

ATTACHMENT 3

PROPOSED ENVIRONMENTAL TECHNICAL SPECIFICATION CHANGE

NORTH ANNA UNITS 1 AND 2

8102260 461

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5.0 ADMINISTRATIVE CONTROLS

Administrative controls below apply to Appendix B Part I only.

5.1 Responsibility

The responsibility for implementing the Environmental Technical Specifications is assigned to the Manager-Nuclear Operations and Maintenance at the corporate level and to the Station Manager at the station level. The Superintendent - Operations shall be responsible for ensuring that the station is operated in accordance with the Limiting Conditions of Operation. The Station Supervisor - Health Physics shall be responsible for the radiological environmental surveillance requirements. The Executive Manager of Environmental Services shall be responsible for providing services which will fulfill the non-radiological environmental surveillance requirements.

5.2 Organization

The relationship between the Nuclear Operations Department and the Environmental Services Department is shown in Figure 5.2-1.

5.3 Review and Audit

5.3.1 Station Nuclear Safety and Operating Committee (SNSOC)

5.3.1.1 Function

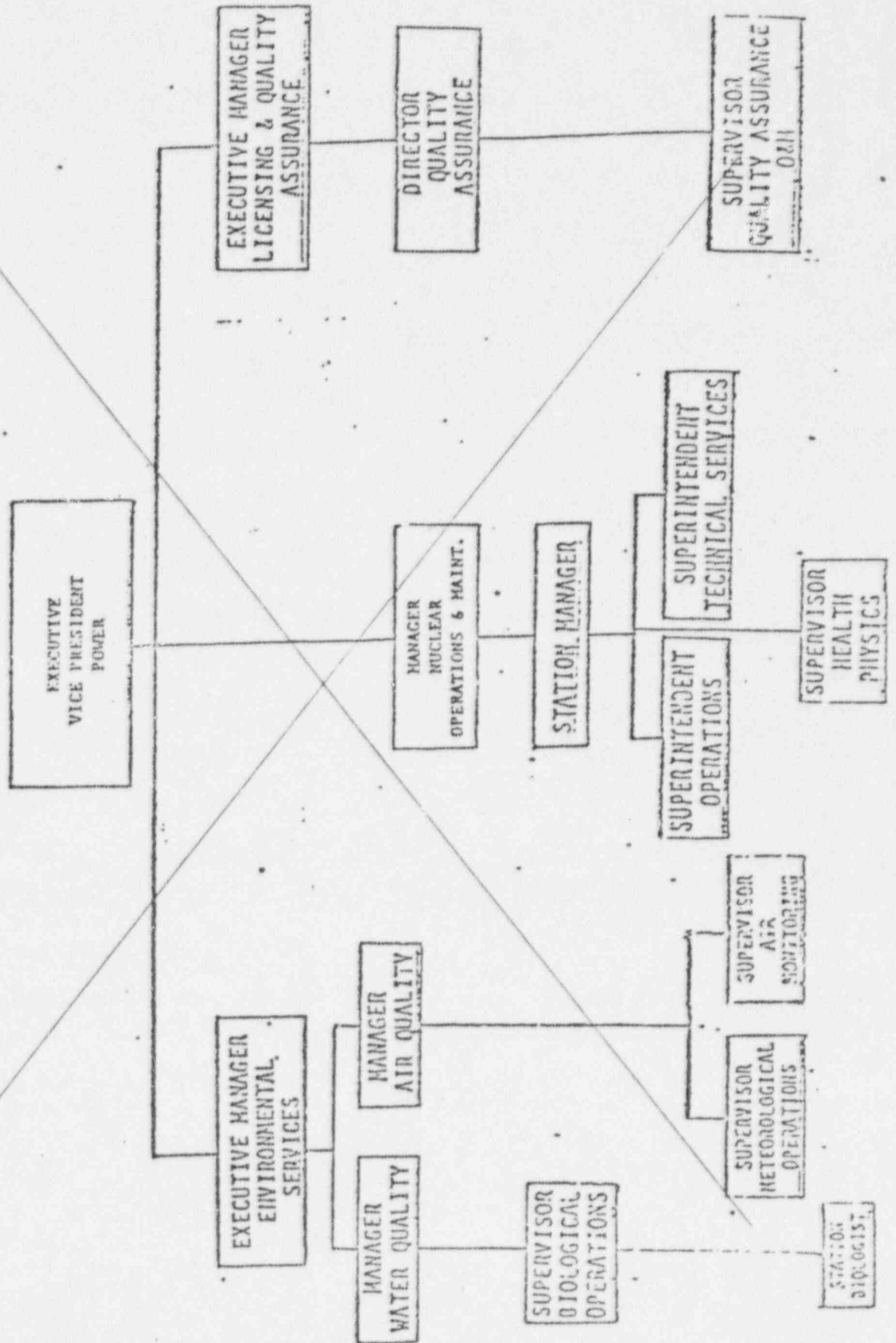
The SNSOC, as described in Section 6.5.1 of Appendix A of this license, shall function to advise the Station Manager on matters related to the environmental impact of the station. When the SNSOC is exercising its responsibility for non-radiological aspects of the ETS, the Station Biologist or his alternate shall be consulted.

