

ATTACHMENT I to JPN-94-029

PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES
JPTS-90-011

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

9406240232 940617
PDR ADOCK 05000333
P PDR

6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 The minimum qualifications with regard to educational background and experience for plant staff positions shown in FSAR Figure 13.2-7 shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions; except for the Radiological and Environmental Services Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- 6.3.2 The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Supervisor or Assistant Shift Supervisor. (1)
- 6.3.3 Any deviations will be justified to the NRC prior to an individual's filling of one of these positions.

NOTE:

- (1) The 13 individuals who hold SRO licenses, and have completed the FitzPatrick Advanced Technical Training Program prior to the issuance of License Amendment 111, shall be considered qualified as dual-role SRO/STAs.

6.4 RETRAINING AND REPLACEMENT TRAINING

A training program shall be maintained under the direction of the Training Manager to assure overall proficiency of the plant staff organization. It shall consist of both retraining and replacement training and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971.

The retraining program shall not exceed periods two years in length with a curriculum designed to meet or exceed the requalification requirements of 10 CFR 55.59. In addition, fire brigade training shall meet or exceed the requirements of NFPA 27-1975, except for Fire Brigade training sessions which shall be held at least quarterly. The effective date for implementation of fire brigade training is March 17, 1978.

6.5 REVIEW AND AUDIT

Review requirements are accomplished by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group.

6.5.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 6.5.0.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 6.5.0.2 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.

JAFNPP

- 6.5.0.3 Designated technical reviewer(s) shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions.
- 6.5.0.4 The designated technical reviewer shall determine the need for cross-disciplinary reviews. Individuals performing cross-disciplinary reviews shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions.
- 6.5.0.5 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed from a safety perspective by a qualified safety reviewer. Safety and/or environmental impact evaluations, when required, shall be reviewed by PORC per Specification 6.5.1.6.a.
- 6.5.0.6 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by the appropriate member(s) of management.

6.5.1 PLANT OPERATING REVIEW COMMITTEE (PORC)

6.5.1.1 Function

PORC shall function to advise the Resident Manager on matters related to nuclear safety and environmental impact.

6.5.1.2 Membership

The Plant Operating Review Committee shall be composed of the:

Chairman:	General Manager - Operations
Vice-Chairman/Member:	General Manager - Support Services
Vice-Chairman/Member:	General Manager - Maintenance
Member:	Operations Manager
Member:	Maintenance Manager
Member:	Technical Services Manager
Member:	Instrument and Controls Manager
Member:	Radiological and Environmental Services Manager
Member:	Site Engineering Manager
Member:	Reactor Analyst Supervisor

Special consultants to provide expert advice may be utilized when the nature of a particular problem dictates.

JAFNPP

6.5.1.3 Alternates

Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis.

6.5.1.4 Meeting Frequency

Meetings will be called by the Chairman as the occasions for review or investigation arise. Meetings will be no less frequent than once a month.

6.5.1.5 Quorum

A quorum of the PORC shall consist of the Chairman or one of two Vice-Chairmen and five members including designated alternates. Vice-Chairmen may act as members when not acting as Chairman. A quorum shall contain no more than two alternates.

6.5.1.6 Responsibilities

The PORC shall be responsible for the:

- a. Review of 10 CFR 50.59 safety and environmental impact evaluations associated with procedures and programs required by Specification 6.8, and changes thereto.
- b. Review of proposed tests and experiments that affect nuclear safety.
- c. Review of proposed changes to the Operating License and Technical Specifications.
- d. Review of proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of violations to the Technical Specifications. The PORC shall prepare and present a report covering the evaluations and recommendations to prevent recurrence to the Resident Manager, who will then forward the report to the Executive Vice President - Nuclear Generation and to the Chairman of the Safety Review Committee.
- f. Review of plant operations to detect potential safety hazards.
- g. Performance of special reviews and/or investigations at the request of the Resident Manager.
- h. Review of all reportable events.
- i. Review of the Process Control Program and the Offsite Dose Calculation Manual (ODCM) and changes thereto.

6.5.1.7 Authority

The PORC shall:

- a. Recommend to the Resident Manager, approval or disapproval of those items reviewed under Specifications 6.5.1.6.a through 6.5.1.6.d.
- b. Render determinations with regard to whether or not items considered under Specification 6.5.1.6.a through 6.5.1.6.e constitute an Unreviewed Safety Question as defined in 10 CFR 50.59.
- c. In the event of a disagreement between the PORC and Resident Manager, notify the Executive Vice President - Nuclear Generation and the SRC Chairman, or their designated alternates, within 24 hours and provide written notification by the next business day. The Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1.

6.5.1.8 Records

Minutes of all meetings of the PORC shall be recorded and numbered. Copies will be retained in file. Copies will be forwarded to the Chairman of the SRC and the Executive Vice President - Nuclear Generation.

6.5.1.9 Procedures

Conduct of the PORC and the mechanism for implementation of its responsibilities and authority are defined in the pertinent Administrative Procedures.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC 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

JAFNPP

- 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 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President-Nuclear Generation.
- f. The Facility Fire Protection Program and implementing procedures at least once per two years.
- g. An independent fire protection and loss of prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.
- j. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
- k. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- l. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Executive Vice President - Nuclear Generation on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

CHARTER

6.5.2.11 Conduct of the committee will be in accordance with a charter approved by the Executive Vice President - Nuclear Generation setting forth the mechanism for implementation of the committee's responsibilities and authority.

