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OCT 10 1984

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos.: 50-352
50-353

Subject: Limerick Generating Station, Units 1 and 2
Additional Information for
Licensee Qualification Branch (LQB)

References: 1) Letter from J. S. Kemper to A. Schwencer,
dated August 30, 1984
2) Telecon between NRC, Bob Benedict, and PECO
on September 20, 1984

Attachment: Draft FSAR Page Changes

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

The reference 1) letter transmitted information on PECO's policy regarding periodic review of administrative procedures. Pursuant to the reference 2) telecon, draft FSAR page changes which incorporate additional information justifying the frequency of review of plant procedures are attached. These changes will be incorporated into the FSAR, exactly as it appears in the attachment, in the revision scheduled for November, 1984.

Sincerely,

John S. Kemper

RDC/mlb/10058402

cc: See Attached Service List

8410160383 841010
PDR ADDCK 05000352
A PDR

Boo!
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cc: Judge Helen F. Hoyt (w/o enclosure)
Judge Jerry Harbour (w/o enclosure)
Judge Richard F. Cole (w/o enclosure)
Judge Christine N. Kohl (w/o enclosure)
Judge Gary J. Edles (w/o enclosure)
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Board Panel
Docket & Service Section (w/o enclosure)
Mr. James Wiggins (w/o enclosure)
Mr. Timothy R. S. Campbell (w/o enclosure)

DRAFT**13.5 PLANT PROCEDURES**

Safety-related activities performed by the plant staff shall be governed by written and approved procedures of a type appropriate to the circumstances and activity, and shall be carried out in accordance with those procedures. Where appropriate for determining that important activities have been satisfactorily accomplished, quantitative or qualitative acceptance criteria shall be included. The Philadelphia Electric Company (PECo) utilizes the operating experience gained at Peach Bottom Atomic Power Station - Units 2 & 3 (boiling-water reactor (BWR) units similar to Limerick Generating Station) in the development of the procedures.

As fully described below, PECo has implemented ANSI N18.7 - 1976/ANS 3.2, Section 5 as modified by Nuclear Regulatory Commission (NRC) Regulatory Guide 1.33 (Rev 2), paragraphs C.1 and C.5.b through C.5.j, as these documents apply to operating staff activities, in the preparation, content, and control of procedures.

INSERT A.

It is planned that most administrative and operating procedures will be in effect at least six months prior to fuel loading of Unit 1. The procedures will be implemented with sufficient lead time to ensure that operating personnel can become familiar with them. PECo recognizes the benefits of using the preoperational testing phase to demonstrate the adequacy of operating procedures and, where practicable, this will be accomplished.

The following paragraphs describe the types of procedures to be employed by station operating personnel in the conduct of safety-related activities. These procedures are normally prepared by the station operating staff. However, organizations providing technical support and consultants may assist in procedure development. The procedures and revisions thereto are reviewed by the Plant Operations Review Committee (PORC), or by a subcommittee appointed by PORC, and are approved by the Station Superintendent or Assistant Station Superintendent prior to use.

13.5.1 ADMINISTRATIVE PROCEDURES

Administrative procedures generally include those that establish station management policy, those that control activities that involve interfaces among disciplines or groups supporting plant operations, and those that establish criteria for procedures and activities implemented by the plant staff and support organizations. Administrative procedures shall be prepared in sufficient detail so that tasks are performed in a consistent, efficient manner and to ensure that the necessary reviews and approvals are performed.

The following paragraphs describe the administrative procedures expected to be employed. The numbers of procedures and their specific content may be altered as the procedures are developed and experience is gained in their implementation.

13.5.1.1 Procedure for Preparation and Control of Administrative Procedures

This procedure shall provide the measures to control and coordinate the preparation, review, approval, and issuance of administrative procedures. This procedure shall require that administrative procedures be distributed to appropriate personnel in accordance with current distribution lists to ensure that outdated or inappropriate procedures are not used. The format and content of administrative procedures shall be defined as:

- a. Descriptive title, revision number, and date
- b. Statement of applicability or purpose
- c. References, including technical specifications or procedures as applicable
- d. Prerequisites when there are independent actions or procedures that must be completed prior to using the procedure
- e. Procedure section. The procedure shall provide the steps needed to perform the task in the degree of detail necessary to ensure correct, efficient performance without direct supervision or undue reliance on memory. This section may also provide criteria statements to be implemented by other procedures.

