

PROPOSED CHANGES

ATTACHMENT 1

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ADMINISTRATIVE CONTROLS

6.2.3 CATAWBA SAFETY REVIEW GROUP

FUNCTION

6.2.3.1 The Catawba Safety Review Group (XSRG) shall function to provide the review of plant design and operating experience for potential opportunities to improve plant safety; evaluation of plant operations and maintenance activities; and, to advise management on the overall quality and safety of plant operations. The XSRG shall make recommendations for revised procedures, equipment modifications, or other means of improving plant safety to appropriate station/corporate management.

COMPOSITION

6.2.3.2 ~~The CSRG shall be composed of at least five, dedicated, full time engineers located onsite. Each shall have either:~~

- Replaced with Insert A
- ~~(1) A bachelor's degree in engineering or related science and at least 2 years professional level experience in his/her field, at least 1 year of which experience shall be in the nuclear field, or,~~
  - ~~(2) At least 5 years of nuclear experience and hold or have held a Senior Reactor Operator license, or~~
  - ~~(3) At least 8 years of professional level experience in his/her field, at least 5 years of which experience shall be in the nuclear field.~~

~~A minimum of 50% of these personnel shall have the qualifications specified in (1) above.~~

RESPONSIBILITIES

6.2.3.3 The XSRG shall be responsible for:

- a. Review of selected plant operating characteristics and other appropriate sources of plant design and operating experience information for awareness and incorporation into the performance of other duties.
- b. Review of the effectiveness of corrective actions taken as a result of the evaluation of selected plant operating characteristics and other appropriate sources of plant design and operating experience information.
- c. Review of selected programs, procedures, and plant activities, including maintenance, modification, operational problems, and operational analysis.

## *Insert A*

The SRG shall be composed of at least five individuals and at least three of these shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his/her field, at least 1 year of which experience shall be in the nuclear field.

The remaining individuals in the SRG shall have either  
(1) at least 5 years of nuclear experience and hold or have held a Senior Reactor Operator license; or  
(2) at least 8 years of professional level experience in his/her field, at least 5 years of which experience shall be in the nuclear field.

ADMINISTRATIVE CONTROLS

6.5 REVIEW AND AUDIT

6.5.1 TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.1.1 Each procedure and program required by Specification 6.8 and other procedures which affect nuclear safety, and changes thereto, shall be prepared by a qualified individual/organization. Each such procedure, and changes thereto, shall be reviewed by an individual/group other than the individual/group which prepared the procedure, or changes thereto, but who may be from the same organization as the individual/group which prepared the procedure, or changes thereto.

6.5.1.2 Proposed changes to the Appendix A Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specification change shall be reviewed by an individual/group other than the individual/group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the Technical Specifications shall be approved by the Station Manager.

6.5.1.3 Proposed modifications to unit nuclear safety-related structures, systems, and components shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification.

~~Proposed modifications to nuclear safety-related structures, systems, and components shall be approved prior to implementation by the Station Manager, or by the Operating Superintendent, the Technical Services Superintendent, the Maintenance Superintendent, or the Superintendent of Integrated Scheduling, as previously designated by the Station Manager.~~

Replaced with Insert B

6.5.1.4 Individuals responsible for reviews performed in accordance with Specifications 6.5.1.1, 6.5.1.2, and 6.5.1.3 shall be members of the station supervisory staff, previously designated by the ~~Station Manager~~ <sup>Site Vice President</sup> to perform such reviews. Review of environmental radiological analysis procedures shall be performed by the ~~Corporate System Health Physicist~~ or his designee. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the appropriate designated ~~station~~ <sup>Site</sup> review personnel.

~~Proposed test and experiments which affect station nuclear safety and are not addressed in the ESAP or Technical Specifications shall be reviewed by the Station Manager or by the Operating Superintendent, the Technical Services Superintendent, the Maintenance Superintendent, or the Superintendent of Integrated Scheduling, as previously designated by the Station Manager.~~

Replaced with Insert C

General Manager, Environmental Services

INSERT B

Proposed modifications to nuclear safety-related structures, systems, and components shall be approved prior to implementation by the Station Manager; or for the Station Manager by the Mechanical Superintendent, the Operations Superintendent, the I and E Superintendent, or the Work Control Superintendent, as previously designated by the Station Manager.

INSERT C

Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications shall be reviewed by the Station Manager; or for the Station Manager by the Mechanical Superintendent, the Operations Superintendent, the I and E Superintendent, or the Work Control Superintendent, as previously designated by the Station Manager.

ADMINISTRATIVE CONTROLS

FUNCTION (Continued)

- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Administrative control and quality assurance practices.

The NSRB shall report to and advise the ~~Vice President, Nuclear Production~~, on those areas of responsibility specified in Specifications 6.5.2.8 and 6.5.2.9.

ORGANIZATION

*Executive Vice President, Power Generation*

Insert  
D

6.5.2.2 The Director, members, and alternate members of the NSRB shall be appointed in writing by the ~~Vice President, Nuclear Production~~, and shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of 5 years technical experience, of which a minimum of 3 years shall be in one or more areas given in Specification 6.5.2.1. No more than two alternates shall participate as voting members in NSRB activities at any one time.

