

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for facility 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 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.
- c. The Vice President Nuclear Group 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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6.2.2 UNIT STAFF

The unit 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.
- c. At least two licensed Operators shall be in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- e. ALL CORE ALTERATIONS after the initial fuel loading shall be 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.
- f. A Fire Brigade of at least 5 members shall be maintained on site at all times. The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.
- g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; senior reactor operators, reactor operators, radiation control technicians, auxiliary operators, meter and control repairman, and all personnel actually performing work on safety related equipment.

The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant 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 plant modifications, on a temporary basis, the following guidelines shall be followed:

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. 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, all excluding shift turnover time.

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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 Plant Manager or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review.

ADMINISTRATIVE CONTROLS

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the OSC shall consist of the Chairman or his designated alternate and at least one half of the members including alternates.

RESPONSIBILITIES

6.5.1.6 The OSC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes of intent thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the General Manager, Nuclear Operations and to the Chairman of the Offsite Review Committee.
- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Offsite Review Committee.

AUTHORITY

6.5.1.7 The OSC shall:

- a. Recommend to the Plant Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the General Manager Nuclear Operations and the Offsite Review Committee of disagreement between the OSC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The OSC shall maintain written minutes of each meeting and copies shall be provided to the General Manager Nuclear Operations and Chairman of the Offsite Review Committee.

6.5.2 OFFSITE REVIEW COMMITTEE (ORC)

FUNCTION

6.5.2.1 The ORC 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

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COMPOSITION

6.5.2.2 The chairman and all members of the ORC shall be appointed by the Vice President, Nuclear Group. The membership shall consist of a minimum of five individuals who collectively possess a broad based level of experience and competence enabling the committee to review and audit those activities designated in 6.5.2.1 above and to recognize when it is necessary to obtain technical advice and counsel. An individual may possess expertise in more than one speciality area. The collective competence of the committee will be maintained as changes to the membership are made.

ALTERNATES

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

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the ORC Chairman to provide expert advice to the ORC.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.2.9 The ORC shall report to and advise the Vice President, Nuclear Group on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved and distributed as indicated by the following:

- a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman or Vice-Chairman within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be documented in the ORC meeting minutes.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Nuclear Group and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the OSC, and results of this review shall be submitted to the ORC.

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 (1) hour.
- b. The Safety Limit violation shall be reported to the Commission, the General Manager, Nuclear Operations and to the ORC within 24 hours.

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SAFETY LIMIT VIOLATION (Continued)

- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On-Site Safety Committee (OSC). 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, the ORC and the General Manager, Nuclear Operations within 30 days of the violation.

6.8 PROCEDURES

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, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Each procedure and administrative policy of 6.8.1 above and changes of intent thereto, shall be reviewed by the OSC and approved by the Plant Manager, predesignated alternate or a predesignated Manager to whom the Plant Manager has assigned in writing the responsibility for review and approval of specific subjects considered by the committee, as applicable. Changes to procedures and administrative policies of 6.8.1 above that do not receive OSC review, such as correcting typographical errors, reformatting procedures and other changes not affecting the purpose for which the procedure is performed shall receive an independent review by a qualified individual and approved by a designated manager or director.

ADMINISTRATIVE CONTROLS

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered
- b. The change is approved by two (2) members of the plant management staff, at least one (1) of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the OSC and approved by the Plant Manager, predesignated alternate or a predesignated Manager to whom the Plant Manger has assigned in writing the responsibility for review and approval of specific subjects, within 14 days of implementation.

6.8.4 A Post-Accident monitoring program shall be established, implemented, and maintained:

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

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

6.8.5 A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation shall be implemented. This program shall be described in the station chemistry manual and shall include:

- a. Identification of a sampling schedule for the critical parameters and control points for these parameters;
- b. Identification of the procedures used to measure the values of the critical parameters;
- c. Identification for process sampling points;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for off control point chemistry conditions; and
- f. A procedure identifying:
 - 1) the authority responsible for the interpretation of the data, and
 - 2) the sequence and timing of administrative events required to initiate corrective action.

6.17 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

The General Manager Nuclear Operations delegates the responsibility for the Radiological Environmental Monitoring Program to the Radiological Control Manager or his designated alternate.

The Radiological Control Manager is responsible for administering the offsite Radiological Environmental Monitoring Program. He shall determine that the sampling program is being implemented as described to verify that the environment is adequately protected under existing procedures. He shall also have the responsibility for establishing, implementing, maintaining and approving offsite environmental program sampling, analyses and calibration procedures.