REPLACE
WITH
INSERT (B)

To ensure systematic review and feedback, this procedure shall require that administrative procedures be reviewed at a specified frequency of no less than 5 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures.

13.5.1.2 Procedure for Plant Operations Review Committee

This procedure shall define the requirements of membership, meeting frequency, quorum, responsibilities, authority, and records for the PORC in implementation of technical specification provisions. The PORC shall review significant conditions adverse to plant safety to ensure that the cause of the condition is identified, that corrective action is taken and documented, and that appropriate subjects are referred to the Operating and Safety Review (O&SR) committee.

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maintenance and modification activities, the need to provide operable equipment to support the operating mode of the plant, and the need to remain within license limits. Such planning shall also include evaluation of use of special processes, equipment, and materials in regard to potential hazards to personnel and equipment.

- b. A method to ensure that conditions adverse to plant safety (such as failures, malfunctions, deficiencies, deviations, defective plant equipment, abnormal occurrences and nonconformances related to plant equipment) shall be identified and corrected through corrective maintenance
- c. A method to maintain or coordinate maintenance of the identification and traceability of materials, parts, and components as it is established in the storeroom to provide insurance that only correct and accepted items are used and installed
- d. Obtaining the necessary permits, such as blocking and tagging of equipment and radiation work permits that specify radiation protection measures, monitoring, and protective clothing
- e. Review of repetitive malfunctions to determine the cause and corrective measures. This activity can include referral to the Engineering and Research Department for evaluation, determination of repair or replacement parts, and associated design, testing, and installation requirements.

13.5.1.8 Procedure for Administration of the Preventive Maintenance Program

This procedure shall establish the administrative requirements for the preventive maintenance program so that preventive maintenance is preplanned and performed in accordance with written procedures and drawings appropriate to the circumstances. Preventive maintenance shall include those routine actions needed to ensure that plant equipment (including special tools) continues to operate properly by detection or prevention of actual or impending failures or substandard performance. The aspects of preventive maintenance that shall be addressed in this procedure include:

- a. Establishment of the frequency and schedule for preventive maintenance actions
- b. Records of completion of preventive maintenance actions

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- c. Preparation, approval, and control of written procedures for the performance of preventive maintenance actions. Preventive maintenance procedures shall be distributed to appropriate personnel in accordance with current distribution lists to ensure that outdated or inappropriate procedures are not used.

This procedure shall establish the format and content of preventive maintenance procedures as follows:

- a. Descriptive title, revision number, and date
- b. Statement of applicability or purpose
- c. References, including technical specifications, vendor documents, and drawings as appropriate to ensure the required quality of the work
- d. Prerequisites, including those independent actions or procedures that must exist prior to use of the preventive maintenance procedure. Prerequisites applicable only to certain sections of the procedure shall be so identified.
- e. Precautions to alert the individual performing the task to those important measures that should be used to protect equipment and personnel, including the public, or to avoid an abnormal or emergency situation. Routine precautions that a trained craftsman is expected to take, such as normal electrical safety methods, shall not be required to be stated.
- f. Procedure section. The procedure shall provide the steps needed to perform the task in the degree of detail necessary to ensure safety and correct performance without undue reliance on memory or direct supervision and in consideration of the skills normally possessed by trained craft personnel. Precautions and reference documents important to specific steps in the procedure shall be identified or included at those steps. This section shall also provide instructions for performing and documenting the results of required inspections and tests and provides the necessary acceptance criteria. When appropriate, checkoff lists shall be included in or appended to preventive maintenance procedures
- g. Return to normal. This section shall contain instructions as to the mode or condition in which the equipment is to be placed after completion of the preventive maintenance action.

Insert (C)

To ensure systematic review and feedback, this procedure shall require that preventive maintenance procedures be reviewed at a specified frequency of no less than 5 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures.

