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- 5.0 ADMINISTRATIVE CONTROLS
- 5.4 Training
- 5.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Supervisor - Station Training and shall meet or exceed the requirements of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.
- 5.4.2 A training program for the fire brigade shall be maintained under the Manager - Fort Calhoun Station and shall meet or exceed the requirements of Section 27 of NFPA Code-1975, except that the meeting frequency may be quarterly.
 - 5.5 Review and Audit
- 5.5.1 Plant Review Committee (PRC)

Function

5.5.1.1 The Plant Review Committee shall function to advise the Manager -Fort Calhoun Station on all matters related to nuclear safety.

Composition

5.5.1.2 The official Plant Review Committee shall be composed of the:

Chairman:	Manager - Fort Calhoun Station
Member:	Supervisor - Operations
Member:	Supervisor - Technical
Member:	Supervisor - Maintenance
Member:	Supervisor - Instrument & Control and Electrical
Member:	Reactor Engineer
Member:	Supervisor - Chemical and Radiation
Member:	Protection Plant Engineer

Alternates

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

Meeting Frequency

5.5.1.4 The Plant Review Committee shall meet at least once per calendar month and as convened by the Plant Review Committee Chairman.

Quorum

5.5.1.5 A quorum of the Plant Review Committee shall consist of the Chairman or his designated alternate and a majority of the Plant Review Committee including alternates.

Amendment No. \$, 19, 38

Responsibilities

- 5.5.1.6 The Plant Review Committee shall be responsible for:
 - a. Review of 1) all procedures required by Specification 5.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Manager - Fort Calhoun Station to affect nuclear safety.
 - Review of all proposed tests and experiments that affect nuclear safety.
 - Review of all proposed changes to the Technical Specifications.
 - Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Division Manager - Nuclear Production and to the Chairman of the Safety Audit and Review Committee.
 - Review of facility operations to detect potential safety hazards.
 - g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Safety Audit and Review Committee.
 - h. Review of the Site Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Safety Audit and Review Committee.
 - i. Review of the Site Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Safety Audit and Review Committee.

Authority

- 5.5.1.7 The Plant Review Committee shall:
 - Recommend in writing to the Manager Fort Calhoun Station approval or disapproval of items considered under 5.5.1.6(a) through (d) above.

- 5.5.1.7 b. Render determinations in writing with regard to whether or not each item considered under 5.5.1.6(a) through (e) above constitutes an unreviewed salety question.
 - c. Provide immediate written notification to the Division Manager - Nuclear Production and the Safety Audit and Review Conmittee of disagreement between the Plant Review Committee and the Manager - Fort Calhoun Station; however, the Manager -Fort Calhoun Station shall have responsibility for resolution of such disagreements pursuant to 5.1.1 above.

Records

- 5.5.1.8 The Plant Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Division Manager -Nuclear Production and Chairman of the Safety Audit and Review Committee.
 - 5.5.2 Safety Audit and Review Committee (SARC)

Function

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

Composition

5.5.2.2 The Safety Audit and Review Committee shall be composed of:

Chairman:	Division Manager - Quality Assurance and Regulatory Affairs
Member:	Assistant General Manager - Nuclear Production, Production
	Operations, Fuels, and QA&RA
Member:	Assistant General Manager - Electric Operations and Engineering
Member:	Division Manager - Engineering
Member:	Division Manager - Nuclear Production
Member:	OPPD Operations, Engineering, and Technical Support Staff
Member:	Qualified Non-District Affiliated Consultants as Required and
	as Determined by SARC Chairman

Amendment No. p. 19. 60, 76 5-5

- 5.5.2.8 e. The Fort Calhoun Station Emergency Plan and implementing procedures at least once every twelve months.
 - f. The Site Security Plan and implementing procedures at least once every twelve months.
 - g. The Safeguards Contingency Plan and implementing procedures at least once every twelve months.
 - h. Any other area of facility operation considered appropriate by the Safety Audit and Review Committee or the Assistant General Manager - Nuclear Production, Production Operations, Fuels, and Quality Assurance & Regulatory Affairs.

Authority

5.5.2.9 The Safety Audit and Review Committee shall report to and advise the Assistant General Manager - Nuclear Production, Production Operations, Fuels, and Quality Assurance & Regulatory Affairs on those areas of responsibility specified in Sections 5.5.2.7 and 5.5.2.8.

Records

- 5.5.2.10 Records of Safety Audit and Review Committee activities shall be prepared, approved and distributed as indicated below:
 - a. Minutes of each Safety Audit and Review Committee meeting shall be prepared, approved and forwarded to the Assistant General Manager - Nuclear Production, Production Operations, Fuels, and Quality Assurance & Regulatory Affairs within 14 days following each meeting.
 - b. Reports of reviews emcompassed by Section 5.5.2.7 e, f, g, and h above shall be prepared, approved and forwarded to the Assistant General Manager - Nuclear Production, Production Operations, Fuels, and Quality Assurance & Regulatory Affairs within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 5.5.2.8 above shall be forwarded to the Assistant General Manager - Nuclear Production, Production Operations, Fuels, and Quality Assurance & Regulatory Affairs and to the responsible management positions designated by the Safety Audit and Review Committee within 30 days after completion of the audit.