ATTACHMENT A-2

Revise the Beaver Valley Unit No. 2 Technical Specifications as follows:

Remove Pages

6-1
6-2
6-3
6-4
6-7
6-8
6-9
6-11
6-12
6-13
6-24

Insert Pages

6-1
6-2
6-3
-
6-7
6-8
6-9
6-11
6-12
6-13
6-24

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for facility 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 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.
- c. The Vice President Nuclear Group 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.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

The unit organization shall be subject to the following:

- a. Each 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.
- c. At least two licensed Operators shall be in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- e. All CORE ALTERATIONS after the initial fuel loading shall be 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.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; senior reactor operators, reactor operators, radiation control technicians, auxiliary operators, meter and control repairman, and all personnel actually performing work on safety related equipment.

The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant 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 plant modifications, on a temporary basis, the following guidelines shall be followed:

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. 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, all excluding shift turnover time.
- 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 Plant Manager or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review.

6.2.3 INDEPENDENT SAFETY EVALUATION 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 corporate management. If not otherwise implemented, all recommendations shall then be made to the Vice President, Nuclear Group.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. 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 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 Vice President, Nuclear Group. |

a summary report shall be

*Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

COMPOSITION (Continued)

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the OSC shall consist of the Chairman or his designated alternate and at least one half of the members including alternates.

RESPONSIBILITIES

6.5.1.6 The OSC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes of intent thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the ~~Senior~~ ^{General} Manager Nuclear Operations and to the Chairman of the Offsite Review Committee.
- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Offsite Review Committee.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.1.7 The OSC Shall:

- a. Recommend to the Plant Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the ~~Senior Manager Nuclear Operations~~ and the Offsite Review Committee of disagreement between the OSC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1. above.

RECORDS

General

6.5.1.8 The OSC shall maintain written minutes of each meeting and copies shall be provided to the ~~Senior Manager Nuclear Operations~~ and Chairman of the Offsite Review Committee.

6.5.2 OFFSITE REVIEW COMMITTEE (ORC)

FUNCTION

6.5.2.1 The ORC 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

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.2 The chairman and all members of the ORC shall be appointed by the ~~Senior Vice President, Nuclear Group.~~ The membership shall consist of a minimum of five individuals who collectively possess a broad based level of experience and competence enabling the committee to review and audit those activities designated in 6.5.2.1 above and to recognize when it is necessary to obtain technical advice and counsel. An individual may possess expertise in more than one speciality area. The collective competence of the committee will be maintained as changes to the membership are made.

ALTERNATES

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

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the ORC Chairman to provide expert advice to the ORC.

MEETING FREQUENCY

6.5.2.5 The ORC shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 A quorum of ORC shall consist of the Chairman or his designated alternate and at least four members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 The ORC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment, or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the ORC or the Vice President, Nuclear.
- 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 shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

AUTHORITY

6.5.2.9 The ORC shall report to and advise the ~~Senior~~ Vice President, Nuclear Group on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved, and distributed as indicated by the following:

- a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman or Vice Chairman within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be documented in the ORC meeting minutes.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the ~~Senior~~ Vice President, Nuclear Group and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC.

ADMINISTRATIVE CONTROLS

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 (1) hour.
- b. The Safety Limit violation shall be reported to the Commission within one hour. The Safety Limit violation shall be reported to the ~~Senior Manager Nuclear Operations~~ and to the ORC within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On-Site Safety Committee (OSC). 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. *General*
- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the ~~Senior Manager Nuclear Operations~~ within 30 days of the violation.

6.8 PROCEDURES

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, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Each procedure and administrative policy of 6.8.1 above and changes *of intent* thereto, shall be reviewed by the OSC and approved by the Plant Manager, predesignated alternate or a predesignated Manager to whom the Plant Manager has assigned in writing the responsibility for review and approval of specific subjects considered by the committee, as applicable. Changes to procedures and administrative policies of 6.8.1 above that do not receive OSC review, such as correcting typographical errors, reformatting procedures and other changes not affecting the purpose for which the procedure is performed shall receive an independent review by a qualified individual and approved by a designated manager or director.

ADMINISTRATIVE CONTROLS

, predesignated alternate or a predesignated Manager to whom the Plant Manager has assigned in writing the responsibility for review and approval of specific subjects.

PROCEDURE (Continued)

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two (2) members of the plant management staff, at least one (1) of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the OSC and approved by the Plant Manager within 14 days of implementation.

6.8.4 A Post-Accident monitoring program shall be established, implemented, and maintained. The program will provide the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples following an accident. The program shall include the following:

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

6.8.5 A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation shall be implemented. This program shall be described in the station chemistry manual and shall include:

- a. Identification of a sampling schedule for the critical parameters and control points for these parameters;
- b. Identification of the procedures used to measure the values of the critical parameters;
- c. Identification for process sampling points;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for off control point chemistry conditions; and
- f. A procedure identifying:
 - 1) the authority responsible for the interpretation of the data, and
 - 2) the sequence and timing of administrative events required to initiate corrective action.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Regional Office of the NRC unless otherwise noted.

