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ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President, Nuclear Operations* shall be responsible for overall operation of the site, while the Plant Manager shall be responsible for operation of the units. The Vice President, Nuclear Operations and the Plant Manager shall each delegate in writing the succession to this responsibility during their absence.

of
his
and
Manager

INSERT A

6.1.2 The Shift Supervisor (or during his absence from the control room, a designated individual, see Table 6.2.1) shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President, Nuclear Operations shall be reissued to all station personnel on an annual basis.

Group
Production

ANNUALLY

INSERT B

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATION

An onsite and an offsite organization shall be established for unit operation and corporate management, respectively. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The Vice President, Nuclear Operations* shall be responsible for overall site safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Group Vice President, Nuclear Engineering and Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out the radiation protection and quality assurance functions may report to the appropriate manager onsite; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

The unit organization shall include be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum skill crew composition shown in Table 6.2.1.

An Auxiliary Operator shall be assigned to each reactor containing fuel and an additional Auxiliary Operator shall be assigned if either unit is operating.

*
COMANCHE PEAK - UNITS 1 AND 2
INSERT C

INSERT A

The Vice President of Nuclear Operations*, or his designee, in accordance with approved administrative procedures, shall approve prior to implementation, each proposed test or experiment and proposed changes and modifications to unit systems or equipment that affect nuclear safety.

INSERT B

During any absence of the Shift Manager from the control room while the unit is in MODE 1, 2, 3 or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the Shift Manager from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

INSERT C

Duties may be performed by the Plant Manager if that organizational position is assigned.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- b. At least one licensed Operator for each unit shall be in the control room when fuel is in either reactor. In addition, while either unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;
- c. A Radiation Protection Technician* and a Chemistry Technician* shall be on site when fuel is in the reactor;

d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;

d/e. A site Fire Brigade of at least five members* shall be maintained on site at all times. The Fire Brigade shall not include the Shift Manager Supervisor and the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency;

e/f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, Radiation Protection Technicians, auxiliary operators, and key maintenance personnel).

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12); and

f/g. The Shift Operations Manager shall hold a Senior Reactor Operator license.

*The Radiation Protection and the Chemistry Technicians and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION
TWO UNITS WITH A COMMON CONTROL ROOM

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION		
	BOTH UNITS IN MODE 1,2,3 or 4	BOTH UNITS IN MODE 5 or 6 or DEFUELED	ONE UNIT IN MODE 1,2,3, or 4 AND ONE UNIT IN MODE 5 or 6 or DEFUELED
SS	1	1	1
SRO	1	None**	1
RO	3*	2*	3*
AO	3*	3*	3*
STA	1***	None	1***

- SS - Shift Supervisor with a Senior Operator license
- SRO - Individual with a Senior Operator license
- RO - Individual with an Operator license
- AO - Auxiliary Operator
- STA - Shift Technical Advisor

The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in MODE 5 or 6, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

- *At least one of the required individuals must be assigned to the designated position for each unit.
- **At least one licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling must be present during CORE ALTERATIONS on either unit, who has no other concurrent responsibilities.
- ***The STA position shall be manned in MODES 1, 2, 3, and 4 unless the Shift Supervisor or the individual with a Senior Operator license meets the qualifications described in Option 1 of the Commission Policy Statement on Engineering Expertise (50 FR 43621, October 28, 1985).

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Group Vice President, Nuclear Engineering and Operations.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 3 years professional level experience in his field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Group Vice President, Nuclear Engineering and Operations.

6.2.4 SHIFT TECHNICAL ADVISOR

g. 6.2.4.1 The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room. *Manager*

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI-N18.1-1971 for comparable positions, except for the Radiation Protection ~~Manager~~** who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. (Prior to meeting

*Not responsible for sign-off function.

**Until the Radiation Protection Manager meets all qualifications per Regulatory Guide 1.8, September 1975, the Assistant Radiation Protection Manager, who meets all of those qualifications, shall be responsible for the technical aspects of the program.

ADMINISTRATIVE CONTROLS

UNIT STAFF QUALIFICATIONS (Continued)

the qualifications of ANSI-N18.1-1971, technicians and maintenance personnel may be permitted to perform work in the specific task(s) for which qualification has been demonstrated.)

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Vice President, Nuclear Operations and shall meet or exceed the requirements and recommendations of ANSI-N18.1-1971, 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 - REVIEW AND AUDIT - NOT USED

6.5.1 STATION OPERATIONS REVIEW COMMITTEE (SORC)

FUNCTION

6.5.1.1 The SORC shall function to advise the Vice President, Nuclear Operations on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The SORC shall as a minimum be composed of managers or individuals reporting directly to managers from the areas listed below and meet the requirements of ANSI-N18.1-1971 Sections 4.2 or 4.4 for required experience.

