

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Manager Site Operations* shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

TMI GENERATION GROUP

6.2.1 The TMI Generation Group Organization for unit management and technical support shall be as shown on Figure 1.1 of the Organization Plan. The Organization Plan and changes thereto shall be sent to the NRC for review prior to implementation.

TMI-2 ORGANIZATION

6.2.2 The unit organization shall be as shown on Figure 1.2 of the Organization Plan and:

- 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. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- d. A Site Fire Brigade of at least 5 members shall be maintained onsite at all times. The Site 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.
- e. An individual qualified in radiation protection procedures shall be on site whenever Radioactive Waste Management activities are in progress.

*This position title is equivalent to the position title "Unit Superintendent" used on procedures dated prior to January 15, 1980.

TABLE 6.2-1.

MINIMUM SHIFT CREW COMPOSITION#

LICENSE CATEGORY	RECOVERY MODE
SOL	1
OL	1
Non-Licensed	2

#Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

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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 the Manager Radiological Controls or his deputy 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 unit staff shall be maintained under the direction of the Supervisor-Station 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.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Supervisor-Station Training and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The Plant Operations Review Committee (PORC) shall function to advise the Manager Site Operations on all matters related to nuclear safety and radioactive waste safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee shall be composed of the:

- a. Chairman - who shall have an academic degree in engineering or physical science field and a minimum of five years of applicable experience.
- b. 1 Member - who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- c. 7 Members - who shall meet or exceed the qualifications of Section 4.4 of ANSI N18.1 - 1971.

The Manager Site Operations shall designate the Chairman and the Vice Chairman from among the members of the Plant Operations Review Committee.

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ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the PORC shall consist of the Chairman or his designated alternate and four members, including alternates, one of whom shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

RESPONSIBILITIES

6.5.1.6 The Plant Operations Review Committee shall be responsible for the review of:

- a. Written safety evaluation of changes in the facility as described in the Final Safety Analysis Report, changes in procedures as described in the Final Safety Analysis Report and tests or experiments not described in the Final Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests or experiments did not involve a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2).
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(c). Matters of this kind shall be referred to the Generation Review Committee by the PORC following its review or by other functional organizational units within the organization, prior to implementation.
- c. Changes in the technical specifications or license amendments relating to nuclear safety prior to implementation, except in those

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6.5.1.6 RESPONSIBILITY (Continued)

cases where the change is identified to a previously received proposed change.

- d. Violations, deviations and reportable events, which require reporting to the NRC in writing within 24 hours, such as:
 - 1. Violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance.
 - 2. Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components.
 - 3. Reportable events, which require reporting to the NRC in writing within 24 hours, as defined in the plant technical specifications.

Review of event covered under this subsection shall include the results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- e. Any other matter involving safe operation of the nuclear power plant which an independent reviewer deems appropriate for consideration, or which is referred to the Generation Review Committee by the PORC or by the Manager Site Operations.

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6.5.1.6 RESPONSIBILITY (Continued)

- f. The Security Plan and implementing procedures which are in categories a, b or c above, and shall submit recommended changes to the Manager Site Operations and the Generation Review Committee.
- g. The Emergency Plan and implementing procedures which are in categories a, b or c above, and shall submit recommended changes to the Manager Site Operations and the Generation Review Committee.
- h. The Recovery Operations Plan and implementing procedures which are in categories a, b or c above, and shall submit recommended changes to the Manager Site Operations and the Generation Review Committee.
- i. The Radiation Protection Plan and implementing procedures which are in categories a, b or c above, and shall submit recommended changes to the Manager Radiological Controls and the Generation Review Committee.

AUTHORITY

6.5.1.7 The Plant Operations Review Committee shall:

- a. Recommend to the Manager Site Operations in writing approval or disapproval of items considered under 6.5.1.6(a) through (c) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (d) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Director TMI-2 and the GRC Chairman of disagreement between the PORC and the Manager Site Operations; however, the Manager Site Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Director TMI-2 and the GRC Chairman.

