

## 6.0 ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

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

6.1.2 The Director, Nuclear Plant Operations shall be responsible for an annual fire protection inspection which shall be performed utilizing either qualified offsite licensee personnel or an outside fire protection firm. The inspection shall consist of: a) an inspection of safety-related areas of the Plant to verify that they are in conformance with the fire hazards analysis; and b) a review of the Fire Brigade organization, training, and drills to verify their conformance with the requirements of Section 27 of the NFPA Code-1976.

6.1.3 The Director, Nuclear Plant Operations shall be responsible for an inspection of the fire protection program to be performed by a qualified outside fire consultant at least once per 36 months.

### 6.2 ORGANIZATION

#### OFFSITE

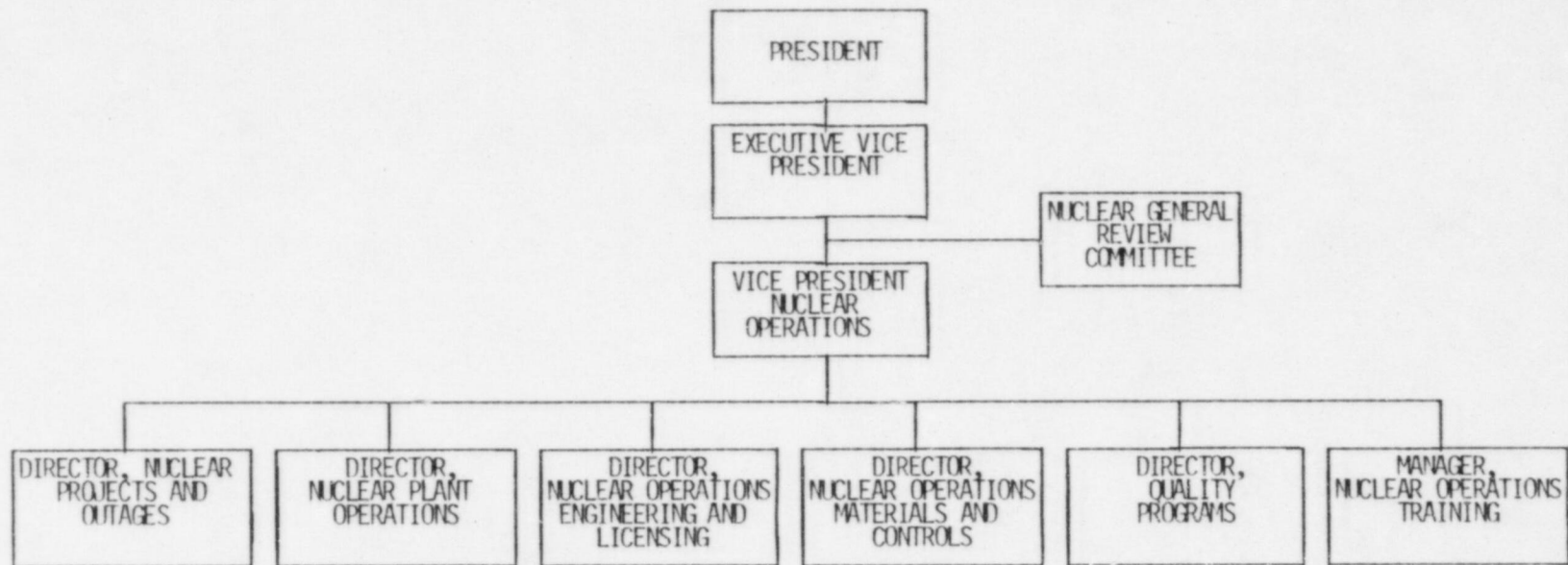
6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

#### FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

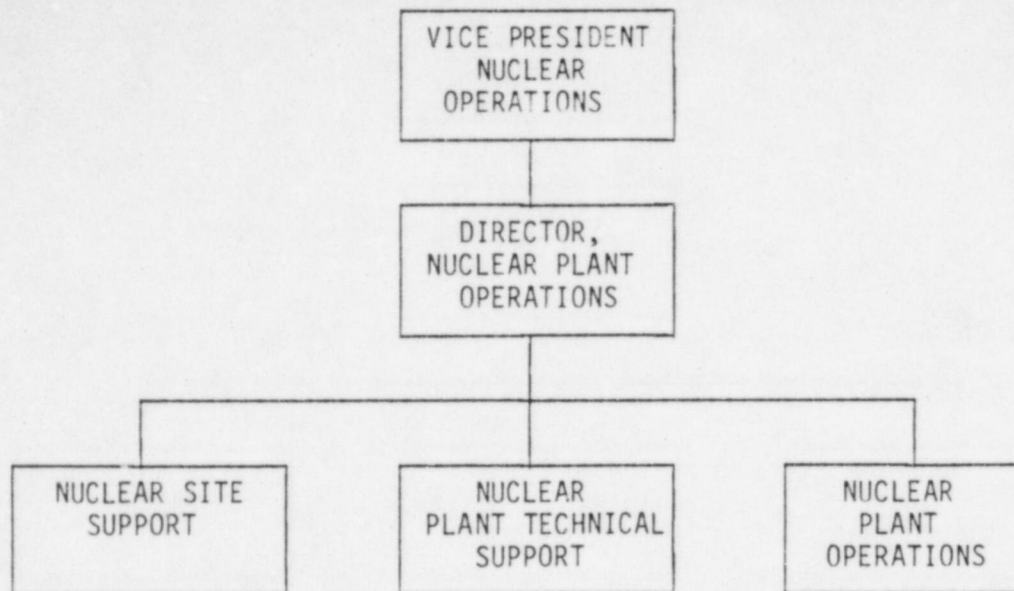
- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, 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 the reactor.

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The Corporate Organization may be changed without prior License Amendment to Figure 6.2-1 provided that a revision to Figure 6.2-1 is included with the next License Amendment request.

FIGURE 6.2-1  
CORPORATE ORGANIZATION



- |                           |                             |                                    |
|---------------------------|-----------------------------|------------------------------------|
| o FIRE PROTECTION         | o INSERVICE INSPECTIONS     | o OPERATIONS STAFF                 |
| o EMERGENCY PLANNING      | o RELIABILITY & PERFORMANCE | - SHIFT SUPERVISOR (SOL)           |
| o TECHNICAL SPECIFICATION | REVIEWS                     | - LICENSED OPERATORS (OL)          |
| COORDINATION              | o OPERATING EXPERIENCE      | - NON LICENSED OPERATORS           |
| o COMPLIANCE REVIEWS      | REVIEWS                     | o MAINTENANCE                      |
| o NUCLEAR SECURITY        |                             | - ELECTRICAL                       |
|                           |                             | - MECHANICAL                       |
|                           |                             | - INSTRUMENT & CONTROLS            |
|                           |                             | - BUILDING SERVICE                 |
|                           |                             | o CHEMISTRY & RADIATION PROTECTION |
|                           |                             | - HEALTH PHYSICS                   |
|                           |                             | - CHEMISTRY CONTROL                |
|                           |                             | - WASTE MANAGEMENT                 |

LEGEND: SOL - Senior Operator License  
OL - Operator License

The Facility Organization may be changed without prior License Amendment to Figure 6.2-2 provided that a revision to Figure 6.2-2 is included with the next License Amendment request.

FIGURE 6.2-2 - FACILITY ORGANIZATION



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### 6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Chemistry and Radiation Protection Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Operations Technical Advisor, who shall have a Bachelor's degree, or the equivalent, in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

### 6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Vice President, Nuclear Operations and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Vice President, Nuclear Operations and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976, except for Fire Brigade training sessions which shall be held at least quarterly.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT REVIEW COMMITTEE (PRC)

##### FUNCTION

- 6.5.1.1 The Plant Review Committee shall function to advise the Director, Nuclear Plant Operations on all matters related to nuclear safety.