5.3.1.2 Responsibility

The SNSOC shall be responsible for:

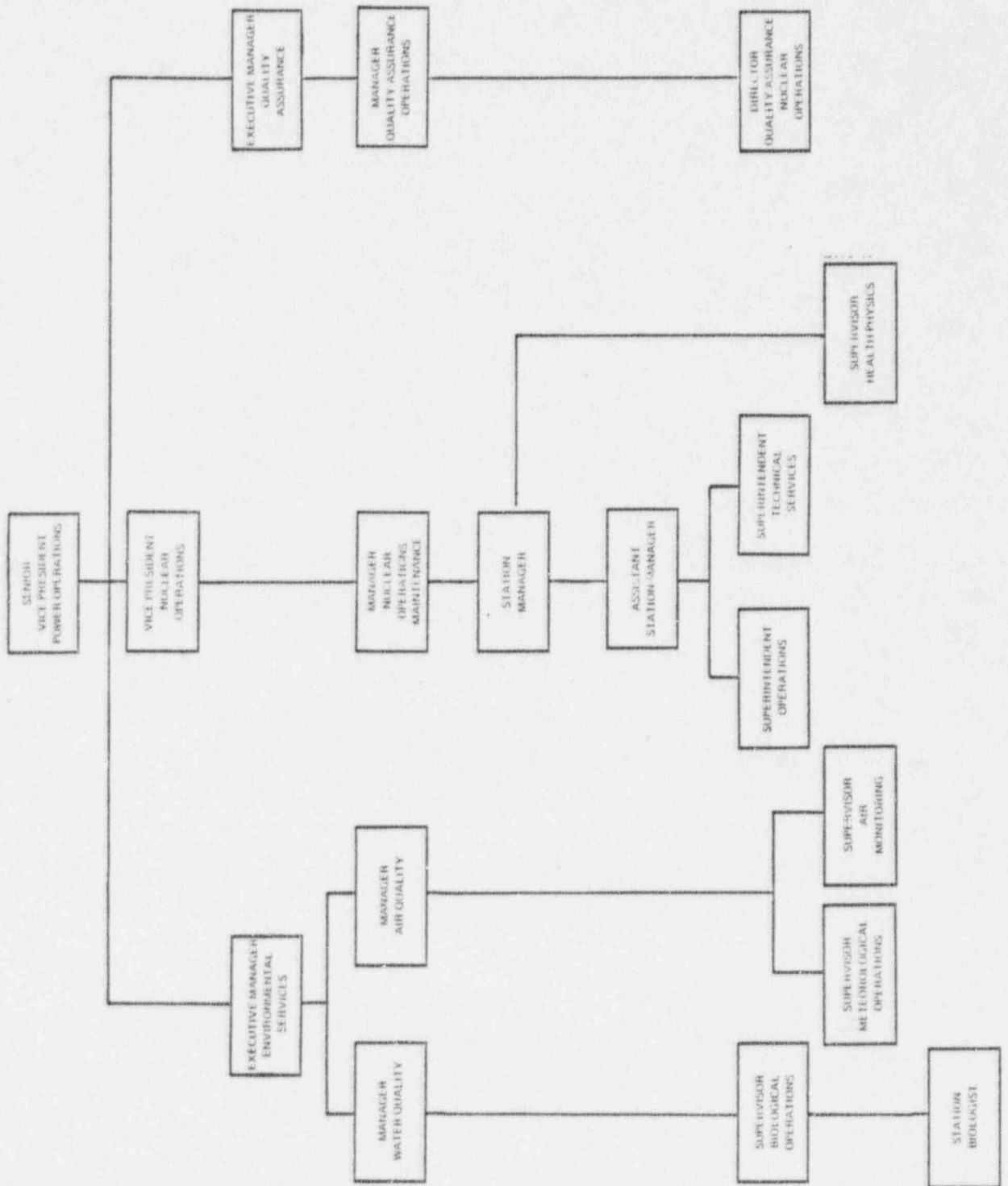
- a. Coordination of the Environmental Technical Specifications with the Safety Technical Specifications (Appendix A) to avoid conflicts and maintain consistency.
- b. Review of changes to the Environmental Technical Specifications and the evaluation of the environmental impact of the change.

