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Docket No. 50-231

General Electric Company ATTN: Dr. Karl Cohen, General Manager Breeder Reactor Development Operation 310 DeGuigne Drive Sunnyvale, California 94086

Gentlemen:

DISTRIBUTION W. Dooly, DR R. Engelken, CO (2) H. Shapar, OGC N. Dube, DRL (5) J. Buchanan, ORNL T. Laughlin, DTIE PDK __Docket File DRL Reading Branch Reading ACRS (3) R. Boyd R. DeYoung E. Scheme D. Skovholt, A. Brauner R. Vollmer, R. Woodruff Change No. 8 S. Teets

License No. DR-15

By letter dated October 8, 1971, you submitted Proposed Change No. 7 to the Technical Specifications appended to Provisional Operating License No. DR-15 for the Southwest Experimental Fast Oxide Reactor. The proposed change would modify the Technical Specifications to reflect the organization changes in the SEFOR management structure and interrelated site supervisory responsibilities.

During our review of the proposed change, we informed your staff that certain modifications to your request were necessary to meet our regulatory requirements. These modifications have been made. We conclude that the proposed change, as modified, does not present significant hazards considerations not described or implicit in the Safety Analysis Report and that there is reasonable assurance that the health and safety of the public will not be endangered.

Accordingly, pursuant to 10 CFR 50.59, changes to the Technical Specifications appended to Provisional Operating License No. DR-15 are hereby authorized as indicated by margin bars on replacement pages 4.9-1 through 4.9-5, 6.1-1 through 6.1-10, 6.2-1, 6.2-2, 6.3-1, 6.3-2 and 6.4-1 in Attachment A to this letter.

Sincerely.

BeastdAJ. Sketholti ... Assistant Director for Reactor Operations Division of Reactor Licensing

Enclosure: Attachment A - Change to Technical Specifications

cc: Paul B. Van Buren, Attorney General Electric Company 175 Curtner Avenue San Jose, California DRL DRL OFFICE . 120 R. Schemel SURNAME . 11/11 /71 11/8/71 DATE U.S. GOVERNMENT PRINTING OFFICE : 1989-- O-354-598

Form AEC-318 (Rev. 9-53)



ATOMIC ENERGY COMMISSION

WASHINGTON, D.C. 20545

November 12, 1971

Docket No. 50-231

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Breeder Reactor Development Operation
310 DeGuigne Drive
Sunnyvale, California 94086

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Sincerely,

Donald J Skovholt

Assistant Director for Reactor Operations

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Division of Reactor Licensing

Enclosure:
Attachment A - Change to
Technical Specifications

General Electric Company
175 Curtner Avenue
San Jose, California 95125

ATTACHMENT A

CHANGE NO. 8 TO THE TECHNICAL SPECIFICATIONS

PROVISIONAL OPERATING LICENSE NO. DR-15

GENERAL ELECTRIC COMPANY

DOCKET NO. 50-231

4.9 Unexplained Reactor Buhavior

Applicability

Applies to unanticipated changes in reactor process and nuclear variables during operation.

Objective

To assure that reactor characteristics are properly interpreted and sufficiently understood for safe operation and safe conduct of the experimental program.

Specification

A. Long-term Unexplained Trends

in addition to the more frequently taken records, records shall be . kept of observations made at least once daily of main and auxiliary sodium flow for given pump conditions and the concurrent reactor sodium inlet and outlet temperatures, reflector segment positions. gross gamma activity in the reactor cover gas, and the reactor operating power. These records shall be examined daily during periods of reactor operation for short-term changes and analyzed in detail at least monthly to determine if there are any unexpected trends of significance which might indicate a change in reactor or component . performance. Any unexpected trends which are observed shall be reviewed by the Site Safety Committee. Reactor operation at a higher power level shall not take place unless identified long-term trends are satisfactorily explained, or the Site Safety Committee concludes that the long-term trends observed do not indicate a deterioration of performance which could affect plant safety during the next planned period of operation. The conclusions of the Site Safety Committee shall be documented and transmitted to the SEFOR Safety Review Committee and the General Marager, BRD, immediately after their concinsions are reached. In the event that there is no satisfactory explanation of long-term trends, independent evaluation by members of the Safety Review Committee shall be obtained within one month after identification of the trend. The General Manager, BRD, upon advice of his technical staff, the SEFOR Site Safety Committee, and the Safety Review Committee shall make a datermination of the future mode of operation of the reactor. These determinations and the supporting documentation shall be transmitted within one week to the DRL.

