- g. A Site Fire Brigade## of at least 5 members shall be maintained onsite at all times. The Site Fire Brigade shall not include members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- h. The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

## 5.3 UNIT STAFF QUALIFICATIONS

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall meet the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. Individuals who do not meet ANSI/ANS 3.1 of 1978, Section 4.5, are not considered technicians or maintenance personnel for purposes of determining qualifications but are permitted to perform work for which qualification has been demonstrated.
- 6.3.2 The Manager-Radiological Controls or the Deputy shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. Each Radiological Controls Technician/Supervisor shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2/4.3.2, or be formally qualified through an NRC approved TMI-1 Radiation Controls training program. All Radiological Controls Technicians will be qualified through training and examination in each area or specific task related to their radiological controls functions prior to their performance of those tasks.
- 6.3.3 The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in unit design, response and analysis of transients and accidents.

## 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, Plant Training - TMI and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977 and Appendix "A" of 10 CFR Part 55 except that Radiological Controls training may be under the direction of the Vice President - Radiological and Environmental Controls. Licensed operators shall meet the supplemental requirement specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager, Plant Training - TMI and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1976.
- 6.5 REVIEW AND AUDIT

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6.5.1 TECHNICAL REVIEW AND CONTROL

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- m. Records of the service lives of all safety related hydraulic snubbers including the date at which the service life commences and associated installation and maintenance records.
- Records for Environmental Qualification which are covered under the provision at paragraph 6.15.

# 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

#### 6.12 HIGH RADIATION AREA

- 6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203 (c) (2) of 10 CFR 20:
  - a. Each High Radiation Area as defined by paragraph 20.202 (b) (3) shall be barricaded and conspicuously posted as a High Radiation Area, and personnel desiring entrance shall obtain a Radiation Work Permit (RWP). Any individual or group of individuals entering a High Radiation Area shall (a) use a continuously indicating dose rate monitoring device or (b) use a radiation dose rate integrating device which alarms at a pre-set dose level (entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them), or (c) assure that a radiological control technician provides positive control over activities within the area and periodic radiation surveillance with a dose rate
  - b. Any area accessible to personnel where a major portion of the body could receive in any one hour a dose in excess of one thousand mrem shall be locked or guarded to prevent unauthorized entry. The keys to these locked barricades shall be maintained under the administrative control of the Group Radiological Controls Supervisor on duty.

The Radiation Work Permit is not required by Radiological Controls personnel during the performance of their assigned radiation protection duties provided they are following radiological control procedures for entry into High Radiation Areas.

### 6.13 PROCESS CONTROL PROGRAM (PCP)

- 6.13.1 The PCP shall be approved by the Commission prior to implementation.
- 6.13.2 GPU Nuclear Corporation initiated changes to the PCP:
  - Shall be submitted to the NRC in the Semiannual Radioactive Effluent Release Report for the period in which the changes were made. This submittal shall contain:
    - a. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
    - a determination that the changes did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and

Amendment Nos. 11, 39, 72, 77, 106, 107



Amendment Nos. X1, 78, 12