Figure 5.2-1
 ORGANIZATION CHART
 ENVIRONMENTAL TECH SPEC IMPLEMENTATION



SEE ATTACHED PAGE

FIGURE 5.2-1
ORGANIZATION CHART
ENVIRONMENTAL TECH SPEC IMPLEMENTATION



- c. Review of proposed written procedures required by Sections 5.5.2 and 5.5.3 below and changes thereto, which affect the environmental impact of the station.
- d. Review of proposed changes to station systems to determine the environmental impact of the changes.
- e. Investigation of all reported instances of violation of the Environmental Technical Specifications; and where the investigation indicates, evaluation and formulation of recommendations to prevent recurrence.
- f. Review of environmental monitoring programs to detect potential or existing significant adverse environmental impacts that have not been evaluated, or that are significantly greater than that evaluated by the Commission.

5.3.1.3 Authority

The SNSOC shall:

- a. Review the environmental evaluation of all changes described in Section 5.3.1.2 a, b and c, above. When the evaluation indicates that such activity may result in a significant adverse environmental impact that was not evaluated, or that is significantly greater than that evaluated by the Commission, the SNSOC shall ensure that a written evaluation of such activities is provided to and prior approval is obtained from the Director of Nuclear Reactor Regulation for the activities.
- b. If the SNSOC determines that unexpected harmful effects or evidence of irreversible damage are occurring as a result of operation of the station, the SNSOC shall ensure that an acceptable analysis of the problem and a plan of action to eliminate or significantly reduce the harmful effects or damage is submitted to the Commission for review and approval.
- c. Review written reports prepared as a result of investigations and reviews conducted under 5.3.1.2 a, e and f.

5.3.1.4 Records

The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the ~~Chairman of the System Nuclear Safety and Operating Committee (SyNSOC)~~. Director - Safety Evaluation and Control.

5.3.2 ^{Quality Assurance Department}
~~Supervisor, Quality Assurance, Operations and Maintenance~~

5.3.2.1 Function

^{Quality Assurance Department}
The ~~Supervisor, Quality Assurance, Operations and Maintenance~~ shall perform independent audits of the implementation of the Environmental Technical Specifications.

5.3.2.2 Audits

The following audits shall be completed:

- a. The conformance of facility operation to provisions contained within these Environmental Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the facility staff involved in ensuring and monitoring compliance with these Environmental Technical Specifications 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 the environmental impact of the station at least once per 12 months.

5.3.2.3 Records

Provide a written report of the results of the audits required by 5.3.2.2 above to the SNSOC, the ~~SyNSOC~~, and the Station Manager.

5.3.3 ^{Safety, Evaluation and Control (SEC) Director - Safety Evaluation and Control,}
~~System Nuclear Safety and Operating Committee (SyNSOC)~~

5.3.3.1 Function

^{SEC}
The ~~SyNSOC~~ as described in Section 6.5.2 of Appendix A of this license, shall function to provide independent review of designated activities related to the environmental impact of the station.

5.3.3.2 Review

^{SEC}
The ~~SyNSOC~~ shall review and, where necessary, comment on the results of the reviews conducted by the SNSOC and the independent audits conducted by the ~~Supervisor, Quality Assurance, Operations and Maintenance.~~

^{Quality Assurance Department.}

5.3.3.3 Responsibility , through appropriate reviews,
SEC
The ~~SyNSOC~~ has the responsibility for ensuring that the station is operated in accordance with the requirements of this license and applicable NRC regulations.