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for Reportable Events:

- (A) The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- (B) Each Reportable Event shall be reviewed by the PORC, and the results of this review shall be submitted to the SRC and the Executive Vice President - Nuclear Generation.

6.7 SAFETY LIMIT VIOLATION

- (A) If a safety limit is exceeded, the reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36, (c) (i).
- (B) An immediate report of each safety limit violation shall be made to the NRC by the Resident Manager. The Executive Vice President - Nuclear Generation and Chairman of the SRC will be notified within 24 hours.
- (C) The PORC shall prepare a complete investigative report of each safety limit violation and include appropriate analysis and evaluation of: (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility component systems or structures and (3) corrective action required to prevent recurrence. The Resident Manager shall forward this report to the Executive Vice President - Nuclear Generation, Chairman of the SRC and the NRC.

6.8 PROCEDURES

- (A) Written procedures and administrative policies shall be established, implemented, and maintained that:
 - 1. meet or exceed the requirements and recommendations of Section 5 of ANSI 18.7-1972 "Facility Administrative Policies and Procedures."
 - 2. are recommended in Appendix A of Regulatory Guide 1.33, November 1972.
 - 3. implement the Fire Protection Program.
 - 4. include programs specified in Appendix B of the Radiological Effluent Technical Specifications, Section 7.2.
- (B) Each procedure of Specification 6.8.(A), and changes thereto, shall be approved prior to implementation by the appropriate responsible member of management as specified in Specification 6.5.0.

JAFNPP

- (C) Temporary changes to the procedures required by Specification 6.8.(A) may be made provided:
1. the intent of the original procedure is not altered.
 2. the change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license.
 3. the change is documented, reviewed and approved by the appropriate member of plant management as required by Specification 6.5.0 within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

(A) ROUTINE REPORTS

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.

1. STARTUP REPORT

- a. A summary report of plant startup and power escalation testing shall be submitted following (1) amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) 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 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.

ATTACHMENT II to JPN-94-029

SAFETY EVALUATION FOR PROPOSED TECHNICAL SPECIFICATION
CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES
JPTS-90-011

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

I. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes to the James A. FitzPatrick Technical Specifications delegate a portion of the Plant Operations Review Committee's (PORC's) procedure review responsibilities for nuclear safety related procedures and procedure changes to the line organizations. PORC will continue to perform safety reviews associated with procedures that are of safety significance. The proposed procedure review and approval process will alter the scope of the PORC function to be more appropriate for that of a safety oversight committee by reducing the administrative burden on the PORC.

A change is also being proposed to the PORC Membership requirements to remove the Resident Manager from PORC. The General Manager of Operations is being proposed as the Chairman of PORC.

In addition, a change is also being proposed to implement the guidance of Generic Letter 93-07. This Generic Letter discusses the removal of the review and audit responsibilities for the Emergency and Security Plans from the technical specifications. These requirements shall be relocated to the respective Emergency and Security Plans.

The changes to the James A. FitzPatrick Technical Specifications are separated into two categories: A). Administrative and editorial changes which improve the human factors aspects of the Technical Specifications; and B). changes to reflect the implementation of the procedure review and approval process, changes to PORC Membership and changes to implement the guidance of Generic Letter 93-07.

A. Administrative and editorial changes

1. Page 248a, Specification 6.5.1.(A)

- a. In the Specification outline numbering pattern, replace section number "(A)" with "6.5.1.2".

2. Page 249

- a. In the Specification outline numbering pattern, replace Section numbers "(B)", "(C)", "(D)" and "(E)" with "6.5.1.3", "6.5.1.4", "6.5.1.5", and "6.5.1.6", respectively.
- b. Renumber the "Responsibilities" section "1 through 12" as "a through i". Item numbers 7 and 8 have been removed to implement the guidance of Generic Letter 93-07. Note that "11" and "12" have been combined into one line item, "i".
- c. In section 6.5.1.6.e, replace the position title "Manager- Nuclear Operations" with "Executive Vice President-Nuclear Generation."

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

3. Page 250

In the Specification outline numbering pattern, replace "(F)", "(G)", and "(H)" with "6.5.1.7", "6.5.1.8" and "6.5.1.9", respectively.

4. Page 253

Replace Section 6.8.(A) on page 253 (current TS) with 6.8.(A) on page 253 of the proposed Technical Specifications. The format of this section was changed from a paragraph form to an outline form.

B. Proposed changes to the procedure review and approval process, implementation of the guidance of Generic Letter 93-07 and changes to the PORC membership requirements are identified below (note that all sections are now referenced with the new, proposed outline numbering pattern).

1. Page 248, Specification 6.5

Replace section 6.5 with "Review requirements are accomplished by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group".

Page 248, Specification 6.5.0

Insert new Section 6.5.0, titled "Review and Approval of Programs and Procedures" (see attached proposed TS pages 248 and 248a for exact wording).

2. Page 248a, Specification 6.5.1

- a. Insert section 6.5.1.1 titled "Function" with the following sentence, "PORC shall function to advise the Resident Manager on matters related to nuclear safety and environmental impact".
- b. Remove the "Resident Manager" as Chairman and replace with the "General Manager-Operations" in section 6.5.1.2.