13.5.1.9 Procedure for Administration of the Surveillance Testing Program

This procedure shall establish the administrative requirements and responsibilities for the surveillance testing program so that such testing is preplanned and performed in accordance with written procedures and drawings appropriate to the circumstances, and in accordance with the technical specification requirements. Included in this program shall be the safety-related instruments and control devices and special equipment as defined in the technical specifications. The aspects of surveillance testing that shall be addressed in this procedure include:

- a. Establishment of calibration intervals and methods for installed safety-related instruments and control devices as defined in the technical specifications
- b. Requirements for the calibration of measuring and test equipment at specified intervals or prior to use to ensure the necessary accuracy of equipment and requirements for use of measuring and test equipment of the proper type and range
- c. Requirements for performing a documented evaluation of the validity and acceptability of previous calibration activities when measuring and test equipment are found to be out of calibration. The evaluation shall cover the applicable surveillance tests from the time of the previous calibration.
- d. Requirements for performing special calibrations of installed safety-related instruments and control devices when the accuracy of the equipment is questionable
- e. Requirements for recording calibration activities and suitably marking equipment to indicate calibration status
- f. Establishment of a master surveillance test schedule reflecting the status of all planned surveillance tests
- g. Responsibilities for timely performance of surveillance tests, evaluation of results, reporting completion, and maintenance of appropriate records

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- h. Planning for performance of required tests so as not to compromise plant safety including the possible consequences of concurrent or sequential testing, the need to provide operable equipment to support the operating mode of the plant, and the need to remain within license limits
- i. Preparation, approval, and control of written procedures for the performance of individual surveillance tests. Surveillance test procedures shall be distributed to appropriate personnel in accordance with current distribution lists to ensure that outdated or inappropriate procedures are not used.

This procedure shall establish the format and content of surveillance test procedures as follows:

- a. Descriptive title, revision number, and date
- b. Statement of applicability and objectives(s) of the test
- c. References, including technical specifications, drawings, and vendor documents as appropriate to ensure the required quality of the work
- d. Prerequisites including those independent actions or procedures that must be completed and plant conditions that must exist prior to use of the surveillance test procedure, and including any special conditions to be used to simulate normal or abnormal operating conditions. Prerequisites applicable to only certain sections of the procedure shall be so identified. Special equipment or calibrations required to conduct the test shall be listed.
- e. Precautions to alert the individual performing the task to those important measures that should be used to protect equipment and personnel, including the public; or to avoid an abnormal or emergency situation. Applicable limiting conditions shall be included. Routine precautions that trained craftsmen or test personnel are expected to take, such as normal electrical safety methods, need not be stated.
- f. Procedure section. The procedure shall provide the steps needed to perform the test in the degree of detail necessary to ensure safety and correct performance without direct supervision and in consideration of the skills normally possessed by trained craft and testing personnel. Precautions and reference documents important to specific steps in the procedure shall be

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identified or included at those steps. Where test steps are to be witnessed, the test sequence shall identify the hold points and shall require appropriate approval for the test to continue beyond the designated hold point. The procedure requires recording of test results, including data such as as-found and as-left information where appropriate. Acceptance criteria for the tests shall be specified. When appropriate, checkoff lists shall be included in or appended to the surveillance test procedures.

- g. Return to normal. This section shall contain instructions as to the mode or condition in which the equipment is to be placed after completion of the surveillance test.

This procedure shall require recording the test date, corrective actions taken (if any), identification of those performing the test, and identification of those evaluating the test results to ensure that requirements have been met. To ensure systematic review and feedback, this procedure shall require that surveillance test procedures be reviewed at a specified frequency of no less than 5 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures.

The surveillance test program shall include procedures for monitoring performance of plant systems to ensure that engineered safety features and emergency equipment are in the required state of readiness and that operating systems are performing properly. The limits for significant parameters shall be identified as well as the nature and frequency of monitoring.

13.5.1.10 Procedure for Administration of Plant Records

This procedure shall establish the provisions and responsibilities for retention of plant records. Preparation of records is discussed in procedures that cover the specific activities. The responsibility for maintaining and storing records at specified location(s) shall be assigned. This procedure shall ensure that retention times are established so that applicable statutory requirements are satisfied. The significance of the event covered by the record type and the contribution of the record to the ability to reconstruct significant events shall also be considered in establishing retention periods.

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- b. Statement of applicability or purpose of the procedure
- c. Prerequisites, when needed, including those independent actions or procedures that must be completed prior to use of the security procedure
- d. References, when needed
- e. Precautions to alert the individual performing the task to those important measures that should be used to protect equipment and personnel, including the public, or to avoid abnormal or emergency conditions
- f. Procedure section. The procedure shall provide the steps needed to perform the task in the degree of detail necessary to ensure safety and correct performance without undue reliance on memory or direct supervision. Precautions and reference documents important to specific steps in the procedure shall be identified or included at those steps. Acceptance criteria, where appropriate, shall be specified. When appropriate, checkoff lists shall be included in or appended to the procedure.