Operations
Maintenance
Instrumentation and Controls
Technical Support
Radiation Protection
Quality Assurance

The Plant Manager shall serve as the chairman of SORC. A senior health physicist is acceptable for the Radiation Protection representative on SORC. The SORC members shall be designated, in writing, by the Vice President, Nuclear Operations.

ALTERNATES

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

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

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

QUORUM

6.5.1.5 The quorum of the SORC necessary for the performance of the SORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and a majority of the regular members (or their alternates).

RESPONSIBILITIES

6.5.1.6 The SORC shall be responsible for:

- a. Review of applicable administrative procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978.
- b. Review of the safety evaluations for: (1) procedures, (2) change to procedures, equipment, systems or facilities, and (3) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- c. Review of proposed procedures and changes to procedures, equipment, systems or facilities which involve an unreviewed safety question as defined in 10 CFR 50.59 or involves a change in Technical Specifications;
- d. Review of proposed test or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59 or requires a change in Technical Specifications;
- e. Review of proposed changes to Technical Specifications or the Operating License;
- f. Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President, Nuclear Operations and to the ORC;
- g. Review of reports of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h. Review of all REPORTABLE EVENTS;

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- i. Review of the Security Plan and shall submit recommended changes to the ORC;
 - j. Review of the Emergency Plan and shall submit recommended changes to the ORC;
 - k. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems;
 - l. Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President, Nuclear Operations, and to the ORC;
 - m. Review of Unit operations to detect potential hazards to nuclear safety;
 - n. Investigations or analysis of special subjects as requested by the Chairman of the ORC or the Vice President, Nuclear Operations;
 - o. Review of the Fire Protection Report and implementing procedures and submittal of recommended changes to the ORC; and
 - p. Review of the Technical Requirements Manual and revision thereto.
- 6.5.1.7 The SORC shall:
- a. Recommend in writing to the designated manager (see Specification 6.5.3) approval or disapproval of items considered under Specification 6.5.1.6a through e prior to their implementation;
 - b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6a. through e. constitutes an unreviewed safety question; and
 - c. Provide written notification within 24 hours to the Group Vice President, Nuclear Engineering and Operations and the Operations Review Committee of disagreement between the SORC and the designated manager (see Specification 6.5.3); however, the Vice President, Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.1.8 The SORC shall maintain written minutes of each SORC meeting that, at a minimum, document the results of all SORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President, Nuclear Operations and the Operations Review Committee.

6.5.2 OPERATIONS REVIEW COMMITTEE (ORC)

FUNCTION

6.5.2.1 The ORC 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,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The ORC shall report to and advise the Group Vice President, Nuclear Engineering and Operations on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

COMPOSITION

6.5.2.2 The ORC shall be composed of at least six individuals of whom no more than a minority are members having line responsibility for operations at CPSES. The Chairman and all members will be appointed by the Group Vice President, Nuclear Engineering and Operations.

The ORC Chairman shall hold a Bachelor's degree in an engineering or physical science field or equivalent experience and a minimum of 6 years technical managerial experience.

The ORC members shall hold a Bachelor's degree in an engineering or physical science field or equivalent experience and a minimum of 5 years technical experience with the exception of CASE's representative, Mrs. Juanita Ellis, and CASE's alternate designated by Mrs. Ellis. It is the responsibility of the Chairman to ensure experience and competence is available to review problems in areas listed in Specification 6.5.2.1a. through h. To a large measure, this experience and competence rests with the membership of the ORC. In specialized areas, this experience may be provided by personnel who act as consultants to the ORC.

ADMINISTRATIVE CONTROLS

ALTERNATES

6.5.2.3 The alternate for the Chairman and all alternate members shall be appointed in writing by the Group Vice President, Nuclear Engineering and Operations to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.

CONSULTANTS

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

MEETING FREQUENCY

6.5.2.5 The ORC shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the ORC necessary for the performance of the ORC review and audit functions of these Technical Specifications shall consist of not less than a majority of the appointed individuals (or their alternates) and the Chairman or his designated alternate. No more than a minority of the quorum shall have line responsibility for operation of the unit.

CASE's representative, Mrs. Juanita Ellis or CASE's alternate designated by Mrs. Ellis, during the period she serves as a member of the ORC, shall be entitled to all of the rights and privileges that all other individuals have as members of the ORC, but for the purposes of this paragraph shall not be counted for establishing or meeting quorum requirements.

