

GPU NUCLEAR CORPORATION
SAXTON NUCLEAR EXPERIMENTAL CORPORATION
APPENDIX A: TECHNICAL SPECIFICATIONS TO
AMENDED FACILITY LICENSE NO. DPR-4

A. SITE

1. Location

The Saxton facility is on a 1.148 acre tract deeded from the Pennsylvania Electric Company to the Saxton Nuclear Experimental Corporation (SNEC). It is located within the property of the Pennsylvania Electric Company near the Borough of Saxton, Pennsylvania, in Liberty Township, Bedford County, Pennsylvania. The Pennsylvania Electric Company property consists of approximately 150 acres along the Raystown Branch of the Juniata River.

2. Exclusion Area Controls

- a. The exclusion area consists of that portion of the Saxton Nuclear Experimental Corporation property enclosed within the fence containing the Containment Vessel. See Figure 1.
- b. Except for authorized entry the following access points shall be maintained locked:
 - 1) the gates to the Exclusion Area fence surrounding the Containment Vessel,
 - 2) the Containment Vessel access door,
 - 3) the grating covering the Auxiliary Compartment stairwell in the Containment Vessel,
 - 4) and the Rod Room door.
- c. The Containment Vessel shall be equipped with an intrusion alarm to supplement the multiple physical barriers to intrusion.
- d. Employees of the Pennsylvania Electric Company's Line Department headquartered on the Pennsylvania Electric Company property shall report to the Program Director SNEC facility or the designated representative any observed indication of change in the facility status as shown by smoke, fire, tornado, flood, or attempted break-in and take any immediate action authorized.

3. Principal Activities

Pennsylvania Electric Company personnel associated with electric power transmission and maintaining electric power distribution equipment are headquartered on the Pennsylvania Electric Company property. Activities permitted within the Exclusion Area shall include routine and emergency inspections, maintenance associated with the possession of the Saxton facility and characterization activities associated with the decommissioning of the facility.

B. ADMINISTRATIVE AND PROCEDURAL CONTROLS

Administrative controls relate to the organization, activities, procedures, record keeping, reporting and review and audit considered necessary to provide assurance and evidence that activities within the Exclusion Area are managed in a safe manner. Procedure controls are applicable to activities for which it is considered necessary to provide assurance that they are performed in a safe manner.

1. Organization

GPU Nuclear (GPUN) has the responsibility for safely maintaining the Containment Vessel and performing the characterization activities in support of its decommissioning. The organizational structure with reporting and communications lines is depicted in Figure 2.

a. The responsibilities of management and supervisory level personnel are as follows:

- 1) President GPU Nuclear is responsible for and provides full-time dedicated staff for the purpose of conducting all nuclear activities safely and effectively. The Vice President Nuclear Services Division (NSD) assures that all division and corporate activities are performed in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications.
- 2) Program Director SNEC Facility is responsible for administration of all Saxton facility functions, for direction of all decontamination and characterization activities, and for assuring that the requirements of License No. DPR-4 and these Technical Specifications are implemented.
- 3) Radiation Safety Officer (RSO) is responsible for the conduct and oversight of all Saxton Radiation Safety Activities through implementation of the Saxton facility's Radiation Protection Plan. All radiological controls personnel shall have stop work authority in matters relating to or impacting radiation safety.
- 4) Group Radiological Controls Supervisor (GRCS) directly supervises radiation safety activities. The position reports to the RSO and will consult with the SNEC Facility Site Supervisor for production activity direction.
- 5) The SNEC Facility Site Supervisor reports to the Program Director SNEC Facility. The Supervisor provides on-site management and continuing oversight of production activities.

b. Other GPU Nuclear Division personnel provide Saxton facility management with technical support and project management capabilities.

c. Staffing requirements are as follows:

- 1) At least two individuals, one of which must be knowledgeable in radiation monitoring and radiological hazards associated with the facility, shall perform radiological surveys necessary to support planned activities within the Containment Vessel if the Containment has been secured (Containment Vessel is sealed except for the breather opening) for a period greater than 24 hours.
- 2) The RSO or a qualified designee shall be present on site whenever entry and/or maintenance or characterization activities within Containment are in progress.

d. Personnel selection and training requirements are as follows:

- 1) Each Radiological Controls Technician/GRCS shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2 and 4.3.2 respectively or shall be formally qualified through an NRC approved Radiological Controls training program.
- 2) All personnel conducting maintenance or characterization activities shall be briefed on the Saxton facility's site specific conditions and requirements of the Characterization Plan.