5.3.3.4 Authority *Manager - Nuclear Technical Services*
Director - Safety Evaluation and Control
The ~~SyNSOC~~ shall report to and advise the ~~Executive Manager~~ ←
~~Licensing and Quality Assurance~~, who shall advise the ~~Executive~~ ←
~~Vice President Power~~ on those areas relating to the environmental impact of the station.
Vice President - Nuclear Operations

5.3.3.5 Records
~~The SyNSOC shall maintain written minutes of each meeting and a copy shall be provided to the committee members and the Executive Vice President Power on those areas relating to the environmental impact of the station.~~

SEE ATTACHED PAGE

5.4 State and Federal Permits and Certificates

None

5.5 Procedures

5.5.1 Written Procedures

Detailed written procedures, including applicable checklists and instructions, shall be prepared and followed for all activities involved in carrying out the Environmental Technical Specifications as defined in Sections 5.5.2, 5.5.3, and 5.5.4, below. Procedures shall include sampling, data recording and storage, instrument calibration, measurements and analyses, and actions to be taken when limits are approached or exceeded. Testing frequency of any alarm shall be included. These frequencies shall be determined from experience with similar instruments in similar environments and from manufacturer's technical manuals.

5.5.2 Operating Procedures

Plant standard operating procedures shall include provisions, in addition to the procedures specified in Section 5.5.1, to ensure that all plant systems and components are operated in compliance with the Limiting Conditions of Operations established as part of the Environmental Technical Specifications.

5.3.3.5

Records

Records of SEC activities relating to the environmental impact of the station shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

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

DISCUSSION OF
PROPOSED TECHNICAL SPECIFICATION CHANGE
NORTH ANNA POWER STATION

As a result of the management reorganization of April 1, 1980, changes to Section 6.0 ADMINISTRATIVE CONTROLS were required to reflect the organization of a Nuclear Operations and Maintenance Department and a Nuclear Technical Services Department. The April 1, 1980 management reorganization changes were approved for North Anna Unit No. 1 by the Staff and issued as Amendment No. 17. The April 1, 1980 management reorganization changes were approved and issued with the low-power operating license for North Anna Unit No. 2 on April 11, 1980. Changes were proposed to the April 1, 1980 organization changes in our license amendment request dated August 1, 1980 (Serial No. 678) to reflect the addition of an Assistant Station Manager to the Station organization. The above changes were further revised by our license amendment submittal dated August 28, 1980 (Serial No. 731), which proposes the implementation of an independent safety review group and the deletion of the existing System Nuclear Safety and Operating Committee. In order to provide the NRC Staff with a complete, consistent, and up-to-date package of proposed organization changes, the changes outlined above have been consolidated in a "master package" for submittal to the Staff. The "master package" also reflects changes to Section 6.0 resulting from the TMI Lessons Learned Category A changes previously submitted to the Staff for review in our license amendment request dated October 15, 1980 (Serial No. 845). The "master package" is discussed below.

Technical Specifications Figure 6.2-1 has been revised to show the new structure of the offsite organization for facility management and technical support. The previous positions of Senior Vice President-Power and Vice President-Power Supply and Production Operations have been deleted from the Technical Specifications. The deleted positions have been replaced by the Executive Vice President-Power, the Senior Vice President-Power Operations, and the Vice President-Nuclear Operations. All previous references to the Senior Vice President-Power and Vice President-Power Supply and Production Operations positions have been revised to reference either the Senior Vice President-Power Operations or the Vice President-Nuclear Operations positions.

As indicated by Figure 6.2-1, the Manager-Nuclear Operations and Maintenance and the Manager-Nuclear Technical Services replace the previous position of Director-Nuclear Operations. Both managers will report to the Vice President-Nuclear Operations. The Manager-Nuclear Operations and Maintenance has responsibility for the supervision of the Nuclear Station Managers in the operation and maintenance of the Company's operational nuclear units. Both Nuclear Station Managers and the Director-Operation and Maintenance Services report to the Manager-Nuclear Operations and Maintenance. The Director-Operation and Maintenance Services is responsible for coordinating operational and maintenance support with nuclear unit activities. The Section Supervisor-Training, the Section Supervisor-Operation and Maintenance Support, and the Section Supervisor - Administrative Services will report to the Director-Operation and Maintenance Services.

The Manager-Nuclear Technical Services has responsibility for technical services activities required to support the Company's operational nuclear units. Reporting to the Manager-Nuclear Technical Services are the Director-Chemistry and Health Physics, the Director-Technical Analysis and Control, and the Director-Safety Evaluation and Control. The Director-Chemistry and Health Physics will provide support to the nuclear stations in the areas of chemistry and health physics. The Director-Technical Analysis and Control is responsible for furnishing support for station design modifications and responses to NRC requirements. The Director-Safety Evaluation and Control, who is responsible for offsite safety review of nuclear power station operations, is discussed in greater detail below.

