Attachment 3

ITS Mark-up

of

Technical Specifications, Section 6
(Applicable Pieces)

R-7

6.5 REVIEW AND AUDIT

6.5.1 Operations Committee

6.5.1.1 Function

The Operations Committee shall function to advise the Plant Superintendent - Nuclear on all matters related to nuclear safety.

6.5.1.2 Composition

The Operations Committee shall be composed of selected Assistant Plant Superintendents, Superintendents, Supervisors and personnel from the following departments: Operations, Maintenance, Reactor Performance, Radiation Protection, Quality Control, and Technical Support.

The Assistant Plant Superintendent-Operations and Maintenance shall act as the Chairman. One or more of the members shall be designated as Vice Chairman.

6.5.1.3 Alternates

All alternate members shall be appointed in writing by the Plant Superintendent-Nuclear to serve on a permanent basis; however, no more than three alternates shall participate as voting members in Operations Committee activities at any one time.

6.5.1.4 Meeting Frequency

The Operations Committee meet at least once per calendar month and as convened by the Operations Committee Chairman or Vice Chairman.

6.5.1.5 Quorum

A quorum of the Operations Committee shall consist of the chairman or Vice Chairman and five members including alternates.

6.5.1.6 Responsibilities

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The Operations Committee shall be responsible for:

a. Review of (1) all procedures required by Specification 6.8, Plant Operating Procedures, and changes thereto, (2) any other proposed procedures or changes thereto as determined by the plant Superintendent-Nuclear to affect nuclear safety.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to the Technical Specifications.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President, Nuclear and to the Chairman of the Safety Committee.

f. Review of all Reportable Events.

g. Review of facility operations to detect potential safety hazards.

h. Performance of special reviews, investigations or analysis and reports thereon as requested by the Chairman of the Safety Committee.

(R) i. Review of the Plant Security Plan.

j. Review of the Emergency Plan.

k. Review of every unplanned release of radioactivity to the environs for which a report to the NRC is required.

l. Review of changes to the Offsite Dose Assessment Manual and changes to the Process Control Program.

m. Review of the Fire Protection Program and implementing procedures.

6.5.1.7 Authority

The Operations Committee shall:

a. Recommend to the Plant Superintendent-Nuclear written approval or disapproval of items considered under Specification 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 and the Safety Committee of disagreement between the Operations Committee and the Plant Superintendent-Nuclear; however, the Plant Superintendent-Nuclear shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

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6.5.1.8 Record

The Operations Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice Present, Nuclear and the Chairman of the Safety Committee.

6.5.2 Safety Committee

6.5.2.1 Function

The Safety Committee shall function to provide independent review and audit of disignated activities in the areas of:

a. Nuclear power plant operations.

b. Nuclear Engineering.

Specification 5.2

c. Chemistry and radiochemistry.

d. Metallurgy.

e. Instrumentation and control.

f. Radiological safety.

g. Mechanical and electrical engineering.

h. Quality assurance practices.

i. Non-destructive testing.

j. Administration.

6.5.2.2 Composition

The Safety Committee shall be composed of persons who have been appointed in writing by the President to serve on a permanent basis and who collectively have or have access to applicable technical and experimental expertise in the areas listed in section 6.5.2.1, items a through j.

6.5.2.3 Alternates

All alternate members shall be appointed in writing by the President to serve on a permanent basis.

6.5.2.4 Consultants

Consultants shall be utilized as determined by the Safety Committee Chairman to provide expert advice to the Safety Committee.

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6.5.2.5 Meeting Frequency

The Safety Committee 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.

6.5.2.6 Quorum

A quorum of the Safety Committee shall consist of the Chairman or Vice Chairman and at least four members with a maximum of two alternates as voting members. No more than a minority of the voting members shall have line responsibility for operation of the facility.

Specification 5.2

6.5.2.7 Review

The Safety Committee shall be responsible for the review of:

a. The safety evaluations for (1) changes to procedures, 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 operating 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.

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SPECIFICATION 5.0

CAEC-1

(R-7) ~~1. Reports and meeting minutes of the Operations Committee~~

~~6.5.2.8~~ Deleted

SPECIFICATION 5.0

6.5.2.9 Authority

The Safety Committee shall report to and advise the President on those areas of responsibility specified in Specification 6.5.2.7.

