

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1

The Vice President & Director Oyster Creek shall be responsible for overall facility operation. Those responsibilities delegated to the Vice President & Director as stated in the Oyster Creek Technical Specifications may also be fulfilled by the Deputy Director. The Vice President & Director shall delegate in writing the succession to this responsibility during his and/or the Deputy Directors absence.

6.2 ORGANIZATION

6.2.1 OFFSITE

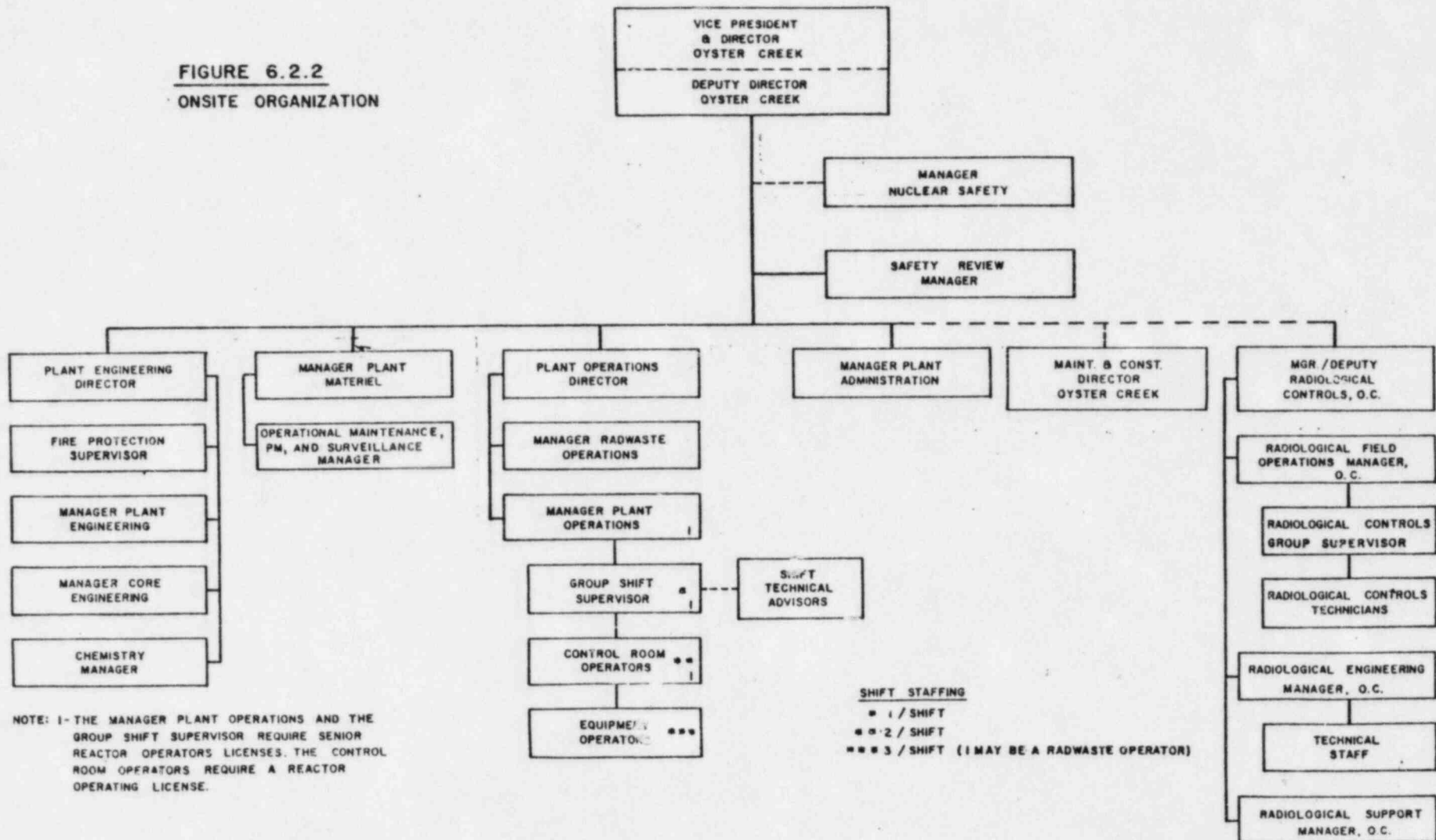
The organization for GPU Nuclear Corporation for management and technical support shall be functionally as shown on Figure 6.2.1.