*Generation*

6.5.2.3 The NSRB shall be composed of at least five members, including the Director. Members of the NSRB may be from the Nuclear ~~Production~~ Department, from other departments within the Company, or from external to the Company. A maximum of one member of the NSRB may be from the Catawba Nuclear Station staff.

*Site*

6.5.2.4 Consultants shall be utilized as determined by the NSRB Director to provide expert advice to the NSRB.

6.5.2.5 Staff assistance may be provided to the NSRB in order to promote the proper, timely, and expeditious performance of its functions.

6.5.2.6 The NSRB 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.

6.5.2.7 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these Technical Specifications shall consist of the Director, or his designated alternate, and at least four other NSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of Catawba Nuclear Station.

*In special cases, candidates for appointment without an academic degree in engineering or physical science may be qualified with a minimum of ten years experience in one of the areas in Specification 6.5.2.1.*

Insert  
D

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.3.1 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;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement No. 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. ~~Security Plan implementation;~~
- d. ~~Emergency Plan implementation;~~
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance Program implementation for effluent and environmental monitoring;
- h. Fire Protection Program implementation;
- i. Commitments contained in FSAR Chapter 16.0.

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Deleted

a group manager,  
superintendent/manager,  
or one of their  
designated direct reports

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved by ~~the Station Manager, or by: (1) Operating Superintendent, (2) Technical Services Superintendent, (3) Maintenance Superintendent, or (4) Superintendent of Integrated Scheduling, as previously designated by the Station Manager,~~ prior to implementation and shall be reviewed periodically as set forth in administrative procedures. For ~~Applied Activities Section~~ procedures which implement offsite environmental, technical and laboratory activities, the above review and approval may be performed by the Manager, ~~Production Environmental Services or designated Technical System Manager in the Production Support Department, in lieu of the individuals specified above.~~

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is ~~documented, reviewed, and approved by the Station Manager, or by: (1) Operating Superintendent, (2) Technical Services Superintendent, (3) Maintenance Superintendent, or (4) Superintendent of Integrated Scheduling, as previously designated by the Station Manager,~~ designee General by within 14 days of implementation.

6.8.4 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 containment spray, Safety Injection, chemical

~~Review and approval may be performed by the Superintendent of Station Services.~~

CATAWBA NUCLEAR STATION  
Proposed Technical Specification Change  
Dated December 18, 1991

ATTACHMENT 2

Item 1: Please change specification 5.2.3.2 to read:

The SRG shall be composed of at least five individuals and at least three of these shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his/her field, at least 1 year of which experience shall be in the nuclear field.

The remaining individuals in the SRG shall have either (1) at least 5 years of nuclear experience and hold or have held a Senior Reactor Operator license; or (2) at least 8 years of professional level experience in his/her field, at least 5 years of which experience shall be in the nuclear field.

Bases: This proposed change clarifies the intent of the present technical specification. The requirement for three degreed engineers is consistent with the original licensing of Catawba in which credit was given for the review and approval of the McGuire organization. The NRC had accepted the onsite SRG of this composition due the corporate support organization providing some of the assessment function that had been called for in the original TMI requirement (Item I.B.1.2).

Item 2: Please change the last sentence of specification 6.5.1.2 to read as follows:

Proposed changes to the Technical Specifications shall be approved by the Station Manager.

Bases: Our submittal dated December 18, 1991, had proposed to add the phrase "or his designee" to the end of this sentence. This has been determined to be vague and in fact unnecessary. It is our understanding that in situations where the Station Manager is unavailable, the individual acting on his behalf may in fact approve proposed technical specification changes. This is particularly important when the Station Manager is on travel and the need for an emergency technical specification arises. In this instance, the individual standing in for the Station Manager is in fact authorized to approve any proposed technical specifications. Thus we conclude the previously proposed change is unnecessary.



Item 3: Please revise Insert at the bottom of page 6-9 to read as follows:

In special cases, candidates for appointment without an academic degree in engineering or physical science may be qualified with a minimum of ten years experience in one of the areas in Specification 6.5.2.1.

Bases: The current requirement for NSRB membership is five years of technical experience, in addition to the nominal four years for a degree. For non-degreed individuals, an additional year of technical experience has been established such that a minimum of ten years experience is required in these special cases.

Item 4: Please change specifications 6.8.2 and 6.8.3.c. to read as follows:

6.8.2 Each procedure of Specification 6.8.1 and changes thereto, shall be approved by a group manager, superintendent/manager, or one of their designated direct reports prior to implementation and shall be reviewed periodically as set forth in administrative procedures....

6.8.3.c The change is approved by a group manager, superintendent/manager, or one of their designated direct reports within 14 days of implementation.

Bases: Our submittal dated December 18, 1991, had proposed to include the phrase "site vice president or his designee". It was determined that this phrase was vague. Accordingly, the above language is proposed. Duke believes that procedure approval should be accomplished by the appropriate designated implementing manager. This philosophy is consistent with the staff position contained in SRP 17.3 and as proposed in the Duke QA Topical. Duke is empowering managers to assure quality in the performance of their assigned work activities. We believe that this is better than the previous way of having higher levels of management assure quality by approving the multitude of procedures that are used in the plants today. Station directives will include details on implementation of approval requirements.