

ADMINISTRATIVE CONTROLS

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ADMINISTRATIVE CONTROLSCOMPOSITION

6.5.1.2 The Station Review Board (SRB) shall be composed of at least six members of the Davis-Besse onsite management organization. The members shall be as a minimum, managers or individuals reporting directly to managers from each of the following disciplines: plant operations, maintenance, planning, radiological controls, engineering, and quality assurance. The members shall meet the requirements of ANSI N18.1-1971, Sections 4.2, 4.4, or 4.6 for applicable required experience.

The SRB Chairman shall be drawn from the SRB members and designated in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SRB Chairman; however, no more than two alternates shall participate as voting members in SRB activities at any one time.

MEETING FREQUENCY

6.5.1.4 The SRB shall meet at least once per calendar month and as convened by the SRB Chairman or his designee.

QUORUM

6.5.1.5 A quorum of the SRB shall consist of the Chairman or his designee and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Station Review Board shall be responsible for:

- a. Review of plant administrative procedures and changes thereto.
- b. Review of the safety evaluation for 1) procedures, 2) changes to procedures, equipment or systems, and 3) tests or experiments completed under the provisions of 10 CFR 50.59, to verify that such actions do not constitute an unreviewed safety question.
- c. Review of proposed procedures and changes to procedures and equipment determined to involve an unreviewed safety question as defined in 10 CFR 50.59.

**INFORMATION ONLY**

- d. Review of proposed tests or experiments determined to involve an unreviewed safety question as defined in 10 CFR 50.59.
- e. Review of reports of violations of codes, regulations, orders, Technical Specifications, or Operating License requirements having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.
- f. Review of all proposed changes to the Technical Specifications or the Operating License.
- g. Deleted
- h. Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect plant safety.
- i. Review of changes to the Industrial Security Plan, the Security Training and Qualification Plan, and the Security Contingency Plan, ~~and changes thereto.~~
- j. Review of changes to the Davis-Besse Emergency Plan, ~~and changes thereto.~~
- k. Review of items which may constitute potential nuclear safety hazards as identified during review of facility operations.
- l. Investigations or analyses of special subjects as requested by the Company Nuclear Review Board.
- m. Review of all REPORTABLE EVENTS.
- n. Review of all Safety Limit Violation Reports and Protective Limit Violation Reports (Section 6.7).
- o. Review of any unplanned, accidental or uncontrolled radioactive releases, evaluation of the event, assurance that remedial action is identified to prevent recurrence, review of a report covering the evaluation and forwarding of the report to the Plant Manager and to the CNRB.
- p. Review of the changes to the OFFSITE DOSE CALCULATION MANUAL.
- q. Review of the changes to the PROCESS CONTROL PROGRAM.
- r. Review of the Annual Radiological Environmental Operating Report.
- s. Review of the Radioactive Effluent Release Report.
- t. Review of changes to the Fire Protection Program, ~~and changes thereto.~~

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6.8 PROCEDURES AND PROGRAMS (Continued)

- c. Surveillance and test activities of safety related equipment.
- d. Industrial Security Plant implementation.
- e. Davis-Besse Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. The radiological environmental monitoring program.
- h. The Process Control Program.
- i. Offsite Dose Calculation Manual implementation.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as set forth in 6.5.3 above.

6.8.3 (deleted)

6.8.4 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 makeup, letdown, seal injection, seal return, low pressure injection, containment spray, high pressure injection, waste gas, primary sampling and reactor coolant drain systems. The program shall include the following:

- (i) Preventive maintenance and/or periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

6.8.4 (Continued)

c. Post-Accident Sampling

A program which will ensure the capability to obtain and analyse reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

d. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM.
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table 2-H, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 ~~406~~ and with the methodology and parameters in the ODCM.
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days.

6.8.4 (Continued)

d. Radioactive Effluent Controls Program (Continued)

- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table 2-H, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

e. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

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### SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 50.4 within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specifications:

- a. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- b. Deleted |
- c. Deleted |
- d. Deleted |
- e. Deleted
- f. Deleted
- g. Inoperable Remote Shutdown System control circuit(s) or transfer switch(es) required for a serious control room or cable spreading room fire, Specification 3.3.3.5.2.

### 6.10 RECORD RETENTION

- 6.10.1 The following records shall be retained for at least five years:
- a. Records and logs of facility operation covering time interval at each power level.
  - b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
  - c. ALL REPORTABLE EVENTS.
  - d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
  - e. Records of changes made to Operating Procedures.
  - f. Records of radioactive shipments.
  - g. Records of sealed source and fission detector leak tests and results.
  - h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- 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. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient ~~or~~ of operational cycles for those facility components identified in USAR Table 5.1-8-5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- 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 meetings of the SRB and the CNRB.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.13.
- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analyses at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- o. Records of the service lives of all safety related hydraulic and mechanical snubbers including the date at which the service life commences and associated installation and maintenance records.
- p. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.



### 6.11 Deleted RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

### 6.12 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(e)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit<sup>a</sup>. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or the Health Physicist.

6.12.1 High radiation areas with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation:

<sup>a</sup>Health Physicist personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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6.12.1 (continued)

- a. Each entry way to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of a Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures (e.g., health physics personnel) and personnel continuously escorted by such individuals may be exempted from the requirement for a RWP or equivalent while performing their assigned duties provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual (whether alone or in a group) entering such an area shall possess:
  1. A radiation monitoring device that continuously displays radiation dose rates in the area; or
  2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or
  4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, by personnel qualified in radiation protection procedures responsible for controlling personnel radiation exposure in the area.
- e. Except for individuals qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.

6.12.2 Locked high radiation areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or from any surface penetrated by the radiation:

6.12.2 (continued)

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked door, gate, or other barrier that prevents unauthorized entry, and, in addition:
  1. All keys to such doors, gates, or other barriers shall be maintained under the administrative control of the shift supervisor, radiation protection manager, or his or her designee.
  2. Doors, gates, or other barriers shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for a RWP or equivalent while performing radiation surveys in such areas provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual (whether alone or in a group) entering such an area shall possess:
  1. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
  3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
    - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

6.12.2 (continued)

- (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, by personnel qualified in radiation protection procedures responsible for controlling personnel radiation exposure in the area and with the means to communicate with and control every individual in the area, or
- 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
- e. Except for an individual qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.
- f. Such individual areas that are within a larger area that is controlled as a high radiation area, where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area, need not be controlled by a locked door or gate, but shall be barricaded and conspicuous, and a clearly visible flashing light shall be activated at the area as a warning device.

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6.14 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.p. This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
  - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the SRB and the approval of the Plant Manager.

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.p. This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
  - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20. ~~1302~~ 106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.
- b. Shall become effective after review and acceptance by the SRB and the approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.