6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The ANO General Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2.-1.

FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2.-2. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.-1.

6.3. FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for (1) the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a 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.

6.4 TRAINING

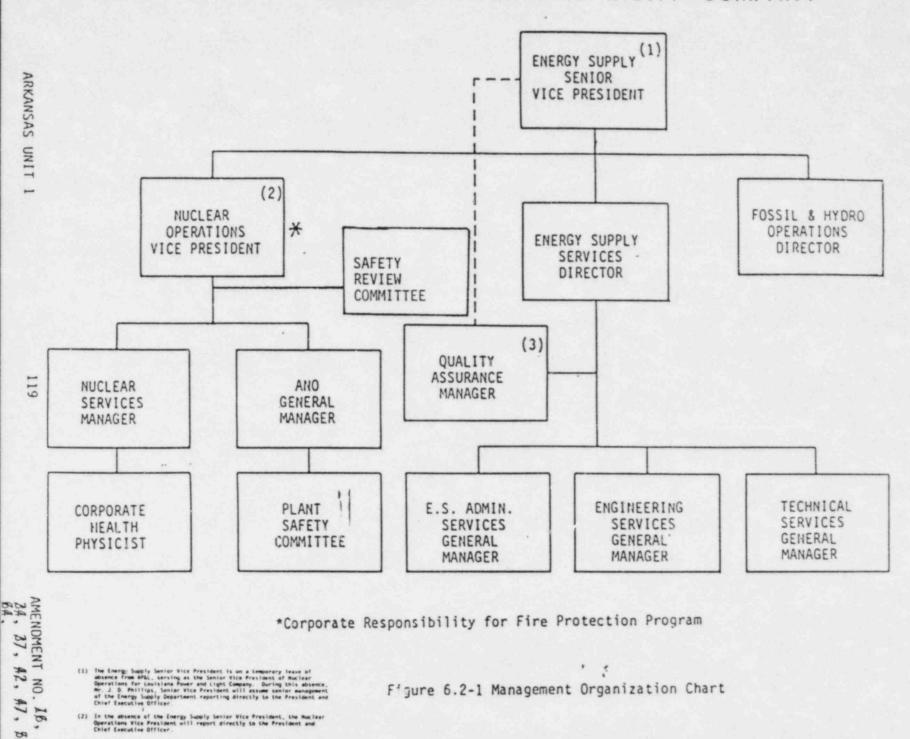
- 6.4.1 A retraining and replacement training program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for fire protection training shall be maintained and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 with the exception of frequency of training which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

- 6.5.1 Plant Safety Committee (PSC) Function
- 6.5.1.1 The Plant Safety Committee shall function to advise the ANO General Manager on all matters related to nuclear safety.

(See Page 121)

Amendment No. 16, 30, 34, 37, -117-47, 80, 89, 84,



*Corporate Responsibility for Fire Protection Program

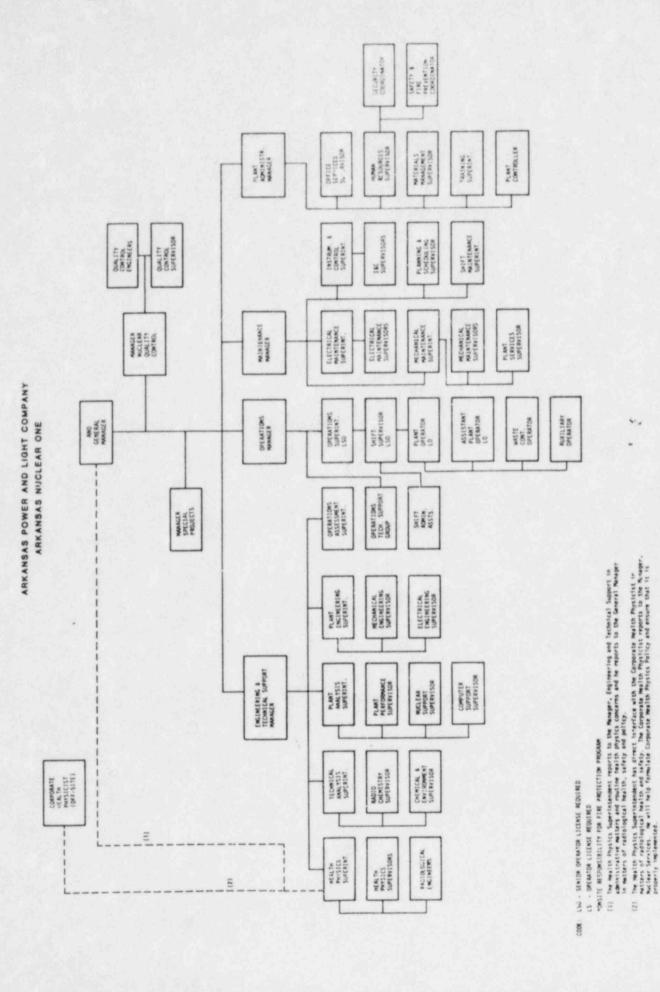
(2) In the absence of the Energy Supply Senior Vice President, the Muclear Operations Vice President will report directly to the President and Chief Executive Officer.

