6.2.3 SAFETY ENGINEERING STAFF (SES)

FUNCTION

6.2.3.1 The SES shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The SES shall be composed of at least five dedicated, full-time engineers located onsite.

RESPONSIBILITIES

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

AUTHORITY

6.2.3.4 The SES shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Assistant Station Manager (Nuclear Safety and Licensing).

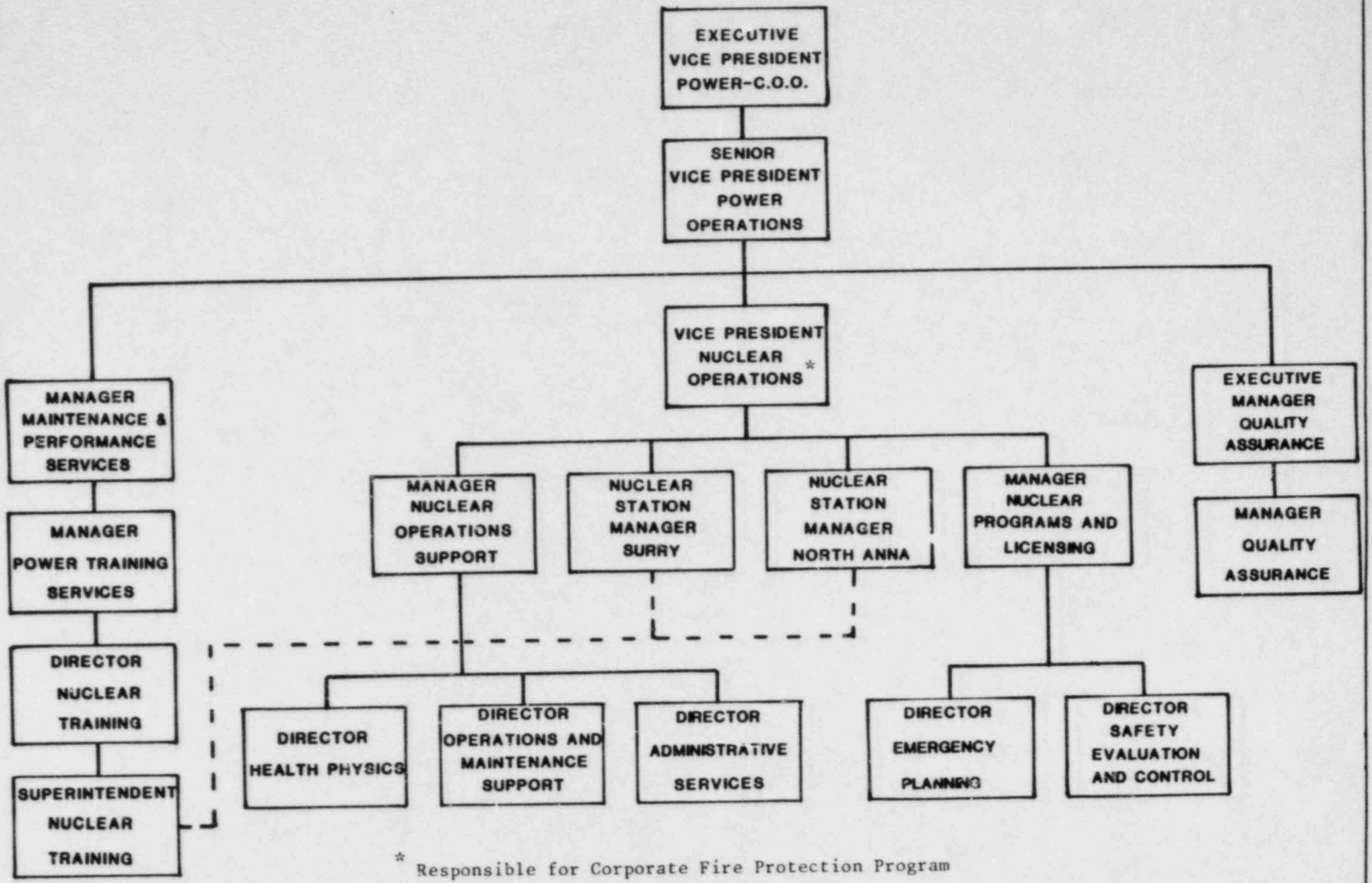
6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