6.5.2.10 Records

Records of Safety Committee activities shall be prepared, approved, and distributed as indicated below:

a. Minutes of each Safety Committee meeting shall be prepared, approved, and forwarded to the President within 14 days following each meeting.

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SPECIFICATION 5.0

(R-7)

b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved and forwarded to the President within 14 days following completion of the review.

c. Deleted

6.5.3 Deleted

Specification 5.0

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS.

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a. Each REPORTABLE EVENT shall be reviewed by the Operations Committee, and a report shall be submitted to the Safety Committee and the Vice President, Nuclear and

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b. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50.

DAEC-1

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5.4

6.8 PLANT OPERATING PROCEDURES

5.4.1

6.8.1 Written procedures involving nuclear safety, including applicable check-off lists and instructions, covering areas listed below shall be prepared, and approved as specified in Subsection 6.8.2. All procedures shall be implemented, and maintained. COVERING THE FOLLOWING ACTIVITIES: ESTABLISHED,

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5.4.1.a Insert 5

1. Normal startup, operation, and shutdown of systems and components of the facility.

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2. Refueling operation.

3. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms, suspected primary system leaks, and abnormal reactivity changes.

5.4.1.b

4. Emergency and off-normal condition procedures.

Insert 6

5. Preventive and corrective maintenance operations which could have an effect on the nuclear safety of the facility.

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6. Surveillance and testing requirements of equipment that could have an effect on the nuclear safety of the facility.

7. Deleted.

5.4.1.c All programs specified in Specification 5.5

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8. Deleted

9. Operation of radioactive waste systems.

10. Fire Protection Program implementation.

11. A preventive maintenance and periodic visual examination program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient to as low as practical levels. This program shall also include provisions for performance of periodic systems leak tests of each system once per OPERATING CYCLE.

12. Program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions, including training of personnel, procedures for monitoring and provisions for maintenance of sampling and analysis equipment.

13. Administrative procedures for shift overtime for Operations personnel to be consistent with the Commission's June 15, 1982 policy statement.

14. ~~OFFSITE DOSE ASSESSMENT MANUAL~~

15. ~~PROCESS CONTROL PROGRAM~~

16. Quality ~~Control Program~~ ASSURANCE for effluents and environmental monitoring.

6.8.2 Procedures described in 6.8.1 above, and changes thereto, shall be reviewed by the Operations Committee as indicated in Specification 6.5.1.6 and approved by the Plant Superintendent-Nuclear or designee prior to implementation, except as provided in 6.8.3 below.

6.8.3 Temporary minor changes to procedures described in 6.8.1 above which do not change the intent of the original procedure may be made with the concurrence of two members of the plant management staff, at least one of whom shall hold a senior operator license. Such changes shall be documented and promptly reviewed by the Operations Committee and by the Plant Superintendent-Nuclear or designee. Subsequent incorporation, if necessary, as a permanent change, shall be in accord with 6.8.2 above.

Specification 5.0

6.10 RECORDS RETENTION

6.10.1 The following records shall be retained for at least 5 years:

1. Records and logs of facility operation covering time interval at each power level.

2. Records and logs of principal maintenance activities, inspections, and repair and replacement of principal items of equipment related to nuclear safety.

R14

3. All Licensee Event Reports.

4. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

5. Records of reactor tests and experiments.

6. Records of changes made to Operating Procedures.

7. Records of radioactive shipments.

8. Records of sealed source leak test and results.

9. Records of annual physical inventory verifying accountability of sources on record.

10. Records of radioactive effluent monitor setpoints and setpoint determinations.

6.10.2 The following records shall be retained for the duration of the Facility Operating License.

1. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.

R14

2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

3. Records of facility radiation and contamination surveys.

4. Records of radiation exposure for all individuals for whom monitoring was required.

5. Records of gaseous and liquid radioactive material released to the environment.

6. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.

