



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 68
License No. NP-7-10

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the license for San Onofre Nuclear Generating Station, Unit 2 (the facility) filed by Southern California Edison Company (SCE) on behalf of itself and San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (licensees) dated September 13, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulator ;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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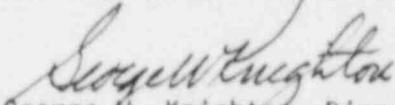
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 68, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and must be fully implemented no later than 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 18, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 68

FACILITY OPERATING LICENSE NO. NPF 10

DOCKET NO. 50-361

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change. Also enclosed are the following overleaf pages to the amended pages.

<u>AMENDMENT PAGE</u>	<u>OVERLEAF PAGE</u>
6-1	-
6-1a	-
6-2	-
6-3	6-4
6-5	6-6
6-12	6-11

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Station 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 Shift Supervisor (or during his absence from the Control Room Area, a designated individual) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice-President of Nuclear Operations shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 Onsite and offsite organizations shall be established for unit 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 Station 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 Engineering, Safety, and Licensing and the Vice President and Site Manager shall have corporate responsibility for overall plant nuclear safety. The Vice President and Site Manager shall take any measures needed to ensure acceptable performance of the staff in operating and maintaining the plant to ensure nuclear safety. The Vice President, Nuclear Engineering, Safety and Licensing shall take any measures needed to ensure acceptable performance of the staff in 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 operational pressures.

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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.

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 Physical Science or equivalent and at least two years professional level experience in his field. Off-duty qualified Shift Technical Advisors may be used to fulfill this requirement.

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.

AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to offsite organization management.

RECORDS

6.2.3.5 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to offsite organization management.

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide 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 unit. The Shift Technical Advisor shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

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, except for the Health Physics Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

* Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

- d. Proposed changes to Technical Specifications or this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
- g. Events requiring 24 hour written notification to the Commission.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meetings minutes of the Onsite Review Committee.

AUDITS

6.5.3.5 Audits of unit activities shall be performed under the cognizance of the NSG. These audits shall encompass:

- a. The conformance of unit 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 unit 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 Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. Any other area of unit operation considered appropriate by the Nuclear Safety Group or Manager of Nuclear Operations.
- f. The Fire Protection Program and implementing procedures at least once per 24 months.
- g. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.



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DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 37
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the license for San Onofre Nuclear Generating Station, Unit 2 (the facility) filed by Southern California Edison Company (SCE) on behalf of itself and San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (licensees) dated September 13, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

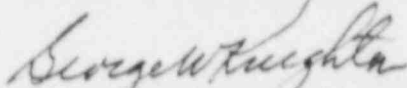
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 37, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and must be fully implemented no later than 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 18, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 37

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change. Also enclosed are the following overleaf pages to the amended pages.

<u>AMENDMENT PAGE</u>	<u>OVERLEAF PAGE</u>
6-1	-
6-1a	-
6-2	-
6-3	-
6-4	-
6-7	6-8
6-13	6-14

Pages 6-9 and 6-10 are reissued without change.

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Station 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 Shift Supervisor (or during his absence from the Control Room Area, a designated individual) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice-President of Nuclear Operations shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 Onsite and offsite organizations shall be established for unit 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 Station 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 Engineering, Safety, and Licensing and the Vice President and Site Manager shall have corporate responsibility for overall plant nuclear safety. The Vice President and Site Manager shall take any measures needed to ensure acceptable performance of the staff in operating and maintaining the plant to ensure nuclear safety. The Vice President, Nuclear Engineering, Safety and Licensing shall take any measures needed to ensure acceptable performance of the staff in 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

UNIT STAFF (Continued)

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. 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 shut-down for refueling, major maintenance or major plant modifications, 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.
- 2) A break of at least eight 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 Station Manager, his deputy, the Manager, Operations 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 Station Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- g. The Plant Superintendent (at time of appointment), Shift Superintendents and Control Room Supervisors shall hold a senior reactor operator license. The Control Operators and Assistant Control Operators shall hold a reactor operator license.

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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.

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 Physical Science or equivalent and at least two years professional level experience in his field. Off-duty qualified Shift Technical Advisors may be used to fulfill this requirement.

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.

AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to offsite organization management.

RECORDS

6.2.3.5 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to offsite organization management.

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide 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 unit. The Shift Technical Advisor shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

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, except for the Health Physics Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

* Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Manager, Nuclear Training and shall meet or exceed the requirements and recommendations of Sections 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the ISEG.

