2;
- (v) Interpretation of critical effluent monitoring data for assisting the Shift Engineer during the first hour of an accident (i.e., station vent monitor and standby gas treatment monitor);
- (vi) First aid and bioassay techniques; and
- (vii) Use of respiratory equipment during emergency situations.

ATTACHMENT A - ENCLOSURE 2

Commonwealth Edison Company

Proposed Change to Technical Specifications

6132N

ADMINISTRATIVE CONTROLS

Any deviation from the above guidelines shall be authorized by the Station Superintendent or his deputy, 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 Station Superintendent or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

D. Qualifications of the station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971. The Rad/Chem Supervisor shall meet the requirements of radiation protection manager of Regulatory Guide 1.8, September, 1975.

INSERT

E. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel", dated March 8, 1971 and Appendix "A" of 10 CFR Part 55, and shall include familiarization with relevant industry operational experience identified by the ONSG.

F. Retraining shall be conducted at intervals not exceeding 2 years.

G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

1. The Supervisor of the Offsite Review and Investigative Function shall be appointed by the Director, Nuclear Safety. The Audit Function shall be the responsibility of the Manager of Quality Assurance and shall be independent of operations.

a. Offsite Review and Investigative Function

The Supervisor of the Offsite Review and Investigative Function shall: (1) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (2) select each participant for this function, (3) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (4) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (5) approve and report in a timely manner all findings of non-compliance with NRC requirements to the Station Superintendent, Division Vice President - Nuclear Stations, Manager of Quality Assurance, and the Vice President - Nuclear Operations. During periods when the Supervisor of Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate, who satisfies the formal training and experience for the Supervisor of the Offsite Review and Investigate Function. The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

ADMINISTRATIVE CONTROLS

Offsite Review and Investigative Function (Continued)

- no change*
- 1) The safety evaluations for (1) changes to procedures, equipment, or systems as described in the safety analysis report and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of Quality Assurance.
 - 2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
 - 3) Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
 - 4) Proposed changes in Technical Specifications or NRC operating licenses.
 - 5) Noncompliance with NRC requirements, or of internal procedures, or instructions having nuclear safety significance.
 - 6) Significant operating abnormalities or deviation from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the Onsite Review and Investigative Function.
 - 7) Reportable occurrences requiring 24 hour notification to the NRC.
 - 8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
 - 9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such change.
 - 10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Superintendent, Division Vice President - Nuclear Stations, and Manager of Quality Assurance.

Technical Specifications Section 6.1.D

INSERT

The ANSI N18.1-1971 qualification requirements for Rad/Chem Technician may also be met by either of the following alternatives:

- 1) Individuals who have completed the Rad/Chem Technician training program and have accrued one year of working experience in the specialty, or
- 2) Individuals who have completed the Rad/Chem Technician training program, but have not yet accrued one year of working experience in the specialty, who are supervised by on-shift health physics supervision who meet the requirements of ANSI N18.1-1971 Section 4.3.2, Supervisor Not Requiring AEC Licenses, or Section 4.4.4, Radiation Protection.

ATTACHMENT B

Status of License Change Requests

<u>Change Request</u>	<u>Description</u>	<u>Status</u>
NPF-11/82-14	Rad Effluent Tech Specs revision of reporting, etc.	Submitted to NRC 4-08-82. Telecon 12/82 awaiting CECO resubmittal per agreement in telecon.
NPF-11/83-01	Add position of Project Manager	Submitted to NRC 2-24-83.
NPF-11/83-02	Revise CO ₂ tank level requirement	Submitted to NRC 2-24-83.
NPF-11/83-03	Delete license condition 2.C.(26) and revise Tech Spec Section 6.1.D regarding RCT qualifications	Submitted to NRC 3-11-83.