

ENCLOSURE 3

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
INSTRUCTIONS FOR INCORPORATION

The proposed change to the Technical Specifications (Appendix A to Operating License NPF-68) would be incorporated as follows:

<u>Remove Page</u>	<u>Insert Page</u>
XXII	XXII
6-1	6-1
6-2	6-2
6-3	6-3
6-4	6-4
6-6	6-6
6-7	6-7
6-8	6-8
6-9	6-9
6-12	6-12
6-13	6-13
6-14	6-14
6-24	6-24
6-25	6-25

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.1 RESPONSIBILITY</u>	6-1
<u>6.2 ORGANIZATION</u>	6-1
6.2.1 ONSITE AND OFFSITE ORGANIZATION.....	6-1
6.2.2 PLANT STAFF.....	6-1
FIGURE 6.2-1 (DELETED).....	6-3
FIGURE 6.2-2 (DELETED).....	6-4
TABLE 6.2-1 MINIMUM SHIFT CREW COMPOSITION SINGLE UNIT FACILITY....	6-5
6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)	
Function.....	6-6
Composition.....	6-6
Responsibilities.....	6-6
Records.....	6-6
6.2.4 SHIFT TECHNICAL ADVISOR.....	6-6
<u>6.3 TRAINING</u>	6-6
<u>6.4 REVIEW AND AUDIT</u>	6-7
6.4.1 PLANT REVIEW BOARD (PRB)	
Function.....	6-7
Composition.....	6-7
Alternates.....	6-7
Meeting Frequency.....	6-7
Quorum.....	6-7
Responsibilities.....	6-7
Records.....	6-9

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

^{General Manager - Nuclear Plant}
6.1.1 The ~~general manager~~ shall be responsible for overall plant operation and shall delegate in writing the succession to this responsibility during his absence.

^{General Manager - Nuclear Plant}
6.1.2 The ~~general manager~~ will annually reissue a directive that emphasizes the primary management responsibility of the onshift Operations Supervisor (or during his absence from the control room, the individual designated to assume the command functions) for safe operation of the plant under all conditions on his shift and that clearly establishes his command duties.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 Onsite and offsite organizations shall be established for plant 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. ^{General Manager - Nuclear Plant}
The ~~general manager~~ shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. ^{Vice President - Nuclear}
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.

PLANT STAFF

- 6.2.2 The plant organization shall be subject to the following:
- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
 - b. At least one licensed 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 Operator shall be in the control room;

ADMINISTRATIVE CONTROLS

PLANT STAFF (Continued)

- c. An individual* who has successfully completed the Initial Technician Training portion of the Health Physics Training Program or its equivalent shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. Administrative procedures shall be developed and implemented to limit the working hours of plant staff in performance of safety-related functions (e.g., licensed Senior Operators, licensed Operators, key Health Physics Technicians, key non-licensed operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the plant is operating. (This work week may consist of 12-hour shift schedules.) 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 modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. 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 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. 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 applicable department superintendent, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual excess overtime shall be reviewed monthly by the ~~general manager~~ or his designee to assure that excessive hours were authorized and that they do not become routine.

General Manager - Nuclear Plant

*This individual may be absent for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

FIGURE 6.2-1 (DELETED)

FIGURE 6.2-2 (DELETED)

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of plant design and operating experience information, which may indicate areas for improving plant safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving plant safety to the ~~vice president~~.

Vice President - Nuclear

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the ~~vice president~~.

6.2.4 SHIFT TECHNICAL ADVISOR

Vice President - Nuclear

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the plant. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the plant for transients and accidents, and in plant design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 TRAINING

6.3.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Plant Training and Emergency Preparedness Manager. Personnel will meet the minimum education and experience recommendations of ANSI N18.1-1971 and, for licensed staff, Appendix A of 10 CFR 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, before they are considered qualified to perform all duties independently. Prior to meeting the recommendations of ANSI N18.1-1971, personnel may be trained to perform specific tasks and will be qualified to perform those tasks independently.

*Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

6.4 REVIEW AND AUDIT

6.4.1 PLANT REVIEW BOARD (PRB)

FUNCTION

6.4.1.1 The PRB shall function to advise the ~~general manager~~ on all matters related to nuclear safety.

General Manager - Nuclear Plant

COMPOSITION

6.4.1.2 The PRB shall be composed of Department Superintendents or Managers, or supervisory personnel reporting directly to Department Superintendents or Managers from the departments listed below:

Operations
Maintenance
Quality Control
Health Physics
Nuclear Safety and Compliance
Engineering Support

A senior health physicist is acceptable for the Health Physics Department PRB representative. The chairman, his alternate and other members and their alternates of the PRB shall be designated by the ~~general manager~~.