2. Review and Audit

a. Radiation Safety Committee

- 1) The Radiation Safety Committee shall report to the Vice President NSD. The Committee will consist of at least four members and membership will be on the recommendation of the Vice President NSD. Three members shall constitute a quorum. It will be responsible to review all matters with radiological safety implications relative to activities at the Saxton facility. Meetings shall be held at least annually to review and discuss the events of the preceding period.
- 2) The Committee will review License and Technical Specification changes, characterization and maintenance actions, special nuclear and radioactive material activities, facility changes, quarterly inspection results, audit and NRC Inspection reports and corrective actions for deficiencies identified.
- 3) Written minutes of all meetings shall be prepared and distributed to the Vice President NSD within 30 days of the meeting date.

b. The audit function is provided by GPU Nuclear and is independent of the Saxton facility's management. Audits shall be performed by qualified individuals, as a minimum, for those activities

designated within the scope of the Saxton facility's QA Program. Audits are generally conducted biennially, however, frequency is based on the level of activity at the Saxton facility. Audits may also be performed at the request of the GPU Nuclear President. GPU Nuclear audits are performed in accordance with the GPU Nuclear audit program procedures. The audit procedures identify areas which may be included in the audit scope. Audit reports shall be forwarded to the GPU Nuclear President within 60 days of completion of the audit.

3. Procedures

- a. Activities which are designated as within the scope of the Saxton facility's QA Program shall be prescribed by written, reviewed and approved procedures of a type appropriate to the circumstances. The GPU Nuclear procedure control methodology will be prescribed by an administrative procedure.
- b. Written procedures shall be established, implemented and maintained for the activities listed below:
 - 1) Characterization and maintenance activities requiring Health Physics controls consistent with 10 CFR Part 20 requirements.
 - 2) Access control, emergency actions, facility inspections and audits.
 - 3) Radiological exposure control, survey activities and radwaste shipping and handling.
 - 4) Activities which could impact containment integrity and/or could result in a measurable release to the environment.
- c. These procedures shall require that the following actions be taken:
 - 1) All maintenance and characterization work associated with the Containment Vessel under Health Physics control shall be consistent with 10 CFR Part 20 requirements to minimize the radiation exposure of personnel and to prevent the release of radioactivity to the environment.
 - 2) Entry into the controlled area of the containment requires that radiation levels and airborne activity surveys be obtained prior to beginning work.
 - 3) All radiation surveys, tests, counting work, radiation exposure control measures and all other work performed in radiologically controlled areas shall conform with the requirements of the Saxton Nuclear Facility Radiation Protection Plan.
 - 4) Facility inspections and access controls shall meet specific requirements of the Technical Specifications.

- d. These procedures and any subsequent revisions shall be prepared, reviewed and approved in accordance with the requirements of the GPU Nuclear administrative procedure for procedures prior to their initial use. |

4. Inspections

- a. Facility inspections shall be performed in accordance with an established schedule at a frequency no less than quarterly. The inspections will be performed by personnel knowledgeable in radiation monitoring and the radiological hazards associated with the facility. Inspection and radiation monitoring activities will be conducted concurrently.

- 1) The radiation monitoring activities shall include:

- a. Survey of radiation levels and surface contamination in the Containment Vessel.
- b. Replacement of the ventilation "breather" pipe filter and counting the original for activity as a measure of the activity available for release.
- c. Inspection of the Containment Vessel at the lowest level for water. If water is found, a sample shall be taken and analyzed for the isotopic concentration of all significant radionuclides and shall as a minimum include gamma spectral analysis.

- 2) The inspection activities shall include:

- a. Verification that the locks at all entrances to the Containment Vessel exclusion area fence are locked.
- b. Verification of the operability of the Containment Vessel intrusion alarm.