6.2.4.2 The Shift Technical Advisor shall disseminate relevant operational experience identified by the SES.

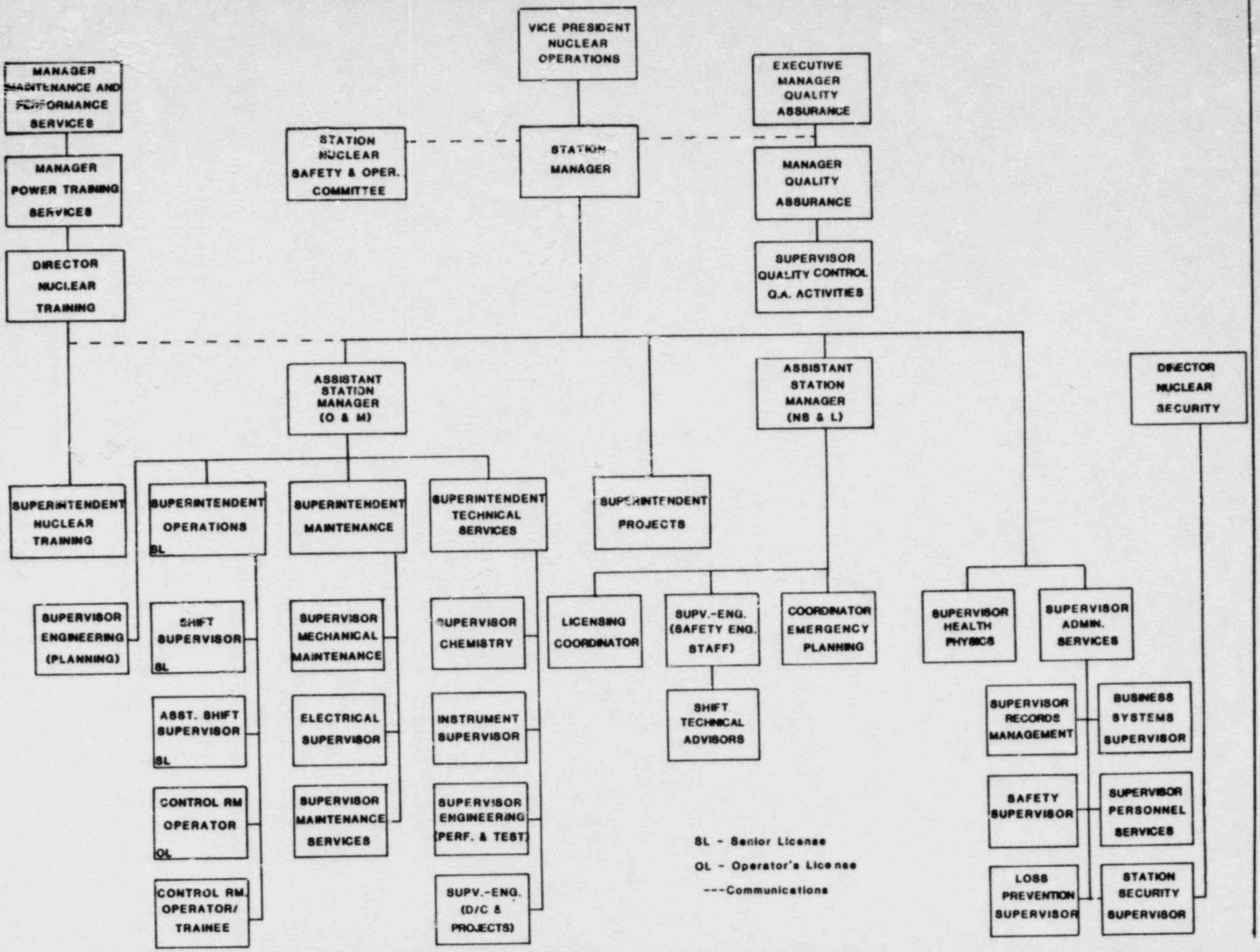
*Not responsible for sign-off function.

Figure 6.2-1 Offsite Organization for Facility Management and Technical Support



* Responsible for Corporate Fire Protection Program

Figure 6.2-2 Facility Organization - North Anna - Units 1 and 2



6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANS 3.1-(12/79 Draft) for comparable positions and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for (1) the Supervisor - Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 The Station Manager is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5 of ANS 3.1-(12/79 Draft) and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the SES.

6.5 REVIEW AND AUDIT

6.5.1 STATION NUCLEAR SAFETY AND OPERATING COMMITTEE (SNSOC)

FUNCTION

6.5.1.1 The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The SNSOC shall be composed of the:

Chairman:	Assistant Station Manager (Nuclear Safety and Licensing)
Vice Chairman:	Assistant Station Manager (Operations and Maintenance)
Member:	Superintendent-Operations
Member:	Superintendent-Maintenance
Member:	Superintendent-Technical Services
Member:	Supervisor-Health Physics

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SNSOC Chairman to serve on a temporary basis; however, no more than one alternate shall participate as a voting member in SNSOC activities at any one time.

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 Specification 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 or modifications to plant systems or equipment that affect nuclear safety.

d. Review of all proposed changes to Appendix "A" Technical Specifications and Appendix "B" Environmental Protection Plan. Recommended changes shall be submitted to the Station Manager.

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 Vice President - Nuclear Operations and the Director-Safety Evaluation and Control.

f. Review of events requiring 24 hour written notification to the Commission.

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 or Station Manager.

i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.

j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Station Manager.

k. Review of every unplanned onsite release of radioactive material to the environs 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 Director-Safety Evaluation and Control.

l. Review changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

6.5.1.7 The SNSOC shall:

a. Provide written approval or disapproval of items considered under 6.5.1.6(a) through (c) above.

b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the Vice President-Nuclear Operations and the Director-Safety Evaluation and Control of disagreement between the SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Station Manager, Vice President-Nuclear Operations and the Director-Safety Evaluation and Control.

