15.6 ADMINISTRATIVE CONTROLS

15.6.1 RESPONSIBILITY

- 15.6.1.1 The Plant Manager Point Beach Nuclear Plant (hereinafter referred to as the Manager) shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during absences from the Point Beach Nuclear Plant area of greater than 48 hours and where ready contact by telephone or other means is not assured.
- 15.6.1.2 The Duty Shift Superintendent (or during his absence from the control room, the Duty Operating Supervisor) shall be responsible for the Control Room Command function.

15.6.2 ORGANIZATION

- 15.6.2.1 Onsite and offsite organizations shall be established for plant operation and corporate management, respectively.
 - 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 Point Beach Nuclear Plant Final Safety Analysis Report, or plant procedures.
 - b. The Plant Manager shall be responsible for overall safe plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

15.6 ADMINISTRATIVE CONTROLS (Continued)

15.6.2 ORGANIZATION (Continued)

15.6.2.1 (Continued)

- c. The Chief Nuclear Officer shall be an officer of the Company and 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 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.

FACILITY STAFF

- 15.6.2.2 Facility staffing shall be subject to the following requirements:
 - a. Each on-duty shift shall normally be composed of at least the minimum shift crew composition (for all modes except with a unit defueled) as follows:**
 - 1. Shift Superintendent (SRO)* one per shift
 - 2. Duty Shift Technical Advisor one per shift located on-site on ten minute call to the control room
 - 3. Operating Supervisor (SRO)* one per shift
 - 4. Operator (RO)* two three per shift for one or two unit operation***

 three two per shift for two with neither unit in operation***
 - 5. Non-licensed Operator two per shift for one unit
 operation one per shift for each unit
 containing fuel and an additional one per
 shift when either unit is in operation
 three per shift for two unit operation

6. The Duty Technical Advisor is located on-site on ten minute call to the control room.

15.6 ADMINISTRATIVE CONTROLS (Continued)

15.6.2 ORGANIZATION (Continued)

FACILITY STAFF (Continued)

15.6.2.2 (Continued)

- b. At least one licensed Operator shall be in the control room when fuel is in either reactor. When there is fuel in either unit, an SRO* shall be in the control room at all times. In addition to this SRO*, for each unit containing fuel, an RO* or SRO* shall be present at the controls at all times.
- c. DELETED At least two licensed Operators shall be present 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 on site when fuel is in either reactor.**
- e. All core alterations 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.

^{*}SRO = NRC Senior Reactor Operator License

RO = NRC Reactor Operator License

^{**}This shift may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of personnel, provided immediate action is taken to restore the shift makeup to within the minimum requirements.

^{***} A unit is considered to be operating when it is in a mode other than cold shutdown or refueling shutdown.

15.6.2.3 DELETED Duty & Call Superintendent

- a. To assist and counsel the Shift Superintendent in case of significant operating events, a Duty & Call Superintendent group has been established. The Duty & Call Superintendent group shall consist of qualified persons designated in writing by the Manager.
- b. In the event of a reportable occurrence, the Shift
 Superintendent shall communicate with at least one Duty &
 Call Superintendent before taking other than the immediate
 on-the-spot action required. One Duty & Call
 Superintendent will be assigned to be "on call" at all times.

- In the event the position of Health Physicist is vacated and the proposed replacement does not meet all the qualifications of 15.6.3.2, but is determined to be otherwise well qualified, the concurrence of NRC shall be sought in approving the qualification of that individual.
- The Duty Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents. The Duty Shift Technical Advisor shall also receive training in plant design and layout including the capabilities of instrumentation and controls in the control room.

15.6.3.5 The Operations Manager shall:

- 1) Hold a Senior Reactor Operator license at PBNP; or
- 2) Have held a Senior Reactor Operator license at PBNP or a similar unit; or
- Have been certified at an appropriate simulator for equivalent senior operator knowledge level.

If the Operations Manager does not hold a Senior Reactor Operator license at PBNP, then an operations middle manager to whom the operating crews report shall hold a Senior Reactor Operator license at PBNP.

15.6.4 TRAINING

15.6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

15.6.5 REVIEW AND AUDIT

15.6.5.1 Manager's Supervisory Staff DELETED, (Relocated to owner controlled documents)

15.6.5.1.1 The Manager's Supervisory Staff (MSS) shall function to advise the Manager on all matters related to nuclear safety.

15.6.5.1.2 The Manager's Supervisory Staff shall be selected and designated by the Manager from a list of qualified individuals in the following disciplines:

Operations
Maintenance
Health Physics
Engineering
Licensing
Training
Chemistry

15.6.5.1.3 Each individual representing a MSS discipline shall meet or exceed the qualification requirements specified in Section 4.2 of ANSI N18.1-1971, except as described in Specification 15.6.3.2 for the Health Physicist.