3. Page 249

- a. In 6.5.1.3, remove "however, no more than two alternates shall participate in PORC activities at any one time".
- b. In 6.5.1.5, add the sentence, "A quorum shall contain no more than two alternates".

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

- c. In 6.5.1.6.a replace "Review plant procedures, and changes thereto, required by Specification 6.8" with "Review of 10 CFR 50.59 safety and environmental impact evaluations associated with procedures and programs required by Specification 6.8 and changes thereto".
 - d. Add the phrase "The PORC shall be responsible for the:" at the beginning of 6.5.1.6. Minor changes are made in 6.5.1.6.a through i to make them grammatically consistent with the new phrase "The PORC shall be responsible for the:".
 - e. Replace sections 6.5.1.6.e with "Investigation of violations to the Technical Specifications. The PORC shall prepare and present a report covering the evaluations and recommendations to prevent recurrence to the Resident Manager, who will then forward the report to the Executive Vice President - Nuclear Generation and to the Chairman of the Safety Review Committee".
 - f. Remove what used to be line items 7 and 8 from the list of PORC responsibilities.
 - g. Combine what used to be line items 11 and 12 into one line, "i" which states "Review of the Process Control Program and the Offsite Dose Calculation Manual (ODCM) and changes thereto".
4. Page 250
- a. Replace Specification 6.5.1.7 titled "Authority" with the following:
"The PORC shall:
 - a. Recommend to the Resident Manager, approval or disapproval of those items reviewed under Specifications 6.5.1.6.a through 6.5.1.6.d.
 - b. Render determinations with regard to whether or not items considered under Specification 6.5.1.6.a through 6.5.1.6.e constitute an Unreviewed Safety Question as defined in 10 CFR 50.59.
 - c. In the event of a disagreement between the PORC and Resident Manager, notify the Executive Vice-President Nuclear Generation and the SRC Chairman, or their designated alternates, within 24 hours and provide written notification by the next business day. The Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1."
5. Page 252a
- Remove requirements to review and audit sections 6.5.2.1.e and f from the technical specifications. Items "g through l" are relettered to accommodate this change.

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

6. Page 253

- a. Replace section 6.8.(B) on page 253 (current TS) with 6.8.(B) on page 253 of the proposed Technical Specifications.

7. Page 254-a

- a. Replace section 6.8.(C) with "Temporary changes to the procedures required by Specification 6.8.(A) may be made provided:".
- b. Replace section 6.8.(C).2 with "The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license".
- c. Replace section 6.8.(C).3 with "the change is documented, reviewed and approved by the appropriate member of plant management as required by Specification 6.5.0 within 14 days of implementation."

II. PURPOSE OF THE PROPOSED CHANGES

The proposed changes to the James A. FitzPatrick Technical Specifications reduce the administrative burden on the Plant Operating Review Committee (PORC) by establishing a procedure review and approval process which shifts a portion responsibility for the review of nuclear safety related procedures and procedure changes from the PORC to the line organizations. PORC will continue to review any new procedures and procedure changes that are of safety significance. These changes alter the scope of PORC's review function to be more appropriate to that of a safety oversight committee. Currently, all Technical Specification required procedures and changes thereto must be reviewed by PORC. Instead, these items will be reviewed and approved through a new procedure review and approval process.

Specifications for the procedure review and approval process are being added. The new process shall be controlled by administrative procedures. The process requires that all nuclear safety related procedures and procedure changes be reviewed by two designated technical reviewers, a qualified safety reviewer and approved by a responsible procedure owner. The designated technical reviewers verify the technical accuracy and useability of procedures and revisions including human factors considerations. The qualified safety reviewer performs the 10 CFR 50.59 safety and environmental impact screening and evaluation associated with the procedure or procedure change.

Another Technical Specification change is being proposed which will remove the Resident Manager from PORC. The General Manager of Operations is being proposed as the Chairman of PORC.

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

In addition, a change is also being proposed to the Technical Specifications to implement the guidance of Generic Letter 93-07. This Generic Letter discusses the removal of the review and audit responsibilities for Emergency and Security plans from the Technical Specifications. These requirements shall be relocated to the respective Emergency and Security Plans.

The purpose of each change identified in Section I (the letters and numbers in Sections I and II correspond) is as follows:

- A. Administrative changes have been made to the Specification outline numbers to be consistent with the pattern used elsewhere in the Technical Specifications. Editorial changes have also been made to clarify and improve the quality of the Technical Specifications. These editorial changes do not involve any safety issues.**
- B. The following changes reflect the implementation of the procedure review and approval process, changes to the PORC Membership requirements and changes to implement the recommendations of Generic Letter 93-07.**
 - 1. Page 248, Specification 6.5

The proposed change adds the use of "designated technical reviewers" and "qualified safety reviewer(s)" in the review and audit process. Safety/technical reviewers will perform reviews of procedures and procedure changes prior to approval by the responsible procedure owner.

Page 248, Specification 6.5.0

A new section (6.5.0) is proposed which sets forth the principal provisions of the review and approval of programs and procedures. The review and approval of programs and procedures is outlined below and shall be controlled by an administrative procedure as required by Appendix A of Regulatory Guide 1.33, 1972. Technical Specification 6.8.(A).2 requires that an administrative procedure be maintained and established covering procedure review and approval activities.

