

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

LONG ISLAND POWER AUTHORITY SHOREHAM NUCLEAR POWER STATION, UNIT 1 AMENDMENT TO TRANSFER POSSESSION ONLY LICENSE DOCKET NO. 50-322

Amendment No. 9 License No. NPF-82

- The U.S. Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The joint application filed by Long Island Lighting Company (LILCO) and Long Island Power Authority (LIPA or the licensee), of June 28, 1990, and as supplemented on June 13, June 27, Cctober 31, and December 5, 1991 and March 27, and April 10, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commissions rules and regulations set forth in 10 CFR Chapter I;
 - B. Construction of the Shoreham Nuclear Power Station, Unit 1 (the facility), has been completed in conformity with Construction Permit No. CPPR-95 and the application, as amended, the provisions of the Act, and the regulations of the Commission.
 - C. The facility will be maintained in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - D. There is reasonable assurance (i) that the activities authorized by this license can be conducted without endangering the health and safety of the public and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2 D below):
 - E. The licensee is technically qualified to engage in the activities authorized by this operating license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;
 - F. The licensee has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
 - G. The issuance of this license will not be inimical to the common defense and security or to the health and safety of the public;

- 2 -H. After weighing the environmental, economic, technical, and other benefits of the facility against environmental and other costs and considering available alternatives, the issuance of Possession Only License No. NPF-82, subject to the conditions for protection of the environment set forth in the Environmental Protection Plan attached as Appendix B, is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied: and I. The receipt, possession, and use of source, byproduct, and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70. Accordingly, Possession Only License No. NPF-82 is hereby amended in its entirety to read as follows: A. The license applies to the Shoreham Nuclear Power Station, Unit 1, a boiling water nuclear reactor and associated equipment, owned by the licensee. The facility is located in Suffolk County, New York, and is described in the Shoreham Defueled Safety Analysis Report (DSAR), which includes, by reference, the appropriate sections of the 'lpdated Safety Analysis Report (USAR), as supplemented and amended, and the Shoreham Environmental Report, as supplemented and amended. B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses the Long Island Power Authority (LIPA or the licensee): (1) Pursuant to Section 103 of the Act and 10 CFR Part 50, to possess, use, but not operate the facility at the designated location in Suffolk County, New York, in accordance with the procedures and limitations set forth in this license; (2) Pursuant to the Act and 10 CFR Part 70, to possess at any time special nuclear material as reactor fuel, accordance with the limitations for storage and amounts required for the original reactor core load, as described in the Defueled Safety Analysis Report, as supplemented and amended; (3) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source, and special nuclear material as sealed neutron sources for radiation monitoring equipment calibration and as fission detectors in amounts as required; (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

- (5) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may have previously been produced by the operation of the facility.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, egulations (except for those exemptions from specific portions of the regulations, previously granted by the Commission, and are still applicable), and orders of the Commission now or hereafter in effect and is subject to the additional conditions specified or incorporated below:
 - (1) Maximum Power Lev.

The licensee is not authorized to operate the facility at any core power level.

(2) <u>Technical Specifications and Environmental Protection Plan</u>

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 9 are hereby incorporated into this license. Long Island Power Authority shall maintain the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Requirement to Obtain NRC Approval to Place Fuel in the Reactor Vessel

The licensee shall not place any fuel assemblies in the reactor vessel without the prior approval of the NRC staff.

(4) Commission Condition (CLI-92-4)

In the event LIPA ceases to exist or is otherwise found to be unqualified to hold the license, this license will revert to LILCO in accordance with the provisions of the "Joint Contingency Plan of the Long Island Lighting Company and Long Island Power Authority Required by NRC Order Approving Shoreham License Transfer - February 29, 1992," submitted by letter dated March 27, 1992, as supplemented on April 10, 1992.

D. The licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in the Fire Hazard Analysis Report and the DSAR for the facility and as approved in the Safety Evaluation Report (SER) of April 1981 and Supplements 2 of February 1982 and 9 of December 1985, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if these changes would not adversely affect the ability to maintain the fuel in the spent fuel pool in a safe condition in the event of a fire.