15:6.5 REVIEW AND AUDIT (Continued)

15.6.5.1 Manager's Supervisory Staff (Continued)

- 15.6.5.1.4 The MSS Chairman shall be selected by the Manager from a group specifically designated by the Manager and shall mest or exceed the qualification requirements specified in Section 4.2.1 of ANSI N18.1-1971. The Chairman shall ensure that the proper disciplines are present to address the items to be brought to the MSS for review in accordance with Specification 15.6.5.1.8.
- -15.6.5.1.5 The MSS shall meet at least once per calendar month and as convened by the MSS Chairman.
- 15.6.5.1.6 A quorum of the MSS shall consist of the Chairman and four members
 representing four different disciplines. In addition, the quorum shall be
 representative of the issues being discussed.
- 15.6.5.1.7 A list of MSS members shall be maintained and shall be updated at least annually.
- 15.6.5.1.8 The MSS shall have the following duties:
 - Specifications. Review other procedures or changes thereto which affect nuclear safety as determined by the Manager.
 - b. Review all proposed tests and experiments related to nuclear safety and the results thereof when applicable.
 - c. Review all proposed changes to Technical Specifications.
 - -d. Review all proposed changes or modifications to plant systems or equipment where changes affect nuclear safety.
 - e. Periodically review plant operations for potential hazards to nuclear safety.

15.6.5 REVIEW AND AUDIT (Continued)

15.6.5.1 Manager's Supervisory Staff (Continued)

- f. Review violations of Technical Specifications, such reviews to include reports, evaluations and recommendations.
- g. Perform special reviews, investigations or prepare reports
 thereon as requested by the Chairman of the Off-Site Review
 Committee.
- h. Review the Facility Fire Protection Program at least once per 24 months to ensure the program meets established commitments and requirements.
- i. Investigate, review, and report on all reportable events.
- j. Review every release of radioactive material to the environment in excess of the limits specified in Section 15.7.5. Such review will include a summary of evaluation, recommendation and disposition of corrective action to prevent recurrence.
- k. Review all changes to the PCP and ODCM.

15.6.5.1.9 The Manager's Supervisory Staff shall have the following responsibility:

- a. Serve as an advisory committee to the Manager.
- -b. Make recommendations to the Manager for proposals under items
 a, through d, above. In the event of disagreement between a
 majority of the Supervisory Staff and decisions by the Manager,
 the course of action will be determined by the Manager and the
 disagreement recorded in the Staff minutes.

15,6.5 REVIEW AND AUDIT (Continued)

15.6.5.1 Manager's Supervisory Staff (Continued)

- c. Make recommendations as to whether or not proposals considered by the Staff involve unreviewed safety questions.
- d. Review and approve the contents of a report for each reportable
 event. Copies of all such reports shall be submitted to the Vice
 President Nuclear Power and the Chairman of the Off-Site
 Review Committee.
- Written minutes of each meeting shall be reviewed by staff
 members and copies shall be provided to the Vice President
 Nuclear Power and Chairman of the Off Site Review
 Committee.

Specification

The following action shall be taken for Reportable Events:

- A. The Commission shall be notified and/or 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 Manager's Supervisory Staff (MSS) and submitted to the Off-Site Review Committee (OSRC) and the Chief Nuclear Officer.

15.6.8 PLANT OPERATING PROCEDURES

- 15.6.8.1 The plant shall be operated and maintained in accordance with approved procedures. Major procedures Procedures, supported by appropriate minor procedures (such as checkoff lists, operating instructions, data sheets, alarm responses, chemistry analytical procedures, etc.) shall be provided for the following operations where these operations involve nuclear safety of the plant:
 - Normal sequences of startup, operation and shutdown of components, systems and overall plant.
 - 2. Refueling.
 - Specific and foreseen potential malfunctions of systems or components including abnormal reactivity changes.
 - 4. Security Plan Implementation.
 - Emergencies which could involve release of radioactivity.
 - 6. Nuclear core testing.
 - 7. Surveillance and Testing of safety related equipment.
 - 8. Fire Protection Implementation.

15.6.8.2 Approval of Procedures.

- All major procedures of the categories listed in 15.6.8.1 (except 15.6.8.1.4) and 15.6.11, and modifications to the intent thereof, shall be reviewed by the Manager's Supervisory Staff and approved by the Manager prior to implementation. Each procedure, or change thereto, of the categories listed in 15.6.8.1 (except 15.6.8.1.4) and 15.6.11 shall be reviewed by an individual or group other than the individual who prepared the procedure, or change thereto. All procedures of the categories listed in 15.6.8.1 (except 15.6.8.1.4) and 15.6.11, and modifications to the intent thereof, shall be approved by the Plant Manager or a department manager assigned responsibility for those procedures (hereafter referred to as the Approval Authority) prior to implementation.

 Non-intent changes shall be reviewed and approved in accordance with 15.6.8.2 or 15.6.8.3.
- B. Minor procedures (checkoff lists, operating instructions, data sheets, alarm responses, chemistry analytical procedures, technical instructions, special and routine maintenance procedures, laboratory manuals, etc.) shall, prior to initial use, be reviewed by the Manager's Supervisory Staff and approved by the Manager. Individuals responsible for reviews in accordance with 15.6.8.2 and 15.6.8.3 shall be members of the plant staff previously designated by the Plant Manager and meet

or exceed the qualifications of Technical Specification 15.6.3.