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⁽¹⁾ The Energy Supply Senior Vice President is on a temporary leave of absence from APAL, serving as the Senior Vice President of Nuclear Operations for tousians Power and Light Company. Ouring this absence, Mr. J. D. Phillips, Senior Vice President will assume senior management of the Energy Supply Department reporting directly to the President and Chief Executive Officer.

⁽²⁾ The Quality Assurance Manager will report (deshed line function) to the vice President, Nuclear Operations during the absence of the Energy Supply Senior vice President.

Figure 6.2-1 Management Organization Chart



COMPOSITION

6.5.1.2 The Plant Safety Committee shall be composed of the:

Chairman:

Manager of Special Projects

Member:

Operations Manager Maintenance Manager

Member:

Engineering and Technical Support Manager

Member:

Administrative Manager

Member:

Technical Analysis Superintendent Plant Analysis Superintendent Plant Engineering Superintendent

Member:

Health Physics Superintendent

The ANO General Manager shall designate in writing the Alternate Chairman in the absence of the Chairman.

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 The minimum quorum of the PSC necessary for the performance of the PSC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

- 6.5.1.6 The Plant Safety Committee shall be responsible for:
 - a. Review of 1) all procedures required by Specification 6.8 and revisions thereto, 2) any other proposed procedures or revisions thereto as determined by the ANO General Manager to affect nuclear safety.
 - Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Appendix "A" Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the ANO General Manager.

- f. Review of those Reportable Occurrences requiring 24-hour notification of the Commission.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations and reports thereon as requested by the ANO General Manager.
- Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the ANO General Manager.
- Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the ANO General Manager.

AUTHORITY

6.5.1.7.1 The Plant Safety Committee shall:

- a. Recommend to the ANO General Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice-President, Nuclear Operations and the Safety Review Committee of disagreement between the PSC and the ANO General Manager; however, the ANO General Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

- 6.5.1.8 The Plant Safety Committee shall maintain written minutes of each PSC meeting that, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the ANO General Manager and Chairman of the Safety Review Committee.
- 6.5.2 Safety Review Committee (SRC)

FUNCTION

- 6.5.2.1 The Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:
 - a. nuclear power plant operations
 - b. nuclear engineering
 - c. chemistry and radiochemistry

- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- mechanical and electrical engineering g.
- quality assurance practices h.

COMPOSITION

6.5.2.2. The SRC shall be composed of the:

Chairman: Manager, Quality Assurance

Member: General Manager, ES Administrative Services

General Manager, Technical Services

Member: General Manager, Technica Member: Manager, Nuclear Services Member: Manager, Technical Analysis Member: Manager, I&C Engineering Member: Corporate Health Physicist

Member: Arkansas Nuclear One Plant Safety Committee Chairman

Member: Nuclear Safety Oversight Engineer*

The Chairman shall designate in writing the alternate chairman in the absence of the SRC Chairman.