- E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are titled: "Shoreham Nuclear Power Station Security Plan for Long Term Defueled Condition, Fuel Storage in Spent Fuel Pool," with revisions submitted through October 9, 1990; November 4 and 8, 1991, "Guard Training and Qualification Plan," with revisions submitted through September 18, 1990, and "Shoreham Nuclear Power Station Safeguards Contingency Plan," with revisions submitted through May 13, 1988. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.
- F. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- G. This license shall expire at midnight on April 13, 2013.
- 3. This license amendment will become effective within thirty (30) calendar days from date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Bruce A. Boger, Director

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Division of Reactor . rojects - III/IV/V Office of Nuclear Reactor Regulation

Attachment: Appendix A - Technical

Specifications Changes

Date of Issuance: September 4, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 9

POSSESSION ONLY LICENSE NO. NPF-82

DOCKET NO. 50-322

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

Remove	Insert
vi	vi
vii	vii
6-1	6-1
6-2	6-2
5-3	6-3
6-4	6-4
6-5	6-5
6-6	5-6
6-7	6-7
6-8	6-8
6-9	6-9
6-10	6-10
6-15	6-15
6-17	6-17
6-18	6-18

INDEX

ADMINISTRATIVE CONTROLS

SECT	10N	PAGE			
6.1	RESPONSIP LITY	6-1			
6.2	6.2 ORGANIZATION				
6.2.	6.2.1 NUCLEAR ORGANIZATION				
6.2.	2 UNIT STAFF	6-2			
6.3	UNT STAFF QUALIFICATIONS	6-2			
6.4	TRAINING	6-3			
6.5	REVIEW AND AUDIT	6-3			
6.5.	1 SITE REVIEW COMMITTEE (SRC)	6-3			
	FUNCTION	6+3			
	COMPOSITION	6-3			
	ALTERNATES	6-3			
	MEETING FREQUENCY	6-3			
	QUORUM	6-4			
	RESPONSIBILITIES	6-4			
	RECORDS	6-5			
6.5.2	2 INDEPENDENT REVIEW PANEL (IRP)	6-6			
	FUNCTION	6-6			
	COMPOSITION	6-6			
	MEETING FREQUENCY	6-6			
	QUORUM	6-7			
	REVIEW	6-7			

INDEX

A PAR 2 61	FRENCH	4 425	AMINE	AL P
AUMIN	ISTRAT	IVE	LUNIN	ULS

SECTI	ION	PAGE
6.5.2	INDEPENDENT REVIEW PANEL (IRP) CONT'D)	
	AUDITS	6-7
	RECORDS	6-8
6.6	REPORTABLE EVENT ACTION	6-9
6.7	PROCEDURES AND PROGRAMS	6-9
6.8	REPORTING REQUIREMENTS	6-13
6.8.	1 ROUTINE REPORTS	6-13
	ANNUAL REPORTS	6-13
	ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT	6-13
	SEMIANN'AL RADIOACTIVE EFFLUENT RELEASE REPORT	6-14
6.8.	2 SPECIAL REPORTS	6-14
6.9	RECORD RETENTION	6-14
6.10	RADIATION PROTECTION PROGRAM	6-15
6.11	HIGH RADIATION AREA	6-16
6.12	PROCESS CONTROL PROGRAM (PCP)	6-17
6.13	OFFSITE DOSE CALCULATION MANUAL (ODCM)	6-17

6.1 RESPONSIBILITY

- 6.1.1 The Resident Manager shall be responsible for the management of the overall plant and ensuring the safe storage and handling of irradiated fuel. The Resident Manager shall delegate in writing the succession to this responsibility during his absence.
- 6.1.2 The Watch Engineer (or during his absence from the Control Room a designated certified fuel handling operator) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Executive Vice President of Shoreham Project, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 Nuclear Organization

An organization shall be established for the unit in the DEFUELED MODE and for corporate management. This organization shall include the positions for activities affecting the safe storage and handling of irradiated nuclear fuel.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all organization positions involved with the safe storage and handling of irradiated fuel. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the DSAR and updated in accordance with 10 CFR 50.71(e).
- b. The Executive Vice President of Shoreham Project shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in maintaining and providing technical support to the plant to ensure the safe storage and handling of irradiated fuel.
- c. The Resident Manager shall be responsible for overall unit safety and shall have control over those onsite activities necessary for safe maintenance of the plant and storage and handling of irradiated fuel.
- d. The individuals who train the operations staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

UNIT STAFF

6.2.2 The station organization shall be as follows:

- a. Each duty shift shall be composed of at least the minimum shift crew consisting of three operators, one of which shall be a Watch Engineer. The Watch Engineer shall hold a Senior Fuel Handling Operators Certification* on SNPS Unit 1.
- b. One of the operators, as specified in 6.2.2a, other than the Watch Engineer shall be certified* and qualified to respond to any alarms in the Main Control Room. This operator should normally be in the Main Control Room when fuel is in the Spent Fuel Pool.
- c. All fuel handling operations shall be observed and directly supervised by a certified* operator or individual certified to supervise the handling of irradiated fuel, and who has no other concurrent responsibilities during this operation.
- d. A Health Physics technician shall be on site when irradiated fuel is being handled on site.
- e. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of fuel movement, major maintenance, or major unit modification, on a temporary basis the following guidelines shall be followed:
 - An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
 - 2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
 - A break of at least 8 hours should be allowed between work periods, including shift turnover time.