6.5 REVIEW AND AUDIT

6.5.1 ONSITE REVIEW COMMITTEE (OSRC)

FUNCTION

6.5.1.1 The Onsite Review Committee shall function to advise the Station Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Onsite Review Committee shall be composed of the:

Chairman:	Station Manager
Member:	Deputy Station Manager
Member:	Manager, Operations
Member:	Manager, Technical
Member:	Plant Superintendent SONGS Units 2 and 3
Member:	Supervisor of I&C
Member:	Manager, Health Physics
Member:	Supervisor of Chemistry
Member:	Manager, Maintenance
Member:	Supervising Engineer (NSSS, NSSS Support, Computer, or STA)
Member:	San Diego Gas & Electric Representative, Senior Engineer ⁽¹⁾

ALTERNATES

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

⁽¹⁾ BS degree in Engineering or Physical Science plus at least four years professional level experience in his field. At least one of the four years experience shall be nuclear power plant experience.

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

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

QUORUM

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

RESPONSIBILITIES

6.5.1.6 The Onsite Review Committee shall be responsible for:

- a. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Nuclear Safety Group (NSG).
- b. Review of events requiring 24-hour written notification to the Commission.
- c. Review of unit operations to detect potential nuclear safety hazards.
- d. Performance of special reviews, investigations or analyses and reports thereon as requested by the Station Manager or the NSG.
- e. Review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last OSRC meeting.

AUTHORITY

6.5.1.7 The Onsite Review Committee (OSRC) shall:

- a. Render determinations in writing with regard to whether or not items considered under 6.5.1.6(a) above constitute unreviewed safety questions.
- b. Provide written notification within 24 hours to the Manager of Nuclear Operations and NSG of disagreement between the OSRC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.1.8 The Onsite Review Committee shall maintain written minutes of each OSRC meeting that, at a minimum, document the results of all OSRC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Nuclear Safety Group.

6.5.2 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.2.1 The Station Manager shall assure that each procedure and program required by Specification 6.8 and other procedures which affect nuclear safety, and changes thereto, is prepared by a qualified individual/organization. Each such procedure, and changes thereto, shall be reviewed by an individual/group other than the individual/group which prepared the procedure, or changes thereto, but who may be from the same organization as the individual/group which prepared the procedure, or changes thereto.

6.5.2.2 Proposed changes to the Appendix "A" Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be reviewed by an individual/group other than the individual/group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the Technical Specifications shall be approved by the Station Manager.

6.5.2.3 Proposed modifications to unit nuclear safety-related structures, systems and components shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to nuclear safety-related structures, systems and components shall be approved prior to implementation by the Station Manager; or by the Manager, Technical as previously designated by the Station Manager.

6.5.2.4 Individuals responsible for reviews performed in accordance with 6.5.2.1, 6.5.2.2 and 6.5.2.3 shall be members of the station supervisory staff, previously designated by the Station Manager to perform such reviews. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the appropriate designated review personnel.

6.5.2.5 Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications shall be reviewed by the Station Manager, the Manager, Technical, the Manager, Operations, the Manager, Maintenance, the Deputy Station Manager or the Manager, Health Physics as previously designated by the Station Manager.

6.5.2.6 The station security program, and implementing procedures, shall be reviewed at least once per 12 months. Recommended changes shall be approved by the Station Manager and transmitted to the Manager of Nuclear Operations and to the NSG.

ADMINISTRATIVE CONTROLS

AUDITS

- 6.5.3.5 Audits of unit activities shall be performed under the cognizance of the NSG. These audits shall encompass:
- a. The conformance of unit 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 unit 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 Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
 - e. Any other area of unit operation considered appropriate by the Nuclear Safety Group or Manager of Nuclear Operations.
 - f. The Fire Protection Program and implementing procedures at least once per 24 months.
 - g. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.
 - h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

AUTHORITY

6.5.3.6 The NSG shall report to and advise offsite organization management on those areas of responsibility specified in Sections 6.5.3.4 and 6.5.3.5.

RECORDS

6.5.3.7 Records of NSG activities shall be prepared and maintained. Report of reviews and audits shall be distributed monthly to the Station Manager and to the management positions responsible for the areas audited.

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the OSRC and submitted to the NSG and the Manager of 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 one hour. The Manager of Nuclear Operations and the NSG Chairman shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the OSRC. 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.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the Manager of Nuclear Operations and the NSG within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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.