

ADMINISTRATIVE CONTROLS

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6.1 RESPONSIBILITY

6.1.1 The General Manager - Nuclear Plant shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

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. A management directive to this effect, signed by the vice president responsible for Nuclear Generation, hereafter referred to as vice president, shall be reissued on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The General Manager-Nuclear Plant shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The vice president shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

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6.2.3 SAFETY AUDIT AND ENGINEERING REVIEW GROUP (SAERG)

FUNCTION

6.2.3.1 The SAERG shall function to conduct operational evaluations, engineering reviews, and audits for the purpose of improving safety.

COMPOSITION

6.2.3.2 The SAERG shall be composed of multi-disciplined dedicated onsite group with a minimum assigned complement of five engineers or appropriate specialists.

RESPONSIBILITIES

6.2.3.3 The SAERG shall be responsible for the following:

- a. Participating in operational evaluations for improvement of safety wherein such evaluations and recommendations therefrom are not limited to the fulfillment of existing programs, policies, procedures, or capabilities of existing equipment and installations.
- b. Systematic engineering reviews of plant performance and activities with results reported independently of onsite operational management to offsite upper management.
- c. Comprehensive plant audits in accordance with audit requirements set forth in quality assurance programs, licensing documents, and other policies and procedures.

AUTHORITY

6.2.3.4 The onsite SAERG shall carry out its function reporting offsite directly to the Manager-Safety Audit and Engineering Review who in turn reports directly to the vice president.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor primarily in the assessment of accident and transient occurrences.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, except for (1) the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

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AUTHORITY

6.5.1.7 The PORC shall:

- a. Recommend to the General Manager - Nuclear Plant in writing, approval or disapproval of items considered under 6.5.1.6(a) through (e) and (j) and (k) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a), (c) and (d) above constitutes an unreviewed safety question.
- c. Make recommendations to the General Manager - Nuclear Plant in writing that actions reviewed under 6.5.1.6(b) above did not constitute an unreviewed safety question.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of the Nuclear Operations Review Board.

6.5.2 NUCLEAR OPERATIONS REVIEW BOARD (NORB)

FUNCTION

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

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

COMPOSITION

6.5.2.2 The NORB shall be composed of at least four persons including:

Chairman:	vice president
Vice Chairman:	General Manager - Nuclear Support
Secretary:	Manager-Safety Audit and Engineering Review
Member:	General Manager - Nuclear Plant

and other appointed personnel having an academic degree in an engineering or physical science field and a minimum of five years technical experience, of which a minimum of three years shall be in one or more of the areas given in 6.5.2.1.

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- g. Reports and meetings minutes of the PORC.
- h. Proposed changes to Technical Specifications or this Operating License.
- i. The safety evaluations for proposed 1) procedures 2) changes to procedures, equipment or systems and 3) test or experiments completed under the provision of Section 50.59 10 CFR, to verify that such actions did not constitute an unreviewed safety question.

AUDITS

6.5.2.8 The following audits shall be conducted under the direction of APCO's Manager - Safety Audit and Engineering Review:

- 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 Facility Emergency Program at least once per 12 months.
- f. The Facility Security Plan at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the NORB or the vice president.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit of the unit 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 unit fire protection and loss prevention program by a qualified outside fire consultant at least once per 36 months.
- k. The radiological effluent and environmental monitoring programs and the results thereof at least once per 12 months.

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- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- n. At each scheduled NORB meeting, the Manager-Safety Audit and Engineering Review shall make a summary report of the above audits.

AUTHORITY

6.5.2.9 The NORB shall report to and advise the vice president on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

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

- a. Minutes of each NORB meeting shall be prepared, approved and forwarded to the vice president within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the vice president within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the vice president and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

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

- a. Procedures required by Technical Specification 6.8 and other procedures which affect plant nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures will be approved by either the Technical Manager, the Operations Manager, the Maintenance Manager, the Performance and Planning

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Manager, Plant Modifications Manager, the Administrative Manager, or an Assistant General Manager as applicable. The General Manager - Nuclear Plant will approve administrative procedures, security implementing procedures, emergency plan implementing procedures and contingency implementing procedures. Temporary changes to procedures which clearly do not change the intent of the approved procedures will be approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's License. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the General Manager - Nuclear Plant. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the General Manager - Nuclear Plant.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the General Manager - Nuclear Plant.
- d. Occurrences reportable pursuant to the Technical Specification 6.0 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the General Manager - Nuclear Plant and forwarded to the vice president and to the Chairman of the Nuclear Operations Review Board.
- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, and 6.5.3.1.d shall be members of the plant supervisory staff previously designated by the General Manager - Nuclear Plant. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
- f. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10CFR50.59 NRC approval of items involving unreviewed safety question will be obtained prior to General Manager - Nuclear Plant approval for implementation.

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RECORDS

6.5.3.2 Records of the above activities shall be provided to the General Manager - Nuclear Plant, PORC and/or NORB as necessary for required reviews.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NORB and the vice president.

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 all cases within one hour. The vice president shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. 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, and the vice president for NORB review 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, 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.

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6.1 RESPONSIBILITY

6.1.1 The General Manager - Nuclear Plant shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

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- j. An inspection and audit of the unit fire protection and loss prevention program by a qualified outside fire consultant at least once per 36 months.
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- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, and 6.5.3.1.d shall be members of the plant supervisory staff previously designated by the General Manager - Nuclear Plant. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
- f. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10CFR50.59 NRC approval of items involving unreviewed safety question will be obtained prior to General Manager - Nuclear Plant approval for implementation.

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- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NORB and the vice president.

6.7 SAFETY LIMIT VIOLATION

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- b. The NRC Operations Center shall be notified by telephone as soon as possible and all cases within one hour. The vice president shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. 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, and the vice president for NORB review 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, 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.

ATTACHMENT 2

Significant Hazards Consideration Evaluation Pursuant to 10 CFR 50.92 for the Proposed Organization Technical Specification Change

Proposed Change:

Revise Technical Specification 6.1.2, 6.2.1, 6.2.3, 6.5.1, 6.5.2, 6.5.3, 6.6.1, and 6.7.1 to change references to the Senior Vice President to vice president.

Background:

The reference to the corporate management position of Senior Vice President is proposed to be revised to remove unnecessary details from the Technical Specifications. The reference to Senior Vice President is changed to vice president. Additionally, the reference to Senior Vice President was deleted from 6.5.1.8 since 6.5.2.2 already defines the NORB Chairman to be the vice president. The more general reference to the vice president would reduce the need for license amendments to reflect title changes while still maintaining an executive position that has corporate responsibility for oversight of activities affecting safety.

Analysis

Alabama Power Company has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed change to revise the reference of Senior Vice President to vice president and consider the proposed change not to involve a significant hazards consideration.

In support of this conclusion, the following analysis is provided:

1. The proposed change will not increase the probability or consequences of an accident previously evaluated. The change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. Since the change has no direct bearing on operation, maintenance, or testing of the plant, the response of the plant to previously evaluated accidents will not be affected.
2. The proposed change does not create the possibility of a new or different kind of accident than any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. A new or different kind of accident could therefore not result.

3. The proposed change does not reduce a margin of safety. The previous level of management oversight will be maintained over activities affecting nuclear safety. The vice president is the designated executive position that has corporate responsibility for overall nuclear safety and has the authority to take such measures to ensure nuclear safety. Margins of safety are therefore not reduced.

Conclusion

Based upon the analysis provided herein, Alabama Power Company has determined that the proposed change will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, Alabama Power Company has determined that this proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.