ALTERNATES

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

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

OUORUM

6.5.2.6 The minimum quorum of the SRC necessary for the performance of the SRC review and audit functions of these technical specifications shall consist of the Chairman or his designated alternate and at least 4 SRC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

*Middle South Services

- d. The Facility Emergency Plan and implementing procedures at least once per two years.
- e. The Facility Fire Protection Program and implementing procedures at least once per two years.
- f. The Facility Security Plan and implementing procedures at least once per two years.
- g. Any other area of facility operation considered appropriate by the SRC or the Vice President, Nuclear Operations.
- h. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Vice President, Nuclear Operations on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records of SRC activities shall be prepared, approved and distributed as indicated below:
 - a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Vice President, Nuclear Operations within 14 days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7 above shall be prepared, approved and forwarded to the Vice President, Nuclear Operations within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 6.5.2.8 above shall be forwarded to the Vice President, Nuclear Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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 6.12.
 - b. Each Reportable Occurrence requiring 24-hour notification to the Commission shall be reviewed by the PSC and submitted to the SRC and the Vice-President, Nuclear Operations by the ANO General Manager.

6.7 SAFETY LIMIT VIOLATION

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
 - a. The facility shall be placed in at least hot shutdown within one hour.
 - b. The Nuclear Regulatory Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.36 and Specification 6.12.3.1

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. Refueling operations.
 - c. Surveillance and test activities of safety related equipment.
 - d. Security Plan implementation.
 - e. Emergency Plan implementation.
 - f. Fire Protection Program implementation.
- 6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the PSC and approved by the ANO General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.
- 6.8.3 Temporary changes to procedures of 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 the plant 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 PSC and approved by the ANO General Manager within 14 days of implementation.

6.12 REPORTING REQUIREMENTS

- 6.12.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Administrator of the appropriate NRC Regional Office unless otherwise noted.
- 6.12.2 Routine Reports

6.12.2.1 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 specific 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.

6.12.2.2 Occupational Exposure Data Report $\underline{1}/$

An Occupational Exposure Data Report for the previous calendar year shall be submitted prior to March 1 of each year. The report 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/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.

- 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.

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.

6.12.2.3 Monthly Operating Report

Routine reports of operating statistics which include:

1. Average Daily Unit Power Level

2. Operating Data Report

3. Unit Shutdowns and Power Reductions

4. Narrative Summary of Operating Experience

shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the appropriate Regional Office by the fifteenth of each month following the calendar month covered by the report.

6.12.3 Reportable Occurrences

Reportable occurrences, including corrective actions and measures to prevent recurrence, shall be reported to the NRC as required below. 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.

6.12.3.1 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 Administrator 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. A copy of the confirmation and the written followup report shall also be sent to the Director, Office of Management and Program Analysis, USNRC. 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.

- (h) Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the Technical Specifications that have or could have permitted reactor operation in a manner less conservative than assured in the analyses.
- (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 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 reporting of potentially generic problems.

6.12.3.2 Thirty Day Written Reports

The reportable occurrences discussed below shall be the subject of written reports to the Administrator of the appropriate Regional Office within thirty days of occurrence of the event. A copy of the written report shall also be sent to the Director, Office of Management and Program Analysis. The written report shal' 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 or plant shutdown required by a limiting condition for operation.

NOTE:

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

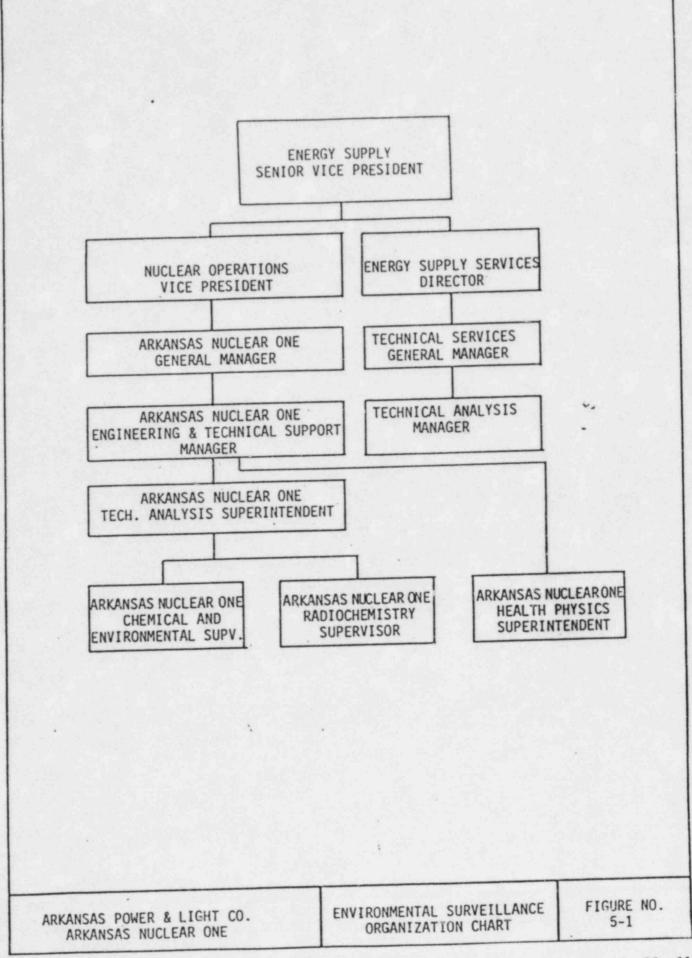
(c) Observed inadequacies in the implementation of administrative or procedural control which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.