6.5.2 SAFETY EVALUATION AND CONTROL (SEC)

FUNCTION

6.5.2.1 SEC shall function to provide independent review 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
h. Administrative controls and quality assurance practices
i. Other appropriate fields associated with the unique characteristics of the nuclear power plant

d. Violations and reportable occurrences 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. Reportable occurrences as defined in the station Technical Specification 6.9.1.8.

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.

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 Programs and Licensing, 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 Support

4. Manager-Nuclear Programs and Licensing

5. Executive Manager-Quality Assurance

6. Others that the Director-Safety Evaluation and Control may designate.

m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974, and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

6.5.3.2 The Quality Assurance Department shall report to and advise the Executive Manager-Quality Assurance, who shall advise the Senior Vice President-Power Operations on those areas of responsibility specified in Section 6.5.3.1.

RECORDS

6.5.3.3 Records of the Quality Assurance Department audits shall be prepared and maintained in the department files. Audit reports shall be disseminated as indicated below:

1. Vice President - Nuclear Operations
2. Nuclear Power Station Manager
3. Manager-Nuclear Operations Support
4. Manager-Nuclear Programs and Licensing
5. Executive Manager - Quality Assurance
6. Director - Safety Evaluation and Control
7. Nuclear Power Station Manager Quality Assurance
8. Supervisor of area audited

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.

b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the SNSOC and submitted to the Director-Safety Evaluation and Control and the Vice President - Nuclear Operations.

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 Vice President-Nuclear Operations, 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 Vice President-Nuclear Operations 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.

c. Surveillance and test activities of safety related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. OFFSITE DOSE CALCULATION MANUAL implementation.

i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of 6.8.1 above, except 6.8.1.d and 6.8.1.e and changes thereto, shall be reviewed and approved by the SNSOC prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1 d and 6.8.1.e shall be reviewed and approved as per 6.5.1.6.i and j.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed, and approved by the SNSOC within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation spray, safety injection, chemical and volume control, gas stripper, and hydrogen recombiners. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements and

(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

i. For any abnormal degradation of the structural integrity of the reactor vessel or the Reactor Coolant System pressure boundary detected during the performance of Specification 4.4.10, an initial report shall be submitted within 10 days after detection and a detailed report submitted within 90 days after the completion of Specification 4.4.10.

j. For any abnormal degradation of the containment structure detected during the performance of Specification 4.6.1.6, an initial report shall be submitted within 10 days after completion of Specification 4.6.1.6. A final report, which includes (1) a description of the condition of the liner plate and concrete, (2) inspection procedure, (3) the tolerance on cracking and (4) the corrective actions taken, shall be submitted within 90 days after the completion of Specification 4.6.1.6.

k. Inoperable Fire Detection Instrumentation, Specification 3.3.3.7.

l. Inoperable Fire Suppression Systems, Specifications 3.7.14.1, 3.7.14.2, 3.7.14.3, 3.7.14.4 and 3.7.14.5.

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

a. Records and logs of facility 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. Each REPORTABLE OCCURRENCE submitted to the Commission.

d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

e. Records of changes made to Operating Procedures.

f. Records of radioactive shipments.

g. Records of sealed source leak tests and results.

h. Records of annual physical inventory of all sealed source material of record.

i. Records of the annual audit of the Station Emergency Plan and implementing procedures.

j. Records of the annual audit of the Station Security Plan and implementing procedures.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

6.1 RESPONSIBILITY

6.1.1 The Station Manager shall be responsible for overall facility operation. In his absence, the Assistant Station Manager (Operations and Maintenance) shall be responsible for overall facility operation. During the absence of both, the Station Manager shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Supervisor (or during his absence from the Control Room, a designated individual) shall be responsible for the Control Room command function and shall be the only individual that may direct the licensed activites of licensed operators. A management directive to this effect, signed by the Senior Vice President - Power Operations, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODES 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.

c. A health physics technician# shall be on site when fuel is in the reactor.

d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times#. The Fire Brigade shall not include the minimum shift crew shown in Table 6.2-1 or any personnel required for other essential functions during a fire emergency.

#The health physics technician and Fire Brigade composition may be less than the minimum requirement for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

6.2.3 SAFETY ENGINEERING STAFF (SES)

FUNCTION

6.2.3.1 The SES shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The SES shall be composed of at least five dedicated, full-time engineers located onsite.

RESPONSIBILITIES

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

AUTHORITY

6.2.3.4 The SES shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Assistant Station Manager (Nuclear Safety and Licensing).