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FUNCTION (Continued)

2. 10 CFR Part 50, Section 50.34a(b)(2) requires that each application to construct a nuclear power reactor provide an estimate of the quantity of radionuclides expected to be released annually to unrestricted areas in liquid and gaseous effluents produced during normal reactor operation.
3. 10 CFR Part 50, Section 50.34a(3) requires that each application to construct a nuclear power reactor provide a description of the provisions for packaging, storage and shipment offsite of solid waste containing radioactive materials resulting from treatment of gaseous and liquid effluents and from other sources.
4. 10 CFR Part 50, Section 50.34a(3)(c) requires that each application to operate a nuclear power reactor shall include (1) a description of the equipment and procedures for the control of gaseous and liquid effluents and for the maintenance and use of equipment installed in radioactive waste systems and (2) a revised estimate of the information required in (b)(2) if the expected releases and exposures differ significantly from the estimate submitted in the application for a construction permit.
5. The Regulatory staff's Safety Evaluation Report and amendments thereto issued prior to the issuance of an operating license contains a description of the radioactive waste systems installed in the nuclear power reactor and a detailed evaluation (including estimated releases of radioactive materials in liquid and gaseous waste and quantities of solid waste produced from normal operation, estimated annual maximum exposures to an individual in the unrestricted area and estimated exposures to the general population) which shows the capability of these systems to meet the appropriate regulations.

6.17 ^{General} RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

The ~~Senior~~ Manager Nuclear Operations delegates the responsibility for the Radiological Environmental Monitoring Program to the Radiological Control Manager (~~Figure 6.2-1~~) or his designated alternate.

The Radiological Control Manager is responsible for administering the offsite Radiological Environmental Monitoring Program. He shall determine that the sampling program is being implemented as described to verify that the environment is adequately protected under existing procedures. He shall also have the responsibility for establishing, implementing, maintaining and approving offsite environmental program sampling, analyses and calibration procedures.

A T T A C H M E N T B

Safety Analysis
Beaver Valley Power Station
Proposed Technical Specification Change
Unit 1 Change No. 146
Unit 2 Change No. 12

Description of amendment request: The proposed amendment would revise the administrative control requirements to reflect changes to the Nuclear Group organization and incorporate general requirements to replace the organization charts in accordance with the guidance provided in Generic Letter 88-06. The title of section 6.2.1 has been changed to "ONSITE AND OFFSITE ORGANIZATION". This section provides the essential details of the operating and corporate organizations required to maintain adequate operational safety. Section 6.2.1.a establishes the requirement for organization charts which define the management and operating positions with respect to lines of authority, responsibility and communication. These organization charts are to be documented and maintained in the FSAR. Section 6.2.1.b provides for an onsite organization with the Plant Manager having the responsibility for overall safe operation of the facility. This ensures an individual is available to provide the control measures over the onsite resources necessary for the safe operation and maintenance of the plant. Section 6.2.1.c provides for a corporate organization with the Vice President Nuclear Group having the responsibility for overall plant nuclear safety. This ensures an individual is available to provide the control measures and resources required for acceptable staff performance in plant operations, maintenance and technical support. Section 6.2.1.d provides for an organizational structure which allows the training, health physics and quality assurance functions adequate organizational freedom and independence from operating pressures.

Section 6.2.2 has been revised by replacing reference to the facility organizational chart shown on Figure 6.2-2 with reference to items a through g. These items have been found acceptable previously by the NRC since they adequately define additional requirements related to the plant organization.

Figure 6.2-1 and 6.2-2 are being deleted in response to the above changes, therefore, page numbers have been changed accordingly. Both Unit 1 and Unit 2 pages 6-1, 6-2 and 6-3 will be used to incorporate the proposed changes. For Unit 1, page 6-1a is no longer required. For Unit 2, page 6-4 is no longer required and a note (next page is 6-5) has been added to page 6-3. Also on this page, Section 6.2.3.4 has been revised to correct a typographical error. This section now identifies a summary report as the record to be forwarded by the ISEG to the Vice President, Nuclear Group each calendar month. This summary report will be the documentation of record for satisfying the requirements of this section.