Change No 128 1971

B. Short-Term Unexplained Trends

1. Verification that reactor parameters meet the requirements of paragraph 3.13. A shall be obtained at each planned stable condition of reactor operation and at least once per shift when stable operating conditions are maintained. If such verification is not obtained, reactor power shall be reduced to a level of no more than 50% of that at which the failure to meet limits was observed. The SEFOR Site Manager shall be notified immediately. Reactor power shall not be increased unless the cause of the change has been determined. If the cause is not immediately apparent, the SEFOR Site Manager shall determine whether operation at reduced power may continue or whether the reactor should be shut down. As soon as practical, he shall call a meeting of the Site Safety Committee which shall investigate the unexplained occurrence and recommend further action. If the cause of the occurrence is not identified or if it is determined that there is a potential safety problem, resumption of operation at the initial power level where the change was observed shall not be permitted until a report has been made to the General Manager of BRD and an investigation has been conducted by members of the BRD technical staff. The General Manager, BBD, may authorize higher power operation of SEFOR upon evaluation of the reports of his technical staff and the Site Safety Committee. Upon such authorization, a report of his decision and supporting documentation shall be forwarded to the DRL within one week. If operation is resumed, the conclusions of the Site Safety Committee

> 4.9-2 Change No. 8 November 12, 1971

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- and the BED technical staff shall be documented and circulated to the SEFOR Safety Review Committee and their independent evaluation shall be obtained within one week of the resumption of operation.
- 2. If cover gas activity increases are apparently associated with unexplained reactivity changes of measurable magnitude, the reactor shall be immediately shut down to investigate the cause. If it is confirmed that the reactor cover gas activity increase and reactivity change are related, reactor operations shall not be resumed until authorized by the General Manager of SED as discussed in 1. above.
- 3. If there is positive indication that cladding failure has occurred, the reactor shall be shut down for examination of all fuel rods which are accessible by means of through-head ports. The reactor may be started up if defective fuel rods, as defined in Specification 3.3.K, are located and removed. If, after examination of all fuel rods located under through-head ports, defective fuel rods are not located, the reactor may be started up if, in the judgment of the Site Manager, it is safe to proceed.
- 4. In conjunction with fuel rod examinations for the purpose of locating failed fuel, at least two sodium samples shall be obtained from the reactor vessel. One sodium sample shall be kept for an archive sample, and smother shall be examined for evidence of defective fuel.

4.9-3 Change No. 8 November 27, 1971

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The direct responsibility for safe operation of SEFOR on a day-to-day basis is vested in the . Site Manager and his staff. Although general review and evaluation of SEFOR operations and the performance of the SEFOR operating staff will be made by the Safety Review Committee, the BRD General Manager and his staff, and the DRL, this observation is not continuous on a day-to-day basis, and, unless gross and serious errors and conditions exist, is largely in the nature of an advisory function. To have it otherwise leads to the danger of very inefficient operation and, more seriously, might tend to reduce safety by diluting the responsibility of the Site Manager and his staff. The present specification is intended to preserve this responsibility while at the same time, under special circumstances which might have serious safety implications, to assure that independent reviews are made by competent individuals who are not directly involved in the day-to-day operation of the reactor. In the case of anomalous behavior of the reactor, it is believed that evaluation by technically qualified individuals who are not involved with the day-to-day operation may provide additional perspective to the situation and may point up potential problems, which are not evident to those involved in the reactor operation.