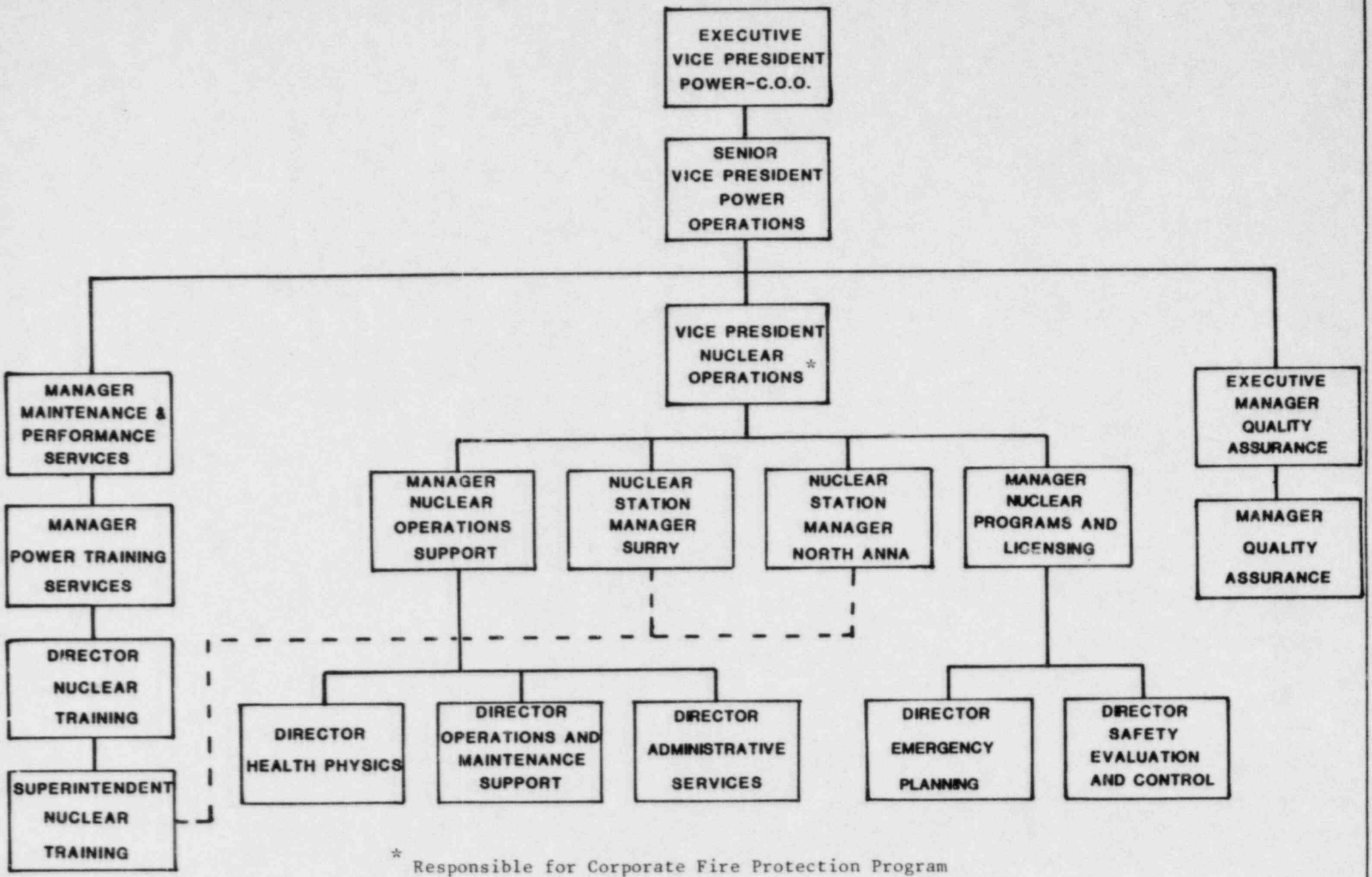
6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capabity to Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