5. Records

In addition to the records required by applicable NRC regulations, including subpart L of 10 CFR 20, 20.2101 through 20.2110 inclusive, GPU Nuclear shall retain records of the following: |

- a. Inspections of the decommissioned facility including the results of surveys of radioactivity levels and as-found and as-left conditions of the facility.
- b. Entries into the Containment Vessel and the reason for entry.
- c. Dates of quarterly inspections and evaluation of the results.
- d. Radioactivity releases or discharges into the air or water beyond the effective control of GPU Nuclear as measured at or prior to the point of such release or discharge. |

- e. Design changes and maintenance necessary to maintain the decommissioned facility as described in the Saxton Decommissioning Plan and Safety Analysis Report as revised by SNEC letter dated May 31, 1974 and design changes and maintenance necessary to accomplish characterization activities associated with decommissioning.
- f. Characterization study results.
- g. Audit reports.

6. Reports

In addition to those reports required by applicable NRC regulations (ie. violation of license or technical specification condition) GPU Nuclear shall submit the following:

- a. A report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, GPU Nuclear shall promptly, within 24 hours of discovery, notify by telephone or telegraph, the Administrator of Region I, or designee, and the NRC Operations Center, and shall submit a written follow-up report to the Document Control Desk and the Administrator of Region I within 15 days, which describes the circumstances and the corrective action taken. These reports shall include:
 - 1) Any unplanned or uncontrolled release of radioactive material from the facility.
 - 2) Conditions arising from natural or man-made events that affect the integrity of the Containment Vessel.
- b. An annual report shall be submitted to the Document Control Desk and the Administrator of Region I, within 6 months after the end of the calendar year, of the status of the deactivated facility including:
 - 1) Information relating to changes in those management and supervisory positions designated in section B.1.a as being responsible for the deactivated facility.
 - 2) A summary of entries into the Containment Vessel and reasons for entry.
 - 3) A summary of maintenance and design changes made to the deactivated facility.
 - 4) Results of surveys of radioactivity levels and of water sample analyses.
 - 5) A review of the performance of access control and surveillance measures.

