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April 11, 1996

C. Lance Terry
Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
ADVANCE FSAR SUBMITTAL - RELOCATION OF PORTIONS
OF ADMINISTRATIVE SECTION 6.0 OF TECHNICAL
SPECIFICATIONS TO THE QA PLAN (FSAR 17.2)

Gentlemen:

The attachment to this letter provides a draft advance CPSES FSAR submittal to facilitate NRC Staff review of the subject area in conjunction with provisions of CPSES License Amendment Request 94-014. The attachment is organized as follows:

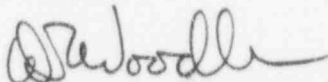
1. A description/justification of each change.
2. A copy of the revised FSAR pages (changes are indicated through the use of "redlining" which will be shown with shading for addition and "line through" for deletion).

The attached material is a portion of one of the many changes which will be incorporated in to CPSES FSAR Amendment 94 which is currently scheduled for August 1, 1996. Any additional changes to these sections will be reviewed and handled in accordance with the provisions of 10CFR50.54(a).

If you have any questions regarding this submittal, please contact Ray Adams at (214) 812-8826.

Sincerely,

C. L. Terry

By: 
D. R. Woodlan
Docket Licensing Manager

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PDR ADOCK 05000445
P PDR

RJA/grp
Attachment

c - Mr. L. J. Callan, Region IV
Ms. L. J. Smith, Region IV
Mr. T. J. Polich, NRR
Resident Inspectors

DO29 11

CPSES - UPDATED FINAL SAFETY ANALYSIS REPORT
AMENDMENT - 94
DETAILED DESCRIPTION

Prefix Page (as amended)	Page	Group	Description	Section:	Page 1
17.2- 6-	18	3	Relocated provisions of TS 6.5, "Review and Audit", to the FSAR Section 17.2.1.3. Retitled FSAR Section 17.2.1.3 "Review and Audit" from "Operations Review Committee" and Each subsection of TS 6.5 is added and numbered sequentially in FSAR Section 17.2.1.3. (ie TS Section 6.5.1 "Station Operations Review Committee (SORC)" is now found in FSAR Section 17.2.1.3.1 and TS Section 6.5.1.1 "Function" is now found in FSAR Section 17.2.1.3.1.1 and so on.)		
Revision					
Change Request Number : SA - 94 - 107 .8					
Related SER : SSER : Section:					
SER/SSER Impact : n					
Change relocates Admin Control TS 6.5 to the FSAR per License Amendment Request 94-014 (TXX-94216).					
17.2- 11-	15	3	Relocated provisions of TS 6.5.2, "Operations Review Committee (ORC)", to the FSAR Section 17.2.1.3.2. Each subsection of TS 6.5.2 is added and numbered sequentially in FSAR Section 17.2.1.3.2 (ie TS Section 6.5.2 "Operations Review Committee (ORC)" is now found in FSAR Section 17.2.1.3.2 and TS Section 6.5.2.1 "Function" is now found in FSAR Section 17.2.1.3.2.1 and so on.)		
Revision					
Change Request Number : SA - 94 - 107 .9					
Related SER : SSER : Section:					
SER/SSER Impact : n					
Change relocates Admin Control TS 6.5 to the FSAR per License Amendment Request 94-014 (TXX-94216).					
17.2- 16	17	3	Relocated provisions of TS 6.5.3, "Technical Review and Controls", to the FSAR Section 17.2.1.3.3. Each subsection of TS 6.5.3 is added and numbered sequentially in FSAR Section 17.2.1.3.3		
Revision					
Change Request Number : SA - 94 - 107 .10					
Related SER : SSER : Section:					
SER/SSER Impact : n					
Change relocates Admin Control TS 6.5 to the FSAR per License Amendment Request 94-014 (TXX-94216).					