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6.5.2 GENERATION REVIEW COMMITTEE (GRC)

FUNCTION

6.5.2.1 The Generation Review Committee (GRC) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear unit 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
- i. Radioactive waste operations

COMPOSITION

6.5.2.2 The GRC shall be composed of at least five members including the Chairman, appointed in writing by the Director Technical Functions. GRC members and alternates may be appointed from within the corporate organization or from external sources.

QUALIFICATIONS

6.5.2.3 Each GRC 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 6.5.2.1.

ALTERNATES

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

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CONSULTANTS

6.5.2.5 Consultants shall be utilized as determined by the GRC Chairman to provide expert advice to the GRC.

MEETING FREQUENCY

6.5.2.6 The GRC shall meet at least once per six months.

QUORUM

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

REVIEW

6.5.2.8.1 The GRC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) 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 of internal procedures or instructions having nuclear safety significance.
- c. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety and radioactive waste safety.
- d. Events requiring 24 hour written notification to the Commission.
- e. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety and radioactive waste safety.
- f. Reports and meeting minutes of the PORC.

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6.5.2.8.2 At least one cognizant member of the GRC shall review:

- a. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- b. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed changes to Technical Specifications or this Operating License.

AUDITS

6.5.2.9 Audits of unit activities shall be performed under the cognizance of the GRC. 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 unit 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, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of all activities required by the Operating Quality Assurance Plan to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Emergency Plan and implementing procedures at least once per 24 months.
- f. The Security Plan and implementing procedures at least once per 24 months.
- g. The Radiation Protection Plan and implementing procedures at least once per year.
- h. The Fire Protection Program Plan and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention inspection and audit performed at least once per 12 months, utilizing either qualified offsite licensee personnel or an outside fire protection firm.

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AUDITS (Continued)

- j. An inspection and audit of the fire protection and loss prevention program performed by an outside qualified fire consultant at least once per 36 months.
- k. Any other area of unit operation considered appropriate by the GRC or the Manager-Quality Assurance.

AUTHORITY

6.5.2.10 The GRC shall report to and advise the Director Technical Functions on those areas of responsibility specified in Sections 6.5.2.8 and 6.5.2.9.

RECORDS

6.5.2.11 Records of GRC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each GRC meeting shall be prepared, approved and forwarded to the Director Technical Functions and Senior Vice President Metropolitan Edison 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 Director Technical Functions and Senior Vice President Metropolitan Edison 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 PORC and a report submitted to the GRC Chairman and the Director TMI-2.
- c. Each monthly and quarterly report required pursuant to Specification 6.9.1.10 shall be reviewed by the PORC and a copy shall be submitted to the GRC Chairman and the Director TMI-2.

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6.7 SAFETY LIMIT VIOLATION

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

- a. The Safety Limit violation shall be reported to the Commission, the Director TMI-2 and to the GRC Chairman as soon as possible within the first 8 hours following the Safety Limit violation.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Operations Review Committee. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the GRC Chairman and the Director TMI-2 within 14 days of the violation.

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 1976.
- b. Recovery Operations Plan implementation.
- c. Surveillance and test activities of safety related equipment and radioactive waste management equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Radiation Protection Plan implementation.

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6.8 PROCEDURES (Continued)

- g. RECOVERY MODE implementation. (Specifically RECOVERY MODE procedures which involve a reduction in the margin of safety, including those which:)
1. Directly relate to core cooling.
 2. Could cause the magnitude of radiological releases to exceed limits established by the NRC.
 3. Could increase the likelihood of failures in systems important to nuclear safety and radioactive waste processing or storage.
 4. Alter the distribution or processing of significant quantities of stored radioactivity or radioactivity being released through known flow paths.

6.8.2 Each procedure described in 6.8.1 above, and changes thereto, shall be reviewed and approved by designated individuals. At a minimum, this will include the manager, or his alternate, responsible for preparation of the procedure. In addition, a designated individual, or individuals, not responsible for preparation or implementation of the procedure, will independently review each procedure and determine if any additional review and approval, such as Plant Operations Review Committee, Quality Assurance, etc., is required. Each Procedure of 6.8.1 b. and g. 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.

6.8.3.1 Temporary changes to procedures of 6.8.1 a., c., d., e. and f. 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 unit management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented and reviewed by the original reviewers and approvers within 14 days of implementation.