Figure 1
Saxton Facility Layout

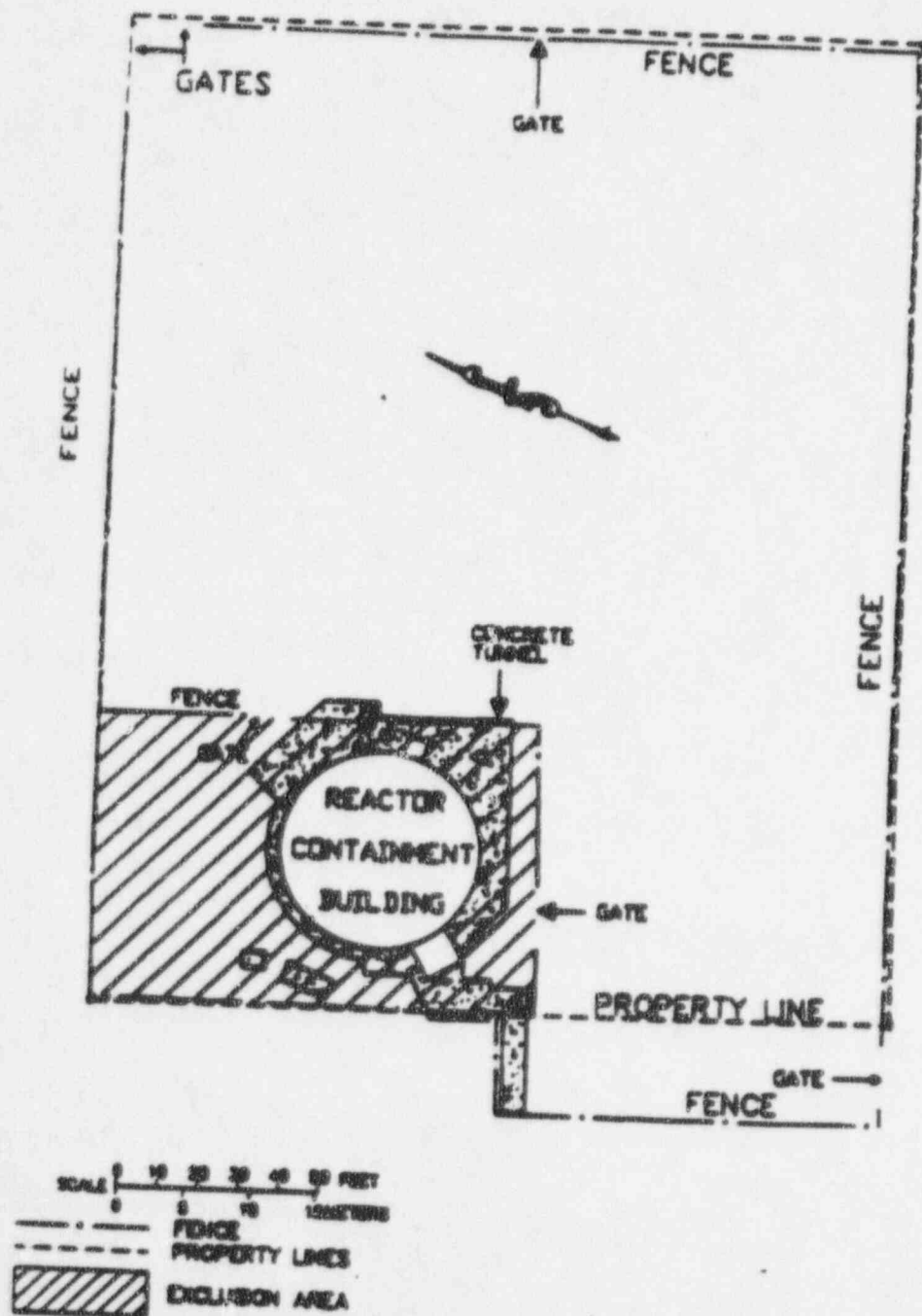
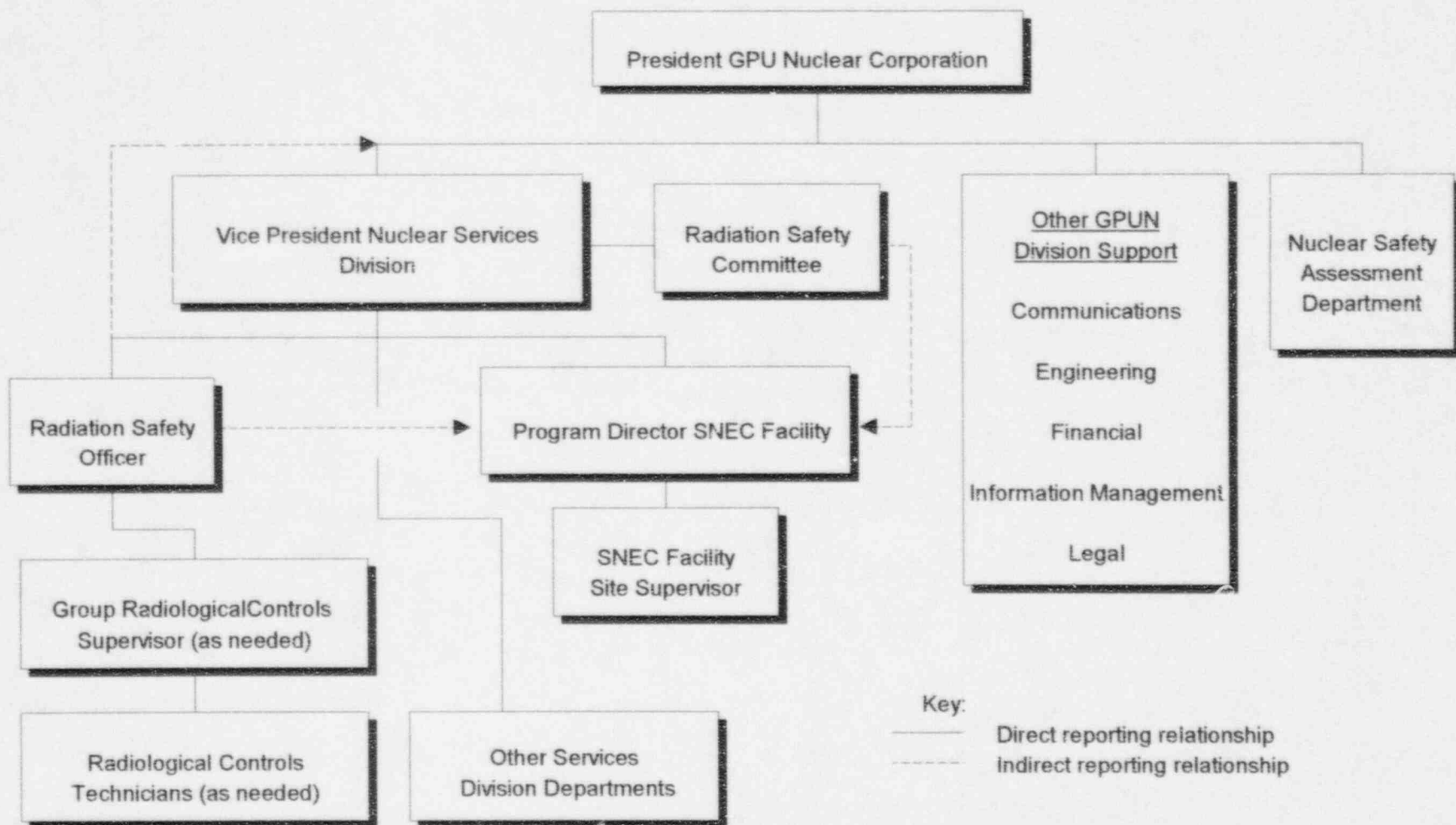