6.2.2 FACILITY STAFF

The facility organization shall be as shown on Figure 6.2.2 and:

- a. Each on duty shift shall include at least the shift staffing indicated on Figure 6.2.2.
- b. At least one licensed reactor operator shall be in the control room when fuel is in the reactor.
- c. Two licensed reactor operators shall be in the control room during all reactor startups, shutdowns, and other periods involving planned control rod manipulations.
- d. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. An individual qualified in radiation protection measures shall be on site when fuel is in the reactor.
- f. A Fire Brigade of at least 5 members shall be maintained onsite at all time. The Fire Brigade shall not include the minimum shift crew necessary for safe shutdown of the facility or any personnel required for other essential functions during a fire emergency.
- g. Each on duty shift shall include a Shift Technical Advisor except that the Shift Technical Advisors position need not be filled if the reactor is in the refuel or shutdown mode and the reactor is less than 212°F.

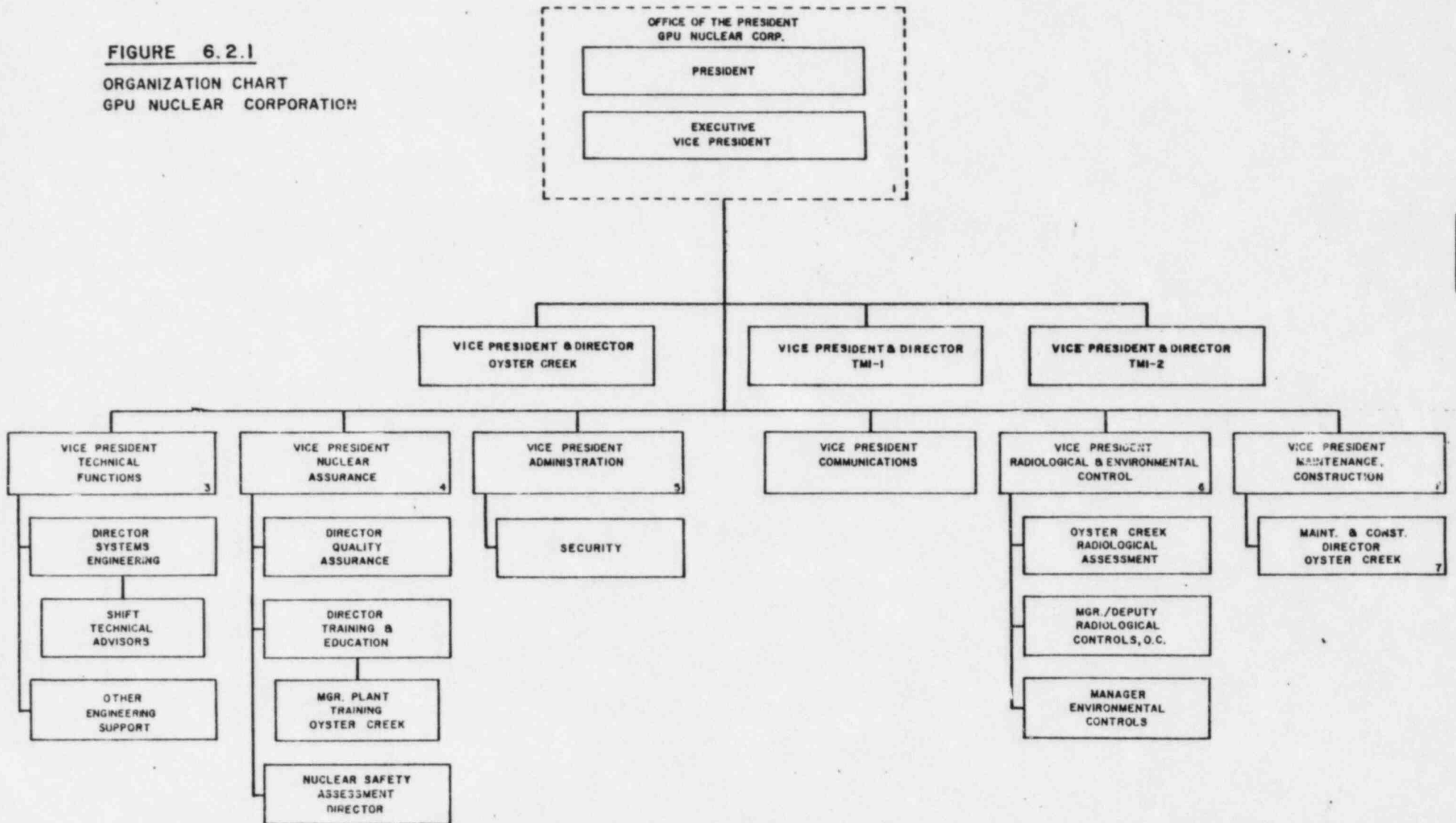
FIGURE 6.2.2
ONSITE ORGANIZATION



NOTES TO FIGURE 6.2.1

1. The project engineering, the shift technical advisors, and licensing functions assigned to each nuclear plant site will report to the Vice President Technical Functions.
2. The quality assurance, emergency planning and training functions assigned to each nuclear plant site will report to the Vice President Nuclear Assurance.
3. The security, materials management, personnel and general administrative functions assigned to each nuclear plant site will report to the Vice President Administration.
4. The radiological and offsite environmental control functions assigned to each nuclear plant site will report to the Vice President Radiological and Environmental Controls.
5. The conduct of all Oyster Creek modifications, repairs and construction activities will be the responsibility of the Maintenance and Construction Director - Oyster Creek who will report to the Vice President Maintenance and Construction.

FIGURE 6.2.1
ORGANIZATION CHART
GPU NUCLEAR CORPORATION



6.3 FACILITY STAFF QUALIFICATIONS

6.3.1

The members of the facility staff shall meet or exceed the following qualifications:

Vice President & Director/Deputy Director

Requirements: Ten years total power plant experience of which three years must be nuclear power plant experience. A maximum of four years of academic training may fulfill four of the remaining seven years of required experience. Both must be capable of obtaining or possess a Senior Reactor Operator's License.