6.2.4.2 The Shift Technical Advisor shall disseminate relevant operational experience identified by the SES.

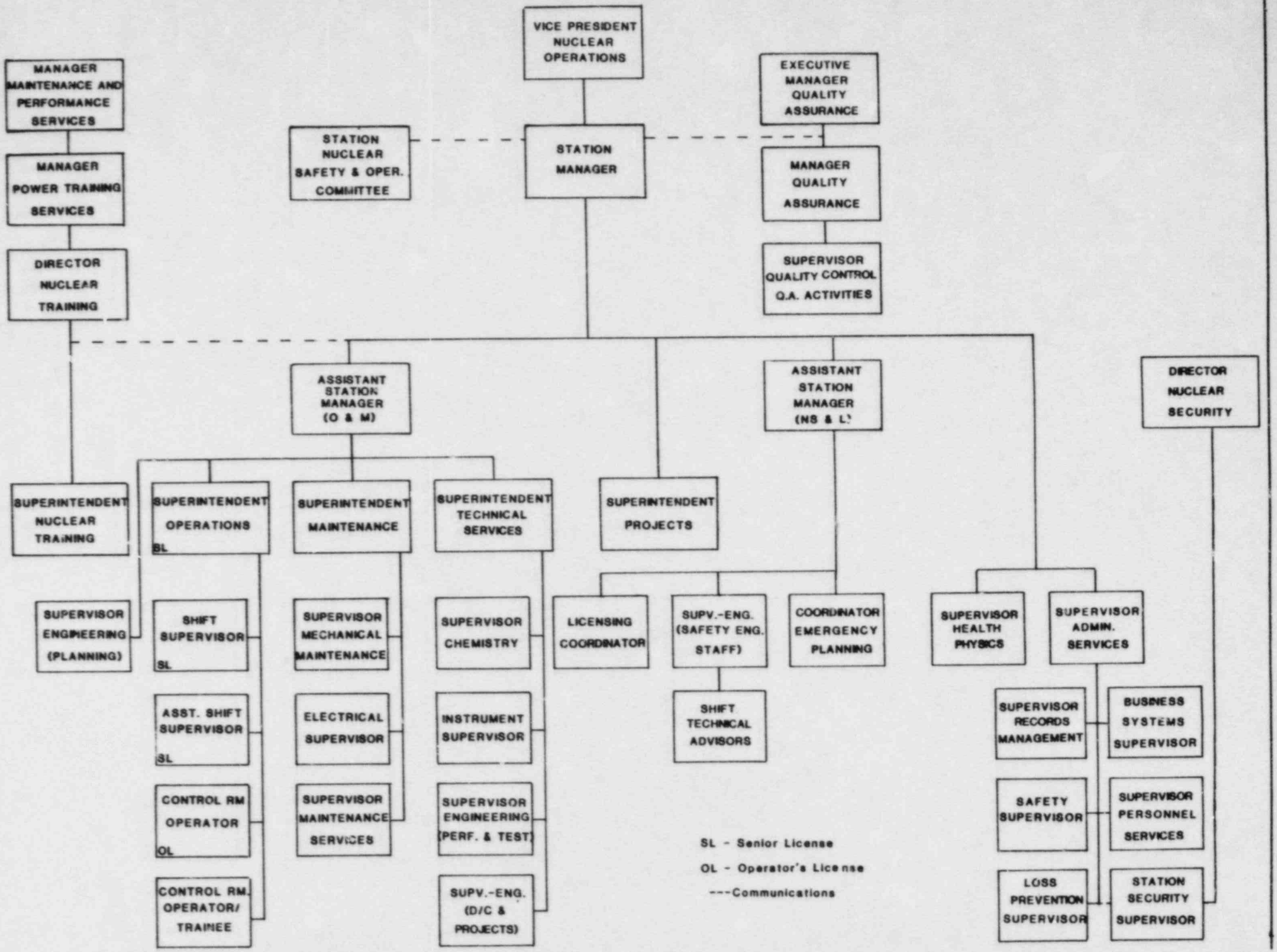
*Not responsible for sign-off function.

Figure 6.2-1 Offsite Organization for Facility Management and Technical Support



* Responsible for Corporate Fire Protection Program

Figure 6.2-2 Facility Organization - North Anna - Units 1 and 2



6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANS 3.1-(12/79 Draft) for comparable positions and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for (1) the Supervisor - Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 The Station Manager is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5 of ANS 3.1-(12/79 Draft) and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the SES.

6.5 REVIEW AND AUDIT

6.5.1 STATION NUCLEAR SAFETY AND OPERATING COMMITTEE (SNSOC)

FUNCTION

6.5.1.1 The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The SNSOC shall be composed of the:

Chairman:	Assistant Station Manager (Nuclear Safety and Licensing)
Vice Chairman:	Assistant Station Manager (Operations and Maintenance)
Member:	Superintendent-Operations
Member:	Superintendent-Maintenance
Member:	Superintendent-Technical Services
Member:	Supervisor-Health Physics

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SNSOC Chairman to serve on a temporary basis; however, no more than one alternate shall participate as a voting member in SNSOC activities at any one time.

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 Specification 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, 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 or modifications to plant systems or equipment that affect nuclear safety.

d. Review of all proposed changes to Appendix "A" Technical Specifications and Appendix "B" Environmental Protection Plan. Recommended changes shall be submitted to the Station Manager.

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 Vice President-Nuclear Operations and the Director-Safety Evaluation and Control.

f. Review of events requiring 24 hour written notification to the Commission.

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 or Station Manager.

i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.

j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Station Manager.

k. Review of every unplanned onsite release of radioactive material to the environs 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 Director-Safety Evaluation and Control.

l. Review changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

6.5.1.7 The SNSOC shall:

a. Provide written approval or disapproval of items considered under 6.5.1.6(a) through (c) above.

b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the Vice President - Nuclear Operations and the Director-Safety Evaluation and Control of disagreement between the SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Station Manager, Vice President - Nuclear Operations, and the Director-Safety Evaluation and Control.

6.5.2 SAFETY EVALUATION AND CONTROL (SEC)

FUNCTION

6.5.2.1 SEC shall function to provide independent review 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
h. Administrative controls and quality assurance practices
i. Other appropriate fields associated with the unique characteristics of the nuclear power plant

REVIEW (Cont'd)

d. Violations and reportable occurrences 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. Reportable occurrences as defined in the station Technical Specification 6.9.1.8.

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.