To ensure systematic review and feedback, this procedure shall require that security procedures be reviewed at a specified frequency of no less than 2 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures.

13.5.1.13 Procedure for Preparation of Maintenance Procedures

This procedure shall establish the administrative requirements and responsibilities for the preparation and control of maintenance procedures that are developed to maintain safety-related equipment. Actual coordination and planning for maintenance actions shall be accomplished through the procedure for controlling inplant work. The following aspects of maintenance work shall be addressed in this procedure:

- a. The need to perform maintenance activities in a manner to ensure quality as specified in the original or approved modification design
- b. Specification and performance of appropriate inspections and tests to attain a suitable level of confidence that the maintenance has been properly performed
- c. Activities that ensure the quality of maintenance shall be performed in accordance with documented drawings or instructions that are appropriate to the circumstances,

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that conform to the design requirements, and which provide for documentation of activities where appropriate. Skills normally possessed by trained craft personnel may not require detailed step-by-step delineations in a written procedure.

- d. The status of inspections and tests performed on items shall be indicated by the use of stamps, tags, labels, routing cards, procedural signoffs, or other methods that provide traceability between the record and the item(s). Also, where necessary to preclude inadvertent bypassing of inspections and tests, items that have satisfactorily passed required inspections and tests shall be identified.
- e. Special control requirements for emergency maintenance that must proceed immediately to correct a degraded safety condition and for which a procedure does not exist

This procedure shall require that the following aspects of housekeeping and cleanliness control be considered in development of maintenance procedures:

- a. Housekeeping provisions must recognize the special requirements involved with radiation zones and control areas.
- b. Only proper materials, equipment, processes, and procedures may be used to ensure that the quality of plant equipment is not degraded.
- c. Where necessary, special instructions for housekeeping and cleaning operations shall be provided and used.
- d. Where needed to prevent contamination of safety systems with foreign materials, personnel and/or materials access control shall be established and a cleanliness inspection shall be performed immediately before closure. The Inspection results shall be documented.

This procedure shall require that appropriate inspections be established and implemented for maintenance actions in accordance with the following criteria:

- a. Inspections, examinations, measurements, or tests shall be specified and performed for each work activity where necessary to ensure quality.
- b. Inspections shall be performed by qualified individuals other than those who performed or directly supervised

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the activity being inspected. Inspection of certain activities (such as work functions associated with normal plant operations, routine maintenance, and certain technical services routinely assigned to the onsite operating organization) may be conducted by shift or plant staff supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work.

- c. Inspections shall be performed in accordance with written approved instructions, drawings or procedures that contain or reference the requirements, acceptance limits, and responsibilities for the inspection.
- d. When specific hold points are required, they shall be indicated in appropriate documents.
- e. When inspection techniques require specialized qualifications, inspection personnel shall meet the specified requirements for the technique involved.
- f. If inspection is impossible or disadvantageous, indirect control by monitoring process methods, equipment, and personnel shall be provided. Both inspection and process monitoring shall be provided when control is inadequate without both.
- g. Inspection instructions or procedures shall include or reference requirements for evaluation of inspection results when the nature of the results indicates that such an evaluation is needed to determine if the plant can be operated safely. Evaluation beyond that given by inspection-level personnel is not normally required for go/no-go and pass/fail type inspections.
- h. Inspectors, data recorders, and those evaluating inspection results shall be identified and the records shall reflect implementation of the inspections and actions completed or planned to correct noted deficiencies.

This procedure shall require that special processes be identified and accomplished under controlled conditions in accordance with applicable codes, standards, specifications, criteria, or other special requirements. The procedure shall require that special processes be accomplished by qualified personnel using qualified procedures and equipment as provided in the specified requirements for the activity.

This procedure shall require testing to be performed as necessary to demonstrate that the item performs satisfactorily in service.

The testing shall be performed in accordance with written approved procedures or instructions that include or reference requirements and acceptance criteria defined in appropriate design documents.