CPSES - UPDATED FINAL SAFETY ANALYSIS REPORT
AMENDMENT - 94
DETAILED DESCRIPTION

Prefix Page (as amended)	Group	Description	Section:	Page 2
17.2- 18	3	Relocated provisions of TS 6.6.1b, under "Reportable Event Action", to the FSAR Section 17.2.1.3.3.3. Revision Change Request Number : SA - 94 - 107 .11 Related SER : SSER : Section: SER/SSER Impact : n Change relocates a portion of the Admin Control TS 6.6 to the FSAR per License Amendment Request 94-014 (TXX-94216).		
17.2- 18	3	Relocated provisions of TS 6.8.1e and TS 6.8.2 under "Procedures and Programs", to the FSAR Section 17.2.1.3.3.4 and 17.2.1.3.3.5 respectively. Revision Change Request Number : SA - 94 - 107 .12 Related SER : SSER : Section: SER/SSER Impact : n Change relocates portions of the Admin Control TS 6.8 to the FSAR per License Amendment Request 94-014 (TXX-94216).		
17.2- 18	3	Relocated provisions of TS 6.13 "Process Control Program", to the FSAR Section 17.2.1.3.3.4.1. Revision Change Request Number : SA - 94 - 107 .13 Related SER : SSER : Section: SER/SSER Impact : n Change relocates Admin Control TS 6.13 to the FSAR per License Amendment Request 94-014 (TXX-94216).		
17.2- 20	21	3 Relocated provisions of TS 6.2.3, "Independent Safety Engineering Group (ISEG)", to the FSAR Section 17.2.1.6. Each subsection of TS 6.2.3 is added and numbered sequentially in FSAR Section 17.2.1.6. (ie TS Section 6.2.3.1 "Function" is now found in FSAR Section 17.2.1.6.1 and so on.) Revision Change Request Number : SA - 94 - 107 .14 Related SER : SSER : Section: SER/SSER Impact : Change relocates Admin Control TS 6.2.3 to the FSAR per License Amendment Request 94-014 (TXX-94216).		

CPSES - UPDATED FINAL SAFETY ANALYSIS REPORT

AMENDMENT - 94 DETAILED DESCRIPTION

Prefix Page (as amended)		Group	Description	Section:	Page 3
17.2-48-	50	3	Relocated provisions of TS 6.10 "Record Retention", to the FSAR Section 17.2.17.1 Each subsection of TS 6.10 is added and numbered sequentially in FSAR Section 17.2.17.1		
Revision					
Change Request Number : SA - 94 - 107 .15					
Related SER : SSER : Section:					
SER/SSER Impact : n					
Change relocates Admin Control TS 6.10 to the FSAR per License Amendment Request 94-014 (TXX-94216).					

5. Review of procurement documents to assure incorporation of adequate quality assurance requirements for procured items and services.
6. Evaluations and inspections of site quality related activities to assure compliance with the applicable quality requirements.
7. Engineering services to support the Operations Review Committee (ORC).
8. Health Physics review to these programs necessary for radiological protection of Company personnel and property, the environment and the general public.
9. Engineering and administrative support to the corporate office Emergency Support Center.
10. Support the development of appropriate emergency plans for TU Electric in accordance with regulatory guidelines and requirements and performance of the annual 10CFR50.54(t) independent review of the Emergency Planning Program.

17.2.1.3 Review and Audit Operations Review Committee

~~Independent reviews of activities affecting plant safety during the operations phase are performed by the Operations Review Committee. The structure and responsibilities of the committee are described in Section 13.4.~~ (NOTE: This paragraph has been relocated to FSAR new Section 17.2.1.3.2)

17.2.1.3.1 Station Operations Review Committee (SORC)

17.2.1.3.1.1 Function

The SORC shall function to advise the Vice President, Nuclear Operations on all matters related to nuclear safety.

17.2.1.3.1.2 Composition

The SORC shall as a minimum be composed of managers or individuals reporting directly to managers from the areas listed below and meet the requirements of ANSI-N18.1-1971 Sections 4.2 or 4.4 for required experience:

- Operations
- Maintenance
- Instrumentation and Controls
- Technical Support
- Radiation Protection
- Quality Assurance

The Plant Manager shall serve as the chairman of SORC. A senior health physicist is acceptable for the Radiation Protection representative on SORC. The SORC members shall be designated, in writing, by the Vice President, Nuclear Operations.