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 Programs and Licensing, 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 Support

RECORDS (Cont'd)

4. Manager-Nuclear Programs and Licensing

5. Executive Manager-Quality Assurance

6. Others that the Director-Safety Evaluation and Control may designate.

6.5.3 QUALITY ASSURANCE DEPARTMENT

FUNCTION

6.5.3.1 The Quality Assurance Department shall function to audit station activities. These audits shall encompass:

a. The conformance of facility 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 facility staff at least once per 12 months.

c. The results of actions taken to correct deficiencies occurring in facility 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", 10 CFR 50, at least once per 24 months.

e. The Station Emergency Plan and implementing procedures at least once per 12 months.

f. The Station Security Plan and implementing procedures at least once per 12 months.

g. Any other area of facility operation considered appropriate by the Executive Manager-Quality Assurance or the Senior Vice President-Power Operations.

h. The Station Fire Protection Program and implementing procedures at least once per 24 months.

i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

6.5.3.2 The Quality Assurance Department shall report to and advise the Executive Manager-Quality Assurance, who shall advise the Senior Vice President-Power Operations on those areas of responsibility specified in Section 6.5.3.1.

RECORDS

6.5.3.3 Records of the Quality Assurance Department audits shall be prepared and maintained in the department files. Audit reports shall be disseminated as indicated below:

1. Vice President - Nuclear Operations
2. Nuclear Power Station Manager
3. Manager-Nuclear Operations Support
4. Manager-Nuclear Programs and Licensing
5. Executive Manager - Quality Assurance
6. Director-Safety Evaluation and Control
7. Nuclear Power Station Manager-Quality Assurance
8. Supervisor of area audited

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.

b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the SNSOC and submitted to the Director-Safety Evaluation and Control and the Vice President - Nuclear Operations.

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 Vice President - Nuclear Operations 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 Vice President - Nuclear Operations 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.

c. Surveillance and test activities of safety related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. OFFSITE DOSE CALCULATION MANUAL implementation.

i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of 6.8.1 above, except 6.8.1.d and 6.8.1.e and changes thereto, shall be reviewed and approved by the SNSOC prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1.d and 6.8.1.e shall be reviewed and approved as per 6.5.1.6.i and 6.5.1.6.j.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed and approved by the SNSOC and within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation spray, safety injection, chemical and volume control, gas stripper, and hydrogen recombiners. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements and

(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

6.10 RECORD RETENTION

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.

6.10.1 The following records shall be retained for at least five years:

a. Records and logs of facility 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. Each REPORTABLE OCCURRENCE submitted to the Commission.

d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

e. Records of changes made to Operating Procedures.

f. Records of radioactive shipments.

g. Records of sealed source leak tests and results.

h. Records of annual physical inventory of all sealed source material of record.

i. Records of the annual audit of the Station Emergency Plan and implementing procedures.

j. Records of the annual audit of the Station Security Plan and implementing procedures.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

a. Records and drawing changes reflecting facility 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 facility radiation and contamination surveys.

d. Records of radiation exposure for all individuals entering radiation control areas.

e. Records of gaseous and liquid radioactive material release to the environs.

f. Records of transient or operational cycles for those facility components identified in Table 5.7-1.

DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

The enclosed changes reflect the recent reorganizational changes in the Nuclear Operations Department. These changes are reflected on Technical Specifications Figures 6.2-1 and 6.2-2.

The changes in the Nuclear Operations Department begin with the creation of the Manager, Nuclear Programs and Licensing. The Manager, Nuclear Programs and Licensing reports to the Vice President-Nuclear Operations. His responsibilities and authorities are in the areas of emergency planning, licensing and independent review. Another newly created position is the Assistant Station Manager (Nuclear Safety and Licensing). He reports to the Station Manager and assumes certain responsibilities and authorities previously held by the Station Manager and Assistant Station Manager (Operations and Maintenance) in the area of the Station Nuclear Safety and Operating Committee. He also has responsibility and authority for emergency planning, the safety engineering staff and licensing. The title of the other Assistant Station Manager before the creation of the Assistant Station Manager (Nuclear Safety and Licensing) has been changed to the Assistant Station Manager (Operations and Maintenance). His responsibility and authority have not changed.

In addition, the following organizational changes were previously in effect:

The Superintendent of Projects reports to the Station Manager and is responsible for the management of plant modifications/maintenance activities which are performed as capital projects.

The Licensing Coordinator reports to the Assistant Station Manager (Nuclear Safety and Licensing) and is responsible for the coordination of licensing activities and regulatory requirements for the power station.

The Coordinator Emergency Planning reports to the Assistant Station Manager (Nuclear Safety and Licensing) and is responsible for implementation of the Emergency Plan at the station and the duties described therein.

The Supervisor Engineering (Safety Engineering Staff) now reports to the Assistant Station Manager (Nuclear Safety and Licensing).

The Supervisor - Maintenance Services reports to the Superintendent Maintenance. He is responsible for evaluating maintenance procedures and methods to ensure compliance with regulatory requirements and company policy, developing a maintenance management program for preventive and scheduled routine maintenance, developing and monitoring a spare and replacement parts program, developing plans for impending outages, and recommending requirements for new and revised maintenance training programs.

The Station Security Supervisor reports directly to the Director Nuclear Security (Off-site) and is responsible for the direction of the activities of the Station Security Organization and ensures that the provisions of the Security Program are carried out.

Several new positions now report to the Supervisor, Administrative Services. These are briefly discussed below.

The Safety Supervisor coordinates station training programs/or occupational safety needs with the Station Training Department and/or station department heads.

The Business Systems Supervisor is responsible for the administration of accounting activities and monitoring cost control and budget activities.