In the case of anomalous behavior occurring over a long period of time, basic responsibility for determining whether continued operation is safe is vested in the SEFOR Site Manager and the Site Safety Committee with the independent reviews to be made by the Safety Review Committee and the BRD General Manager and his staff. The potentially more serious situation is anomalous behavior that occurs over a short period of time. In this case, basic responsibility for return to power level at which the behavior was observed is vested in the BRD General Manager, who has at his disposal the services of a staff of over 200 nuclear energy specialists, including the designers of the SEFOR reactor. He is able to marshall this technical capability on short notice and thus can render decisions, based on detailed technical avaluation by the most qualified individuals who will perform this work in a competent and expeditious manner. He will have the benefit of the judgment of the SEFOR Site Manager and his technical staff. Additional evaluation for the benefit of the General Manager will be forthcoming at a later date from the SEFOR Safety Review Committee, also composed of highly competent technical individuals who are distributed throughout various components of the General Electric Company other than BRD. 4.9-4

> Change No. 8 November 12, 1971

Short-term unexplained variations in process variables called out in the specification are not in themselves an indication that an unsafe reactor condition exists; however, they may be symptomatic of potential safety problems of a serious nature. The Site Manager is charged with the responsibility of determining whether other conditions that occur should be defined as short-term (or long-term) unexplained behavior.

The actions of the SEFOR Site Safety Committee and the Safety Review Committee in the case of unexplained reactor behavior are consistent with their responsibilities as given in Section 6 of these technical specifications.

Section 6 describes the composition of these committees.

4.9-5 Change No. 8 November 12, 1971

Section 6

ADMINISTRATIVE CONTROLS

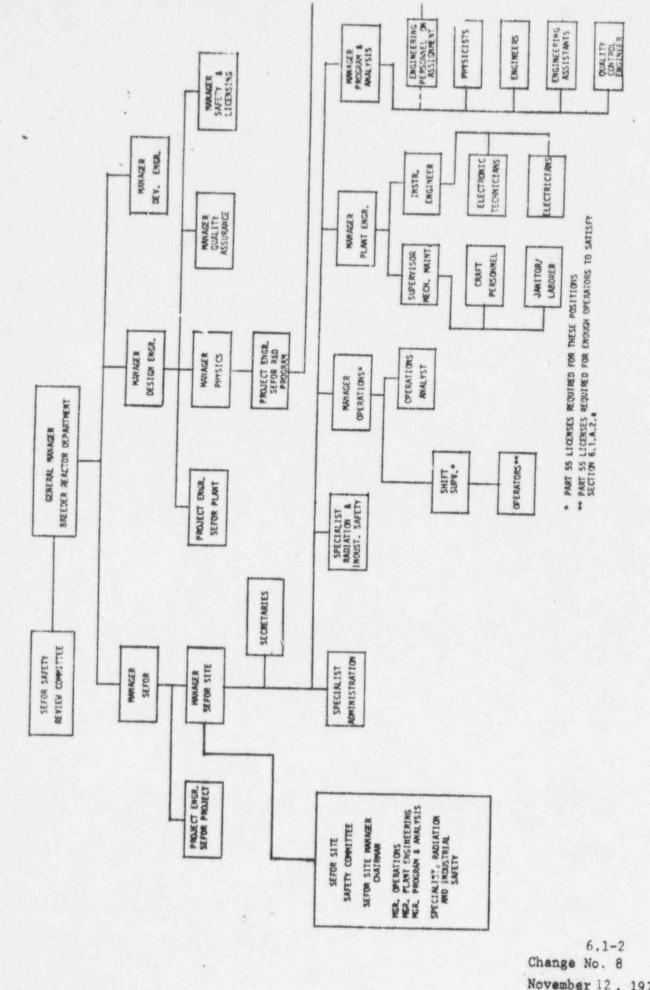
6.1 Organization, Review, and Audit

This specification applies to the organization for management and for review and audit of facility operations. Its objective is to delineate responsibility for management of the facility, to assure maintenance of a high level of staff competence, and to specify an independent program for review and audit of facility operation.

A. Organization

- 1. The organization for management, operation, and audit of SEFOR facility operations shall be as given in Figure 6-1. The overall full-time responsibility for operation of the SEFOR facility and compliance with these Technical Specifications shall reside in the SEFOR Site Manager. The Site Manager reports to the Manager, SEFOR, who in turn is responsible directly to the BRD General Manager. The BRD General Manager reports to the Nuclear Energy Division General Manager. As indicated in Figure 6-1, technical engineering assistance will be provided as necessary through the BRD Manager of Design Engineering.
- 2. The minimum functional organization required for operation of the facility shall be as follows:
 - a. An operating shift shall consist of a shift supervisor and at least three additional operators. At least one of the operators shall be licensed.
 - b. When the reactor is secured, a licensed reactor operator and two additional persons trained in carrying out emergency procedures shall be at the site.
 - c. A shift supervisor shall be in charge of startup, approach to power, normal operation, recovery from unplanned or unscheduled reductions in power, shutdown, handling or transferring of materials in the reactor vessel, and during any handling operations within the refueling cell when the reactor vessel head or ports have been removed.