17.2.1.3.1.3 Alternates

All alternate members shall be appointed in writing by the Vice President, Nuclear Operations to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SORC activities at any one time.

17.2.1.3.1.4 Meeting Frequency

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

17.2.1.3.1.5 Quorum

The quorum of the SORC necessary for the performance of the SORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and a majority of the regular members (or their alternates).

17.2.1.3.1.6 Responsibilities

17.2.1.3.1.6.1 The SORC shall be responsible for:

- a. Review of applicable administrative procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Review of the safety evaluations for: (1) procedures, (2) change to procedures, equipment, systems or facilities, and (3) tests or experiments completed under the provision of 10CFR50.59 to verify that such actions did not constitute an unreviewed safety question;
- c. Review of proposed procedures and changes to procedures, equipment, systems or facilities which involve an unreviewed safety question as defined in 10CFR50.59 or involves a change in Technical Specifications;
- d. Review of proposed test or experiments which involve an unreviewed safety question as defined in 10CFR50.59 or requires a change in Technical Specifications;

- e. Review of proposed changes to Technical Specifications on the Operating License;
- f. Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President, Nuclear Operations and to the ORC;
- g. Review of reports of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h. Review of all REPORTABLE EVENTS;
- i. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems;
- j. 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 Vice President, Nuclear Operations, and to the ORC;
- k. Review of Unit operations to detect potential hazards to nuclear safety;

- l. Investigations or analysis of special subjects as requested by the Chairman of the ORC or the Vice President, Nuclear Operations;
- m. Review of the Fire Protection Report and implementing procedures and submittal of recommended changes to the ORC; and
- n. Review of the Technical Requirements Manual and revision thereto.

17.2.1.3.1.6.2 The SORC shall:

- a. Recommend in writing to the designated manager (see Section 17.2.1.3.3) approval or disapproval of items considered under Sections 17.2.1.3.1.6.1a through e. prior to their implementation;
- b. Render determinations in writing with regard to whether or not each item considered under Section 17.2.1.3.1.6a through e. constitutes an unreviewed safety question; and
- c. Provide written notification within 24 hours to the Group Vice President, Nuclear Engineering and Operations and the Operations Review Committee of disagreement between the SORC and the designated manager (see Section 17.2.1.3.3) however, the Vice President, Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

17.2.1.3.1.7 Records

The SORC shall maintain written minutes of each SORC meeting that, at a minimum, document the results of all SORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President, Nuclear Operations and the Operations Review Committee.

17.2.1.3.2 Operations Review Committee (ORC)

Independent reviews of activities affecting plant safety during the operations phase are performed by the Operations Review Committee. The structure and responsibilities of the committee are described below:

17.2.1.3.2.1 Function

The ORC shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The ORC shall report to and advise the Group Vice President, Nuclear Engineering and Operations on those areas of responsibility specified in Section 17.2.1.3.2.7 and 17.2.1.3.2.8.

17.2.1.3.2.2 Composition

The ORC shall be composed of at least six individuals of whom no more than a minority are members having line responsibility for operations at CPSES. The Chairman and all members will be appointed by the Group Vice President, Nuclear Engineering and Operations.

The ORC Chairman shall hold a Bachelor's degree in an engineering or physical science field or equivalent experience and a minimum of 6 years technical managerial experience.

The ORC members shall hold a Bachelor's degree in an engineering or physical science field or equivalent experience and a minimum of 5 years technical experience. It is the responsibility of the Chairman to ensure experience and competence is available to review problems in areas listed in Section 17.2.1.3.2.1a through h. To a large measure, this experience and competence rests with the membership of the ORC. In specialized areas, this experience may be provided by personnel who act as consultants to the ORC.

17.2.1.3.2.3 Alternates

The alternate for the Chairman and all alternate members shall be appointed in writing by the Group Vice President, Nuclear Engineering and Operations to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.

17.2.1.3.2.4 Consultants

Consultants shall be utilized as determined by the Chairman, ORC to provide expert advice to the ORC.