The Supervisor Personnel Services is responsible for the coordination of station personnel policies.

The Supervisor, Records Management, maintains station files in accordance with applicable regulations and develops and implements a station records management program.

The title of the Fire Marshall has been changed to the Loss Prevention Supervisor. His responsibilities have not changed.

The Supervisor Engineering (Performance and Testing) reports to the Superintendent Technical Services and is responsible for providing engineering technical support for station operations, administering the periodic test program to insure compliance with the Technical Specifications, optimizing plant performance, and providing continuous technical evaluation of reactor operation.

The Supervisor Engineering (D/C and Projects) reports to the Superintendent-Technical Services and is responsible for providing the administrative control and technical evaluation of all station modifications and design changes.

The Supervisor Engineering (Planning) reports to the Assistant Station Manager (Operations and Maintenance) and is responsible for the preparation and administration of schedules for all maintenance and design change activities during unit outages.

Supervisor Quality Control QA Activities reports to the Manager, Quality Assurance. In this capacity, the Supervisor Quality Control QA Activities shall develop, maintain and implement an improved quality assurance auditing program for North Anna Power Station to assure that technical requirements including the design bases, applicable regulatory requirements and specified codes and standards are correctly translated into specifications, drawings, procedures or instructions. He may also serve in an advisory capacity to the Station Nuclear Safety and Operating Committee.

Specification 6.2.3.4 currently reflects that the Safety Engineering Staff (SES) makes detailed recommendations to the Station Manager and the Director-Safety Evaluation and Control. Now the SES will make detailed recommendations to the Assistant Station Manager (Nuclear Safety and Licensing).

Specification 6.5.1.2 deals with the composition of the Station Nuclear Safety and Operating Committee (SNSOC). Currently, the Chairman is the Station Manager and the Vice Chairman is the Assistant Station Manager. The proposed changes are to have the Assistant Station Manager (Nuclear Safety and Licensing) be the Chairman of SNSOC and the Assistant Station Manager (Operations and Maintenance) be the Vice Chairman of SNSOC. This change does not create any new authorities or responsibilities within the Nuclear Operations Department; rather by reducing the span of control of the affected managers (both new and existing management), control and effectiveness in the areas of concern have been enhanced. Thus more management attention will be focused on the significant issues in the areas of nuclear safety, licensing and emergency prepardness.

Specification 6.5.1.6 deals with the responsibilities of SNSOC. The proposed changes will allow the SNSOC to recommend Appendix "A" Technical Specification changes and Appendix "B" Environmental Protection Plan changes to the Station Manager instead of just reviewing proposed changes. Previously, the Chairman SNSOC reviewed and received recommended changes to the Plant Security Plan and implementing procedures and Emergency Plan and implementing procedures. The proposed changes are to have SNSOC review changes to the Plant Security Plan and implementing procedures and Emergency Plan and implementing procedures but they shall submit recommended changes to these plans to the Station Manager instead of the Chairman SNSOC. The SNSOC currently reviews and approves changes to the Process Control Program (PCP) and the Offsite DOSE Calculation Manual (ODCM). The proposed change would have SNSOC review changes to the PCP and ODCM but the Station Manager would approve any changes. These are more programmatic changes and the Station Manager will be responsible for them.

Specification 6.5.1.7 currently gave SNSOC the authority to only recommend to the Station Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d). The proposed changes would allow SNSOC to provide written approval or disapproval of items considered under the current 6.5.1.6(a), 6.5.1.6(b) and 6.5.1.6(d). There is also a reordering of the first four items in 6.5.1.6.

Specification 6.5.1.8 currently tells SNSOC to provide copies of the written minutes of the SNSOC meeting to the Manager-Nuclear Operations and Maintenance and the Director-Safety Evaluation and Control. The proposed changes will provide copies of the SNSOC meeting minutes to the Station Manager, Vice President-Nuclear Operations and the Director-Safety Evaluation and Control.

Specification 6.5.2.9 currently has the Director-Safety Evaluation and Control (SEC) reporting to and advising the Manager-Nuclear Technical Services. The title of the Manager-Nuclear Technical Services is outdated and should be the Manager-Nuclear Programs and Licensing.

Specification 6.5.2.10 should be revised to have SEC prepare and maintain in the SEC files records of SEC activities. These records should be disseminated monthly to the; 1) Vice President-Nuclear Operations, 2) Nuclear Power Station Managers, 3) Manager-Nuclear Operations Support, 4) Manager-Nuclear Programs and Licensing, 5) Executive Manager-Quality Assurance and 6) Others that the Director-Safety Evaluation and Control may designate.

Specification 6.5.3.3 should be revised to have the Quality Assurance Department audits be prepared and maintained in the department files. Audit reports should be disseminated to the; 1) Vice President-Nuclear Operations, 2) Nuclear Power Station Manager, 3) Manager-Nuclear Operations Support, 4) Manager-Nuclear Programs and Licensing, 5) Executive Manager-Quality Assurance, 6) Director-Safety Evaluation and Control, 7) Nuclear Power Station Managers Quality Assurance, and 8) Supervisor of areas audited.