6.1-1 Change No. 8 November 12, 1971



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- d. Personnel requiring Part 55 licenses shall be as indicated , in Figure 6-1.
- 3. Qualifications with regard to education and operating experience for key supervisory personnel shall be as follows:

a. Manager, SEFOR Site

B.S. in Engineering or Science or equivalent in experience. Seven years experience in the design, construction, installation, operation, development, and maintenance of nuclear facilities.

Demonstrated detailed and comprehensive knowledge in related technical fields, including reactor physics, radiological hazards control, nuclear engineering and instrument engineering.

Five years experience, or one year experience at SEFOR plus two years experience elsewhere, in the supervision and management of the construction and operation of reactor facilities. Demonstrated ability to plan, organize, and direct reactor plant operations.

b. Manager, Plant Engineering

B.S. in Engineering or Science, or equivalent in experience. Five years experience or equivalent in the operation and maintenance of power-generation facilities, including a minimum of one year in responsible supervisory positions in the operation or maintenance of such facilities, and one year of nuclear plant experience. Ability to plan, program, and direct activities of engineering and craft personnel.

Demonstrated ability in the design and application of equipment and devices, with a thorough understanding of process equipment such as pumps, fans, heat exchangers and generators, heaters, etc., as applicable to nuclear facilities.

c. Manager, Operations

B.S. in Engineering or Science or equivalent in experience. Five years experience in the operation and maintenance of reactor or nuclear power facilities, including minimum of one year in supervisory positions in the operation and maintenance of such facilities.

Demonstrated ability to organize and coordinate plant operations. Comprehensive knowledge of problems associated with startup and initial operation of reactor facilities, including knowledge of radiological hazards, technical aspects of reactor operation of control systems, radiation shielding, contamination control, etc. Demonstrated good judgment necessary to make correct decisions under rapidly changing conditions. Licensed as a Senior Reactor Operator.

d. Manager, Programs and Analysis

B.S. in Engineering or Science or equivalent in experience. Five years experience in the design, operation, analysis and programming of a variety of reactor types or nuclear power facilities, including at least one year in responsible supervisory position in such organizations.

Comprehensive knowledge of reactor physics, reactor design, reactor operation, radiation shielding, fluid flow, thermodynamics, instrumentation, and related technologies.

Demonstrated capability for directing the efforts of physicists and engineers.

Ability to develop techniques and test procedures to carry out a reactor experimental program.

Demonstrated knowledge of the practical aspects of the operation of reactors, including their characteristics, limitations, and safe operating requirements.

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e. Specialist, Radiation and Industrial Safety

B.S. in Engineering or Science or equivalent in experience. Three years experience in analytical chemistry or radio-chemistry and health physics, including one year of experience in radiation protection.

Demonstrated ability in evaluation of radiation hazards, design and development of radiation monitoring equipment, and in conducting health-physics studies.

Thorough understanding of radiation dosimetry and a working knowledge of design of radiation facilities, shielding calculations and design of ventilation control, radioactive waste processing, calibration of radiation measuring instrumentation, maximum permissible radiation exposure levels, and good radiological safety and health protection practices. Must be cognizant of local and state industrial safety requirements. Demonstrated ability in teaching, lecturing, and implementing safe practices and procedures.

f. Supervisor, Mechanical Maintenance

B.S. in Engineering or Science, or equivalent in experience with a high school education and apprenticeship training.

Five years of experience with power generating equipment, including one year of nuclear experience and one year of experience as a supervisor in the maintenance of associated equipment for reactors or power generating equipment.

Familiarity with non-destructive testing, and understanding of pressure vessel and piping codes.

Knowledge of craft techniques and mechanical maintenance procedures applicable to nuclear facilities.

Cognizance of radiation and safety procedures and regulations as applicable to nuclear facilities.