- 1. Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall also be reviewed by two designated technical reviewers who are knowledgeable in the functional area affected. Designated technical reviewers shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions. A designated technical reviewer shall also identify when cross-disciplinary reviews are required. Designated technical reviewers shall be approved by the Department Managers.
- 2. If necessary, cross-disciplinary reviews shall be performed by additional designated technical reviewer(s).

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

3. Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, will be reviewed by a qualified safety reviewer. The qualified safety reviewer evaluates the procedure from a safety perspective. This reviewer completes the 10 CFR 50.59 safety and environmental impact screening and evaluation.
 4. Each new procedure or proposed procedure change required by Specification 6.8 shall be reviewed by the responsible procedure owner. The responsible procedure owner is to ensure that the proposed activity has been prepared, documented, and reviewed in accordance with the administrative procedure governing the procedure review and approval process.
 5. If a safety or environmental impact evaluation is not required, the new procedure or procedure change shall receive final approval by the responsible procedure owner prior to implementation. PORC review is not required.
 6. If a safety or an environmental impact evaluation is required, it shall be reviewed by PORC. The new procedure or procedure change shall receive final approval by the responsible procedure owner.
 7. Proposed changes to the Process Control Program and the Offsite Dose Calculation Manual must be reviewed and approved by the PORC prior to implementation whether or not a safety or an environmental impact evaluation is necessary.
 8. Designated technical reviewers in the various functional areas shall be approved by the Department Manager. Designation of responsible procedure owners for each procedure type shall be approved by the Resident Manager.
 9. Temporary procedure changes shall be reviewed and approved in a similar manner to the procedure review and approval process.
2. Page 248a, Specification 6.5.1
- a. The proposed change moves the description of PORC's function to the beginning of the Section. In the current Technical Specifications, this portion of PORC responsibility is described in TS 6.5.1.F. This change is for clarity and improvement in the Technical Specifications.
 - b. The proposed change eliminates the Resident Manager from PORC. The Resident Manager should be independent of PORC since PORC's function is to act in an advisory role to the Resident Manager. The Resident Manager will remain as a voting member of the SRC. This would allow the Resident Manager to participate in the SRC's oversight role without any conflict of interest.

The level and quality of the PORC's review would not be adversely altered by the

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

proposed changes. The PORC quorum is currently composed of a Chairman and five members of which no more than two are designated alternates. This composition is not diminished by the proposed changes. The Technical Specifications retain the same PORC quorum requirement.

3. Page 249

- a. (and b.) Specification 6.5.1.3 and 6.5.1.5; The sentence "however, no more than two alternates shall participate in PORC activities at any one time" was removed and replaced in Specification 6.5.1.5 for the purpose of clarity and improvement in the Technical Specifications.
- c. The proposed change revises Specification 6.5.1.6.a to identify that PORC reviews 10 CFR 50.59 safety and environmental impact evaluations associated with procedures in accordance with the new proposed procedure review and approval process.
- d. The phrase "The PORC shall be responsible for" is added to make this section consistent with the Standard Technical Specifications (STS, Reference 5).
- e. The proposed editorial change is needed to make the sentence grammatically correct with the addition of the phrase in the above section d.
- f. This change removes what used to be items 7 and 8 to incorporate the guidance of Generic Letter 93-07.
- g. This change is made for consistency with the contents of the STS.

4. Page 250

The proposed change alters the format of this section from a paragraph form to an outline form. The statement "The PORC shall function to advise the Resident Manager on all matters related to nuclear safety and environmental operations" has been moved from this section to Section 6.5.1.1. This is purely an administrative change.

5. Page 252a

This change is made to incorporate the guidance of Generic Letter 93-07.

6. Page 253

- a. The proposed change in section 6.8.(B) allows for an appropriate responsible member of management to approve procedures rather than the Resident Manager. This specification is changed to allow for the implementation of the proposed procedure review and approval process. "Appropriate responsible member of

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

management" is defined as the responsible procedure owner.

- b. This change clarifies the fact that the procedures contained in section 6.8.(A) can go through the temporary procedure change process.
- c. The proposed change removes "on the unit affected" from the sentence since the James A. FitzPatrick Plant is a single unit plant.
- d. The proposed change allows for temporary procedure changes to be reviewed per the procedure review and approval process and approved by the responsible procedure within 14 days. PORC review of the temporary procedure changes may or may not be required depending on whether or not the procedure change has a safety or environmental impact evaluation associated with it. The responsible procedure owner is responsible for ensuring that the intent of the procedure is not changed. The current Technical Specifications require each temporary procedure to be reviewed by PORC and approved by the Resident Manager.

III. IMPACT OF THE PROPOSED CHANGES

Procedure Review and Approval Process

The proposed procedure review and approval process requires that PORC review safety and environmental impact evaluations associated with procedures and procedure changes. These changes alter the scope of PORC's review function by eliminating reviews of items that do not impact the environment or nuclear safety and, therefore, enhance PORC's function by improving its efficiency and effectiveness. PORC can then focus its attention on matters which could affect nuclear safety.

The proposed process establishes flow and documentation requirements for the review and approval of all nuclear safety related procedures and procedure changes. The program builds on a nuclear safety evaluation process which will be implemented through administrative procedures.