This procedure shall define the format and content of maintenance procedures as follows:

- a. Descriptive title, revision number, and date
- b. Statement of applicability or purpose
- c. References, including technical specifications, vendor documents, and drawings as appropriate to ensure the required quality of the work
- d. Prerequisites, including those independent actions or procedures that must be completed and plant conditions that must exist prior to use of the maintenance procedure. Prerequisites applicable to only certain sections of the procedure shall be so identified.
- e. Precautions to alert the individual performing the task to those important measures that should be used to protect equipment and personnel, including the public, or to avoid an abnormal or emergency situation. Routine precautions that a trained craftsman is expected to take, such as normal electrical safety methods, do not need to be stated.
- f. Procedure section. The procedure shall provide the steps needed to perform the task in the degree of detail necessary to ensure safety and correct performance without undue reliance on memory or direct supervision, and in consideration of the skills normally possessed by trained craft personnel. Precautions and reference documents important to specific steps in the procedure shall be identified or included at those steps. This section shall also provide instructions for performing and documenting the results of required inspections and tests and provides the necessary acceptance criteria. When appropriate, checkoff lists shall be included in or appended to maintenance procedures.
- g. Return to normal. This section shall contain instructions as to the mode or condition in which the equipment is placed after completion of the maintenance action.

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To ensure systematic review and feedback, this procedure shall require that maintenance procedures be reviewed at a specified

frequency of no less than 5 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures. This procedure shall also require that maintenance procedures be distributed to appropriate personnel in accordance with current distribution lists to ensure that outdated or inappropriate procedures are not used.

13.5.1.14 Procedure for Preparation of TRIP Procedures

This procedure shall establish the administrative requirements and responsibilities for the preparation of TRIP procedures.

TRIP procedures are symptom oriented decision tree flowcharts for operator actions based on recognition of critical symptoms and definition of actions to maintain key plant parameters within predetermined ranges. The TRIP procedures have been developed from the BWR Owners Group Emergency Procedure Guidelines (EPG).

To ensure systematic review and feedback, this procedure shall require that TRIP procedures be reviewed at a specified frequency of no less than 2 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures.

TRIP procedures shall be distributed to appropriate personnel in accordance with current distribution lists to ensure that outdated or inappropriate procedures are not used.

13.5.1.15 Procedure for Preparation of Emergency Plan Procedures

This procedure shall establish the administrative requirements and responsibilities for the preparation of emergency plan procedures that implement the emergency plan. This procedure shall establish the format and content of emergency plan procedures as follows:

- a. Descriptive title, revision number, and date
- b. Statement of applicability or purpose

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13.5.1.21 Procedure for Preparation of Health Physics Procedures

This procedure shall establish the administrative requirements and responsibilities for the preparation of health physics procedures that implement the radiation protection program. This procedure shall require preparation of health physics procedures in the following areas:

- a. Monitoring external and internal exposures of appropriate employees utilizing accepted techniques
- b. Routine radiation surveys of work areas
- c. Environmental monitoring within the scope of the operating staff responsibility
- d. Radiation monitoring of maintenance and special work activities
- e. Maintenance of records demonstrating the adequacy of measures taken to control radiation exposures of employees and other appropriate personnel
- f. Control, management, and surveys of radioactive wastes

This procedure shall establish the format and content of health physics procedures as follows:

- a. Descriptive title, revision number, and date
- b. Statement of applicability or purpose
- c. References, including technical specifications, drawings, procedures, and operating manuals as applicable
- d. Apparatus, such as instruments or special equipment, as applicable
- e. Precautions, where necessary, to alert the individual performing the task to those important measures that should be used to protect equipment and personnel, including the public, or to avoid an abnormal or emergency situation. Routine precautions that a trained technician is expected to take need not be listed.
- f. Procedure section. The procedure shall provide the needed steps to perform the task in the degree of detail necessary to ensure safety and correct performance without undue reliance on memory or direct supervision. Precautions and references important to specific steps

INSERT (E)

in the procedure shall be identified and included at those steps. When appropriate, check off lists shall be included in or appended to health physics procedures.

To ensure systematic review and feedback, this procedure shall require that health physics procedures be reviewed at a specified frequency of no less than 5 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures. Health physics procedures shall be distributed to appropriate personnel in accordance with current distribution lists to ensure that outdated or inappropriate procedures are not used.

13.5.1.22 Procedure for Preparation of Chemistry Procedures

This procedure shall establish the administrative requirements and responsibilities for the preparation of chemistry procedures that include chemical and radiochemical control activities and controls for radioactive calibration sources. This procedure shall establish the format, content, distribution, and periodic review requirements for chemistry procedures as described for health physics procedures.