8. Instrumentation Engineer

B.S. in Engineering or Science, or equivalent in experience. Three years experience in design, installation, calibration and maintenance of process instrumentation, including a

> 6.1-5 Change No. 8 Movember 12, 197

minimum of one year of nuclear instrumentation experience and an understanding of electrical codes. Cognizance of significance of control and instrumentation systems with respect to reactor operation and safety. Demonstrated ability to analyze systems for adequacy to meet system requirements and to conceive, assemble, and install necessary modifications to meet systems requirements.

h. Shift Supervisor

B.S. in Engineering or Science, or equivalent in experience.
Three years experience in the operation of reactor or nuclear facilities.

Knowledge of reactor startup methods and procedures, including radiological hazards and their control, plant maintenance, modern physics and other technical aspects of reactor facilities. Ability to plan, coordinate, and direct the efforts of operations personnel as indicated by previous supervisory experience or satisfactory progression in job positions.

Licensed as a Senior Reactor Operator.

B. Review and Audit

Organizational units for the review and audit of plant operations shall be constituted and have the responsibilities and authorities outlined below:

1. SEFOR Site Safety Committee

a. Membership

Chairman: Site Manager or designated alternate.

Manager, Operations or designated alternate.

Manager, Plant Engineering or designated alternate.

Manager, Program and Analysis or designated alternate.

Specialist, Radiation and Industrial Safety or designated alternate.

b. Meeting Frequency

At least every two weeks and more often as deemed necessary by the Chairman.

c. Ouorum

Chairman or his designated alternate, plus two other members.

d. Responsibilities

- (1) Review all proposed normal, abnormal, emergency procedures, and procedures for maintenance which are significant to reactor safety and proposed changes to these procedures.
- (2) Review all proposed tests for the planned experimental program, and plant tests which may have significance to reactor safety.
- (3) Review proposed changes to Technical Specifications.
- (4) Review proposed changes and modifications to plant systems or equipment which would require a change in, or would be covered by procedures in d(1) above.
- (5) Review plant operation to detect potential safety hazards
- (6) Review reported violations of Technical Specifications.
- (7) Perform special reviews and investigations and make recommendations thereon as requested by the SEFOR <u>Site Manager</u>.
- (8) Report to the Manager SEFOR and to the Chairman of the SEFOR Safety Review Committee on all reviews and investigation conducted under items d(6) and d(7) above.
- (9) Make tentative determinations regarding whether proposals considered by the committee involve unreviewed safety questions in accordance with 10 CFR 50.59 and recommend the necessary actions or safety analyses to the <u>Site Manager</u>.

e. Authority

- (1) The SEFOR Site Safety Committee shall be advisory to the Site Manager.
- (2) The SEFOR Site Safety Committee shall review and recommend to the <u>Site Managar approval</u> or disapproval. of proposals under items d(1) through d(5) above.
 - a. In the event of disagreement between the recommendations of the SEFOR Site Safety Committee and actions

contemplated by the Site Manager on safety matters, the decision and action to be taken shall be the responsibility of the Site Manager.

f. Records

Minutes shall be kept for all meetings of the SEFOR Site Safety Committee. Copies of the minutes shall be forwarded to the Manager, SEFOR the Chairman of the SEFOR Safety Review Committee, and to the Manager, Safety and Licensing.

g. Procedures

Committee rules and regulations shall be prepared and maintained describing the function of the committee, its meeting schedule, methods for review and approval of evaluations and recommendations, or designation of meetings and such other matters as may be appropriate.

2. SEFOR Safety Review Committee

a. Membership

- (1) Chairman plus five members appointed by the BRD General Manager.
- (2) Manager, Nuclear Safety Appraisal Operation, Nuclear Energy Division, ex-officio member in addition to the appointees in (1) above.
- (3) Technical consultants as deemed necessary by the BRD General Manager.
- (4) Members of the SEFOR Site Operation (Figure 6-1) shall not serve as members of the Safety Review Committee.
- (5) Qualifications of the Safety Review Committee with regard to the combined experience and technical specialties of the individual members shall be maintained at a high level. The Committee as a whole shall have competence in nuclear reactor technology encompassing the basic disciplines of chemistry, physics, engineering, and also safety and health physics. The minimum qualifications