The August 28, 1980 submittal (Serial No. 731) proposed the transfer of the independent review responsibility from the existing System Nuclear Safety and Operating Committee (SyNSOC) to the Safety Evaluation and Control (SEC) staff and proposed the transfer of the System Nuclear Safety and Operating Committee audit responsibility to the Quality Assurance Department.

The Safety Evaluation and Control staff will be composed of a Director and a minimum of three staff members qualified to perform independent reviews. The Director-Safety Evaluation and Control will report to the Manager-Nuclear Technical Services, who will advise the Vice President-Nuclear Operations on the activities of the Safety Evaluation and Control staff. This organizational structure will assure that sufficient attention is directed towards examination and evaluation of safety concerns and that management is cognizant of the results of these Safety Evaluation and Control staff reviews.

The Safety Evaluation and Control staff will provide the independent reviews of station operational activities required by ANSI N18.7-1976/ANS 3.2 (Administrative Controls and Quality Assurance Program for Operational Nuclear Power Plants), which are presently provided by the System Nuclear Safety and Operating Committee. The advantages of this proposed change are threefold.

First, the Safety Evaluation and Control staff is composed of individuals with direct nuclear experience in their respective technical disciplines. Presently, Safety Evaluation and Control staff specialists meet or exceed the criteria proposed in Technical Specification 6.1.C.2.b. The proposed requirement in Specification 6.1.C.2.b exceeds the criteria for review "staff specialists" established in ANSI N18.1-1971/ANS 3.1-1978 (Standard For Selection and Training of Personnel for Nuclear Power Plants) and meets the present qualification position of the Commission. Additionally, the Director-Safety Evaluation and Control exceeds the criteria established by ANSI N18.1-1971/ANS 3.1-1978 for the Supervisor of an independent review staff. Future Safety Evaluation and Control staff members may not meet the qualification criteria for "staff specialists" positions; however, such individuals will not be directly responsible for the independent review function of Safety Evaluation and Control.

Secondly, the independent reviews of station operational activities by the Safety Evaluation and Control staff will be performed on a continuous basis as part of their routine responsibilities. This is in contrast to an intermittent or scheduled review committee approach; therefore, the Safety Evaluation and Control reviews will be responsive to station time constraints while also providing a more comprehensive review of items presently processed by the System Nuclear Safety and Operating Committee.

Finally, other Safety Evaluation and Control staff routine responsibilities require continuous review of industry-wide operational experience, technical information, and regulatory issues. This effort should maintain a high level of "state-of-the-art" expertise within Safety Evaluation and Control regarding operational activities and general industry concerns. It is anticipated that the Safety Evaluation and Control staff will provide the majority of the expertise necessary to perform independent review activities; however, technical consultants and in-house specialists will be utilized for special concerns when Safety Evaluation and Control review requires additional expertise.

As a result of this change, safety will be enhanced by the proposed transfer of independent review responsibilities from the System Nuclear Safety and Operating Committee to the Safety Evaluation and Control staff by upgrading the quality and timely processing of the independent reviews of station operational activities.

Specification 6.5.2.8 for North Anna Units No. 1 and No. 2 requires the performance of audits of station activities under the cognizance of the System Nuclear Safety and Operating Committee. As a result of this proposed change, the audit responsibilities outlined in Specification 6.5.3.1, which are presently being performed under the cognizance of the System Nuclear Safety and Operating Committee by the Quality Assurance Department, will be transferred to the Quality Assurance Department. Such a transfer will provide for appropriate organizational channels for the reporting of audit results, ensure the availability of appropriate technical expertise for the performance of these audits, and ensure that these audits are performed in an effective and timely manner.

NRC Staff comments received relating to the acceptability of the August 28, 1980 submittal were concerned with the sections (1) on the SEC staff composition and qualification requirements, (2) on the SEC staff meeting requirement (which was omitted from the August 28, 1980 submittal), and (3) on technical items to be reviewed by SEC. In order to address these NRC concerns, proposed changes are enclosed which incorporate (1) requirements for a monthly meeting of the SEC staff, (2) requirements for an academic degree and five years technical experience to qualify as a SEC staff specialist, (3) requirements for the review of the Quality Assurance Department audit program, and (4) revisions to the distribution of Quality Assurance Department audit reports.

