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ADMINISTRATIVE CONTROLS

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.1.2 The Watch Engineer (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 - Nuclear Operations shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 Nuclear Organization

An organization shall be established for unit operation and corporate management. This organization 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 management levels through intermediate levels to and including all operating organizations positions. These relationships shall be documented and updated, as appropriate, in the form of organizational 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 SAR and updated in accordance with 10 CFR 50.71(e).
- b. 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.
- c. The Plant Manager 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.
- 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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UNIT STAFF

- 6.2.2 The station 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 6.2.2-1;
 - b. 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 OPERATIONAL CONDITION 1,2 or 3, at least one licensed Senior Reactor Operator shall be in the control room;
 - c. A Health Physics Technician* 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 Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
 - e. A site fire brigade of at least five members shall be maintained on site at all times*. The fire brigade shall not include the Watch Engineer, the Shift Technical Advisor, nor the two other 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; and
 - f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Reactor Operators, licensed Reactor Operators, health physicists, auxiliary 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 normal 8-hour day, 40-hour week while the unit is operating. 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 unit 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.

*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 the required positions.

6.0 ADMINISTRATIVE CONTROLS

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 Plant Manager or his deputy, 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 overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

Attachment 2
To License Change Application #14

1.0 Definition of Change

In Technical Specification section 6.2.3.1 (last line) and 6.2.3.4 (next to last and last line) change title "Director, Quality Assurance, Safety and Compliance" to "Manager, Nuclear Quality Assurance Department".

In Technical Specification section 6.5.2.1 delete "Executive Vice President" and replace with "Vice President - Nuclear Operations".

In Technical Specification sections 6.5.2.8.g, 6.5.2.9.a, b, and c, delete "Executive Vice President" and add "Assistant Vice President - Nuclear Operations".

2.0 Reason for Change

Effective July 1987, the position "Director, Quality Assurance, Safety and Compliance" was re-titled "Manager, Nuclear Quality Assurance Department". This change has been reflected in the SNPS USAR revision 1 transmittal forwarded to the NRC in December 1987. This License Change Application will achieve consistency within licensing documents.

Additionally, this License Application reflects the change in the Nuclear Review Board (NRB) reporting requirements from the Executive Vice President to the Vice President - Nuclear Operations, and the organizational interfacing of the Assistant Vice President - Nuclear Operations as a result of the realignment of Corporate Management responsibilities on January 1, 1988. The NRC was informed of these organizational changes by SNRC-1403 and SNRC-1412 dated December 8, 1987 and January 28, 1988, respectively.

3.0 Basis For No Significant Hazards Finding

In addition to the basic criteria of 10 CFR 50.92(c) addressed below, this amendment request falls within the guidance provided by the Commission (48 FR 14870) regarding examples of amendments that are not likely to involve significant hazards considerations. Specifically, this proposed amendment is an "administrative change" to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

The proposed change does not involve a significant hazards consideration because operation of the Shoreham Nuclear Power Station - Unit 1 in accordance with this change would not:

- (1) involve a significant increase in the probability or consequence of an accident previously evaluated. This change merely corrects an inconsistency with other plant documents, and reflects organizational changes. The change is administrative in nature and does not affect the operation of the plant.
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change is administrative in nature, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.
- (3) involve a significant reduction in a margin of safety. The proposed change is administrative in nature. The realignment of Corporate Management responsibilities, and reporting requirements of the Nuclear Review Board ensures that the integrity of the Nuclear organization is protected and that, where required, the execution of oversight functions is maintained with functional independence from operating pressures.

4.0 Timing of Change

Since this change is administrative in nature, LILCO requests that it become effective upon issuance.

FIGURES 6.2.1-1 AND 6.2.2-1 HAVE BEEN DELETED.

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the Manager, Nuclear Quality Assurance Department.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated multidisciplined, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science, or equivalent, and at least 2 years professional 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 unit 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 Manager, Nuclear Quality Assurance Department.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Watch Engineer in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. 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 unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit 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 the Health Physics Engineer who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.

*Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS
RESPONSIBILITIES(Continued)

- c. Provide written notification within 24 hours to the Vice President-Nuclear Operations and the Nuclear Review Board of disagreement between the ROC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The ROC Shall maintain written minutes of each ROC meeting that, at a minimum, document the results of all ROC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President-Nuclear Operations and the Nuclear Review Board.

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

6.5.2.1 The NRB 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

The NRB shall report to and advise the Vice President-Nuclear Operations on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

COMPOSITION

6.5.2.2 The NRB shall be composed of the permanent NRB Chairman and a minimum of five permanent NRB members. The chairman and all members of the NRB shall have qualifications that meet the requirements of Section 4.7 of ANSI/ANS 3.1-1978.

The membership shall include at least one individual from outside LILCO's or its contractors' organizations and at least one individual with substantial BWR operating experience. The BWR operating experience may be provided by the individual who is from outside LILCO's or its contractors' organizations.

ALTERNATES

6.5.2.3. All alternate members shall be appointed in writing by the NRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NRB activities at any one time.

ADMINISTRATIVE CONTROLS

AUDITS

6.5.2.8 Audits of station activities shall be performed under the cognizance of the NRB. These audits shall encompass:

- a. The conformance of station 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 station staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit 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 Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by Qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third year;
- g. Any other area of station operation considered appropriate by the NRB, Vice President-Nuclear Operations, or the Assistant Vice President-Nuclear Operations;
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months;
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months; and
- f. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months;
- k. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Vice President-Nuclear Operations and the Assistant Vice President-Nuclear Operations within 14 days following each meeting.

ADMINISTRATIVE CONTROLS

RECORDS (Continued)

- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Vice President-Nuclear Operations, and the Assistant Vice President-Nuclear Operations within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Vice President - Nuclear Operations, the Assistant Vice President-Nuclear Operations, and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

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 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the ROC, and the results of this review shall be submitted to the NRB and the Vice President-Nuclear Operations.

6.7 SAFETY LIMIT VIOLATION

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

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President-Nuclear Operations and the NPB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ROC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, and the Vice President-Nuclear Operations within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.