##### COMPOSITION

- 6.5.1.2 The Plant Review Committee shall be composed of the:

Chairman: Manager, Nuclear Plant Technical Support  
Member: Nuclear Operations Superintendent  
Member: Nuclear Maintenance Superintendent  
Member: Nuclear Security Superintendent  
Member: Nuclear Compliance Manager  
Member: Nuclear Chemistry and Radiation Protection Supt.  
Member: Mgr. Nuclear Mech./Struct. Engineering Services  
Member: Mgr. Nuclear Elect./I&C Engineering Services  
Member: Nuclear Safety and Reliability Superintendent  
Member: Public Large (Designated by Chairman)

##### ALTERNATES

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

##### MEETING FREQUENCY

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

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### QUORUM

- 6.5.1.5 A quorum of the PRC shall consist of the Chairman or his designated alternate and five members including alternates.

### RESPONSIBILITIES

- 6.5.1.6 The Plant Review Committee shall be responsible for:
- a. Review of 1) all procedures and changes thereto as required by Specification 6.8.2, 2) and other proposed procedures or changes thereto as determined by the Director, Nuclear Plant Operations to affect nuclear safety.
  - b. Review of all proposed tests and experiments that affect nuclear safety.
  - c. Review of all proposed changes to the Appendix "A" Technical Specifications.
  - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety, and changes to radwaste systems which could significantly alter their ability to meet Appendix I.
  - e. Investigation of all violations of the Technical Specifications including the review and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President, Nuclear Operations and to the Chairman of the Nuclear General Review Committee.
  - f. Review of all REPORTABLE EVENTS.
  - g. Review of facility operations to detect potential nuclear safety hazards.
  - h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Chairman of the Nuclear General Review Committee.
  - i. Review of the Plant Security Plan and implementing procedures.
  - j. Review of the Emergency Plan and implementing procedures.

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### AUTHORITY

6.5.1.7 The Plant Review Committee shall:

- a. Recommend to the Director, Nuclear Plant Operations 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 Vice President, Nuclear Operations and the Nuclear General Review Committee of disagreement between the PRC and the Director, Nuclear Plant Operations; however, the Director, Nuclear Plant Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

### RECORDS

6.5.1.8 The Plant Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President, Nuclear Operations and Chairman of the Nuclear General Review Committee.

### 6.5.2 NUCLEAR GENERAL REVIEW COMMITTEE (NGRC)

#### FUNCTION

6.5.2.1 The Nuclear General Review Committee 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 NGRC shall be composed of the Chairman, Vice Chairman, and at least 5 members. No more than a minority of the members shall have line responsibility for operation of the facility. The committee shall collectively have the experience and competence required to review problems in the following areas:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Nondestructive testing
- f. Instrumentation and control
- g. Radiological safety
- h. Mechanical and electrical engineering
- i. Administrative controls
- j. Environmental
- k. Quality assurance practices

### QUALIFICATIONS

6.5.2.3 The following minimum experience requirements shall be established for those persons involved in the independent off-site safety review and audit program:

- a. Chairman and Vice-Chairman-Bachelor of Science in engineering or related field or the equivalent and ten years related experience including five years involvement with operation and/or design of nuclear power plants.
- b. Member-Bachelor of Science in engineering or related field or the equivalent and five years related experience including three years involvement with operation and/or design of nuclear power plants.

### ALTERNATES

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

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### CONSULTANTS

6.5.2.5 Consultants shall be utilized as determined by the NGRC Chairman to provide expert advice to the NGRC.

### MEETING FREQUENCY

6.5.2.6 The NGRC 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

6.5.2.7 A quorum of NGRC shall consist of the Chairman or his designated alternate and five additional NGRC members, including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

### REVIEW

6.5.2.8 The NGRC shall review:

- a. Safety evaluations of changes to the facility, changes in procedures and tests and experiments not described in the Final Safety Analysis Report which were completed without prior NRC approval.
- b. Proposed changes in the facility, changes in procedures or proposed tests or experiments which may involve an unreviewed safety question.
- c. Proposed changes in the Technical Specifications or license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change.
- d. Violations, deviations and REPORTABLE EVENTS. This review should include results of investigations and recommendations resulting from such investigations.
- e. Any other matter involving safe operation of the plant which an independent reviewer deems appropriate for consideration, or which is referred to the reviewers by members of Nuclear Operations staff or by other functional organizational units within Florida Power Corporation.
- f. Reports and meeting minutes of the Plant Review Committee.