Specification 5.0

7. Records of training and qualification for current members of the plant staff.

8. Records of in-service inspections performed pursuant to these Technical Specifications.

9. Records of Quality Assurance activities required by the QA Manual with the exception of the records included in Section 6.10.1.

10. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

11. Records of meetings of the Operations Committee and the Safety Committee.

12. Records of the service lives of all safety-related hydraulic and mechanical snubbers including the date at which the service life commences and associated installation and maintenance records.

13. Records of results of analyses required by the radiological environmental monitoring program.

14. Records of reviews performed for changes made to the Offsite Dose Assessment Manual and the Process Control Program.

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5.6 ~~6.11~~ REPORTING REQUIREMENTS

~~In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations,~~ the following ~~identified~~ reports ~~shall~~ be submitted ~~to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.~~

in accordance with 10 CFR 50.4.

6.11.1 Routine Reports

R15

a. Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted with (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

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Occupational Radiation

5.6.1 ~~Annual~~ Exposure Report A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures ~~greater than~~ > 100 mrem/yr and their associated man rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This ~~tabulation~~ report shall be submitted ~~within 60 days~~ by April 30 of ~~January 1~~ each year. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling ~~less than~~ < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources ~~shall~~ should be assigned to specific major work functions.

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L4

ELECTRONIC DIR

A3

Thermoluminescent dosimeter

This tabulation supplements the requirements ~~of Sec.~~ 20.2206 of 10 CFR ~~Part 20~~.

TECHNICAL CHANGES - RELOCATIONS (continued)

R_5 CTS 6.3.4 requires either the Plant Superintendent-Nuclear (i.e., the plant manager) or one of his designated principal alternates to have the experience and training normally required for a SRO license examination. Details of the operator license requirements for these specific positions are relocated to the UFSAR and plant procedures. The guidance documents which dictate the requirements are also identified in the UFSAR. The requirements that the Operations Manager or Operations Supervisor hold an SRO license has been maintained in ITS 5.2.2.f. The people filling these positions directly control the operations of the plant; not the Plant Superintendent-Nuclear. Additionally, changes to the procedures and the UFSAR are controlled in accordance with 10 CFR 50.59. This change will ensure that required qualifications are maintained for the Plant Superintendent-Nuclear and his designated principle alternate and, therefore, is acceptable. This change is consistent with the NUREG.

R_6 DAEC proposes the requirements on training (CTS 6.4.1) be relocated from Technical Specifications on the basis that they are adequately addressed by other Section 5.0 administrative controls as well as regulations. ITS 5.3, Unit Staff Qualifications, provides adequate requirements to assure an acceptable, competent operating staff. Each member of the unit staff shall meet or exceed the minimum qualifications of specific Regulatory Guides or ANSI Standards acceptable to the NRC staff. ITS 5.3 describes the details of the required qualifications.

Additionally, ITS 5.2, Organization, details unit staff requirements. ITS 5.2.2.a and ITS 5.2.2.b, and 10 CFR 50.54 describe the minimum shift crew composition and delineate which positions require an RO or SRO license. Training and requalification of those positions are as specified in 10 CFR 55.

Based upon these considerations, duplicating the provisions relating to training is not necessary to assure operation of the facility in a safe manner and may be relocated to a licensee controlled document which will be evaluated in accordance with the DAEC 10 CFR 50.59 program.

R_7 DAEC proposes that the review and audit functions (CTS 6.5) and Reportable Event review (CTS 6.6.1.a) requirements, be relocated from the ITS to the Quality Assurance Program on the basis that they can be adequately addressed elsewhere and that there is adequate regulatory authority to do so. Thus, the provisions are not necessary to assure safe operation of the facility, given the existence of these

TECHNICAL CHANGES - RELOCATIONS (continued)

R_7 (continued)

redundant requirements. This proposal would rely on a Quality Assurance Program implementing 10 CFR 50.54 and 10 CFR 50, Appendix B, to control the requirements. Such an approach would result in an equivalent level of regulatory authority while providing for a more appropriate change control process. The level of safety of facility operation is unaffected by the change and NRC and DAEC resources associated with processing license amendments for these Administrative Control requirements will be optimized. The following points summarize DAEC's position on removing these requirements from Technical Specifications.