ALTERNATES

General Manager - Nuclear Plant

6.4.1.3 No more than two alternates shall participate as voting members in PRB activities at any one time.

MEETING FREQUENCY

6.4.1.4 The PRB shall meet at least once per calendar month and as convened by the PRB Chairman or his designated alternate.

QUORUM

6.4.1.5 The quorum of the PRB necessary for the performance of the PRB responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.4.1.6 The PRB shall be responsible for:

- a. Review of 1) procedures which establish plant-wide administrative controls to implement the QA program or Technical Specifications surveillance program, 2) procedures for changing plant operating modes, 3) emergency and abnormal operating procedures, 4) procedures for effluent releases of radiological consequences, and 5) fuel handling procedures.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- b. Review of 1) programs required by Specification 6.7.4 and changes thereto, and 2) proposed procedures and changes to procedures which involve an unreviewed safety question as per 10 CFR 50.59.
 - c. Review of all proposed tests and experiments that affect nuclear safety;
 - d. Review of all proposed changes to the Technical Specifications;
 - e. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety;
 - f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the ~~vice president~~ and to the Safety Review Board;
Vice President - Nuclear
 - g. Review of all REPORTABLE EVENTS;
 - h. Review of plant operations to detect potential hazards to nuclear safety;
 - i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the ~~general manager~~ or the Safety Review Board;
General Manager - Nuclear Plant
 - j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the ~~general manager~~ and the Safety Review Board;
General Manager - Nuclear Plant
 - k. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the ~~general manager~~ and the Safety Review Board;
General Manager - Nuclear Plant
 - l. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the ~~vice president~~ and to the Safety Review Board;
Vice President - Nuclear
 - m. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and the Radwaste Treatment Systems; and
 - n. Review of the Fire Protection Program and Implementing procedures and submittal of recommended changes to the ~~general manager~~.
General Manager - Nuclear Plant
- 6.4.1.7 The PRB shall:
- a. Recommend in writing to the ~~general manager~~ approval or disapproval of items considered under Specification 6.4.1.6a. through e. prior to their implementation;
General Manager - Nuclear Plant

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.4.1.6a. through f. constitutes an unreviewed safety question; and
- c. Provide written notification within 24 hours to the ~~vice president~~ and the Safety Review Board of disagreement between the PRB and the general manager; however, the ~~general manager~~ shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

Vice President - Nuclear

General Manager - Nuclear Plant

RECORDS

6.4.1.8 The PRB shall maintain written minutes of each PRB meeting that, at a minimum, document the results of all PRB activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the ~~vice president~~ and the Safety Review Board.

Vice President - Nuclear

6.4.2 SAFETY REVIEW BOARD (SRB)

FUNCTION

6.4.2.1 The SRB 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, and
- h. Quality assurance practices.

Vice President - Nuclear

The SRB shall report to and advise the ~~vice president~~ on those areas of responsibility specified in Specifications 6.4.2.7 and 6.4.2.8.

COMPOSITION

6.4.2.2 The SRB shall be organized as one board for all GPC Nuclear power plants. The SRB shall be composed of a minimum of five persons who, as a group, provide the expertise to review and audit the operation of a nuclear power plant. The chairman and other members shall be appointed by the ~~vice president~~ or other such person as he may designate. The composition of the SRB shall meet the requirements of ANSI N18.7-1976.

Vice President - Nuclear

ADMINISTRATIVE CONTROLS

AUDITS (continued)

- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months;
- k. The Emergency Plan and implementing procedures (at least once per 12 months);
- l. The Security Plan and implementing procedures (at least once per 12 months); and

RECORDS

6.4.2.9 Records of SRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each SRB meeting shall be prepared, approved, and forwarded to the ~~vice president~~ within 14 days following each meeting;
Vice President - Nuclear
- b. Reports of reviews encompassed by Specification 6.4.2.7 shall be prepared, approved and forwarded to the ~~vice president~~ within 14 days following completion of the review; and *Vice President - Nuclear*
- c. Audit reports encompassed by Specification 6.4.2.8 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 by the auditing organization.

6.5 REPORTABLE EVENT ACTION

6.5.1 The following actions shall be taken for REPORTABLE EVENTS:

3. The Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.72 and Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PRB, and the results of this review shall be submitted to the SRB and the ~~vice president~~.