17.2.1.3.2.5 Meeting Frequency

The ORC shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

17.2.1.3.2.6 Quorum

The quorum of the ORC necessary for the performance of the ORC review and audit functions of these Technical Specifications shall consist of not less than a majority of the appointed individuals (or their alternates) and the Chairman or his designated alternate. No more than a minority of the quorum shall have line responsibility for operation of the unit.

17.2.1.3.2.7 Review

The ORC shall be responsible for the review of:

- a. The safety evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10CFR50.59, to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10CFR50.59;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10CFR50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the SQRC.

17.2.1.3.2.8 Audits

Audits of unit activities shall be performed under the cognizance of the ORC. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training, and qualifications of the entire unit 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 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10CFR50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee or personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year;
- 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;

- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging 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;
- k. Any other area of unit operation considered appropriate by the ORC or the Group Vice President, Nuclear Engineering and Operations; and
- l. The performance of activities required by the Technical Requirements Manual at least once per 24 months.

17.2.1.3.2.9 Records

Records of ORC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each ORC meeting shall be prepared, approved and forwarded to the Vice President, Nuclear Operations and Group Vice President, Nuclear Engineering and Operations within 14 days following each meeting;
- b. Reports of reviews encompassed by Section 17.2.1.3.2.7 shall be prepared, approved and forwarded to the Vice President, Nuclear Operations and Group Vice President, Nuclear Engineering and Operations within 14 days following completion of the review; and
- c. Audit reports encompassed by Section 17.2.1.3.2.8 shall be forwarded to the Vice President, Nuclear Operations and Group Vice President, Nuclear Engineering and Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

17.2.1.3.3. Technical Review and Controls

17.2.1.3.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. The Vice President, Nuclear Operations, shall approve Station Administrative Procedures. Other procedures shall be approved by the appropriate department manager as previously designated by the Vice President, Nuclear Operations, in writing. Individuals responsible for procedure reviews shall be members of the Nuclear Operations Management Staff previously designated by the Vice President, Nuclear Operations. Changes to procedures which do not change the intent of approved procedures may be approved for implementation by two members of the Nuclear Operations Management Staff, at least one of whom holds a Senior Operator License, provided such approval is prior to implementation and is documented. Such changes shall be approved by the original approval authority within 14 days of implementation.
- b. Proposed tests and experiments which affect plant nuclear safety shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by a qualified individual/group other than the individual/group which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Plant Manager. Individuals responsible for conducting such reviews shall be members of the Nuclear Operations Management Staff previously designated by the Vice President, Nuclear Operations.

- c. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Chief Engineer. Each such modification shall be reviewed by a qualified individual/group meeting the experience requirements of ANSI N18.1-1971, Section 4.6 other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Individuals/groups responsible for conducting such reviews shall be previously designated by the Chief Engineer. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved by the Plant Manager prior to implementation;
- d. Individuals responsible for reviews performed in accordance with the requirements of Specifications 6.5.3.1a and 6.5.3.1b, shall be members of the Nuclear Operations Management staff previously designated by the Vice President, Nuclear Operations. Each such review shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be done in accordance with the appropriate qualification requirements;
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. For items involving unreviewed safety questions, NRC approval shall be obtained prior to the Plant Manager approval for implementation.

17.2.1.3.3.2 Records of the above activities described in 17.2.1.3.3.1 shall be provided to the Vice President, Nuclear Operations, SORC, and/or ORC as necessary for required reviews.

17.2.1.3.3.3 The following action shall be taken for REPORTABLE EVENTS:

Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the ORC and the Vice President, Nuclear Operations.

17.2.1.3.3.4 Process Control Program (PCP)

Written procedures shall be established, implemented and maintained covering the Process Control Program implementation.

17.2.1.3.3.4.1 Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3a. This documentation shall contain:

1) 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 SORC and the approval of the Vice President, Nuclear Operations.

17.2.1.3.3.5 Each procedure and administrative policy of Technical Specification 6.8.1 and changes thereto shall be reviewed and approved prior to implementation as set forth in Section 17.2.1.3 above.