The Authority will implement a new administrative procedure to govern the 10 CFR 50.59 reviews of proposed procedure changes. This procedure will meet the intent of the guidance contained in EPRI report NSAC-125, "Guidelines for 10 CFR 50.59 Safety Evaluations" (Reference 3). The "safety review" is a two step process comprised of 1) a Nuclear Safety and Environmental Impact Screening and 2) a Nuclear Safety Evaluation (10 CFR 50.59 safety evaluation) and/or an Environmental Impact Evaluation. The screen consists of a series of questions whose responses determine whether or not a Nuclear Safety and/or Environmental Impact Evaluation is required. The results of the screening process, and safety and/or environmental impact evaluations will be documented in writing. If a safety or an environmental impact evaluation is not required, the screening alone constitutes a complete safety review. If the safety review for a new procedure or procedure change conclude that a safety or an environmental evaluation is required, then the evaluation(s) shall be prepared and then reviewed by PORC.

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

Personnel completing safety reviews will be appropriately qualified and trained to perform this function. If qualified to do so, the same individual may prepare both the safety and environmental impact screening and evaluation.

The completed procedure or procedure change package is reviewed by two designated technical reviewers. The designated technical reviewers are individuals knowledgeable in the functional/technical subject matter related to the proposed activity. Designated technical reviewers are designated by the Department Managers. Designated technical reviewers shall be responsible for reviewing the procedure or procedure change for adequacy, completeness, and accuracy. Designated technical reviewers shall also be responsible for identifying whether or not cross-disciplinary reviews are required. A designated technical reviewer can be the same individual as the qualified safety reviewer if qualified to perform both functions. Designated technical reviewers shall meet or exceed the qualifications described in section 4 of ANSI N18.1-1971 for applicable positions. ANSI N18.1-1971 is applicable with the selection and training of nuclear power plant personnel. Section 4 of this Standard applies to qualifications of plant personnel.

If necessary, cross-disciplinary reviews shall be performed by other appropriate designated technical reviewer(s) before the procedure or procedure change is forwarded to the approving authority. After all the necessary reviews (safety and technical reviews) have been completed, the procedure or procedure change package is reviewed by the responsible procedure owner. The "responsible procedure owner" is a member of the management staff having approving authority and responsibility for specific procedures. The responsible procedure owner is responsible for ensuring that the proposed activity has been prepared, documented and reviewed in accordance with the administrative procedure that governs the procedure review and approval process. The responsible procedure owner is the appropriate member of management as described in the Technical Specification.

If a safety/environmental impact evaluation is not required, the new procedure or procedure change receives final approval by the responsible procedure owner. PORC review is not required. If, however, an evaluation is required, PORC is responsible for reviewing the safety/environmental impact evaluation. Responsible procedure owners are designated by the Resident Manager.

As currently specified, temporary changes to procedures listed in Specification 6.8.(A) may be made provided the intent of the original procedure is not altered, and the change is approved by two members of the plant management, at least one of whom holds a Senior Reactor Operator's License. Temporary procedure changes will be approved by the responsible procedure owner within 14 days. The responsible procedure owner will be responsible to ensure that the intent of the procedure is not changed.

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

PORC Membership

An onsite review group (PORC) at JAF was established to assist the plant Resident Manager in keeping abreast of general plant operating conditions in accordance with American National Standard (ANS) N18.7-1972. PORC's function is to advise the Resident Manager in matters related to the nuclear safety and environmental impact.

The proposed change to Technical Specification 6.5.1.2 to remove the Resident Manager from the PORC would strengthen PORC's independent advisory role. Any influence exhibited by the routine presence of the Resident Manager, whether perceived or actual, would be alleviated and members would be free to make decisions and recommendations based on their own judgements. The Committee's collective but independent recommendation would then be presented to the Resident Manager.

It is proposed that the General Manager-Operations replace the Resident Manager as PORC Chairman. The General Manager-Operations has the appropriate level of education and experience necessary to ensure that decisions made by the PORC will consider safety as the primary consideration. The proposed changes in membership/chairmanship do not adversely alter the level and quality of PORC's review function. Diversity in educational background and work experience will continue to exist. Additionally, the quorum requirement will not be diminished. The quorum will continue to be comprised of a Chairman and five members (a majority) of which no more than two are designated alternates.

Additional Changes

Other changes include the deletion of what used to be Technical Specification sections 6.5.1.E.7, 6.5.1.E.8, 6.5.2.1.e, and 6.5.2.1.f to implement the recommendations of NRC Generic Letter 93-07. The Generic Letter allows Technical Specification changes to remove the review and audit requirements for the emergency and security plans from the unit review group (known as PORC at JAF) and the company nuclear audit and review group (known as the Safety Review Committee or SRC at the Authority's headquarters office) list of responsibilities provided these requirements are relocated to the respective emergency and security plans.

The proposed changes to JAF Technical Specifications 6.5.1.E.7 and 6.5.2.1.f delete the annual review and audit requirements, respectively, for the JAF Security Plan from the list of responsibilities of PORC and SRC. Likewise, the proposed changes to Technical Specifications 6.5.1.E.8 and 6.5.2.1.e delete the annual review and audit requirements, respectively, for the JAF Emergency Plan from the list of responsibilities of PORC and SRC. The review and audit requirements will be relocated to the respective security and emergency plans. The changes are in accordance with NRC Generic Letter 93-07 and are administrative in nature.

