

ATTACHMENT 1

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ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

6.5.1.4 The SNSOC shall meet at least once per calendar month and as convened by the SNSOC Chairman or his designated alternate.

QUORUM

6.5.1.5 A quorum of the SNSOC consists of the Chairman or Vice-Chairman and two members including alternates.

RESPONSIBILITIES

6.5.1.6 The SNSOC shall be responsible for:

- a. Review of 1) all procedures required by Specifications 6.8.1, 6.8.2 and 6.8.3 and changes thereto, 2) all programs required by Specification 6.8.4 and changes thereto and 3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. 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 including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager - Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control.
- f. Review of all REPORTABLE EVENTS and Special Reports.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.

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- d. Violations, REPORTABLE EVENTS and Special Reports such as:
1. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance;
 2. Significant operating abnormalities or deviations from normal or expected performance of station safety-related structures, systems, or components; and
 3. All REPORTABLE EVENTS submitted in accordance with Section 50.73 to 10 CFR Part 50 and Special Reports required by Specification 6.9.2.

Review of events covered under this paragraph shall include the results of any investigations made and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- e. The Quality Assurance Department audit program at least once per 12 months and audit reports.
- f. Any other matter involving safe operation of the nuclear power stations which is referred to the Director-Safety Evaluation and Control by the Station Nuclear Safety and Operating Committee.
- g. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

AUTHORITY

6.5.2.9 The Director-Safety Evaluation and Control shall report to and advise the Manager-Nuclear Technical Services, who shall advise the Vice President-Nuclear Operations on those areas of responsibility specified in Section 6.5.2.7.

RECORDS

6.5.2.10 Records of SEC activities required by Section 6.5.2.7 shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

1. Vice President-Nuclear Operations
2. Nuclear Power Station Managers
3. Manager-Nuclear Operations and Maintenance
4. Manager-Nuclear Technical Services
5. Manager-Quality Assurance, Operations
6. Others that the Director-Safety Evaluation and Control may designate.

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SNSOC and the results of this review shall be submitted to the Director-Safety Evaluation and Control and the Manager - Nuclear Operations and Maintenance.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Manager - Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSOC. 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 Director-Safety Evaluation and Control and the Manager - Nuclear Operations and Maintenance within 14 days of the violation.

6.8 PROCEDURES AND PROGRAMS

6.8.1 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. Refueling operations.

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MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the Reactor Coolant System PORVs or safety valves, shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office of Inspection and Enforcement, no later than the 15th of each month following the calendar month covered by the report.

ATTACHMENT 2

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

6.5.1.4 The SNSOC shall meet at least once per calendar month and as convened by the SNSOC Chairman or his designated alternate.

QUORUM

6.5.1.5 A quorum of the SNSOC shall consist of the Chairman or Vice-Chairman and two members including alternates.

RESPONSIBILITIES

6.5.1.6 The SNSOC shall be responsible for:

- a. Review of 1) all procedures required by Specifications 6.8.1, 6.8.2 and 6.8.3 and changes thereto, 2) all programs required by Specification 6.8.4 and changes thereto, and 3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. 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 including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control.
- f. Review of all REPORTABLE EVENTS and Special Reports.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.

ADMINISTRATIVE CONTROLS

REVIEW (Cont'd)

- d. Violations, REPORTABLE EVENTS and Special Reports such as:
1. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance;
 2. Significant operating abnormalities or deviations from normal or expected performance of station safety-related structures, systems, or components; and
 3. All REPORTABLE EVENTS submitted in accordance with Section 50.73 to 10 CFR Part 50 and Special Reports required by Specification 6.9.2.

Review of events covered under this paragraph shall include the results of any investigations made and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- e. The Quality Assurance Department audit program at least once per 12 months and audit reports.
- f. Any other matter involving safe operation of the nuclear power stations which a duly appointed subcommittee or committee member deems appropriate for consideration, or which is referred to the Director-Safety Evaluation and Control by the Station Nuclear Safety and Operating Committee.
- g. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

AUTHORITY

6.5.2.9 The Director-Safety Evaluation and Control shall report to and advise the Manager-Nuclear Technical Services, who shall advise the Vice President-Nuclear Operations on those areas of responsibility specified in Section 6.5.2.7.

RECORDS

6.5.2.10 Records of SEC activities required by Section 6.5.2.7 shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

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2. Nuclear Power Station Managers
3. Manager-Nuclear Operations and Maintenance

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- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SNSOC and the results of this review shall be submitted to the Director-Safety Evaluation and Control and the Manager - Nuclear Operations and Maintenance.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Manager - Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSOC. 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 Director-Safety Evaluation and Control and the Manager - Nuclear Operations and Maintenance within 14 days of the violation.

6.8 PROCEDURES AND PROGRAMS

6.8.1 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. Refueling operations.

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- b. The complete results of the steam generator tube inservice inspections performed during the report period (Reference Specification 4.4.5.5.b.).

MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the Reactor Coolant System PORVs or safety valves, shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office of Inspection and Enforcement, no later than the 15th of each month following the calendar month covered by the report.

ATTACHMENT 3

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

In our letter to the NRC dated March 16, 1984 (Serial No. 136) we submitted Technical Specification changes to reflect revisions in Sections 50.72 and 50.73 to 10 CFR Part 50. In this submittal we included some previously submitted organizational changes.

The NRC has notified Veeco that they cannot approve our March 16, 1984 submittal as it is because of our references to the previous organizational changes since our previously submitted organizational changes have not been approved yet. To enable the NRC to approve the changes due only to the revisions in Sections 50.72 and 50.73 to 10 CFR Part 50 we must supplement our March 16, 1984 request by resubmitting the pages to delete references to the previous organizational changes.

The proposed supplemental Technical Specification changes do not constitute a significant hazards consideration Technical Specification change as discussed in the Federal Register dated April 6, 1983, example (i); A purely administrative change to the Technical Specifications to correct an error. In addition, example (vii) applies; A change to make a license conform to changes in the regulations where the license change results in very minor changes to facility operations clearly in keeping with the regulations.