Any deviation from the above guidelines shall be authorized by the Resident Manager or his deputy, or higher levels of management.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of the programs and procedures as outlined in Section 13 -

*Certification of personnel performing these functions shall be in accordance with the licensee's NRC-approved certification program.

ADMINISTRATIVE CONTROLS

Conduct of Operations**, of the Defueled Safety Analysis Report for comparable positions.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the station staff shall be maintained under the direction of the Training Supervisor, shall meet or exceed the requirements of the programs and procedures as outlined in Section 13.2 - Training Program, of the Defueled Safety Analysis Report.

6.5 REVIEW AND AUDIT

6.5.1 SITE REVIEW COMMITTEE (SRC)

FUNCTION

6.5.1.1 The SRC shall function to advise the Resident Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The SRC shall be composed of a chairman or alternate chairman and six or more members or alternate members of the plant staff as designated by the chairman.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SRC Chairman; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

MEETING FREQUENCY

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

The terms "operation" and "operations" as used herein refer to actions by limensee personnel and utilization of Shoreham systems and equipment to support activities which are required in the DEFUELED MODE or other non-operating plant configuration, including, but not limited to, safe fuel storage and handling, radiological control, personnel habitability, facility maintenance, and decommissioning.

QUORUM

6.5.1.5 The quorum of the SRC necessary for the performance of the SRC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four other members including alternates.

RESPONSIBILITIES

- 6.5.1.6 The SRC shall be responsible for:
 - a. Review of (1) all proposed procedures required by Specification 6.7 and changes thereto, (2) all proposed programs required by Specification 6.7 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Resident Manager to affect nuclear safety;
 - Review of all proposed tests and experiments that affect nuclear safety;
 - Review of all proposed changes to the Possession Only License and to Appendix A Technical Specifications;
 - d. Review of all proposed changes or modifications to unit 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 Executive Vice President of Shoreham Project;
 - f. Review of all REPORTABLE EVENTS;
 - g. Review of station operations to detect potential hazards to nuclear safety;
 - Performance of special reviews, investigations, or analyses and reports thereon as requested by the Resident Manager;
 - i. Review of the Security Plan and implementing procedures;
 - j. Review of the Emergency Plan and implementing procedures;
 - k. Review of the Fire Protection Plan and implementing procedures;

ADMINISTRATIVE CONTROLS

- Review of the proposed changes to the Process Control Program (PCP);
- m. Review of the proposed changes to the Offsite Dose Calculation Manual (ODCM);
- Review of the proposed Major Changes to Radioactive Waste Systems;
- Review of Personnel Radiation Records annually to determine how exposures might be lowered consistent with ALARA principles. Document such considerations;
- p. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Executive Vice President of Shoreham Project; and
- q. Review of proposed changes to the approved Decommissioning Plan.

6.5.1.7 The SRC shall:

- a. Recommend in writing to the Resident Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. and n. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6a. through e. above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Executive Vice President of Shoreham Project of disagreement between the SRC and the Resident Manager; however, the Resident Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The SRC shall maintain written minutes of each SRC meeting that, at a minimum, document the results of all SRC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Executive Vice President of Shoreham Project and the Independent Review Panel.

6.5.2 INDEPENDENT REVIEW PANEL (IRP)

FUNCTION

6.5.2.1 The IRP shall function to provide independent review of designated activities in the areas of nuclear safety, radiological controls, and regulatory compliance. In addition, the IRP shall be cognizant of audit activities as described in Specification 6.5.2.6.

The IRP shall report to the LIPA chairman and ultimately to the LIPA Board of Trustees.

COMPOSITION

6.5.2.2 The IRP shall be composed of the IRP Chairman and a minimum of four additional IRP members. The chairman and all members of the IRP shall be appointed by the LIPA Board of Trustees from outside organizations with demonstrated expertise in the areas of utility nuclear operations, academia and/or research in nuclear fields, or nuclear regulation.

The Chairman and all other members of the IRP shall have qualifications that meet the education and experience requirements of Section 4.7 of ANSI/ANS 3.1-1978. The IRP, on a collective basis, shall be technically competent so as to be able to provide oversight in the areas of administrative controls, nuclear power plant operations, nuclear engineering, quality assurance, radiological safety, mechanical engineering, and electrical engineering.

MEETING FREQUENCY

6.5.2.3 The IRP shall meet at least once per six months.

QUORUM

6.5.2.4 The quorum of the IRP necessary for the performance of the IRP review functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least two other members. The IRP Chairman shall appoint an alternate chairman from among the other members in writing, in advance of any IRP meetings in which the IRP Chairman is not available to participate.