Plant Operations Director

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two years of the remaining five years of required experience. The Plant Operations Director must be capable of obtaining or possess a Senior Reactor Operator's License.

Plant Engineering Director

Requirements: Eight years of responsible positions related to power generation, of which three years shall be nuclear power plant experience. A maximum of four of the remaining five years of experience may be fulfilled by satisfactory completion of academic or related technical training.

Manager Plant Administration

Requirements: Eight years total power plant experience of which four years must have been in nuclear power plant experience. The Manager should possess a four year college degree or equivalent in Business Administration or an Engineering discipline.

Manager Plant Operations

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two of the remaining five years of required experience. The Manager Plant Operations must possess a Senior Reactor Operator's License.

Safety Review Manager

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two of the remaining five years of required experience.

Manager Core Engineering

At the time of initial core loading or appointment to the position, whichever is later, the responsible person shall have a Bachelor's Degree in Engineering or the Physical Sciences and four years experience or a graduate degree and three years experience. Two of these years shall be nuclear power plant experience. The experience shall be in such areas as reactor physics, core measurements, core heat transfer, and core physics testing programs. Successful completion of a reactor engineering training program (such as the 12 week concentrated programs offered by NSS Vendors) may be equivalent to one year's nuclear power plant experience.

Manager Plant Materiel

Requirements: Seven years of total power plant experience of which one year must be nuclear power plant experience. Two years of academic or related technical training may fulfill two of the remaining six years of required experience.

Area Supervisor Instrument & Computer Maintenance

Requirements: Five years of experience in instrumentation and control, of which a minimum of one year shall be in nuclear instrumentation and control at an operating nuclear power plant. A maximum of four years of this five year experience may be fulfilled by related technical or academic training.