The Operations Committee review function, composition, alternate membership, meeting frequency, quorum, responsibilities, authority, and records are all covered in equivalent detail in ANSI N18.7-1972. These requirements are also proposed to be covered in the QA Program. Equivalent change control is provided by 10 CFR 50.54(a).

The Safety Committee is also addressed, although with less detail, in ANSI N18.7-1972. The QA Program will include the requirements for the offsite review group. Since the offsite review group provides after-the-fact recommendations to improve activities, this organization is not necessary to assure safe operation of the facility. Based upon these considerations, duplication of these requirements in the TSs is unnecessary.

Relocating Reportable Event review requirements to the QA Program will ensure these requirements are appropriately maintained. Given that these reviews and submittal of results are required following the event without a specified Completion Time, the proposed relocated requirements are not necessary to assure operation of the facility in a safe manner. The change control process of 10 CFR 50.54(a) will provide equivalent change control.

TECHNICAL CHANGES - RELOCATIONS (continued)

R_8 (continued)

principal operative standard in Section 182a. of the Atomic Energy Act; "health and safety of the public" does not apply. Based on these considerations, the Iodine Monitoring Program administrative control is not necessary to assure operation of the facility in a safe manner and can be relocated from Technical Specifications to the UFSAR or other plant procedures.

R_9 DAEC proposes to relocate and address the review and approval process (CTS 6.8.2) and the temporary change process (CTS 6.8.3) for procedures as part of the QA Program, UFSAR, or appropriate procedures. This proposal is based on the existence of the following requirements which are duplicative of 10 CFR 50.36 in these areas and which assure operation of the facility in a safe manner. The requirement for procedures is mandated by 10 CFR 50 Appendix B, Criterion II (second sentence) and Criterion V. ANSI N18.7-19[illegible] which is an NRC staff-endorsed document used in the development of the QA Program, also contains specific requirements related to procedures.

ANSI N18.7-1972, Section 5.2.2 discusses procedure adherence. This section clearly states that procedures shall be followed, and the requirements for use of procedures shall be prescribed in writing. ANSI N18.7-1972 also discusses temporary changes to procedures, and requires review and approval of procedures to be defined.

ANSI N18.7-1972, Section 5.2.15 describes the review, approval and control of procedures. The section describes the requirements for the licensee's Quality Assurance Program to provide measures to control and coordinate the approval and issuance of documents, including changes thereto, which prescribe all activities affecting quality. The section further states that each procedure shall be reviewed and approved prior to initial use. The reviews required are also described.

ANSI N45.2-1971, Section 6 also requires the Quality Assurance Program to describe procedure requirements.

TECHNICAL CHANGES - RELOCATIONS (continued)

R_9 (continued)

DAEC will continue to implement the requirements of 10 CFR 50, Appendix B, regarding procedures without duplicating the necessity of procedure requirements in the facility Technical Specifications. Safe operation of the plant will continue to be maintained, and therefore, the requirements for procedures and their control should not be re-addressed in Technical Specifications. Duplication of the provisions related to procedures is not necessary to assure safe operation of the facility. The QA Program, UFSAR or appropriate procedures will include adequate detail with respect to the administrative control of procedures related to activities affecting quality and nuclear safety. QA Program changes will be in accordance with 10 CFR 50.54(a), with UFSAR and procedure changes being evaluated in accordance with the DAEC 10 CFR 50.59 program.

R_{10} CTS 6.8.5 contains details that are being relocated to plant controlled documents, which currently implement the preventative and corrective maintenance program (CTS 6.8.1.11). CTS 6.8.1.11 contains program controls that are being placed in ITS 5.5.2 which is a program for Primary Coolant Sources Outside Containment. The details in CTS 6.8.5 involve a once per operating cycle detailed walkdown inspection requirement and an additional quarterly walk down inspection. The program controls will continue to be maintained in ITS 5.5.2 and are sufficient to ensure the leakage is monitored. Changes to relocated requirements will be evaluated in accordance with the DAEC 10 CFR 50.59 pr gram.