REVIEW

6.5.2.7 The ORC shall be responsible for the review of:

- a. The safety evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;

ADMINISTRATIVE CONTROLS

REVIEW (Continued)

- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the SORC.

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the ORC. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training, and qualifications of the entire unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of 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 fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year;
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months;
- k. Any other area of unit operation considered appropriate by the ORC or the Group Vice President, Nuclear Engineering and Operations; and
- l. The performance of activities required by the Technical Requirements Manual at least once per 24 months.

RECORDS

6.5.2.9 Records of ORC activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each ORC meeting shall be prepared, approved, and forwarded to the Vice President, Nuclear Operations and Group Vice President, Nuclear Engineering and Operations within 14 days following each meeting;
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Vice President, Nuclear Operations and Group Vice President, Nuclear Engineering and Operations within 14 days following completion of the review; and
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Vice President, Nuclear Operations and Group Vice President, Nuclear Engineering and Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 TECHNICAL REVIEW AND CONTROLS

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. The Vice President, Nuclear Operations, shall approve Station Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures. Other procedures shall be approved by the appropriate

ADMINISTRATIVE CONTROLSTECHNICAL REVIEW AND CONTROLS (Continued)

department manager as previously designated by the Vice President, Nuclear Operations, in writing. Individuals responsible for procedure reviews shall be members of the Nuclear Operations Management Staff previously designated by the Vice President, Nuclear Operations. Changes to procedures which do not change the intent of approved procedures may be approved for implementation by two members of the Nuclear Operations Management Staff, at least one of whom holds a Senior Operator License, provided such approval is prior to implementation and is documented. Such changes shall be approved by the original approval authority within 14 days of implementation;

- b. Proposed tests and experiments which affect plant nuclear safety shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by a qualified individual/group other than the individual/group which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Plant Manager. Individuals responsible for conducting such reviews shall be members of the Nuclear Operations Management Staff previously designated by the Vice President, Nuclear Operations;
- c. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Chief Engineer. Each such modification shall be reviewed by a qualified individual/group meeting the experience requirements of ANSI N18.1-1971, Section 4.6 other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Individuals/groups responsible for conducting such reviews shall be previously designated by the Chief Engineer. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved by the Plant Manager prior to implementation;
- d. Individuals responsible for reviews performed in accordance with the requirements of Specifications 6.5.3.1a and 6.5.3.1b, shall be members of the Nuclear Operations Management staff previously designated by the Vice President, Nuclear Operations. Each such review shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be done in accordance with the appropriate qualification requirements;
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. For items involving unreviewed safety questions, NRC approval shall be obtained prior to the Plant Manager approval for implementation; and
- f. The Security Plan and Emergency Plan, and implementing procedures, shall be reviewed at least once per 12 months. Recommended changes to the implementing procedures shall be approved by the Vice President,

ADMINISTRATIVE CONTROLS

TECHNICAL REVIEW AND CONTROLS (Continued)

Nuclear Operations. Recommended changes to the Plans shall be reviewed pursuant to the requirements of Specification 6.5.1.6 and approved by the Vice President, Nuclear Operations. NRC approval shall be obtained as appropriate.

6.5.3.2 Records of the above activities described in 6.5.3.1 shall be provided to the Vice President, Nuclear Operations, SORC, and/or ORC as necessary for required reviews.

6.6 REPORTABLE EVENT ACTION NOT USED

6.6.1 The following actions shall be taken for REPORTABLE EVENTS.

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73 and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the ORC 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:

- a. In accordance with 10 CFR 50.72, the NRC Operations Center, shall be notified by telephone as soon as practical and in all cases within one hour after the violation has been determined. The Vice President, Nuclear Operations* and the Operations Review Committee (ORC) shall be notified within 24 hours. *Plant Manager, The*
- b. A Licensee Event Report shall be prepared in accordance with 10 CFR 50.73. *of*
- c. The Licensee Event Report shall be submitted to the Commission in accordance with 10 CFR 50.73, and to the Vice President, Nuclear Operations*, Station Operations Review Committee (SORC), and Operations Review Committee (ORC) within 30 days after discovery of the event. *the Plant Manager, of*
- d. Critical operation of the unit shall not be resumed until authorized by the Nuclear Regulatory Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;

* If that organizational position is assigned

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33;
- c. ^{Not used} ~~Security Plan implementation;~~
- d. ^{Not used} ~~Emergency Plan implementation;~~
- e. ^{Not used} ~~PROCESS CONTROL PROGRAM implementation;~~
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance for effluent and environmental monitoring;
- h. Fire protection program implementation; and
- i. ^{Not used} ~~Technical Requirements Manual implementation.~~