Manager Plant Engineering

The engineer in charge of technical support shall have a Bachelor's Degree in Engineering or the Physical Sciences and have three years of professional level experience in nuclear services, nuclear plant operation, or nuclear engineering, and the necessary overall nuclear background to determine when to call consultants and contractors for dealing with complex problems beyond the scope of owner-organization expertise.

Mgr/Deputy Radiological Controls (Reports Offsite)

Requirements: Bachelor's degree or the equivalent in a science or engineering subject, including some formal training in radiation protection. Five years of professional experience in applied radiation protection. (Master's degree equivalent to one year experience and Doctor's degree equivalent to two years experience where coursework related to radiation protection is involved.) Three years of this professional experience should be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations.

Chemistry Manager

Requirements: Five years experience in chemistry of which a minimum of one year shall be in radiochemistry at an operating nuclear power

plant. A maximum of four years of this five year experience may be fulfilled by related technical or academic training.

M&C Director, O.C.

Requirements: Seven years of total power plant experience of which one year must be nuclear power plant experience. Two years of academic or related technical training may fulfill two of the remaining six years of required experience.

Shift Technical Advisor

Requirements: Bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.3.2

Each member of the radiation protection organization for which there is a comparable position described in ANSI N18.1-1971 shall meet or exceed the minimum qualifications specified therein, or in the case of radiation protection technicians, they shall have at least one year's continuous experience in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, and shall have been certified by the Mgr/Deputy Radiological Controls, as qualified to perform assigned functions. This certification must be based on an NRC approved, documented program consisting of classroom training with appropriate examinations and documented positive findings by responsible supervision that the individual has demonstrated his ability to perform each specified procedure and assigned function with an understanding of its basis and purpose.

6.4 TRAINING

6.4.1

A retraining program for operators shall be maintained under the direction of the Manager Plant Training Oyster Creek and shall meet the requirements and recommendation of Appendix A of 10CFR Part 55. Replacement training programs, the content of which shall meet the requirements of 10CFR Part 55, shall be conducted under the direction of the Manager Plant Training Oyster Creek for licensed operators and Senior Reactor Operators.

6.4.2

A training program for the Fire Brigade shall be maintained under the direction of the Manager Plant Training Oyster Creek.

6.5 REVIEW AND AUDIT

6.5.1 TECHNICAL REVIEW AND CONTROL

The Vice President of each division within GPU Nuclear Corporation as indicated in Figure 6.2.1, shall be responsible for ensuring the preparation, review, and approval of documents required by the activities described in 6.5.1.1 through 6.5.1.5 within his functional area of responsibility as assigned in the GPUN Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above.

ACTIVITIES

6.5.1.1

Each procedure required by Technical Specification 6.8 and other procedures including those for tests and experiments which are important to safety, and changes thereto which are important to safety, shall be prepared by a designated individual(s)/group knowledgeable in the area affected by the procedure. Each such procedure, and change thereto, shall be reviewed for adequacy by an individual(s)/group other than the preparer, but who may be from the same division as the individual who prepared the procedure or change.

6.5.1.2

Proposed changes to the Appendix "A" Technical Specifications shall be reviewed by a knowledgeable individual(s)/group other than the individual(s) group who prepared the change.

6.5.1.3

Proposed modifications to facility structures, systems and components important to safety shall be designed by an individual/organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification but may be from the same division as the individual who designed the modification.

6.5.1.4

Proposed tests and experiments that are important to safety shall be reviewed by a knowledgeable individual(s)/group other than the preparer but who may be from the same division as the individual who prepared the tests and experiments.

6.5.1.5

Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, shall be

reviewed by a knowledgeable individual(s)/group other than the individual/ group which performed the investigation.

6.5.1.6

Events requiring 24-hour written notification to the Commission shall be reviewed by an individual/group other than the individual/group which prepared the report.

6.5.1.7

Special reviews, investigations or analyses and reports thereon as requested by the Vice President & Director Oyster Creek shall be performed by a knowledgeable individual(s)/group.