Figure 2

GPU Nuclear Organization for the Saxton Facility



ATTACHMENT G
EXPLANATION OF APPENDIX A REVISION
PAGES 1 TO 4

ATTACHMENT G
EXPLANATION OF APPENDIX A REVISION

In connection with their application to transfer management-related authority for the Saxton Nuclear Experimental Corporation facility (Saxton facility) from the Saxton Nuclear Experimental Corporation (SNEC) to GPU Nuclear Corporation (GPU Nuclear), and to amend the Saxton facility license, SNEC and GPU Nuclear propose that the following revision be made to the Saxton facility's Technical Specifications:

Replace pages 1 through 9 with the revised pages included in Attachment F.

Reason for the Changes

The organization performing the remainder of the characterization activities and future dismantlement and decommissioning activities at the Saxton facility is proposed to be changed. Under the change, GPU Nuclear would acquire from SNEC the authority to control the activities as described in the license transfer and amendment application for the Saxton facility. The purpose of the proposed change is to make GPU Nuclear directly responsible as licensee for activities it is already performing at Saxton as a contractor. This will enable Saxton, without the extra step of contracting, to take direct advantage of the nuclear experience represented by GPU Nuclear's technical and managerial staff. The change would strengthen the over-all management and control of the maintenance, characterization, decontamination, dismantlement and decommissioning activities at the Saxton facility. To that end, the Technical Specifications for Saxton are proposed to be revised as explained below:

A.2.d "Employees of the Pennsylvania Electric Company's Line Department headquartered on the Penelec property shall report to the Program Director SNEC Facility or the designated representative any observed indication of change in the facility status as shown by smoke, fire, tornado, flood, or attempted break-in and take any immediate action authorized."

This change would rename the position being reported to from SNEC Vice President and General Manager to the Program Director SNEC Facility. The change is administrative.

B.1 "GPU Nuclear has the responsibility for safely maintaining the Containment Vessel and performing the characterization activities in support of its decommissioning. The organizational structure with reporting and communications lines is depicted in Figure 2."

With the to transfer the management responsibilities to GPU Nuclear, GPU Nuclear replaces SNEC as the responsible party.

- B.1.a.1 "President GPU Nuclear is responsible for, and provides full-time dedicated staff for the purpose of, conducting all nuclear activities safely and effectively. The Vice President Nuclear Services Division (NSD) assures that all division and corporate activities are performed in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications."

The original section was deleted as a result of the submittal of the License Amendment Application to transfer management responsibilities to GPU Nuclear. References to The SNEC Board of Directors and President SNEC have been eliminated from the description and organization chart.

The section was revised to indicate that GPU Nuclear replaces SNEC as the responsible party. The substituted material regarding the President GPU Nuclear and Vice President NSD would provide statements not previously included which are now considered necessary to describe the reporting structure in light of the requested transfer of management responsibilities to GPU Nuclear.

- B.1.a.2 "Program Director SNEC Facility is responsible for administration of all Saxton facility functions, for direction of all decontamination and characterization activities, and for assuring that the requirements of License No. DPR-4 and these Technical Specifications are implemented."