17.2.1.4 Delegation of Quality Assurance Functions

NP periodically retains qualified consultants and contractors to provide safety-related services. All consultants and contractors providing safety-related services and suppliers providing safety-related equipment or materials for CPSES are required to establish and implement quality

3. Demonstrated ability to manage people and projects.
4. Knowledge of quality assurance requirements for nuclear plants including a minimum of one year related experience in the implementation of a nuclear quality assurance program. If the Nuclear Overview Manager does not meet the one year quality assurance experience requirements then the Programs Overview Manager must satisfy the requirement until the Nuclear Overview Manager acquires the required experience.

17.2.1.6 Independent Safety Engineering Group (ISEG)

17.2.1.6.1 Function

The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Group Vice President, Nuclear Engineering and Operations.

17.2.1.6.2 Composition

The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 3 years professional level experience in his field.

17.2.1.6.3 Responsibilities

The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

* Not responsible for sign-off function.

17.2.1.6.4 Records

Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Group Vice President, Nuclear Engineering and Operations.

17.2.2 QUALITY ASSURANCE PROGRAM

The Quality Assurance Program requires a Quality Assurance manual be developed for each nuclear power plant, which prescribe specific measures to assure the quality of safety-related activities, structures, systems and components of that facility. The quality assurance requirements and controls implemented during operations of CPSES are established by the portion of the CPSES Quality Assurance Program in this section (17.2) of the FSAR.

Quality assurance requirements and controls are established and implemented throughout the testing and operation phases at CPSES. This program shall be implemented at least 90 days prior to fuel loading. Responsibilities and authority, and measures for the control and accomplishment of activities affecting the quality and operation of safety-related structures, systems, and components of CPSES are defined. The structures, systems, and components covered by the quality assurance program are listed in Table 17A-1. These provisions apply to all activities, such as operating, maintaining, repairing, modifying, and refueling which affect the safety-related functions of those structures, systems, and components.

A Quality Assurance Program shall be developed and implemented to attain high levels of quality assurance during the operation of CPSES. This program shall comply with the requirements of Title 10, Code of Federal Regulations, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants," and certain NRC Regulatory Guides and ANSI standards as identified in the Final Safety Analysis Report (SAR).

Overall responsibility for the Quality Assurance (QA) Program lies with the Group Vice President, Nuclear Production. Specific responsibility

personnel have access to the records areas. As allowed by ANSI N45.2.9-1974, maintenance of duplicate records stored in a remote location may be used as an alternative to the utilization of these storage facilities, and the appropriate administrative controls for the maintenance of duplicate records are prescribed by procedures and instructions.

17.2.17.1 Record Retention

17.2.17.1.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

17.2.17.1.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety;
- c. ALL REPORTABLE EVENTS;
- d. Records of surveillance activities, inspections and calibrations required by the Technical Specifications, Technical Requirements Manual, and Fire Protection Report, except as explicitly covered in Section 17.2.17.1.3.
- e. Records of changes made to the procedures required by Technical Specification 6.8.1;
- f. Deleted

- g. Records of sealed source and fission detector leak tests and results; and
- h. Records of annual physical inventory of all sealed source material of record.

17.2.1.7.1.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- c. Records of doses received by all individuals for whom monitoring was required by 10CFR Part 20;
- d. Records of gaseous and liquid radioactive material released to the environs;
- e. Records of transient or operational cycles for those unit components identified in Technical Specification Table 5.7-1;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the unit staff;
- h. Records of inservice inspections performed pursuant to the Technical Specifications;
- i. Records of quality assurance activities required by the Quality Assurance Manual;

- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR50.59;
- k. Records of meetings of the SORC and the ORC;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by the Technical Requirements Manual including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality;
- n. 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; and
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.
- p. Records of radioactive shipments.

17.2.18 AUDITS

Requirements are established for an evaluation program. The evaluation program is consistent with the applicable portions of Regulatory Guides 1.33, 1.144, and 1.146 as discussed in Appendix 1A(B).

Planned and periodic evaluations are performed in accordance with written procedures to verify compliance with all aspects of the quality assurance program. Responsibility for the evaluation program has been assigned to the Nuclear Overview Manager. Evaluations are conducted by Nuclear Overview personnel and include evaluation and examination of quality-related activities such as:

1. Operation, maintenance, and modification of CPSES.