6.5.1.8

The Security Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.

6.5.1.9

The Emergency Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.

6.5.1.10

Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation shall be performed by a knowledgeable individual(s)/group. Recommendations and disposition of the corrective action to prevent recurrence shall be sent to the Vice President & Director Oyster Creek.

6.5.1.11

Major changes to radwaste systems shall be reviewed by a knowledgeable individuals(s)/group other than the individual(s)/group which prepared them.

6.5.1.12

Individuals responsible for reviews performed in accordance with 6.5.1.1 through 6.5.1.4 shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate personnel. Individuals responsible for reviews considered under 6.5.1.1 through 6.5.1.5 shall render determinations in writing with regard to whether or not 6.5.1.1 through 6.5.1.5 constitute an unreviewed safety question.

RECORDS

6.5.1.13

Written records of activities performed under specifications 6.5.1.1 through 6.5.1.11 shall be maintained.

QUALIFICATIONS

6.5.1.14

Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI N18.1-1978 Section 4.6 or 4.4 for applicable disciplines or have 7 years of appropriate experience in the field of his specialty. Credit towards experience will be given for advanced degrees on a one for one basis up to a maximum of two years. These Reviewers shall be designated in writing.

6.5.2 INDEPENDENT SAFETY REVIEW

FUNCTION

6.5.2.1

The Vice President of each division within GPU Nuclear Corporation as indicated in Figure 6.2.1 shall be responsible for ensuring the periodic independent safety review of the subjects described in 6.5.2.5 within his assigned area of safety review responsibility, as assigned in the GPUN Review and Approval Matrix.

6.5.2.2

Independent safety review shall be completed by an individual/group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual/group performing the original work.

6.5.2.3

GPU Nuclear Corporation shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Nondestructive testing
- f. Instrumentation and control
- g. Radiological safety
- h. Mechanical engineering
- i. Electrical engineering
- j. Administrative controls and quality assurance practices

- k. Emergency plans and related organization, procedures and equipment
- l. Other appropriate fields associated with the unique characteristics of Oyster Creek

6.5.2.4

Consultants may be utilized as determined by the cognizant Vice President to provide expert advice.

RESPONSIBILITIES

6.5.2.5

The following subjects shall be independently reviewed by the functionally assigned divisions:

- a. Written safety evaluations of changes in the facility as described in the Safety Analysis Report, of changes in procedures as described in the Safety Analysis Report, and of tests or experiments not described in the Safety Analysis Report, which are completed without prior NRC approval under the provisions of 10CFR 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 10CFR 50.59(a)(2). Such reviews need not be performed prior to implementation.
- 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 10CFR 50.59(c). Matters of this kind shall be reviewed prior to submittal to the NRC.
- c. Proposed changes to Technical Specifications or license amendments related to nuclear safety shall be reviewed prior to submittal to the NRC for approval.
- d. Violations, deviations, and reportable events which require reporting to the NRC in writing. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- e. Written summaries of audit reports in the areas specified in section 6.5.3 and involving safety related functions.
- f. Any other matters involving safe operation of the nuclear power plant which a reviewer deems appropriate for consideration, or which is referred to the independent reviewers.

QUALIFICATIONS

6.5.2.6

The independent reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have 9 years of appropriate experience in the field of his speciality. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

RECORDS

6.5.2.7

Reports of reviews encompassed in Section 6.5.2.5 shall be prepared, maintained and transmitted to the cognizant division Vice President.

6.5.3. AUDITS

6.5.3.1

Audits of facility activities shall be performed under the cognizance of the Vice President Nuclear Assurance. These audits shall encompass:

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- e. The Facility Security Plan and implementing procedures at least once per 12 months.
- f. Any other area of facility operation considered appropriate by the IOSRG or the Office of the President-GPUNC.

6.5.3.2

Audits of the following shall be performed under the cognizance of the Vice President - Technical Functions:

- a. An independent fire protection and loss prevention program

inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.

b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant at intervals no greater than 3 years.

RECORDS

6.5.3.3

Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 60 days after completion of the audit. Upper management shall be informed per the Operation Quality Assurance Plan.