The following changes have been incorporated to reflect revisions to the Nuclear Group organization:

1. The Senior Vice President Nuclear Group has been promoted to Executive Vice President Operations and the Vice President Nuclear has been promoted to Vice President Nuclear Group. The Vice President Nuclear Group is now the corporate officer having the responsibility for overall nuclear plant safety. This individual will ensure the control measures and resources required are available for acceptable staff performance in plant operations, maintenance, and technical support.
2. The Plant Manager has been promoted to General Manager Nuclear Operations. This position replaces the Senior Manager Nuclear Operations, and has responsibility for:
 - a. Nuclear Training
 - b. Planning and Outage Management
 - c. Plant Management
 - d. Technical Services
 - e. Radiological Control (including Industrial Safety)
3. The Vice President Nuclear title has been replaced with General Manager Corporate Nuclear Services with responsibility for:
 - a. Engineering Information Services
 - b. Nuclear Construction
 - c. Management Services
 - d. Nuclear Engineering
 - e. Administrative Services (including Security)
 - f. Nuclear Safety (including Fire Protection and ISEG)
4. The BV-2 Project title has been deleted with that organization having been incorporated into the operating organization.
5. The General Manager Nuclear Engineering and Records title has been deleted with these responsibilities having been assigned to the Manager Engineering Information Services, the Manager Management Services and the Manager Nuclear Engineering.

The following sections have been revised to change the Senior Manager Nuclear Operations title to General Manager Nuclear Operations:

- a. 6.5.1.6.c
- b. 6.5.1.7.c
- c. 6.5.1.8
- d. 6.7.1.b
- e. 6.7.1.d
- f. 6.17

Reference to Figure 6.2-1 has been deleted from Section 6.17 for both units to reflect the deleted figures.

The following sections have been revised to change the Senior Vice President Nuclear Group title to Vice President Nuclear Group:

- a. 6.5.2.2
- b. 6.5.2.9
- c. 6.5.2.10.c

The title of BV-1 Section 6.5.2.9 has been changed to AUTHORITY to correct a typographical error.

Section 6.8.2 has been revised for BV-2 to reflect BV-1 Amendment No. 110 which included the words "of intent". This is consistent with the BV-1 requirements which provide for the OSC review and Plant Manager or alternate approval of changes that affect the intent of the procedures listed in Section 6.8.1.

Section 6.8.3.c has been revised for both units to clarify approval requirements for temporary procedure changes. This change is consistent with 6.8.2 which provides for approval of changes in 6.8.1 by the Plant Manager, predesignated alternate or a predesignated Manager to whom the Plant Manager has assigned in writing the responsibility for review and approval of specific subjects.

Removal of the organization charts has been compensated for by the addition of general requirements which address those organizational characteristics the NRC has deemed important to safety. These changes are administrative in nature since these management positions and other changes will continue to provide the control measures, resources and support required for acceptable staff performance and ensure the nuclear plants are operated in a safe manner. These changes will allow implementation of changes to the organizational structure without obtaining NRC approval and do not represent any reduction in current safety requirements. Chapter 12 of the Unit 1 FSAR and Chapter 13 of the Unit 2 FSAR will continue to document the detailed organizational structure required by these proposed changes. Therefore, the proposed changes support the conclusion that the organization will be maintained to operate the plants safely and will not reduce the safety of the nuclear plants.

A T T A C H M E N T C

No Significant Hazards Evaluation
Beaver Valley Power Station
Proposed Technical Specification Change
Unit 1 Change No. 146
Unit 2 Change No. 12

Basis for proposed no significant hazards consideration determination: The Commission has provided standards for determining whether a significant hazards consideration exists 10 CFR 50.92(c). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant hazards consideration because:

1. This change eliminates the organization charts from the technical specifications and replaces them with general organizational requirements consistent with the guidance provided in Generic Letter 88-06. These general requirements provide the important features detailed in the organization charts to ensure the safe operation of the nuclear plants.

Changes to the Nuclear Group organization have been incorporated to provide the new titles for the management positions identified in the administrative controls. The management organization may be changed in many ways and continue to maintain those features which ensure the nuclear plants will be operated safely. Duquesne Light has determined that the revised organizational structure will provide the positions adequate to the functions required to support this conclusion. The revised organization will continue to provide the lines of authority, responsibility, communication and organization freedom required to provide for the safe operation of the nuclear plants. Therefore, based on the above, the proposed changes have been determined to be safe and will not reduce the safety of the plant. These changes do not require any changes in plant design or affect the FSAR accident analysis. Thus, the proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The organization charts are documented in the FSAR and are maintained in accordance with the FSAR update schedule set forth in 10 CFR 50.71(e). A general description of the organizational requirements will replace the organization charts and titles and positions will be revised to reflect the changes to the management organization. These changes do not affect the operation of the plant or operating parameters and consequently will not create the possibility of a new or different kind of accident from those described in the FSAR.
3. The proposed organization changes reflect the company commitment to maintain qualified personnel in positions of responsibility. This ensures that those organizations which perform safety functions and those that oversee the implementation of the safety functions maintain a high level of competence. These changes will not affect any of the plant setpoints or margins to the accident analysis or technical specification limits. Therefore, the plant safety margins will not be affected or reduced as a result of these changes.

Therefore, based on the above, it is proposed to determine that these changes are administrative in nature and do not involve any significant hazards consideration.