6.8.3.2 Temporary changes to procedures of 6.8.1 b. and g. may be made provided the provisions of 6.8.3.1 are satisfied and the change is submitted to the NRC for review within 72 hours following approval by the original procedure approver.

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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^{1/}

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.
- b. The following information on aircraft movements at the Harrisburg International Airport:
 1. The total number of aircraft movements (takeoffs and landings) at the Harrisburg International Airport for the previous twelve-month period.
 2. The total number of movements of aircraft larger than 200,000 pounds, based on a current percentage estimate provided by the airport manager.

RADIATION SAFETY PROGRAM REPORT

6.9.1.6 A Radiation Safety Program Report shall be prepared describing a management plan and schedule for upgrading the Radiation Safety Program in response to Recommendation 4 of NUREG-0640, December 7, 1979. The initial report and subsequent quarterly status reports describing the progress made in implementing this program shall be submitted to the Director of the

^{1/}A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

^{2/}This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

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Regional Office of Inspection and Enforcement. The initial report shall be submitted by February 8, 1980, and the subsequent quarterly status reports shall be submitted no later than the 15th of each month following the calendar month covered by the report.

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. Deleted.
- b. Operation of the unit or affected 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.
- c. Abnormal degradation discovered in reactor coolant pressure boundary, or primary containment.
- d. An unplanned reactivity insertion of more than 0.5% delta K/K or occurrence of any unplanned criticality.
- e. Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the SAR.
- f. Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.
- g. Conditions arising from natural or man-made events that, as a direct result of the event, require operation of safety systems or other protective measures required by Technical Specifications.
- i. 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; 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.

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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 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. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation.
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in engineered safety feature systems or radioactive waste treatment systems.
- d. Abnormal degradation of systems other than those specified in 6.9.1.8.c above designed to contain radioactive material resulting from the fission process.

REPORTING REQUIREMENTS FOR INCIDENT WHICH OCCURRED ON MARCH 28, 1979

6.9.1.10 A written quarterly update/status report of the incident which occurred on March 28, 1979 and related events which occurred through January 15, 1980, shall be submitted to the Director of the Regional Office no later than the 15th of each quarter (January 15, April 15, July 15, and October 15). These quarterly reports shall include available information concerning the cause of the incident, probable consequences of the incident, planned (short term and preliminary longterm) corrective action and a description of continuing activities related to the incident. These quarterly reports shall continue until a final report is issued and these reports shall include the similar type of information described above as well as those interim analysis results and interim evaluation concerning the incident which have become available. The final report shall include a summary of Technical Specification violations which occurred during and after the transient. The final report shall also include a summary of the cause(s) of the incident, a sequence of events which occurred during the transient, and corrective actions (both short term and long term) which were taken as a result of the March 28, 1979 incident. These quarterly reports shall be in lieu of the reports required by 6.9.1.8, 6.9.1.9 and 6.9.2 which would have been required for the interval of March 28, 1979 through January 15, 1980.

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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 unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety and radioactive waste 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. Reports required by 6.9.1.6 and 6.9.1.10.
- g. Records of radioactive shipments.
- h. Records of sealed source and fission detector leak tests and results.
- i. Records of annual physical inventory of all sealed source material of record.
- j. Records and logs of radioactive waste systems operations.

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.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of transient or operational cycles for those unit components designed for a limited number of transients or cycle.
- d. Records of reactor tests and experiments.

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- e. Records of training and qualification for current members of the unit staff.
- f. Records of in-service inspections performed pursuant to these Technical Specifications.
- g. Records of Quality Assurance activities required by the Operating Quality Assurance Plan.
- h. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- i. Records of meetings of the PORC and the GRC.
- j. Records of the incident which occurred on March 28, 1979.
- k. Records of unit radiation and contamination surveys.
- l. Records of radiation exposure for all individuals entering radiation control areas.
- m. Records of gaseous and liquid radioactive material released to the environs.

6.11 RADIATION PROTECTION PROGRAM

Personnel radiation protection shall be consistent with the requirements of 10 CFR Part 20 and the NRC approved Radiation Protection Plan.

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.