13.5.1.23 Procedure for Temporary Changes to Approved Procedures

This procedure shall establish the administrative requirements and responsibilities for making temporary changes to approved procedures. The procedure shall provide that temporary changes, clearly not changing the intent of the approved procedure, shall be documented and approved by two members of the plant staff knowledgeable in the area(s) affected by the procedure. At least one of these individuals shall be a shift superintendent or shift supervisor (a senior reactor operator on the unit affected). Temporary changes shall be incorporated in the next procedure revision if appropriate.

13.5.1.24 Procedure for Preparation of Off-Normal Procedures

This procedure shall establish the administrative requirements and responsibilities for the preparation of off-normal procedures that are written to specify operator actions following an operator observation of an off-normal (nontransient) condition which requires immediate action to prevent degeneration of the existing condition. This procedure shall establish the format and content of off-normal procedures as follows:

- a. Descriptive title, revision number, and date
- b. Symptoms. This section shall include symptoms to aid in identifying or confirming the off-normal condition.

INSERT (A)

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After the second paragraph in the section 13.5 of the FSAR, the following should be added:

Sections 13.5.1.1 through 13.5.1.25, which follow, describe administrative procedures. Many of these sections describe how various procedure types (such as maintenance procedures or preventive maintenance procedures) are developed and controlled, whereas other sections describe an administrative process (such as purchasing). Unless stated otherwise in the sections which describe how various procedure types are developed and controlled, the periodic review of the procedures will be on a two-year basis. Those that will be reviewed with a five-year frequency are provided with rationale to support this position.

Each of the rationales rest at least in part upon the position that the mere passage of time is not sufficient reason to review a procedure for adequacy. The ANSI Standard which recommends the two-year frequency does not provide a basis for the selection of two years. Something must occur during the passage of time which would make the review or revision of a procedure an appropriate action to take. In this regard, it should be noted that controlled reviews of equipment or system modifications result in the review of applicable procedures for the potential effect of the modification. In addition, standard practices regarding review and response to documents such as NRC IE Bulletins, Circulars and Notices, INPO documents and industry documents which are screened by the Independent Safety Engineering Group and forwarded for action by the plant staff are in place and cause procedures to be reviewed and revised as appropriate in relation to the review of these individual documents.

INSERT (B)

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Replace last paragraph of section 13.5.1.1 with the following:

Administrative procedures are written to provide direction for the efficient administration of plant business and reflect the station management philosophy and implement corporate policies regarding these functions. Because they are used routinely, their continuing applicability is demonstrated through use. These procedures would be unaffected by specific equipment modifications, but may be affected by documents such as NRC Bulletins, Circulars, and Notices, changes in company policy, or INPO documents. Because these documents are reviewed on an ongoing basis and factored into administrative procedures where appropriate on a case by case basis, two-year review would not be necessary. However, recognizing potential for an accumulation of such documents having some effect on administrative requirements for a nuclear power plant, this procedure shall require that administrative procedures be reviewed at a specified frequency of no less than 5 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures.

INSERT (C)

DRAFT

Add the following before last paragraph of sections 12.5.1.8 and 13.5.1.13:

Maintenance and preventive maintenance procedures are proven to be correct through their use. Because they are written for specific equipment, they are not subject to intersystem changes which may affect other procedure types, such as General Plant procedures.

Maintenance and preventive maintenance procedures are reviewed when equipment modifications are made through the controlled modification program at the station. In addition, when indicated by the review of NRC IE Bulletins, Circulars, or Notices, INPO documents and industry documents, the procedures are revised if necessary on a case-by-case basis.

INSERT (D)

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Insert the following in Section 13.5.1.9 as shown:

Surveillance Tests and Routine Tests are performed on a periodic basis; this step-by-step use of the procedure demonstrates the adequacy of the procedures. Additionally, when changes in the plant Technical Specifications are received, the appropriate procedures are identified and revised. Plant modifications, NRC Bulletins and Information Notices also initiate procedure review and revision, if needed.

INSERT (E)

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Insert the following before the last paragraph of section 13.5.1.21:

The Health Physics procedures are primarily administrative and analytic. They represent the most efficient way to administer the Health Physics program. Many are based upon either the type of equipment in use in the plant or, in the case of shipping radioactive materials, they are based upon regulations. When the regulations change, the Health Physics procedures would be revised if needed. If new equipment for analysis is obtained, then new procedures would be written for that new equipment.