

ADMINISTRATIVE CONTROLS

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the plant staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 The Fire Brigade training program shall be maintained and shall, as practicable, meet or exceed the requirements of Section 27 of the NFPA Code-1975. Fire brigade training drills shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

6.5.1.1 FUNCTION

The Plant Review Committee (PRC) shall function to advise the Plant General Manager on all matters related to nuclear safety.

6.5.1.2 COMPOSITION

The PRC is composed of nine regular members from either the Palisades staff or the Nuclear Engineering and Construction Organization (NECO) staff. The qualification level for PRC members shall be at least equivalent to those described in Section 4.4 of ANSI N18.1-1971. The PRC shall include representatives from the Operations, Radiological Services, Maintenance and Engineering Departments. The members shall be designated in administrative procedures by the Plant General Manager. The Plant General Manager shall also designate the Chairman and alternates in writing.

6.5.1.3 ALTERNATES

Alternate members of the PRC shall be appointed in writing by the PRC Chairman to serve on a temporary basis. No more than two alternates shall participate as voting members at any one time in PRC activities.

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6.5.2 NUCLEAR PERFORMANCE ASSESSMENT DEPARTMENT (NPAD)

6.5.2.1 FUNCTION

The Nuclear Performance Assessment Department (NPAD) shall function to provide independent review of activities in the areas of:

- a. Nuclear power plant operation
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Nondestructive testing
- f. Instrumentation and control
- g. Radiological safety
- h. Mechanical and electrical engineering
- i. Administrative controls and quality assurance practices
- j. Emergency Planning
- k. Training

6.5.2.2 COMPOSITION

The NPAD shall include the Director, who reports to the Vice President - NOD, and a full-time staff of Nuclear Performance Specialists reporting to the Director. The Director and the Nuclear Performance Specialists shall meet or exceed the qualifications described in Section 4.7 of ANSI/ANS 3.1-1987. The NPAD shall have no direct responsibility for activities subject to its review.

6.5.2.3 CONSULTANTS

If sufficient expertise is not available within NPAD to review particular issues, the NPAD shall have the authority to utilize consultants or other qualified organizations for expert advice.

6.5.2.4 RESPONSIBILITIES

6.5.2.4.1 REVIEW

The NPAD shall review:

- a. The safety evaluations for: 1) changes to procedures, equipment or systems, and 2) tests or experiments completed under the provisions of 10 CFR 50.59 to verify that such actions do 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.

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6.5.2.4.2 AUDITS (Continued)

- f. Any other area of plant operation considered appropriate by NPAD or the Vice President - Nuclear Operations.
- g. The plant Fire Protection Program and implementing procedures at least once per 24 months.
- h. An independent fire protection and loss prevention inspection and audit to be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program to be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- j. Radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- l. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

Audit reports encompassed by Specification 6.5.2.4.2 above shall be forwarded to the Director NPAD, and Management positions responsible for the areas audited within thirty (30) days after completion of the audit.

- 6.5.2.4.3 NPAD review of the subjects in Specifications 6.5.2.4.1 and 6.5.2.4.2 shall be performed by an assigned Nuclear Performance Specialist selected on the basis of his technical expertise relative to the subject being reviewed. If the assigned Nuclear Performance Specialist determines the need for interdisciplinary review, a committee consisting of the Director, NPAD, or his designate, and at least four Nuclear Performance Specialists, shall be assigned. Such committee shall meet as conditions requiring interdisciplinary review arise, but no less than twice yearly.

6.5.2.5 AUTHORITY

The NPAD shall report to and advise the Vice President - NOD of significant findings associated with those areas of responsibility specified in Sections 6.5.2.4.1 and Section 6.5.2.4.2.