6.5.4 INDEPENDENT ONSITE SAFETY REVIEW GROUP (IOSRG)

STRUCTURE

6.5.4.1

The IOSRG shall be a full-time group of engineers experienced in nuclear power plant engineering, operations, and/or technology, independent of the facility staff, and located onsite.

ORGANIZATION

6.5.4.2

a. The IOSRG shall consist of the Manager - Nuclear Safety and staff members who meet the qualifications of 6.5.4.5. Group expertise shall be multidisciplined.

b. The IOSRG shall report to the Nuclear Safety Assessment Director.

FUNCTION

6.5.4.3

The periodic review functions of the IOSRG shall include the following on a selective and overview basis:

- 1) Evaluation for technical adequacy and clarity of procedures important to the safe operation of the facility.
- 2) Evaluation of facility operations from a safety perspective.
- 3) Assessment of facility nuclear safety programs.
- 4) Assessment of the facility performance regarding conformance to

requirements related to safety.

5) Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Safety deems appropriate for consideration.

AUTHORITY

6.5.4.4

The IOSRG shall have access to the facility and facility records as necessary to perform its evaluations and assessments. Based on its reviews, the IOSRG shall provide recommendations to the management positions responsible for the areas reviewed.

QUALIFICATIONS

6.5.4.5

IOSRG engineers shall have either (1) a Bachelor's Degree in Engineering or appropriate Physical Science and three years of professional level experience in the nuclear power field which may include technical supporting functions or (2) eight years of appropriate experience in nuclear power plant operations and/or technology. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years.

RECORDS

6.5.4.6

Reports of evaluations and assessments encompassed in Section 6.5.4.3 shall be prepared, approved, and transmitted to the Nuclear Safety Assessment Director, Oyster Creek and Nuclear Assurance division Vice Presidents, and the management positions responsible for the areas reviewed.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1

The following actions shall be taken in the event of a Reportable Occurrence:

a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.

b. Each occurrence shall be reported immediately to the cognizant manager and the cognizant division Vice President and the Vice President & Director Oyster Creek. The functionally cognizant division staff shall prepare a description of the occurrence, the cause of the occurrence and recommendations for appropriate corrective action to prevent or minimize the probability of a repetition of the occurrence. Copies of all such reports shall be submitted to the functionally cognizant division Vice President and the Vice President & Director Oyster Creek.

6.7 SAFETY LIMIT VIOLATION

6.7.1

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

a. If any Safety Limit is exceeded, the reactor shall be shut down immediately until the Commission authorizes the resumption of operation.

b. The Safety Limit violation shall be reported to the Commission and the Vice President & Director Oyster Creek.

c. A Safety Limit Violation Report shall be prepared. The report shall be submitted to the Vice President & Director Oyster Creek. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components systems or structures, and (3) corrective action taken to prevent recurrence.

d. The Safety Limit Violation Report shall be submitted to the Commission within 10 days of the violation.

6.8 PROCEDURES

6.8.1

Written procedures shall be established, implemented, and maintained that meet or exceed the requirements of Section 5.2 and 5.3 of American National Standard N18.7-1976 and Appendix "A" of the Nuclear Regulatory Commission's Regulatory Guide 1.33-1972 except as provided in 6.8.2 and 6.8.3 below.

6.8.2

Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed as described in 6.5.1.1 and approved as described in 6.5.1 prior to implementation and periodically as specified in the Administrative Procedures.

6.8.3

Temporary changes to procedures 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of GPUNC Management Staff authorized under Section 6.5.1.12 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of facility systems or equipment, at least one of these individuals shall be a member of facility management or supervision holding a Senior Reactor Operator's License on the facility.

c. The change is documented, subsequently reviewed and approved as described in 6.8.2 within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

In addition to the applicable reporting requirements of 10 CFR, the following identified reports shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

6.9.1 ROUTINE REPORTS

a. Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specified details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

b. Annual Exposure Data Report. Routine exposure data reports covering the operation of the facility during the previous calendar year shall be submitted prior to March 1 of each year. Reports shall contain a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/year and their associated man rem exposure according to work and job functions (This tabulation supplements the requirements of 10 CFR 20.407), 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.

c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly

basis which will include a narrative of operating experience, to the Director, Office of Management and Program Control, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office of I&E, no later than the 15th of each month following the calendar month covered by the report.