As a result of the reorganization of the Licensing and Quality Assurance Department, the Licensing function has been transferred to Safety Evaluation and Control and the Quality Assurance organization has been restructured. The Executive Manager-Quality Assurance will be responsible for the quality assurance effort encompassing the areas of engineering, construction, and operational activities of both the fossil and the nuclear stations. He will also be responsible for the area of corporate emergency response planning and implementation. The Executive Manager-Quality Assurance will report to the Senior Vice President-Power Operations. The Manager-Quality Assurance, Operations will be responsible for implementing quality assurance programs which are related to the operational activities of the fossil and nuclear power

stations. He will report to the Executive Manager-Quality Assurance. The Director-Quality Assurance, Nuclear Operations will be responsible for the implementation of quality assurance programs which are related to the operational activities associated with the nuclear power stations. He will report to the Manager-Quality Assurance, Operations.

The organization charts for the North Anna Environmental Technical Specifications and the Appendix "A" Technical Specifications have been revised to reflect the restructuring of the Quality Assurance Department and changes to other organization titles. The previous title of Executive Manager-Licensing and Quality Assurance has been revised to Executive Manager-Quality Assurance. In addition, the positions of Manager-Quality Assurance, Operations and Director-Quality Assurance, Nuclear Operations are shown on the organization chart; however, those positions of the Quality Assurance Department which have no direct responsibility pertaining to the operation of the nuclear stations have not been shown on the Technical Specifications organization chart or referenced in the text of the Specifications.

Technical Specification Figure 6.2-2 has been revised to show the new structure of the North Anna Power Station organization. As explained above, the Station Manager reports to the Manager-Nuclear Operations and Maintenance. Our July 30, 1980 submittal (Serial No. 487) proposes revising Section 6.0 to add the new position of Assistant Station Manager to the North Anna Power Station organization. The Assistant Station Manager will be directly responsible for the safe operation and maintenance of the power station. He will serve in a coordinating capacity to the Station Manager for the off-site activities of the Station. During the absence of the Station Manager, the Assistant Manager will act as the Station Manager. The Assistant Station Manager will also be the Vice Chairman of the Station Nuclear Safety and Operating Committee (SNSOC). The Superintendent-Operations, the Superintendent-Maintenance, and the Superintendent-Technical Services will report to the Assistant Station Manager. All three of these superintendents will remain members of the SNSOC.

The positions of Operating Supervisor and Auxiliary Operator have been eliminated from the organization chart. In addition, the position title of Assistant Control Room Operator has been revised to Control Room Operator Trainee. The positions of Maintenance Coordinator and Mechanical Supervisor have been replaced on the station organization chart by the position of Supervisor-Mechanical Maintenance. Both the Maintenance Coordinator and the Mechanical Supervisor report to the Supervisor-Mechanical Maintenance. Other title changes made to the organization chart include the change of Supervisor-Safety Engineering to Engineering Supervisor (Safety Engineering), the change of Engineering Supervisor to Engineering Supervisors to reflect the two positions of Engineering Supervisor-Performance and Tests and Engineering Supervisor-Design Changes and Projects and, the change of Training Supervisor to Supervisor-Nuclear Training. The Supervisor-Health Physics position has been shifted so that he will now report directly to the Station Manager instead of reporting to the Superintendent-Technical Services. The positions of Supervisor-Nuclear Training and Supervisor-Administrative Services will also report to the Station Manager.

An appraisal of the North Anna health physics program was conducted by the NRC office of Inspection and Enforcement during the period of May 5-16, 1980. The results of this appraisal were forwarded in a letter to Mr. J. H. Ferguson dated September 15, 1980 (Serial No. 787). One of the NRC recommendations resulting from the program review is that the Supervisor-Health Physics be added as a member of the Station Nuclear Safety and Operating Committee (SNSOC). The Supervisor-Health Physics was previously a member of the SNSOC; however, as a result of an Amendment for North Anna Unit 1, he was deleted. In order to address this concern, the proposed change is to reinstate the Supervisor-Health Physics as a member of the SNSOC. Since many operations at the station involve the health physics group in some capacity, the addition of the Supervisor-Health Physics will improve the quality of SNSOC reviews by adequately appraising the impact of radiation safety on station activities.

The proposed Technical Specification Changes to incorporate TMI-2 Lessons Learned Category A changes, which were submitted by our letter dated October 15, 1980 (Serial No. 845), are reflected in the attached pages. These changes revised the format of the minimum shift crew manning table and incorporated revisions to the sections on training and facility staff training.