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5.5.3 Fire Protection Inspection

- a. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm. The audit and inspection program responsibility shall rest with the Safety Audit and Review Committee.
- b. An inspection and audit of the fire protection and loss prevention program by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.
- 5.6 Reportable Occurrence Action
- 5.6.1 The following actions shall be taken in the event of a REPORTABLE OCCURRENCE:
 - a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 5.9.

Amendment No. J. 1. 38. 4. 76 5-8

- b. Each Reportable Occurrence requiring 24 hour notification to the Commission shall be reviewed by the Plant Review Committee and submitted to the Safety Audit and Review Committee and the Division Manager - Nuclear Production.
- 5.7 Safety Limit Violation
- 5.7.1 The following actions shall be taken in the event a Safety Limit is violated:
 - a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
 - b. The safety limit violation shall be reported to the Commission, the Division Manager - Nuclear Production and to the Safety Audit and Review Committee immediately.

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- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Review Committee. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Safety Audit and Review Committee and the Division Manager - Nuclear Production within 10 days of the violation.

5.8 Procedures

- 5.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the minimum requirements of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33 except as provided in 5.8.2 and 5.8.3 below.
- 5.8.2 Each procedure and administrative policy of 5.8.1 above, and changes thereto, shall be reviewed by the Plant Review Committee and approved by the Manager - Fort Calhoun Station prior to implementation and periodically as set forth in each document.
- 5.8.3 Temporary changes to procedures 5.8.1 above may be made provided:

ATTACHMENT B

JUSTIFICATION AND DISCUSSION

The Fort Calhoun Station Technical Specifications are being changed to reflect changes to the plant support and plant organizations. All changes proposed are administrative in nature.

The plant support organizational structure is being revised to reflect licensee reorganization. A separate nuclear division has been designated within the licensee's organization. This new division provides dedicated management support to the Fort Calhoun Station. Previously, the Division Manager - Production Operations and the Section Manager - Operations had direct responsibility for all electrical generating facilities owned and operated by the Omaha Public Power District, including fossil-fueled generating units. Under the revised plant support organization, the Section Manager - Operations position has been eliminated, with the Manager - Fort Calhoun Station reporting directly to the newly-designated Division Manager - Nuclear Production. Changes to Section 5.5.1 (subparts 5.5.1.6.e, 5.5.1.7.c, and 5.5.1.8), Section 5.5.2 (subparts 5.5.2.2, 5.5.2.8.h, 5.5.2.9, 5.5.2.10.a, 5.5.2.10.b, and 5.5.2.10.c), Section 5.6.1 (subpart 5.6.1.b), and Section 5.7.1 (subparts 5.7.1.b and 5.7.1.d) are proposed to reflect the Division Manager - Nuclear Production position and to reflect a title change for the Assistant General Manager, to whom the Division Manager - Nuclear Production directly reports.

The plant organization has been changed to reflect three new positions: the ALARA and RAD Waste Coordinators and the Supervisor - Station Training. The Supervisor - Station Training reports directly to the Manager - Fort Calhoun Station and will be responsible for plant staff training as indicated in the proposed change to Section 5.4.1. These changes are also reflected on Figure 5-2, "Fort Calhoun Station Organization Chart." Additionally, this figure has been corrected to provide the correct title of "Supervisor - Administrative Services and Security".

NO SIGNIFICANT HAZARDS CONSIDERATIONS

- This proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are administrative in nature only. The changes provide for:
 - a. Dedicated nuclear plant management support at a higher level in the licensee plant support organization.
 - b. Elimination of one management level between the General Manager and CEO of the licensee and the Manager - Fort Calhoun Station.
 - c. Organization elevation of the position responsible for plant staff training at the Fort Calhoun Station. The supervisor responsible for this training would report directly to the Manager - Fort Calhoun Station.

NO SIGNIFICANT HAZARDS CONSIDERATIONS (Continued)

- d. Creation of a new position dedicated to radioactive waste management at the Fort Calhoun Station.
- e. Creation of a new position dedicated to ALARA responsibilities at the Fort Calhoun Station.
- Correction of title of Supervisor Administrative Services and Security.
- The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes are administrative in nature only. (Please see 1. above)
- The proposed amendment does not involve a significant reduction in a margin of safety. The proposed changes are administrative in nature only. (Please see 1. above)

JUSTIFICATION FOR FEE CLASSIFICATION

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The proposed amendment is deemed to be Class II, within the meaning of 10 CFR 170.22. It is administrative in nature, has no safety or environmental significance, and does not involve a significant hazards consideration.