6.12.4 Unique Reporting Requirements

Unique reports cover inspections, tests, and maintenance that are appropriate to assure safe operation of the plant. The frequency and content of these reports are determined on an individual case basis and designated in these Technical Specifications. Unique reports shall be submitted in writing to the Administrator of the appropriate Regional Office within 90 days of the completion of the tests, inspections, and maintenance.

The subjects of unique reports shall include:

(a) Tendon surveillance. (Specification 4.4.2)



BASIS FOR CHANGE

This proposed change to the ANO-2 Technical Specifications and Environmental Technical Specifications was prepared to reflect implementation of the new Energy Supply organization, designation of the AP&L Senior Nuclear Management Representative, and to correct minor items in the specifications.

EFFECT ON PLANT OPERATION

This change should have no effect on the operation of ANO since it reflects changes in the LRGO Energy Supply Organization. The major effects of this change will be on the Safety Review Committee which is being restructured to reflect the new organization.

6.1 RESPONSIBILITY

6.1.1 The ANO General Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

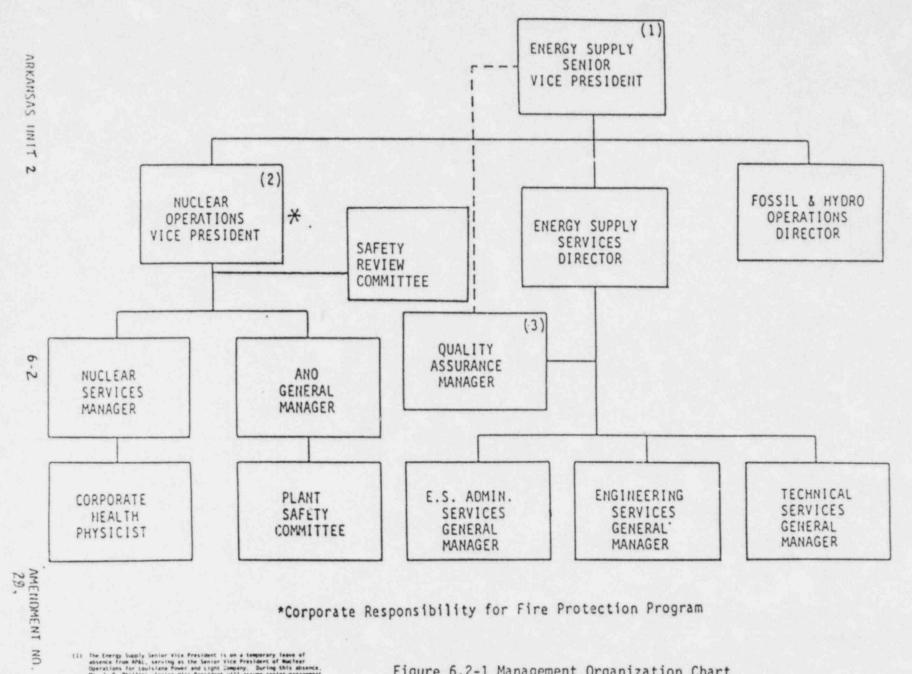
6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

FACILITY STAFF

- 6.2.2 The Facility organization shall be as shown on Figure 6.2-2 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. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
 - d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
 - e. 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.
 - f. A site Fire Brigade of at least 5 members shall be maintained or site at all times. The 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.