- C. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- D. Each review shall include an assessment for applicability of 10 CFR 50.59 and when necessary appropr ate evaluations shall be performed.

15.6.8 Plant Operating Procedures (Continued)

15.6.8.3 Changes to Procedures

- A. Temporary changes to major procedures, of the categories listed in 15.6.8.2A, which do not change the intent of the approved procedure, may be made provided such changes are approved by the cognizant group head (Duty Shift Superintendent in Operations) and one of the Duty and Call Superintendents. Changes to procedures, of the categories in 15.6.8.2A, that may involve a change to the intent of the original procedures shall be approved in accordance with 15.6.8.2.
- B. All temporary changes to major procedures, (made by a Duty and Call Superintendent and either a cognizant group head or the Duty Shift Superintendent) shall subsequently be reviewed by the Manager's Supervisory Staff and approved by the Manager within 2 weeks: Temporary changes to major procedures made to a given unit during its refueling outage may be reviewed and approved at any time prior to initial criticality of the reload core; Temporary changes only become permanent changes after the Manager's Supervisory Staff review and Manager's approval steps. Temporary changes to procedures, of the categories listed in 15.6.8.2A, which do not change the intent of the approved procedure, may be made provided such changes are approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's License.
- C. All temporary or permanent changes to minor procedures shall be approved by a supervisor of the cognizant group (Duty Shift Superintendent in Operations) and shall be subsequently reviewed and approved by the group head of the cognizant group. All temporary changes to procedures of the categories listed in 15.6.8.2A shall subsequently by reviewed and approved in accordance with 15.6.8.2 within 2 weeks. Temporary changes only become perm ment changes after approval by the Approval Authority.

15.7.8 ADMINISTRATIVE CONTROLS

15.7.8.1 DELETED Duties of the Manager's Supervisory Staff

The duties of the Manager's Supervisory Staff with respect to these radiological effluent technical specifications are listed in Specification 15.6.5.1.8 at Items j. and k.

15.7.8.2 Audits

- A. An audit of the activities encompassed by the Radioactive Effluent and Materials
 Control and Accountability Program (REMCAP), [the Offsite Dose Calculation
 Manual (ODCM), the Radiological Effluent Control Program (RECP), the
 Radiological Environmental Monitoring Program (REMP), and the Process Control
 Program (PCP)] and its implementing procedures shall be performed utilizing either
 offsite licensee personnel or a consulting firm.
- B. The results of the audit above shall be transmitted to the Chief Nuclear Officer and the Chairman of the Offsite Review Committee.

15.7.8.3 Plant Operating Procedures and Programs

The Radioactive Effluent and Materials Control and Accountability Program (REMCAP) shall be established, implemented, and maintained in accordance with the provisions of Technical Specification 15.6.8. REMCAP shall assure that radioactive effluent and waste material from PBNP complies with applicable Federal, State, and burial ground regulations while keeping all exposures to members of the public as low as reasonably achievable (ALARA). This program shall conform to and implement the requirements of PBNP GDC 70 and of 10 CFR 50.34a and 10 CFR 50.36a for the control of radioactive effluents while maintaining doses from these effluents ALARA, shall implement the requirements of 10 CFR 50.34a and General Design Criterion 60 of Appendix A to 10 CFR 50 to suitably control the release and the processing of waste materials, shall conform to the guidance of Appendix I to 10 CFR 50 and PBNP GDC 17 for the assessment of radioactivity in the environs of PBNP, and shall include remedial actions to be taken whenever the program limits are exceeded. REMCAP shall be implemented and maintained under the procedures and methodologies specified in the four (4) manuals/programs listed below and supported, as required, by other procedures. Effluent and environmental monitoring shall be addressed in the Quality Assurance Program.

- 3. Revisions shall become effective after review and acceptance by the

 Manager's Supervisory Staff and the approval by of the Plant Manager
 PBND.
- B. Revisions to the EM, ODCM, RECM and REMCAP
 - Revisions to the EM, ODCM, RECM and REMCAP shall be documented and reviews performed of the revision shall be retained as required in 15.7.8.6. The documentation shall contain:
 - Sufficient information to support the change together with the appropriate analyses or evaluations justifying the revision, and
 - b. A determination that the change will maintain the levels of radioactive effluent control required pursuant to 10 CFR 20.1302, 10 CFR 50.36a, Appendix I to 10 CFR 50, and 40 CFR 190.
 - Shall become effective after review and acceptance by the Manager's Supervisory-Staff and the approval of the Plant Manager—PBNP,
 - 3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire manual either as part of, or concurrent with, the Annual Monitoring Report for the period of the report in which the revision 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. Each copy shall indicate the date (e.g., month/year) the revision was implemented.
 - In addition to items 1-3 above, all changes regarding explosive gas must be made via the 50.59 process.