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the FitzPatrick plant in accordance with the proposed amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92, since the proposed changes would not:

1. involve a significant increase in the probability of an accident or consequence previously evaluated.

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated since: 1) PORC will continue to review environmental impact and 10 CFR 50.59 safety evaluations associated with procedures and procedure changes; 2) Only personnel knowledgeable in the affected functional areas will review procedures and procedure changes; 3) Review and approval personnel (designated technical reviewers, and responsible procedure owners) will be identified in the appropriate administrative procedures. Designated technical reviewers shall meet or exceed the qualifications described in section 4 of ANSI N18.1-1971 for applicable positions. Designated technical reviewers are designated by the Department Managers. The responsible procedure owners are designated by the Resident Manager; 4) The designated technical reviewers will be responsible for identifying whether additional cross-disciplinary reviews are required; 5) The qualified safety reviewers will be responsible for reviewing the procedure changes from a safety perspective; and 6) The responsible procedure owners will be responsible for verifying that procedure reviews are performed in accordance with the administrative procedure governing the procedure review and approval process.

The proposed changes 1) will add more detailed requirements regarding procedure review and approval to the Technical Specifications which will strengthen the controls over the process, and 2) will free PORC from reviewing items that are outside the charter of a "safety review" committee because non-safety significant items can reduce the time that PORC members can spend on matters that are safety significant. The proposed Technical Specification change establishes a highly structured review and approval program for procedures.

The proposed change to the PORC Membership requirements would not significantly increase the probability or consequences of an accident because it does not adversely affect the level of expertise applied to the PORC review function. There will not be an adverse loss of PORC effectiveness as a result of this change. The PORC quorum is currently composed of five members including up to two designated alternates and a Chairman. This composition is not changed by the proposed amendment.

The miscellaneous administrative changes not related to the procedure review and approval process or the PORC Membership requirements cannot affect the probability or consequences of an accident because they do not affect operations, equipment, or any safety-related activity.

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

2. create the possibility of a new or different kind of accident from those previously evaluated.

No physical changes to the plant or changes in plant equipment operating procedures are being proposed. The changes are administrative and will not have any direct affect on equipment important to safety. Changing the process by which procedures are reviewed and approved cannot in itself create the possibility of a new or different kind of accident. Furthermore, a documented safety review, utilizing screening criteria, will be performed for all nuclear safety related procedures and procedure changes. The proposed change establishes detailed controls while allowing PORC to spend more time on safety significant issues.

The proposed change to the PORC Membership requirements would not create the possibility of a new or different kind of accident from any previously evaluated since no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.

The miscellaneous administrative changes not related to the procedure review and approval or the PORC Membership requirements cannot create the possibility of an accident because they do not affect operations, equipment or any safety-related activity.

3. involve a significant reduction in the margin of safety.

The proposed amendment does not involve a significant reduction in the margin of safety because a program controlled by Administrative Procedures using designated technical reviewers approved by the Department Managers will be in place to review new procedures and procedure changes. A 10 CFR 50.59 screening of each new procedure and permanent procedure change will be performed by a qualified safety reviewer and PORC will continue to review 10 CFR 50.59 Safety and Environmental Impact Evaluations associated with procedures and procedure changes. Cross-disciplinary reviews will be conducted as appropriate. Thus the margin of safety will be maintained by implementing the new procedure review and approval process.

The proposed change to the PORC Membership requirements would not involve a significant reduction in the margin of safety since the level and quality of PORC review will be maintained and there will not be an adverse change to the collective educational background and work experience of PORC. There will not be an adverse loss of PORC effectiveness as a result of this change. The PORC quorum is currently composed of five members including up to two designated alternates and a Chairman. This composition is not changed by the proposed changes.

The miscellaneous administrative changes not related to the procedure review and approval process or PORC Membership program cannot reduce any margin of safety because they do not affect any safety-related activity or equipment. These changes increase the probability that the Technical Specifications are correctly interpreted by

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

clarifying information.

V. IMPLEMENTATION OF THE PROPOSED CHANGES

Implementation of the proposed changes will not adversely affect the ALARA or Fire Protection Program at the FitzPatrick plant, nor will the changes impact the environment.

VI. CONCLUSION

The changes, as proposed, do not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, they:

- a. will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the safety analysis report;
- b. will not increase the possibility of an accident or malfunction of a different type from any evaluated previously in the safety analysis report; and
- c. will not reduce the margin of safety as defined in the basis for any technical specification; and
- d. involve no significant hazards consideration, as defined in 10 CFR 50.92.

VII. REFERENCES

1. James A. FitzPatrick Nuclear Power Plant Updated Final Safety Analysis Report (FSAR).
2. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER), dated November 20, 1972, and supplements thereto.
3. EPRI report, NSAC-125, "Guidelines for 10 CFR 50.59 Safety Evaluations", June 1989.
4. James A. FitzPatrick Nuclear Power Plant Technical Specifications.
5. NUREG-1433, "Standard Technical Specifications for General Electric Boiling Water Reactors" Revision 0, dated September 28, 1992.
6. NRC Generic Letter 93-07, dated December 28, 1993, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans."