6.9.2 REPORTABLE OCCURRENCES

Reportable occurrences, including corrective actions and measures to prevent reoccurrences, 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 license event report shall be completed and reference shall be made to the original report date.

a. Prompt Notification With Written Followup. The types of events listed below shall be reported as expeditiously as possible, but within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the appropriate Regional Office, or his designate no later than the first working day following the event, with a written followup report within two weeks. 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 a complete explanation of the circumstances surrounding the event.

(1) Failure of the reactor protection system or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting system setting in the technical specifications or failure to complete the required protective function.

NOTE: Instrument drift discovered as a result of testing need not be reported under this item but may be reportable under items 2.a(5), 2.a(6), or 2.b(1) below.

(2) Operation of the facility or affected systems when any parameter or operation subject to a limiting condition is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications.

NOTE: If specified action is taken when a system is found to be operating between the most conservative and the least conservative aspects of a limiting condition for operation listed in the technical specifications, the limiting condition for operation is not considered to have been violated and need not be reported under this item, but it may be reportable under item 2.b(2) below.

(3) Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary, or primary containment.

NOTE: Leakage of valve packing or gaskets within the limits for identified leakage set forth in technical specifications need not be reported under this item.

(4) Reactivity anomalies, involving disagreement with the predicted value of reactivity balance under steady state conditions during power operation, greater than or equal to $1\% \Delta k/k$; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the technical specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if sub-critical, an unplanned reactivity insertion of more than $0.5\% \Delta k/k$ or occurrence of any unplanned criticality.

(5) 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.

(6) 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.

NOTE: For items 2.a(5) and 2.a(6) reduced redundancy that does not result in a loss of system function need not be reported under this section but may be reportable under items 2.b(2) and 2.b(3) below.

(7) Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.

(8) Errors discovered in the transient or accident analyses or in methods used for such analyses as described in the safety report or in the bases for the technical specifications that or could have permitted reactor operation in a manner less conservative than assumed in the analyses.

(9) 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 plant 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.

NOTE: This item is intended to provide for the reporting of potentially generic problems.

b. Thirty Day Written Reports. The reportable occurrences discussed below shall be the subject of written reports to the

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

(1) 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.

(2) Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.

NOTE: Routine surveillance testing, instrument calibration, or preventive maintenance which require system configurations as described in items 2.b(1) and 2.b(2) need not be reported except where test results themselves reveal a degraded mode as described above.

(3) Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.

(4) Abnormal degradation of systems other than those specified in item 2.a(3) above designed to contain radioactive material resulting from the fission process.

NOTE: Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limits for identified leakage set forth in technical specifications need not be reported under this item.

6.9.3 UNIQUE REPORTING REQUIREMENTS

Special reports shall be submitted to the Director of Regulatory Operations Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification.

a. Materials Radiation Surveillance Specimen Reports (4.3A)

b. Integrated Primary Containment Leakage Tests (4.5)

c. Semi-annual reports specifying effluent release shall be submitted to the NRC. These reports shall include the following:

(1) Radioactive Effluent Releases

A statement of the quantities of radioactive effluents released from the plant with data summarized on a monthly basis following the format of USAEC Guide 1.21.

(a). Gaseous Effluents

1. Gross Radioactivity Releases

- a. Total gross radioactivity (in curies), primarily noble and activation gases.
- b. Maximum gross radioactivity release rate during any one-hour period.
- c. Total gross radioactivity (in curies) by nuclide release based on representative isotopic analyses performed.
- d. Percent of technical specification limit.

2. Iodine Releases

- a. Total iodine radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.
- b. Percent of technical specification limit for I-131 released.

