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FIGURE 6.2-1

CORPORATE ORGANIZATION (PARTIAL)

## ADMINISTRATIVE CONTROLS

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### 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.

## ADMINISTRATIVE CONTROLS

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### 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 one half of the 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.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operation abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- i. Reports and meeting minutes of the OSC.
- j. The results of the Radiological Monitoring Program, prior to submittal, annual report is provided in accordance with Specification 6.9.1.10.



## ADMINISTRATIVE CONTROLS

### AUDITS (Continued)

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 working 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 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 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the Senior Manager, Nuclear Operations General Manager within 14 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 all procedure changes 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.

## ATTACHMENT B

### Proposed Technical Specification Change No. 106, Revision 4 No Significant Hazard Evaluation

Description of amendment request: The proposed amendment would revise our previous submittals to reflect the Nuclear Group organization. Figure 6.2-1 has been revised to indicate the ORC reports to the Senior Vice President, Nuclear Group and the Independent Safety Evaluation Group (ISEG) reports to the Manager, Nuclear Safety. Sections 6.5.2.2, 6.5.2.9 and 6.5.2.10.c have been revised to reflect the title change to Senior Vice President, Nuclear Group. Section 6.8.1.a has been updated to reference Revision 2 of Regulatory Guide 1.33, dated February 1978. This will provide consistency for the OSC when reviewing procedures since BV-2 is required to review procedures in accordance with Revision 2 of Reg. Guide 1.33. Section 6.5.2.7.j has been revised to require the ORC to review the Radiological Monitoring Program results before it is forwarded to the NRC.

Basis for no significant hazard determination: Based on the criteria for determining whether a significant hazards consideration exists as set forth in 10 CFR 50.92(c), plant operation in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability of occurrence or the consequences of an accident previously evaluated because: These changes are administrative in nature and the title changes and updating to applicable procedures recommended in Reg. Guide 1.33, Revision 2 will provide consistency between BV-1 and BV-2. ORC review of the Radiological Monitoring Program report prior to submittal to the NRC reflects the present review procedure and is requested by the NRC. Therefore, the changes will not affect the probability of occurrence or the consequences of an accident previously evaluated since they are administrative and not technical in nature.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated because: No changes in plant operations or to equipment or components is required. These changes are administrative in nature, do not affect the safe operation of the plant and do not affect the accident analyses of UFSAR Section 14. Therefore, these changes will not create the possibility of a new or different kind of accident from those described in the UFSAR.
3. Involve a significant reduction in the margin of safety because: These changes are administrative in nature, do not affect the bases for any technical specification and will not affect the safe operation of the plant.

#### Conclusion

The proposed changes do not involve a significant increase in the probability or consequences of a previously evaluated accident, do not create the possibility of a new or different kind of accident and do not involve a significant reduction in a margin of safety. These changes reflect the Nuclear Group organization and Revision 2 of Reg. Guide 1.33. Therefore, based on the above, it is proposed to characterize the changes as involving no significant hazards consideration.



## SAFETY EVALUATION

Technical Specification Change 1A-106, Revision 4 would revise our previous submittals to reflect the Nuclear Group organization. Figure 6.2-1 has been revised to indicate the ORC reports to the Senior Vice President, Nuclear Group and the ISEG reports to the Manager, Nuclear Safety. Sections 6.5.2.2, 6.5.2.9 and 6.5.2.10.c have been revised to change the title from Vice President, Nuclear to Senior Vice President, Nuclear Group. Section 6.8.1.a has been updated to reference Revision 2 of Reg. Guide 1.33, February 1978. This will provide consistency for the OSC when reviewing procedures since BV-2 is required to review procedures in accordance with Reg. Guide 1.33, Revision 2. Section 6.5.2.7.j has been revised to require the ORC to review the Radiological Monitoring Program results before it is forwarded to the NRC.

### Basis

1. Is the probability of an occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the UFSAR increased? No

### Reason

These changes are administrative in nature and the title changes and updating to applicable procedures recommended in Reg. Guide 1.33, Revision 2 will provide consistency between BV-1 and BV-2. ORC review of the Radiological Monitoring Program report prior to submittal to the NRC reflects the present review procedure and is requested by the NRC. Therefore, these changes will not affect the probability of occurrence or the consequences of an accident previously evaluated since they are administrative and not technical in nature.

2. Is the probability for an accident or malfunction of a different type than previously evaluated in the UFSAR created? No

### Reason

No changes in plant operations or to equipment or components is required. These changes are administrative in nature, do not affect the safe operation of the plant and do not affect the accident analyses of UFSAR Section 14. Therefore, these changes will not create the possibility of a new or different kind of accident from those described in the UFSAR.

3. Is the margin of safety as defined in the basis for any technical specification reduced? No

### Reason

These changes are administrative in nature, do not affect the bases for any technical specification and will not affect the safe operation of the plant.

4. Is a change to the UFSAR required? No

### Reason

These changes do not require a UFSAR change, however, the UFSAR will be revised to reflect the Nuclear Group organization.

Conclusion

The proposed changes do not involve a significant increase in the probability or consequences of a previously evaluated accident, do not create the possibility of a new or different kind of accident and do not involve a significant reduction in a margin of safety. These changes reflect the Nuclear Group organization and Revision 2 of the Reg. Guide 1.33. Therefore, based on the above, these changes have been determined to be safe and do not involve an unreviewed safety question.