

The Vice President of each division within GPU Nuclear Corporation as indicated in Figure 6-1, shall be responsible for ensuring the preparation, review, and approval of documents required by the activities described in 6.5.1.1 through 6.5.1.5 within his functional area of responsibility as assigned in the GPUN Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above.

ACTIVITIES

- 6.5.1.1 Each procedure required by Technical Specification 6.8 and other procedures which affect nuclear safety, and substantive changes thereto, shall be prepared by a designated individual(s)/group knowledgeable in the area affected by the procedure. Each such procedure, and substantive changes thereto, shall be reviewed for adequacy by an individual(s)/group other than the preparer, but who may be from the same organization as the individual who prepared the procedure or change.
- 6.5.1.2 Proposed changes to the Appendix "A" Technical Specifications shall be reviewed by a knowledgeable individual(s)/group other than the individual(s) group who prepared the change.
- 6.5.1.3 Proposed modifications that affect nuclear safety to unit structures, systems and components shall be designed by an individual/organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification but may be from the same division as the individual who designed the modification.
- 6.5.1.4 Proposed tests and experiments that affect nuclear safety shall be reviewed by a knowledgeable individual(s)/group other than the preparer but who may be from the same division as the individual who prepared the tests and experiments.
- 6.5.1.5 Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, shall be reviewed by a knowledgeable individual(s)/group other than the individual/group which performed the investigation.
- 6.5.1.6 All REPORTABLE EVENTS shall be reviewed by an individual/group other than the individual/group which prepared the report.
- 6.5.1.7 Special reviews, investigations or analyses and reports thereon as requested by the Vice President TMI-1 shall be performed by a knowledgeable individual(s)/group.
- 6.5.1.8 The Security Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/

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6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the items referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Surveillance and test activities of equipment that affects nuclear safety and radioactive waste management equipment.
- c. Refueling Operations.
- d. Security Plan Implementation.
- e. Fire Protection Program Implementation.
- f. Emergency Plan 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 4.15.
- j. Plant Staff Overtime, to limit the amount worked by staff performing safety-related functions in accordance with NRC Policy Statement on working hours (Generic Letter No. 82-12).

6.8.2 Further, each procedure required by 6.8.1 above, and substantive changes thereto, shall be reviewed and approved as described in 6.5.1 prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

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 GPUNC Management Staff qualified in accordance with 6.5.1.14 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision holding a Senior Reactor Operator's License on the unit.
- c. The change is documented, reviewed and approved as described in 6.5.1 within 14 days of implementation.

The Radioactive Effluent Release Reports shall include the following information for each type of solid waste shipped offsite during the report period:

- a. container volume,
- b. total curie quantity (specify whether determined by measurement or estimate),
- c. principal radionuclides (specify whether determined by measurement or estimate),
- d. type of waste (e.g., spent resin, compacted dry waste, evaporator bottoms),
- e. type of container (e.g., LSA, Type A, Type B, Large Quantity) and
- f. solidification agent (e.g., cement, urea formaldehyde).

The Radioactive Effluent Release Reports shall include a summary of unplanned releases from the site to unrestricted areas of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the Process Control Program (PCP) and to the Offsite Dose Calculation Manual (ODCM), as well as listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.23.2.

6.10 RECORD RETENTION

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

- a. Records of normal station operation including power levels and periods of operation at each power level.
- b. Records of principal maintenance activities, including inspection, repairs, substitution, or replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS
- d. Records of periodic checks, tests and calibrations.
- e. Records of reactor physics tests and other special tests related to nuclear safety.
- f. Changes to procedures required by Specification 6.8.1.
- g. Records of solid radioactive shipments.

- h. Test results, in units of microcuries, for leak tests performed on licensed sealed sources.
- i. Results of annual physical inventory verifying accountability of licensed sources on record.
- j. Control Room Log Book.
- k. Shift Foreman Log Book.

6.10.2 The following records shall be retained for the duration of Operating License DPR-50 unless otherwise specified in 6.10.1 above.

- 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. Routine unit radiation surveys and monitoring records.
- d. Records of radiation exposure history and radiation exposure status of personnel, including all contractors and unit visitors who enter radioactive material areas.
- e. Records of radioactive liquid and gaseous wastes released to the environment, and records of environmental monitoring surveys.
- f. Records of transient or operational cycles for those facility components which affect nuclear safety for a limited number of transients or cycles as defined in the Final Safety Analysis Report.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the Operational Quality Assurance Plan.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of reviews by the Independent Onsite Safety Review Group.
- l. Records of analyses required by the radiological environmental monitoring program.