6.1-8 Change No.8 November 12, 1971 for membership of this Committee shall be determined by the BRD General Manager. The membership of this Committee shall be selected by the BRD General Manager with the advice and concurrence of the Manager, Nuclear Safety Appraisal Operation, Nuclear Energy Division. The performance of this committee shall be reviewed periodically by both the BRD General Manager and the Manager, Nuclear Safety Appraisal Operation. Deterioration in its performance shall be avoided by replacement of individuals or a reconstitution of the committee, if necessary, at the discretion of the BRD General Manager. Replacement shall be made from the manpower resources of the General Electric Company as a whole.

b. Meeting Frequency

Semi-annually and as required on call of the Chairman or the BRD General Manager. During the first year of operation, the committee shall meet at least three times.

c. Quorum

Chairman or his delegated alternate plus three members.

d. Responsibilities

- Review proposed changes to the Operating License, including Technical Specifications.
- (2) Review matters including proposed changes or modifications to plant systems or equipment as referred to it by the SEFOR Site Safety Committee or by the Site Manager and review decisions with regard to unreviewed safety questions.
- (3) Audit proposed changes to procedures, tests, experiments, and review those changes which may have safety significance.
- (4) Review reports, minutes, and results of audit inspections and select for review specific items which may have safety implications.
- (5) Conduct, or have conducted by a qualified group, audits of plant operation at least semi-annually to assure that emergency procedures are up-to-date and to assure compliance with Operating Procedures and Technical Specifications.

6.1-9 Change No. 8 November 12, 1971

- (6) Review reported instances of violations of Technical Specifications and recommend to the BRD General Manager appropriate action to prevent recurrence of the violations.
- (7) Review instances of significant equipment malfunctions which are of an unusual or unexpected type, and perform other special reviews and investigations as requested by the BRD General Manager.

e. Authority

The function of the SEFOR Safety Review Committee shall be advisory, and it shall report directly to the BRD General Manager.

f. Records

A report on each meeting of the SEFOR Safety Review Committee shall be prepared and forwarded to the RRD General Manager and to such others as the Chairman or the BRD General Manager may designate. This report shall contain the findings and recommendations resulting from each meeting. The BRD General Manager shall have documented, within a reasonable period following the receipt of the report, the actions taken on the recommendations. Copies of this response shall be forwarded to the Chairman and members of the SEFOR Safety Review Committee.

g. Procedures

Procedures for committee operation shall be established by the Chairman of the committee and the BRD General Manager.

The BRD General Manager shall review periodically the performance of the committee to assure an independent and comprehensive review of facility operation.

6.2 Plant Operating and Emergency Procedures

- A. Detailed written procedures and instructions with check-off lists, approved by the SEFOR Site Manager, shall be provided and used for the following conditions:
 - Refueling and refueling cell operations, normal startup, operation, and shutdown of the complete facility and of all systems and components involving nuclear and radiological safety of the facility.
 - 2. All program tests and experiments.
 - Emergency conditions involving possible or actual releases of radioactive materials.
 - 4. Preventive or corrective operations that could have an effect on reactor safety or affect nuclear or radiological safety.
- B. Temporary operating procedures which do not decrease plant safety margins, may be used after review by the Manager, Program and Analysis, and approval by the Manager, Operations. Use of these procedures shall be documented in the operating records.
- C. Modifications to experimental test procedures, which do not change the original intent or add to the scope of the test, and which do not reduce safety margins may be made with the approval of the Manager, Program and Analysis. Such changes shall be documented in the operating records.
- D. Provisional test procedures which are complementary to experimental test procedures or that are of a diagnostic nature, and do not reduce plant safety margins, may be used after review by the Manager, Operations and approval by the Manager, Program and Analysis. Such procedures shall be documented in the operating records.
- E. Radiation control procedures shall be established and all station personnel shall be instructed in these procedures. These procedures shall show the permissible radiation exposure levels and methods for control of radiation exposure.

The radiation protection program shall be organized to meet the requirements of 10 CFR 20 with the following exception: (1)

6.2-1 Change No. 8 November 12, 1971 Paragraph 20.203 - caution signs, labels and signals. In lieu of the "control device" or the "conspicuous visible or audible alarm signal" specified in paragraph 20.203 (c) (2), each High Radiation Area in which the intensity of radiation is 100mREM/hr or more shall be barricaded and physically posted as a High Radiation Area. Entrance thereto shall be controlled by requiring a special work permit and any individual or group of individuals permitted to enter such an area shall be provided with a radiation monitoring device which continuously indicates the radiation dose in the area.