*Corporate Responsibility for Fire Protection Program

- (1) The Energy Supply Senior Vice President is on a temporary leave of absence from APAL, serving as the Senior Vice President of Musther Operations for Louisiane Power and Light Company, During this absence, Mr. J. D. Phillips, Senior Vice President will assume senior management of the Energy Supply Department reporting directly to the President and Chief Executive Officer.
- (2) In the absence of the Energy Supply Senior Vice President, the Muclear Operations Vice President will report directly to the President and Chief Executive Officer.
- (3) The Quality Assurance Manager will report (dashed line function) to the vice President, Nuclear Operations during the absence of the Energy Supply Senior vice President.

Figure 6.2-1 Management Organization Chart

FIGURE 6.2-2 FUNCTIONAL ORGANIZATION FOR PLANT OPERATION

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 (1) the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and (2) the Shift Technical Advisor who shall have a 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.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the ANO General Manager 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 ANO General Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code 1975, except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT SAFETY COMMITTEE (PSC)

FUNCTION

6.5.1.1 The Plant Safety Committee shall function to advise the ANO General Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Safety Committee shall be composed of the:

Chairman:

Manager of Special Projects

Member:

Operations Manager

Member:

Maintenance Manager

Member:

Engineering and Technical Support Manager

Member:

Administrative Manager

Member:

Technical Analysis Superintendent Plant Analysis Superintendent

Member:

Plant Engineering Superintendent

Member:

Health Physics Superintendent

Member:

Nuclear Software Expert* (*See page 6-5a)

The ANO General Manager shall designate in writing the Alternate Chairman in the absence of the PSC Chairman.

ATLERNATES

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

MEETING FREQUENCY

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

QUORUM

The minimum quorum of the PSC necessary for the performance of 6.5.1.5 the PSC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

- 6.5.1.6 The Plant Safety Committee shall be responsible for:
 - 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 ANO General Manager to affect nuclear safety.
 - Review of all proposed tests and experiments that affect nuclear b.
 - Review of all proposed changes to Appendix "A" Technical Specifications.
 - d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.
 - Investigation of all violations of the Technical Specifications e. including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the ANO General Manager and to the Chairman of the Safety Review Committee.

ADMINISTRATIVE CONTROLS

- f. Review of events requiring 24 hour written notification to the Commission.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the ANO General Manager or the Safety Review Committee.
- Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the ANO General Manager and the Safety Review Committee.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the ANO General Manager and the Safety Review Committee.

AUTHORITY

- 6.5.1.7 The Plant Safety Committee shall:
 - a. Recommend in writing to the ANO General Manager approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
 - c. Provide written notification within 24 hours to the Vice President, Nuclear Operations and the Safety Review Committee of disagreement between the PSC and ANO General Manager; however, the ANO General Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Safety Committee shall maintain written minutes of each PSC meeting that, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the ANO General Manager and Chairman of the Safety Review Committee.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

- 6.5.2.1 The Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:
 - nuclear power plant operations a.
 - b. nuclear engineering
 - chemistry and radiochemistry C.
 - metallurgy d.
 - instrumentation and control e.
 - f. radiological safety
 - mechanical and electrical engineering g.
 - quality assurance practices h.

COMPOSITION

6.5.2.2. The SRC shall be composed of the:

Chairman: Manager, Quality Assurance

Member: General Manager, E.S. Administrative Services Member: General Manager, Technical Services

Member: Manager, Nuclear Services Member: Manager, Technical Analysis Member: Manager, I&C Engineering Member: Corporate Health Physicist

Member: Arkansas Nuclear One Plant Safety Committee Chairman

Member: Nuclear Safety Oversight Engineer*

The Chairman shall designate in writing the alternate chairman in the absence of the SRC Chairman.