R_{11} CTS 6.9.2, "High Radiation Area," contains "**" and "***" footnotes that specify measurement distances from a source of radioactivity used to determine personnel dose rates. This type of detail is not retained in the ITS and can be relocated to plant controlled documents where changes to these requirements will be evaluated in accordance with the DAEC 10 CFR 50.59 program.

TECHNICAL CHANGES - RELOCATIONS (continued)

R_{12} The details contained in CTS 6.9.4.b, "Radiological Environmental Monitoring Program," are proposed to be relocated to the Offsite Dose Assessment Manual (ODAM). The program is a redundant verification of the effectiveness of the effluent monitoring program contained in the ODAM and specified in the administrative controls section of the ITS. The relocated program has no impact or effect on nuclear safety of the plant. ITS 5.5.1 for the ODAM requires the ODAM to contain these activities. Changes to the ODAM will be controlled in accordance with ITS 5.5.1.c.

R_{13} CTS 6/7.9.5 does not identify a parameter which is an initial condition assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary and does not provide any mitigation of a design basis event. Therefore, CTS 6/7.9.5 did not satisfy the screening criteria of 10 CFR 50.36 as documented in the Application of Selection Criteria to DAEC Technical Specifications, and has been relocated to plant procedures. Any changes to these requirements located in plant procedures will be evaluated in accordance with the DAEC 10 CFR 50.59 program.

R_{14} DAEC proposes the requirements on record retention (CTS 6.10) be relocated from Technical Specifications on the basis that they can be adequately addressed by the QA Program (10 CFR 50, Appendix B, Criterion XVII) and other sections of 10 CFR 50 that are applicable to DAEC (i.e., 10 CFR 50.71, 10 CFR 50.73, etc.) and because provisions relating to record keeping, in the CTS, do not assure operation of the facility in a safe manner.

Facility operations are performed in accordance with approved written procedures. Areas include normal startup, operation and shutdown, abnormal conditions and emergencies, refueling, safety-related maintenance, surveillance and testing, and radiation control. Facility records document appropriate station operations and activities. Retention of these records provides document retrievability for review of compliance with requirements and regulations. Post-compliance review of records does not assure operation of the facility in a safe manner as activities described in these documents have already been performed. Numerous other regulations such as 10 CFR 20, Subpart L, and 10 CFR 50.71 also require the retention of certain records related to operation of the nuclear plant.

TECHNICAL CHANGES - RELOCATIONS (continued)

R_{15} The requirement to submit a Startup Report (CTS 6.11.1.a) has been relocated from the CTS. The report is a summary of plant startup and power escalation testing following receipt of the Operating License, increases in licensed power level, installation of nuclear fuel with a different design or manufacturer than the current fuel, and modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit. The report provided a mechanism for NRC to review the appropriateness of licensee activities after-the-fact, but provided no regulatory authority once the report was submitted (i.e., no requirement for Commission approval). The approved 10 CFR 50, Appendix B, Quality Assurance Program and Startup Test Program provide assurance that the listed activities are adequately performed and that appropriate corrective actions, if required, are taken.

Given that the report was required to be provided to the Commission no sooner than 90 days or 9 months following completion of the respective milestone, report completion and submittal was clearly not necessary to assure operation of the facility in a safe manner for the interval between completion of the startup testing and submittal of the report. Additionally, given there is no requirement for the Commission to approve the report, then the Startup Report is not necessary to assure operation of the facility in a safe manner.

Based on these considerations, the Startup Report may be removed from the Technical Specifications and relocated to a licensee controlled document. Where changes are evaluated in accordance with the DAEC 10 CFR 50.59 program.

R_{16} This change proposes to relocate the notification and reporting requirements (CTS 6.6.1.b) for Reportable Event Action out of TS. These requirements are duplicated in 10 CFR 50.73. These requirements will be relocated to plant procedures or other licensee controlled documents. Given that these notifications and reports are required following the event, notification and report submittal is clearly not necessary to assure operation of the facility in a safe manner. Additionally, given there is no requirement for the Commission to approve the notification or reports, these requirements are not necessary to ensure operation of the facility in a safe manner. Changes to the relocated requirements in plant procedures will be evaluated in accordance with the 10 CFR 50.59 program. This change is consistent with the NUREG.