3. Particulate Releases

- a. Total gross radioactivity (β, γ) released (in curies) excluding background radioactivity.
- b. Gross alpha radioactivity released (in curies) excluding background radioactivity.
- c. Total gross radioactivity (in curies) of nuclides with half-lives greater than eight days.
- d. Percent of technical specification limit for particulate radioactivity with half-lives greater than eight days.

4. Liquid Effluents

- a. Total gross radioactivity (β, γ) released (in curies) excluding tritium and average concentration released to the unrestricted area.
- b. The maximum concentration of gross radioactivity (β, γ) released to the unrestricted area (averaged over the period of release).

c. Total tritium and total alpha radioactivity (in curies) released and average concentration released to the unrestricted area.

d. Total dissolved gas radioactivity (in curies) and averaged concentration released to the unrestricted area.

e. Total volume (in liters) of liquid waste released.

f. Total volume (in liters) of dilution water used prior to release from the restricted area.

g. Total gross radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.

h. Percent of technical specification limit for total radioactivity.

(2). Solid Waste

(a). The total amount of solid waste shipped (in cubic feet).

(b). The total estimated radioactivity (in curies) involved.

(c). Disposition including date and destination.

(3). Environmental Monitoring

(a). For each medium sampled during the reporting period, e.g., air, baybottom, surface water, soil, fish, include:

1. Number of sampling locations.

2. Total number of samples.

3. Number of locations at which levels are found to be significantly above local backgrounds, and

4. Highest, lowest, and the average concentrations or level of radiation for the sampling point with the highest average and description of the location of that point with respect to the site.

(b). If levels of radioactive materials in environmental media as determined by an environmental monitoring program indicate the likelihood of public intakes in excess of 1% of those that could result from continuous exposure to the concentration values listed in Appendix B, Table II, Part

20 estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided.

(c). If statistically significant variations of offsite environmental concentrations with time are observed, correlation of these results with effluent release shall be provided.

(d). Results of required leak tests performed on sealed sources if the tests reveal the presence of 0.005 microcuries or more of removeable contamination.

d. Inoperable Fire Protection Equipment (3.12)

e. Core Spray Sparger Inservice Inspection (Table 4.3.1-9)

Prior to startup of each cycle, a special report presenting the results of the inservice inspection of the Core Spray Spargers during each refueling outage shall be submitted to the Commission for review.

6.10 RECORD RETENTION

6.10.1

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

a. Records and logs of facility operation covering time interval at each power level.

b. Records and logs of principle maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

c. Reportable occurrence reports.

d. Records of surveillance activities, inspections and calibrations required by these technical specifications.

e. Records of reactor tests and experiments.

f. Records of changes made to operating procedures.

g. Records of radioactive shipments.

h. Records of sealed source leak tests and results.

i. Records of annual physical inventory of all source material of record.

6.10.2

The following records shall be retained for the duration of the

Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these technical specifications.
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- j. Records of reviews by the Independent Onsite Safety Review Group.
- k. Records for Environmental Qualification which are covered under the provisions of paragraph 6.14

6.10.3

Quality Assurance Records shall be retained as specified by the Quality Assurance Plan.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 (Deleted)

6.13 HIGH RADIATION AREA

6.13.1

In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

NOTE: Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are following plant radiation protection procedures for entry into high radiation areas.

An individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a pre-set integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e. qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive exposure control over the activities within the area and who will perform periodic radiation surveillance at the frequency in the RWP. The surveillance frequency will be established by the Radiological Controls Manager.

6.13.2

Specification 6.13.1 shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of operations and/or radiation protection supervision on duty.

6.14 ENVIRONMENTAL QUALIFICATION

A. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these

documents are attached to Order for Modification of License DPR-16 dated October 24, 1980.

B. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

6.15 Integrity of Systems Outside Containment

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

- 1) Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- 2) System leak test requirements, to the extent permitted by system design and radiological conditions, for each system at a frequency not to exceed refueling cycle intervals. The systems subject to this testing are (1) Core Spray, (2) Containment Spray, (3) Reactor Water Cleanup, (4) Isolation Condenser and (5) Shutdown Cooling.

6.16 Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas* under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

* Areas requiring personnel access for establishing hot shutdown condition.