In addition to the above requirement, any high radiation area in which the intensity of radiation is greater than 1000 mREM/hr, shall be provided with locked doors to prevent entry into such areas by unauthorized personnel. The keys to these doors shall be kept under the administrative control of the shift supervisor and the Manager, Operations.

F. Practice drills on Emergency Procedures shall be conducted prior to initial criticality and at least annually thereafter. Such drills shall include as a minimum, partial or complete evacuation of the site and a test of the adequacy of communications with off-site support groups.

Reference

⁽¹⁾ Letter to Dr. Peter A. Morris, U.S.A.E.C., Division of Reactor Licensing from Karl Cohen, BRDO, General Electric Company dated February 28, 1969.

6.3 Action to Be Taken in the Event of an Abnormal Occurrence

A. Limitary Safety System Setting

- If a limiting safety system setting is violated without causing a reactor scram or other safety system action, the reactor shall be shut down immediately, and the occurrence shall be reported promptly to the Manager, SEPOR Site.
- 2. A thorough investigation of the conditions related to the occurrence shall be made by the Site Safety Committee. The Committee shall prepare a report for each such occurrence, including an evaluation of the cause of the occurrence and recommendations for appropriate actions to prevent or reduce the probability of recurrence. Copies of this report shall be forwarded to the Manager, SEFOR.
- 3. The DRL shall be promptly notified of the occurrence.
- 4. Reactor operations may be resumed after corrective action has been taken to prevent recurrence of the situation, provided such operation is recommended by the Site Safety Committee.

B. Limiting Conditions for Operation

- If during operation, the limiting conditions for operation specified in Section 3 of these Technical Specifications are not met, the reactor shall be shut down.
- 2. The Site Safety Committee shall review the occurrence and ascertain that corrective measures are taken to prevent or minimize the probability of recurrence of the event. The committee shall prepare a report documenting its evaluation of the event and its recommendations and forward the report to the Manager.

 SEFOR.
- 3. If a violation of the limiting conditions for operation causes a reactor shutdown, the DRL shall be notified by means of the quarterly operations report. This report shall include the circumstances of the abnormal occurrence and the remedial actions taken.
- 4. Reactor operations may be resumed when remedial actions have been taken and the limiting conditions for operation are met.

C. Component Failures and Deterioration of Fission Product Barriers

- 1. If component failures should occur which threaten the operability of an engineered safety system or if abnormal deterioration should be discovered which could threaten the integrity of one of the barriers to the release of fission products, the reactor shall be shut down.
- 2. The Site Safety Committee shall review the occurrence and ascertain that corrective measures are taken before reactor operations are resumed. The Committee shall prepare a report documenting the occurrence and the basis for any action it recommends and forward the report to the Manager, SEFOR.
- The DRL shall be notified of the occurrence as required by the license and by means of the Quarterly Operations Report. This report shall identify the circumstances and the remedial action taken.

D. Administrative and Procedural Controls

- Should inadequacies in administrative or procedural controls
 he disclosed during the course of facility operations which
 create or could lead to an unsafe condition, immediate action
 shall be taken to put the affected portion of the plant in the
 safest possible condition.
- 2. The Site Safety Committee shall review the deficiencies and assure that corrective measures are taken before normal operations are resumed. The Committee shall prepare a report of the circumstances and action taken and forward the report to the Manager SEFOR.
- The DRL s'all be notified by means of the Quarterly Operations Report.

6.4 Action to Be Taken if a Safety Limit is Exceeded

If a safety limit is exceeded, the reactor shall be shut down immediately. Reactor operations shall not be resumed until authorized by the DRL. An immediate report shall be made to the Manager, SEFOR and to the DRL. A complete analysis of the circumstances leading up to and resulting from the situation, together with a recommendation to prevent a recurrence shall be prepared by the SEFOR Site Safety Committee. This report shall be submitted to the Manager, SEFOR, and the Chairman, SEFOR Safety Review Committee for review and action. Appropriate analyses and reports, verbal and written, shall be submitted to the DRL.