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May 16, 1988

Document Control Desk U. S. Nuclear Regulatory Commission Washington, DC 20555

Subject:

Virgil C. Summer Nuclear Station

Document No. 5/395

Operating License No. NPF-12 Technical Specifications

Deletion of Organization Charts and Revision of Training Requirements

Gentlemen:

As discussed during a telephone conversation on April 13, 1988, the attached Virgil C. Summer Nuclear Station Technical Specifications pages 6-1, 6-2, and 6-3 have been amended to reflect additional information added as a result of Generic Letter 88-06. It is requested that these specific pages be substituted for those contained in our original submittal of July 6, 1987. This change has no effect on the Safety Evaluation or the Significant Hazards Determination. This change has been reviewed by the Plant Safety Review Committee and the Nuclear Safety Review Committee. The initial processing fee of \$300.00 was included for both changes with the July 6, 1987 submittal.

I declare the statements and matters set forth herein are true and correct to the best of my knowledge, information and belief.

If you have any questions, please advise.

Very truly yours,

OSBradham for

HID/DAN:1cd Attachment

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Director, Nuclear Plant Operations, shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence. The title Director, Nuclear Plant Operations, is synonymous to the titles Manager, Virgil C. Summer Nuclear Station, Station Manager or Plant Manager.
- 6.1.2 The Shift Supervisor shall be responsible for unit operations. A management directive to this effect, signed by the Vice President, Nuclear Operations, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 Offsite and Onsite Organizations

Offsite and Onsite organizations shall be established for unit operation and corporate management, respectively. The offsite and onsite 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 from the highest levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. The organizational charts will be documented in the FSAR and updated in accordance with 10CFR50.71(e).
- b. The Director, Nuclear Plant Operations, shall be responsible for overall unit safe operation and shall have control over onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President, Nuclear Operations, 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 the 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.

Attachment to Document Control Letter May 16, 1988 Page 2 of 3 6.2.2 Unit Staff the reactor.

- Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- 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 MODE 1, 2, 3 or 4, at least one Licensed Senior Reactor Operator shall be in the Control Room.
- A health physics technician# shall be on site when fuel is in
- 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.
- A site Fire Brigade of at least 5 members shall be maintained onsite at all times.# The Fire Brigade shall not include the Shift Supervisor and the other 2 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safetyrelated functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used. or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

- An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period, al! excluding shift turnover time.

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

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- c. A break of at least eight hours should be allowed between work periods, including shift turnover time.
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Director, Nuclear Plant Operations or his designee, or higher levels of management, in accordance with established procedures and with documentation of basis for granting the deviation. Except during extended shutdown periods, controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Director, Nuclear Plant Operations or his designee to assure that excessive hours have not been assigned. Routine deviation from the above quidelines is not authorized.