^{*} Middle South Services

AUDITS

- 6.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRC. These audits shall encompass:
 - The conformance of unit operation to provisions contained within a. the Technical Specifications and applicable license conditions at least once per 12 months.
 - The performance, training, and qualifications of the entire unit b. staff at least once per 12 months.
 - The results of actions taken to correct deficiencies occurring in C. unit equipment, structures, systems, or method of operation that affect nuclear safety at least once per 6 months.
 - The performance of activities required by the Operational Quality d. Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
 - The Facility Emergency Plan and implementing procedures at least e. once per 24 months.
 - The Facility Security Plan and implementing procedures at least f. once per 24 months.
 - Any other area of unit operation considered appropriate by the SRC g. or the Vice President, Nuclear Operations.
 - The Facility Fire Protection Program and implementing procedures h. at least once per 24 months.
 - An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
 - An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Vice President, Nuclear Operations on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records of SRC activities shall be prepared, approved and distributed as indicated below:
 - a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Vice President, Nuclear Operations within 14 days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Vice President, Nuclear Operations within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Nuclear Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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.
 - Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the PSC and submitted to the SRC and the Vice President, Nuclear Operations.

6.7 SAFETY LIMIT VIOLATION

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
 - The unit shall be placed in at least HOT STANDBY within one hour.
 - The Safety Limit violation shall be reported to the Commission. b. the Vice-President, Nuclear Operations and to the SRC within 24 hours.
 - A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PSC. 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.
 - The Safety Limit Violation Report shall be submitted to the d. Commission, the SRC and the Vice-President, Nuclear Operations 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:
 - The applicable procedures recommended in Appendix "A" of a. Regulatory Guide 1.33, Revision 2, February 1978.
 - Refueling operations. b.
 - Surveillance and test activities of safety related equipment. C.
 - Security Plan implementation. d.
 - e. Emergency Plan implementation.
 - Fire Protection Program implementation. f.
 - Modifications of Core Protection Calculator (CPC) Addressable g. Constants

NOTE:

Modification to the CPC addressable constants based on information obtained through the Plant Computer - CPC data link shall not be made without prior approval of the Plant Safety Committee.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the PSC and approved by the ANO General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

- 6.8.3 Temporary changes to procedures of 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 the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
 - c. The change is documented by the PSC and approved by the ANO General Manager within 14 days of implementation.

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 Administrator of the Regional Office unless otherwise noted.

STARTUP REPORT

- 6.9.1.1 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.
- 6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall 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 specific details required in license conditions based on other commitments shall be included in this report.
- 6.9.1.3. 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.

MONTHLY OPERATING REFORT

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.

REPORTABLE OCCURRENCES

6.9.1.7 The REPORTABLE OCCURENCES of Specifications 6.9.1.8 and 6.9.1.9 below, 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 Administrator of the Regional Office, or his designee no later than the first working day following the event, with a written followup report within 14 days. The written followup 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. 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 safety system setting in the technical specifications or failure to complete the required protective function.
 - 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 fuel cladding, reactor coolant pressure boundary, or primary containment.

- d. Reactivity anomalies involving disagreement with the predicted value of reactivity balance under steady state conditions during power peration greater than or equal to 1% Δk/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 subcritical, an unplanned reactivity insertion of more than 0.5% Δk/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 unit shutdown, operation of safety systems, or other protective measures required by technical specifications.
- h. Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the technical specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.
- i. Performance of structures, systems, or components that required 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.

THIRTY DAY WRITTEN REPORTS

6.9.1.9. The types of events listed below shall be the subject of written reports to the Administrator 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 or plant shutdown required 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 reactor protection systems or engineered safety feature 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.

SPECIAL REPORTS

- 6.9.2 Special reports shall be submitted to the Administrator of the 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. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
 - Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
 - c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
 - d. Seismic event analysis, Specification 4.3.3.3.2.
 - e. Inoperable Fire Detection Instrumentation, Specification 3.3.3.8.
 - f. Inoperable Fire Suppression Systems, Specifications 3.7.10.1 and 3.7.10.2.
 - g. Primary coolant specific activity, Specification 3.4.8.

ADMINISTRATIVE CONTROLS

- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PSC and the SRC.
- Records of changes to the Core Protection Calculator System (CPCS) SOFTWARE. Changes to the CPCS SOFTWARE shall be made in accordance with methods approved by the NRC. These records shall include the following:
 - 1. Purpose of change.
 - Detailed description of changes including algorithms, changes to the assembly listings, checksums and disk identification numbers.
 - Summary of validation test results.
- m. Records of Environmental Qualification which are covered under the provisions of paragraph 6.12.

6.11 RADIATION PROTECTION PROGRAM

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

6.12 ENVIRONMENTAL QUALIFICATION

6.12.1 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 NPF-6 dated October 24, 1980.