This change renames the position of SNEC Vice President and General Manager to Program Director SNEC Facility and also adds the phrase "for direction of all decontamination and characterization activities" to the responsibilities of the position. The renamed position reports to the GPU Nuclear Vice President NSD. The administrative change improves the description of the responsibilities of the position involved.

The substitution of the language "Saxton facility functions" for "SNEC functions" reflects the submittal of the License Amendment application to transfer management responsibilities from SNEC to GPU Nuclear.

- B.1.a.5 "The SNEC Facility Site Supervisor reports to the Program Director SNEC Facility. The Supervisor provides on-site management and continuing oversight of production activities."

The change revises the name of the position from SNEC Site Superintendent to SNEC Facility Site Supervisor and revises the position to which it reports from SNEC General Manager to Program Director SNEC Facility. The change is administrative. Both of these individuals, as well as all other individuals described in Section B.1.a, will be GPU Nuclear employees.

- B.1.b "Other GPU Nuclear Division personnel provide Saxton facility management with technical support and project management capabilities."

The change to the wording of the text indicates that personnel from other GPU Nuclear divisions would be assigned and work together to provide technical support and project management capabilities to Saxton facility. At the same time, the change eliminates the connotation that an actual "team" has been formed for this purpose. The change is administrative.

The substitution of the language "Saxton facility management" for "SNEC management" reflects the submittal of the License Amendment application to transfer management responsibilities from SNEC to GPU Nuclear.

- B.2.a.1 "The Radiation Safety Committee shall report to the Vice President NSD. The committee will consist of at least four members and membership will be on the recommendation of the Vice President NSD. Three members shall constitute a quorum. It will be responsible to review all matters with radiological safety implications relative to activities at the Saxton facility. Meetings shall be held at least annually to review and discuss the events of the preceding period."

The change in reporting is administrative and reflects that the Vice President NSD, by virtue of being the supervisor of the Program Director SNEC Facility, is responsible for Saxton facility functions and direction of activities.

- B.2.a.3 "Written minutes of all meetings shall be prepared and distributed to the Vice President NSD within 30 days of the meeting date."

The change in the distribution is administrative. The Vice President NSD, in his capacity as the Supervisor of the Program Director SNEC Facility, will now be responsible for Saxton facility functions and for the direction of activities.

- B.1.a.3, B.2.b., B.3.a., B.3.d, B.5, B.5.d., B.6. and B.6.a
For all of these sections, references to SNEC are proposed to be changed to references to GPU Nuclear or the Saxton facility.

Figure 2 changes:

1. With the transfer of management responsibilities to GPU Nuclear, the SNEC Board of Directors and President SNEC are eliminated from the organization chart.
2. The Vice President NSD is included in the organization chart since the Program Director SNEC Facility reports directly to the position. Various NSD departments provide services in support of Saxton facility activities. They are direct reports and are indicated in a new box, titled "Other Services Division Departments". Note that these departments (Environmental, Human Resources, Regulatory Affairs and Training) are not specifically identified. They are intentionally omitted to preclude the need for additional Technical Specification changes based on a position name change or reporting change within the Division.
3. The Radiation Safety Committee reports directly to the Vice President NSD and maintains an indirect reporting relationship with the Program Director SNEC Facility, encouraging communication between the Committee and site management.
4. The Radiation Safety Officer reports directly to the Vice President NSD and is tied via an indirect reporting relationship to both the President GPU Nuclear and the Program Director SNEC Facility to encourage communication among the positions.
5. The box previously labeled Technical Support identified GPU Nuclear departments and depicted them as reporting directly to the President GPU Nuclear. They in fact are departments of other GPU Nuclear divisions (besides NSD) which in turn report directly to the President GPU Nuclear and provide activities in support of the Saxton facility. The box has been renamed Other GPU Nuclear Division Support to more correctly identify the relationship.

These changes are administrative and allow resources supporting activities at the Saxton facility to work within the existing framework of the GPU Nuclear organizational structure. Allowing the administrative changes, in connection with the transfer to GPU Nuclear of management responsibilities under the Saxton license, helps to ensure enhances the success of the remaining characterization and the decommissioning efforts by permitting direct and effective utilization of GPU Nuclear's experience.