REVIEW

6.5.2.5 The IRP shall roview:

- a. The safety evaluations for (1) changes to equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not consistitute an unreviewed safety question;
- Proposed changes to progradures, equipment, or systems which involve an unreviewed society question as defined in 10 CFR 50.59;
- Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications of this Possession Only License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant deviations from normal and expected performance of station equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operations of structures, systems, or components that could affect nuclear safety: and
- i. Reports and meeting minutes of the SRC.

AUDITS

- 6.5.2.6 Audits of station activities shall be performed under the cognizance of the IRP. These audits and audit frequencies are as follows:
 - a. The conformance of station operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;

AUDITS (Continued)

- b. The performance, training and qualifications of the entire staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per year;
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures, equipment and program implementation at least once per 24 months utilizing either a qualified offsite licensee fire protection errineer(s) or an outside independent fire protection consultant.
- f. Any other area of station operation considered appropriate by the IRP, the President of Shoreham Project or the Executive Vice President of Shoreham Project;
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months; and
- The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

RECORUS

- 6.5.2.7 Records of IRP activities shall be prepared, approved, and distributed as indicated below:
 - a. Minutes of each IRP meeting shall be prepared, approved, and forwarded to the President of Shoreham Project and the Executive Vice President of Shoreham Project within 14 days following each meeting.
 - b. Reports of reviews encompassed by Specification 6.5.2.5 shall be prepared, approved, and forwarded to the President of Shoreham Project and the Executive Vice President of Shoreham Project within 14 days following completion of the review.

RECORDS (Continued)

c. Audit reports encompassed by Specification 6.5.2.6 shall be forwarded to the President of Shoreham Project, Executive Vice President of Shoreham Project and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.6 REPORTABLE EVENT ACTION

- .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 SRC, and the results of this review shall be submitted to the Executive Vice President of Shoreham Project.

6.7 PROCEDURES AND PROGRAMS

- 6.7.1 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 applicable procedures required to implement the requirements of NUREG-0737.
 - c. Fuel handling operations.
 - d. Surveillance and test activities of safety-related equipment.
 - e. Security Plan implementation.
 - f. Emergency Plan implementation.
 - g. Fire Protection Program implementation.
 - h. PROCESS CONTROL PROGRAM implementation.
 - i. OFFSITE DOSE CALCULATION MANUAL implementation.
 - Quality Assurance Program for effluent and environmental monitoring.

- 6.7.2 Each procedure of Specification 6.7.1, and changes thereto, shall be reviewed by the SRC prior to implementation. The Resident Manager shall approve Station Administrative Procedures, Security Plan Implementing Procedures and Defueled Emergency Plan Implementing Procedures prior to implementation. Other procedures of Specification 6.7.1 shall be approved by the appropriate Division Manager or by the Resident Manager prior to implementation. Each Division Manager shall be responsible for a designated set of procedures. These procedures shall be reviewed periodically as set forth in administrative procedures.
- 6.7.3 Temporary changes to procedures of Specification 6.7.1 may be made provided:
 - a. The intent of the original procedure is not altered;
 - b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Fuel Handling Operators Certification on the unit affected; and
 - c. The change is documented, reviewed by the SRC, and approved by the Resident Manager within 14 days of implementation.
- 6.7.4 The following programs shall be established, implemented, and maintained:
 - a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

 Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM.

- h. Records of annual physical inventory of all sealed source material of record.
- 6.9.3 The following records shall be retained for the duration of the unit License:
 - a. Records and drawing changes reflecting station design modifications made to systems and equipment described in the Defueled Safety Analysis Report.
 - b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
 - c. Records of radiation exposure for all individuals issued monitoring devices in accordance with 10 CFR 20.202.
 - d. Records of gaseous and liquid radioactive material released to the environs.
 - e. Records of training and qualification for current members of the unit staff.
 - f. Records of quality assurance activities required by the Quality Assurance Manual which are not listed in Section 6.9.2.
 - g. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
 - h. Records of meetings of the SRC and IRP and of meetings of the Review of Operations Committee and Nuclear Review Board held by the original licensee.
 - i. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
 - j. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.10 RADIATION PROTECTION PROGRAM

6.10 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

where no enclosure exists for purposes of locking, and no enclosure-can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote (such as use of closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide exposure control over the activities within the area.

6.12 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 5.3.3. This documentation shall contain:
 - Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the SRC and the approval of the Resident Manager.

6.13 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.9.3.j. This documentation shall contain:
 - Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

- 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by SRC and the approval of the Resident Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the acted pages, clearly indicating the area of the page that was ad, and shall indicate the date (e,g., month/year) the access was implemented.