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
PORC MEMBERSHIP AND REVIEW RESPONSIBILITIES (JPTS-90-011)**

7. American National Standard (ANS) N18.7, "Administrative Controls for Nuclear Power Plants," 1972.
8. Regulatory Guide 1.33 (Safety Guide 33), "Quality Assurance Program Requirements (Operation)," November 1972.
9. American National Standard Institute (ANSI) N18.1, "Selection and Training of Nuclear Power Plant Personnel," 1971.

Attachment III to JPN-94-029

CURRENT TECHNICAL SPECIFICATION TO BE CHANGED REGARDING PORC
MEMBERSHIP AND REVIEW RESPONSIBILITIES
JPTS-94-XXX

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Docket No. 50-333

DPR-59

6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 The minimum qualifications with regard to educational background and experience for plant staff positions shown in FSAR Figure 13.2-7 shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions; except for the Radiological and Environmental Services Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- 6.3.2 The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Supervisor or Assistant Shift Supervisor. (1)
- 6.3.3 Any deviations will be justified to the NRC prior to an individual's filing of one of these positions.

NOTE:

- (1) The 13 individuals who hold SRO licenses, and have completed the FitzPatrick Advanced Technical Training Program prior to the issuance of License Amendment 111, shall be considered qualified as dual-role SRO/STAs.

6.4 RETRAINING AND REPLACEMENT TRAINING

A training program shall be maintained under the direction of the Training Manager to assure overall proficiency of the plant staff organization. It shall consist of both retraining and replacement training and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971.

The retraining program shall not exceed periods two years in length with a curriculum designed to meet or exceed the requalification requirements of 10 CFR 55.59. In addition, fire brigade training shall meet or exceed the requirements of NFPA 27-1975, except for Fire Brigade training sessions which shall be held at least quarterly. The effective date for implementation of fire brigade training is March 17, 1978.

6.5 REVIEW AND AUDIT

Two separate groups for plant operations have been constituted. One of these, the Plant Operating Review Committee (PORC), is an onsite review group. The other is an independent review and audit group, the offsite Safety Review Committee (SRC).

↑
Replace with Text "A"

Insert Text "AA"

Insert Text "AA"

6.5.1 PLANT OPERATING REVIEW COMMITTEE (PORC)

(A) Membership

6.5.1.2

The Plant Operating Review Committee shall be composed of the:

Chairman:

Vice Chairman/Member:

Vice-Chairman/Member:

Vice-Chairman/Member:

Member:

Member:

Member:

Member:

Member:

Member:

Member:

Resident Manager

General Manager - Operations

General Manager - Support Services

General Manager - Maintenance

Operations Manager

Maintenance Manager

Technical Services Manager

Instrument and Controls

Manager

Radiological and Environmental Services

Manager

Site Engineering Manager

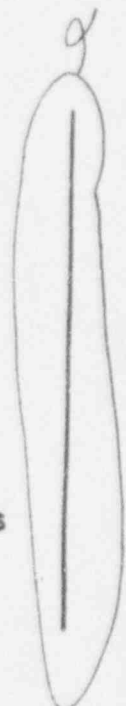
Reactor Analyst Supervisor

Special consultants to provide expert advice may be utilized when the nature of a particular problem dictates.

6.5.1.1

Insert text "B"

Chairman



6.5.1.3 (B)

Alternates

Alternative members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PORC activities at any one time.

6.5.1.4 (C)

Meeting Frequency

Meetings will be called by the Chairman as the occasions for review or investigation arise. Meetings will be no less frequent than once a month.

6.5.1.5 (D)

Quorum

A quorum of the PORC shall consist of the Chairman or one of three Vice-Chairmen and five members including designated alternates. Vice-Chairmen may act as members when not acting as Chairman. A quorum shall contain no more than two alternates.

6.5.1.6 (E)

Responsibilities

- a. 1. Review plant procedures, and changes thereto, required by Specification 6.8.
- b. 2. Review proposed tests and experiments that affect nuclear safety.
- c. 3. Review proposed changes to the Operating License and Technical Specifications.
- d. 4. Review proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. 5. Investigate violations of the Technical Specifications and prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the Manager - Nuclear Operations and to the Chairman of the Safety Review Committee.
- f. 6. Review plant operations to detect potential safety hazards.
- 7. Review the Security Plan (including the Safeguards Contingency Plan) and implementing procedures annually.

Insert Text "c"

Insert Text "D"

Insert Text "E"

Insert from page 250

8. Review the Emergency Plan and implementing procedures annually.

g. 9. Perform special review and/or investigations at the request of the Resident Manager.

h. 10. Review of all Reportable Events.

Replace with Text "F" L

11. Review the Offsite Dose Calculation Manual (ODCM) and implementing procedures at least once per 24 months.

12. Review the Process Control Program (PCP) at least once per 24 months.

(F) Authority

Relocate to bottom of page 249

6.5.1.7

The PORC shall function to advise the Resident Manager on all matters related to nuclear safety and environmental operations. The PORC shall recommend approval or disapproval to the Resident Manager of those items considered in 6.5 1E (1) through (4) and determine if items considered in 6.5 1E (1) through (5) constitute unreviewed safety questions, as defined in 10 CFR 50.59.

Replace with Text "G"

In the event of a disagreement between the PORC and the Resident Manager, the Chairman of the SRC and the Executive Vice President-Nuclear Generation, or their designated alternates, shall be notified within 24 hours and written notification provided on the next business day; however, the Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1.