Vice President - Nuclear

ADMINISTRATIVE CONTROLS

6.6 SAFETY LIMIT VIOLATION

6.6.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. In accordance with 10 CFR 50.72, the NRC Operations Center shall be notified by telephone as soon as practical and in all cases within one hour after the violation has been determined. The ~~vice-president~~, the SRB, PRB, and the ~~general manager~~ shall be notified within 24 hours.
Vice President - Nuclear
General Manager - Nuclear Plant
- b. A Licensee Event Report shall be prepared in accordance with 10 CFR 50.73.
- c. The Licensee Event Report shall be submitted to the Commission in accordance with 10 CFR 50.73, and to the PRB, SRB, the ~~general manager~~ and the ~~vice-president~~ within 30 days after discovery of the event.
General Manager - Nuclear Plant
Vice President - Nuclear
- d. Critical operation of the unit shall not be resumed until authorized by the Nuclear Regulatory Commission.

6.7 PROCEDURES AND PROGRAMS

6.7.1 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, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. Security Plan implementation;
- d. Emergency Plan implementation;
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance for effluent and environmental monitoring;
- h. Fire Protection Program Implementation; and
- i. Technical Specifications Improvement Program implementation.

6.7.2 Each procedure of 6.7.1 above, and changes thereto, shall be reviewed as set forth in administrative procedures and approved by either the ~~general manager~~ or the department head of the responsible department prior to implementation with the exception of the following which shall be approved by the ~~general manager~~:

General Manager - Nuclear Plant

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- 1) procedures which establish plant-wide administrative controls (which implement the quality assurance program and the Technical Specifications surveillance program),
- 2) unit operating procedures (UOPs)
- 3) emergency operating procedures (EOPs)
- 4) abnormal operating procedures (AOPs)
- 5) procedures for implementing the security plan, emergency plan, and the fire protection program, and
- 6) fuel handling procedures.

PRB responsibilities for procedures are delineated in Specification 6.4.1.

6.7.3 Temporary changes to procedures of Specification 6.7.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license; and
- c. The change is documented, reviewed in accordance with Specification 6.7.2 and approved by the ~~general manager~~ or department head of the responsible department within 14 days of implementation.

6.7.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the following:

- 1) Residual Heat Removal System
- 2) Containment Spray System (excluding NaOH Subsystem)
- 3) Safety Injection (excluding Boron Injection & Accumulators)
- 4) Chemical and Volume Control System (Letdown, Boron Recycle, and Charging Pumps)
- 5) Post Accident Processing System
- 6) Gaseous Waste Processing System
- 7) Nuclear Sampling System (Pressurizer steam and liquid sample lines, Reactor Coolant sample lines, RHR sample lines, CVCS Demineralizer and Letdown Heat Exchanger sample lines only)

General Manager - Nuclear Plant

ADMINISTRATIVE CONTROLS

6.12 PROCESS CONTROL PROGRAM (PCP) (Continued)

- 3) Documentation of the fact that the change has been reviewed and found acceptable by the PRB.

b. Shall become effective upon approval by the general manager.

6.13 OFFSITE DOSE CALCULATION MANUAL (ODCM)

General Manager - Nuclear Plant

6.13.1 The ODCM shall be approved by the Commission prior to implementation.

6.13.2 Licensee-initiated changes to the ODCM:

- a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:

- 1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered, dated and containing the revision number, together with appropriate analyses or evaluations justifying the change(s);
- 2) A determination that the change will not reduce the accuracy or reliability of dose calculations or Setpoint determinations; and
- 3) Documentation of the fact that the change has been reviewed and found acceptable by the PRB.

b. Shall become effective upon approval by the general manager.

General Manager - Nuclear Plant

6.14 MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE TREATMENT SYSTEMS*

6.14.1 Licensee-initiated major changes to the Radwaste Treatment Systems (liquid, gaseous, and solid):

- a. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PRB. The discussion of each change shall contain:
 - 1) A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - 2) Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;

*Licensees may choose to submit the information called for in this Specification as part of the annual FSAR update.

ADMINISTRATIVE CONTROLS

6.14 MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE TREATMENT SYSTEMS
(Continued)

- 3) A detailed description of the equipment, components, and processes involved and the interfaces with other plant systems;
 - 4) An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the License application and amendments thereto;
 - 5) An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the License application and amendments thereto;
 - 6) A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the change is to be made;
 - 7) An estimate of the exposure to plant operating personnel as a result of the change; and
 - 8) Documentation of the fact that the change was reviewed and found acceptable by the PRB.
- b. Shall become effective upon approval by the general manager.

General Manager - Nuclear Plant