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### REVIEW (Continued)

- g. Changes to the PROCESS CONTROL PROGRAM and to the OFFSITE DOSE CALCULATION MANUAL.

### AUDITS

6.5.2.9 Audits of facility activities shall be performed under the cognizance of the NGRC. These Audits shall encompass:

- a. The conformance of facility 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 facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility 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. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. The Facility fire protection program and implementing procedures at least once per 12 months.
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months.

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### AUDITS (Continued)

- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- k. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.
- l. Any other area of facility operation considered appropriate by the NGRC or the Executive Vice President.

### AUTHORITY

- 6.5.2.10 The NGRC shall report to and advise the Executive Vice President on those areas of responsibility specified in Sections 6.5.2.8 and 6.5.2.9.

### RECORDS

- 6.5.2.11 Records of NGRC activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each NGRC meeting shall be prepared, approved and forwarded to the Executive Vice President within 14 days following each meeting.
  - b. Reports of reviews encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President within 14 days following completion of the review.
  - c. Audit reports encompassed by Section 6.5.2.9 above, shall be forwarded to the Executive Vice President 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 and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR 50, and
  - b. Each REPORTABLE EVENT shall be reviewed by the PRC and submitted to the NGRC and the Vice President, 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 facility shall be placed in at least HOT STANDBY within one hour.
  - b. The Safety Limit violation shall be reported to the Commission, the Vice President, Nuclear Operations, and to the NGRC within 24 hours.
  - c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRC. 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 NGRC and the Vice President, Nuclear Operations within 14 days of the violation. A separate Licensee Event Report need not be submitted if the Safety Limit Violation Report meets the requirements of 10 CFR 50.73 (b) in addition to the requirements above.

6.8 PROCEDURES

## 6.8.1 SCOPE

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, November, 1972.
- 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. Systems Integrity Program implementation.
- h. Iodine Monitoring Program implementation.
- i. PROCESS CONTROL PROGRAM implementation.
- j. OFFSITE DOSE CALCULATION MANUAL implementation.
- k. Quality Assurance Program for effluent and environmental monitoring.



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### 6.8 PROCEDURES (Continued)

#### 6.8.2 REVIEW PROCESS

- 6.8.2.1 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as follows:
- a. The Emergency Plan, Security Plan, Fire Protection Plan and implementing procedures, Administrative Instructions and those test procedures associated with plant modifications that affect nuclear safety shall be reviewed and approved by the PRC and the Director, Nuclear Plant Operations prior to implementation.
  - b. For all other procedures, the review cycle shall consist of: an intradepartmental review by a Qualified Reviewer, and interdisciplinary review by Qualified Reviewer(s) in interfacing departments, as specified in administrative procedures, and approval by the responsible Superintendent or Manager, as specified by administrative procedures. The PRC shall then review the 10 CFR 50.59 evaluation within 14 days of approval.
- 6.8.2.2 The training and qualification of Qualified Reviewers shall be governed by administrative procedures, with final certification by the Director, Nuclear Plant Operations. Recertification will be required on a periodic basis and upon transfer between departments. As a minimum, all Qualified Reviewers shall meet the requirements of ANSI N18.1-1971, Sections 4.2, 4.3, 4.4, or 4.6, or the equivalent.
- 6.8.2.3 Each procedure and administrative policy of 6.8.1 shall be reviewed on a periodic basis as set forth in administrative procedures.

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### MONTHLY OPERATING REPORT

- 6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, DC 20555, with a copy to the Regional Office, submitted no later than the 15th of each month following the calendar month covered by the report.