(G) Records

6.5.1.8

Minutes of all meetings of the PORC shall be recorded and numbered. Copies will be retained in file. Copies will be forwarded to the Chairman of the SRC and the Executive Vice President-Nuclear Generation.

(H) Procedures

6.5.1.9

Conduct of the PORC and the mechanism for implementation of its responsibilities and authority are defined in the pertinent Administrative Procedures.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC 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

- 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 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan (including the Safeguards Contingency Plan) and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President-Nuclear Generation.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. An independent fire protection and loss of prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.
- l. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
- m. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Executive Vice President-Nuclear Generation on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8

Amendment No. ~~58~~, ~~58~~, ~~55~~, ~~76~~, ~~95~~, 252a

CHARTER

6.5.2.11 Conduct of the committee will be in accordance with a charter approved by the Executive Vice President-Nuclear Generation setting forth the mechanism for implementation of the committee's responsibilities and authority.

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for Reportable Events:

- (A) The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- (B) Each Reportable Event shall be reviewed by the PORC, and the results of this review shall be submitted to the SRC and the Executive Vice President - Nuclear Generation.

6.7 SAFETY LIMIT VIOLATION

- (A) If a safety limit is exceeded, the reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36, (c) (1).
- (B) An immediate report of each safety limit violation shall be made to the NRC by the Resident Manager. The Executive Vice President-Nuclear Generation and Chairman of the SRC will be notified within 24 hours.
- (C) The PORC shall prepare a complete investigative report of each safety limit violation and include appropriate analysis and evaluation of: (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility component systems or structures and (3) corrective action required to prevent recurrence. The Resident Manager shall forward this report to the Executive Vice President-Nuclear Generation, Chairman of the SRC and the NRC.

6.8 PROCEDURES

(A) Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Appendix A of Regulatory Guide 1.33, November 1972. In addition, procedures shall be established, implemented and maintained for the Fire Protection Program and other programs, as specified in Appendix B of the Radiological Effluent Technical Specifications, Section 7.2.

Replace with Text "I"

(B) Those procedures affecting nuclear safety shall be reviewed by PORC and approved by the Resident Manager prior to implementation.

Replace with Text "J"

(C) Temporary changes to ~~nuclear related~~ *the procedures required by specification 6.8(A)* procedures may be made provided:

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



2. 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.~~

3. The change is documented, reviewed by the ~~POBC and approved by the Resident Manager within 14 days of implementation.~~

6.9 REPORTING REQUIREMENTS *6.5.0 within 14 days of implementation.*

(A) ROUTINE REPORTS

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.

1. STARTUP REPORT

- a. A summary report of plant startup and power escalation testing shall be submitted following (1) amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) 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 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.

Text "A"

"Review requirements are accomplished by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group".

Text "AA"

"6.5.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 6.5.0.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 6.5.0.2 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.
- 6.5.0.3 Designated technical reviewer(s) shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions.
- 6.5.0.4 The designated technical reviewer shall determine the need for cross disciplinary reviews. Individuals performing cross-disciplinary reviews shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions.
- 6.5.0.5 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed from a safety perspective by a qualified safety reviewer. Safety and/or environmental impact evaluations, when required, shall be reviewed by PORC per Specification 6.5.1.6.a.
- 6.5.0.6 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by the appropriate member(s) of management."

Text "B"

"Function

PORC shall function to advise the Resident Manager on matters related to nuclear safety and environmental impact".

Text "C"

"The PORC shall be responsible for the:"

Text "D"

"Review of 10 CFR 50.59 safety and environmental impact evaluations associated with procedures and programs required by Specification 6.8 and changes thereto".

Text "E"

"Investigation of violations to the Technical Specifications. The PORC shall prepare and present a report covering the evaluations and recommendations to prevent recurrence to the Resident Manager, who will then forward the report to the Executive Vice President - Nuclear Generation and to the Chairman of the Safety Review Committee".

Text "F"

"Review of the Process Control Program and the Offsite Dose Calculation Manual (ODCM) and changes thereto".

Text "G"

"The PORC shall:

- a. Recommend to the Resident Manager, approval or disapproval of those items reviewed under Specifications 6.5.1.6.a through 6.5.1.6.d.
- b. Render determinations with regard to whether or not items considered under Specification 6.5.1.6.a through 6.5.1.6.e constitute an Unreviewed Safety Question as defined in 10 CFR 50.59.
- c. In the event of a disagreement between the PORC and Resident Manager, notify the Executive Vice President-Nuclear Generation and the SRC Chairman, or their designated alternates, within 24 hours and provide written notification by the next business day. The Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1."

Text "I"

"Written procedures and administrative policies shall be established, implemented, and maintained that:

1. meet or exceed the requirements and recommendations of Section 5 of ANSI 18.7-1972 "Facility Administrative Policies and Procedures."
2. are recommended in Appendix A of Regulatory Guide 1.33, November 1972.
3. implement the Fire Protection Program.
4. include programs specified in Appendix B of the Radiological Effluent Technical Specifications, Section 7.2."

Text "J"

"Each procedure of Specification 6.8.(A), and changes thereto, shall be approved prior to implementation by the appropriate responsible member of management as specified in Specification 6.5.0."