6.8.2 ~~Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as set forth in Specification 6.5 above.~~

6.8.3 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the post accident recirculation portions of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, RHR System, and RCS Sampling System (Post Accident Sampling System portion only). The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and
- 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. ^{Not used} ~~In-Plant Radiation Monitoring~~

~~A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:~~

- ~~1) Training of personnel,~~

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

b. In-Plant Radiation Monitoring (Continued)

- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation and low pressure turbine disc stress corrosion cracking. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables,
- 2) Identification of the procedures used to measure the values of the critical variables,
- 3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,
- 4) Procedures for the recording and management of data,
- 5) Procedures defining corrective actions for all off-control point chemistry conditions, and
- 6) A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

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

e. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

e. Radioactive Effluent Controls Program (Continued)

be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and set-point determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR 50,
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50, and

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

e. Radioactive Effluent Controls Program (Continued)

- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR 190.

f. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

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 Regional Administrator of the Regional Office of the NRC unless otherwise noted.

STARTUP REPORT

Not used

6.9.1.1 A summary report of unit 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 unit.

ADMINISTRATIVE CONTROLS

STARTUP REPORT (Continued)

The initial Startup Report shall address each of the startup tests identified in Chapter 14 of the Final Safety Analysis Report 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. Subsequent Startup Reports shall address startup tests that are necessary to demonstrate the acceptability of changes and/or modifications.

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 operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS*

6.9.1.2 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

- a. 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** e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent 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 should be assigned to specific major work functions;

*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.

**This tabulation supplements the requirements of 10 CFR 20.407.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

- b. The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.7. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration ($\mu\text{Ci/gm}$) and one other radioiodine isotope concentration ($\mu\text{Ci/gm}$) as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.3 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM, and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT**

6.9.1.4 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR 50.

MONTHLY OPERATING REPORTS

6.9.1.5 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves,

*A single submittal may be made for a multiple unit station.

**A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

MONTHLY OPERATING REPORTS (Continued)

shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

20th

CORE OPERATING LIMITS REPORT

6.9.1.6a Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT (COLR) before each reload cycle or any remaining part of a reload cycle for the following:

- 1). Moderator temperature coefficient BOL and EOL limits and 300 ppm surveillance limit for Specification 3/4.1.1.3,
- 2). Shutdown Rod Insertion Limit for Specification 3/4.1.3.5,
- 3). Control Rod Insertion Limits for Specification 3/4.1.3.6,
- 4). AXIAL FLUX DIFFERENCE Limits and target band for Specification 3/4.2.1.,
- 5). Heat Flux Hot Channel Factor, $K(Z)$, $W(Z)$, and F_{Q}^{RTP} for Specification 3/4.2.2,
- 6). Nuclear Enthalpy Rise Hot Channel Factor Limit and the Power Factor Multiplier for Specification 3/4.2.3.

6.9.1.6b The following analytical methods used to determine the core operating limits are for Units 1 and 2, unless otherwise stated, and shall be those previously approved by the NRC in:

- 1). WCAP-9272-P-A, "WESTINGHOUSE RELOAD SAFETY EVALUATION METHODOLOGY," July 1985 (W Proprietary). (Methodology for Specifications 3.1.1.3 - Moderator Temperature Coefficient, 3.1.3.5 - Shutdown Bank Insertion Limit, 3.1.3.6 - Control Bank Insertion Limits, 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor, and 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor.)
- 2). WCAP-8385, "POWER DISTRIBUTION CONTROL AND LOAD FOLLOWING PROCEDURES - TOPICAL REPORT," September 1974 (W Proprietary). (Methodology for Specification 3.2.1 - Axial Flux Difference [Constant Axial Offset Control].)
- 3). T. M. Anderson to K. Kniel (Chief of Core Performance Branch, NRC January 31, 1980--Attachment: Operation and Safety Analysis Aspects of an improved Load Follow Package. (Methodology for Specification 3.2.1 - Axial Flux Difference [Constant Axial Offset Control].)
- 4). NUREG-0800, Standard Review Plan, U.S. Nuclear Regulatory Commission, Section 4.3, Nuclear Design, July 1981. Branch Technical Position CPB 4,3-1, Westinghouse Constant Axial Offset Control (CAOC), Rev. 2, July 1981. (Methodology for Specification 3.2.1 - Axial Flux Difference [Constant Axial Offset Control].)

ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued)

- 5). WCAP-10216-P-A, "RELAXATION OF CONSTANT AXIAL OFFSET CONTROL F_0 SURVEILLANCE TECHNICAL SPECIFICATION," June 1983 (W Proprietary).
(Methodology for Specification 3.2.2 - Heat Flux Hot Channel Factor (W(z) surveillance requirements for F_0 Methodology).)
- 6). WCAP-10079-P-A, "NOTRUMP, A NODAL TRANSIENT SMALL BREAK AND GENERAL NETWORK CODE," August 1985, (W Proprietary).
- 7). WCAP-10054-P-A, "WESTINGHOUSE SMALL BREAK ECCS EVALUATION MODEL USING THE NOTRUMP CODE", August 1985, (W Proprietary).
- 8). WCAP-11145-P-A, "WESTINGHOUSE SMALL BREAK LOCA ECCS EVALUATION MODEL GENERIC STUDY WITH THE NOTRUMP CODE", October 1986, (W Proprietary).
- 9). RXE-90-006-P, "Power Distribution Control Analysis and Overtemperature N-16 and Overpower N-16 Trip Setpoint Methodology," February 1991.
(Methodology for Specification 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor.)
- 10). RXE-88-102-P, "TUE-1 Departure from Nucleate Boiling Correlation", January 1989.
- 11). RXE-88-102-P, Sup. 1, "TUE-1 DNB Correlation - Supplement 1", December 1990.
- 12). RXE-89-002, "VIPRE-01 Core Thermal-Hydraulic Analysis Methods for Comanche Peak Steam Electric Station Licensing Applications", June 1989.
- 13). RXE-91-001, "Transient Analysis Methods for Comanche Peak Steam Electric Station Licensing Applications", February 1991.
- 14). RXE-91-002, "Reactivity Anomaly Events Methodology", May 1991.
(Methodology for Specification 3.1.1.3 - Moderator Temperature Coefficient, 3.1.3.5 - Shutdown Bank Insertion Limit, 3.1.3.6 - Control Bank Insertion Limits, 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor, 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor.)
- 15). RXE-90-007, "Large Break Loss of Coolant Accident Analysis Methodology", December 1990.
- 16). TXX-88306, "Steam Generator Tube Rupture Analysis", March 15, 1988.

Reference 17) is for Unit 1 only:

- 17). WCAP-9220-P-A, "WESTINGHOUSE ECCS EVALUATION MODEL, February 1978 Version," February 1978 (W Proprietary).

ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued)

Reference 18) is for Unit 2 only:

- 18). WCAP-9220-P-A, Rev. 1, "WESTINGHOUSE ECCS EVALUATION MODEL- 1981 Version", February 1982 (W Proprietary).

6.9.1.6c The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as SHUTDOWN MARGIN, and transient and accident analysis limits) of the safety analysis are met.

6.9.1.6d The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

ADMINISTRATIVE CONTROLS

SPECIAL REPORTS

6.9.2 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

6.10 RECORD RETENTION *NOT USED*

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;
- c. ALL REPORTABLE EVENTS;
- d. Records of surveillance activities, inspections, and calibrations required by the Technical Specifications, Technical Requirements Manual, and Fire Protection Report, except as explicitly covered in Specification 6.10.3;
- e. Records of changes made to the procedures required by Specification 6.8.1;
- f. Records of radioactive shipments;
- g. Records of sealed source and fission detector leak tests and results; and
- h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- c. Records of radiation exposure for all individuals entering radiation control areas;
- d. Records of gaseous and liquid radioactive material released to the environs;

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- e. Records of transient or operational cycles for those unit components identified in Table 5.7-1;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the unit staff;
- h. Records of inservice inspections performed pursuant to these Technical Specifications;
- i. Records of quality assurance activities required by the Quality Assurance Manual;
- j. 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 SORC and the ORC;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by the Technical Requirements Manual including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality;
- n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed; and
- o. Records of review performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION PROTECTION PROGRAM NOT USED

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

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 10 CFR 20.203(c)(5), in lieu of the "control device" or "alarm signal" required by paragraph 10 CFR 20.203(c), each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be

ADMINISTRATIVE CONTROLS

6.12 HIGH RADIATION AREA (Continued)

controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Radiation Protection Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or radiation protection supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

Manager

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

ADMINISTRATIVE CONTROLS

6.13 ~~PROCESS CONTROL PROGRAM (PCP)~~ NOT USED

Changes to the PCP:

(This section is circled and contains diagonal hatching lines)

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the SORC and the approval of the Vice President, Nuclear Operations.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained ~~as required by Specification 6.10.3o~~. This documentation shall contain: for the duration of the unit Operating License.
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the SORC and the approval of the Vice President, Nuclear Operations.*
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

* Duties may be performed by the Plant Manager if that organizational position is assigned.