Specification 6.8.2 previously had each procedure in 6.8.1, and changes thereto, be reviewed by the SNSOC and approved by the Station Manager prior to implementation and reviewed periodically as set forth in administrative procedures. The proposed changes are to have each procedure, except 6.8.1 d and e be reviewed and approved by the SNSOC prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1 d and e shall be reviewed and approved as per 6.5.1.6.i and j. This would keep the programmatic responsibility with the Station Manager.

Specification 6.8.3 has temporary changes made to procedures of 6.8.1 being provided to and reviewed by SNSOC and approved by the Station Manager within 14 days of implementation. The proposed change would allow SNSOC to review and approve temporary changes made to procedures in 6.8.1 within 14 days of implementation.

Also, reorganizations in the Nuclear Operations Department have occurred in the past few years. The title of the Manager, Nuclear Operations and Maintenance has been upgraded to the Vice President-Nuclear Operations. The position of the Manager, Nuclear Operations and Maintenance has been renamed the Manager, Nuclear Operations Support and the title of the Manager, Nuclear Technical Services has been renamed the Manager, Nuclear Programs and Licensing. The Technical Analysis and Control Group has been deleted. The Section Supervisor, Administrative Services has been renamed Director, Administrative Services and reports to the Manager, Nuclear Operations Support. The title of the Director, Operations and Maintenance Services has been changed to the Director, Operations and Maintenance Support. The titles of the Section Supervisor, Training and Section Supervisor, Operation and Maintenance Support have been deleted from Figure 6.2-1. The function of emergency planning has been added in the Nuclear Operations Department. The Director, Emergency Planning will report to the Manager, Nuclear Programs and Licensing. The title of the Director, Chemistry and Health Physics has been revised to Director, Health Physics. The chemistry function will be the responsibility of the Director, Operations and Maintenance Support.

Because the reorganization only results in a redistribution of existing authorities and responsibilities to enhance management controls in selected areas, this change is considered administrative in nature. Thus, because the change is administrative in nature, no unreviewed safety question is involved.

Reorganizations in the Quality Assurance Department have occurred in the past few years. To reflect the current organization, the following changes must be made in Section 6.0 of the Technical Specifications. The title of the Manager-Quality Assurance, Operations has been revised to be the Executive Manager-Quaility Assurance. The title of the Nuclear Power Resident Quality Control Engineer has been changed to the Nuclear Power Station Manager Quality Assurance and he reports to the Executive Manager-Quality Assurance. In addition, the title Director-Quality Assurance, Nuclear Operations and Director-Quality Assurance, Operations have been deleted.

Having the Nuclear Power Station Manager Quality Assurance report directly to the Executive Manager-Quality Assurance will enhance the Quality Assurance Program of the Company.

A new department called Maintenance and Performance Services has been created. The creation of the Maintenance and Performance Services Department will aid in the quality of training activities at the power stations. The Superintendent, Nuclear Training reports directly to the Director, Nuclear Training offsite. He also has communication with the Station Manager. The Director, Nuclear Training reports to the Manager Power Training Services and he reports to the Manager, Maintenance and Performance Services.

The Maintenance and Performance Services Department will plan, organize, direct and control nuclear training, so that, effective and efficient technical training is provided to the Nuclear Operations staff. They will assess and recommend specific training requirements for regulatory agencies as applicable and coordinate program offerings as necessary.

The title of the Executive Vice President-Power has changed to the Executive Vice President and Chief Operating Officer. The Executive Vice President-Power previously issued a management directive, on an annual basis to all station personnel, the responsibilities of the Control Room command function of the Shift Supervisor. The Senior Vice President-Power Operations will sign the management directive on the Shift Supervisors responsibilities and issue this to all station personnel on an annual basis.

The Security Department has also had a reorganization. The Station Security Supervisor reports to the Director, Nuclear Security at the corporate office. The Station Security Supervisor continues to have communications with the Supervisor, Administrative Services at the Station.

In addition, there is a change to Technical Specification 6.10 which adds Technical Specifications 6.10.1i and 6.10.1j. The reason for the addition of Technical Specification 6.10.1i is because 10 CFR 50.54 (t) requires the retention of records for at least five years when the Station Emergency Plan and implementing procedures are audited annually. The reason for the addition of Technical Specification 6.10.1j is because 10 CFR 73.46g(6) requires the retention of records for at least five years when the Station Security Plan and implementing procedures are audited annually.

The proposed change to the referenced ANSI standard on Facility Staff Qualifications (Section 6.3) and Training (Section 6.4) reflects the ANS standard specified in Vepco's QA Topical Report, "Quality Assurance Program Operations Phase", Amendment 4, regarding Vepco's position on NRC Regulatory Guide 1.8 - "Personnel Qualification and Training". The QA Topical Report was

approved on October 6, 1982. Thus, the change amends the Technical Specifications to make them consistent with the NRC approved QA Topical Report. The specific change replaces ANSI N18.1-1971 with ANS 3.1-(12/79 Draft). ANS 3.1-(12/79 Draft) meets or exceeds the requirements of the older ANSI standard.

These proposed changes do not pose a significant hazards consideration as defined in the Federal Register, 48 FR 14870, Example (i); a purely administrative change to the technical specifications; for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.