

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The ~~Plant Superintendent~~^{Manager} shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

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.

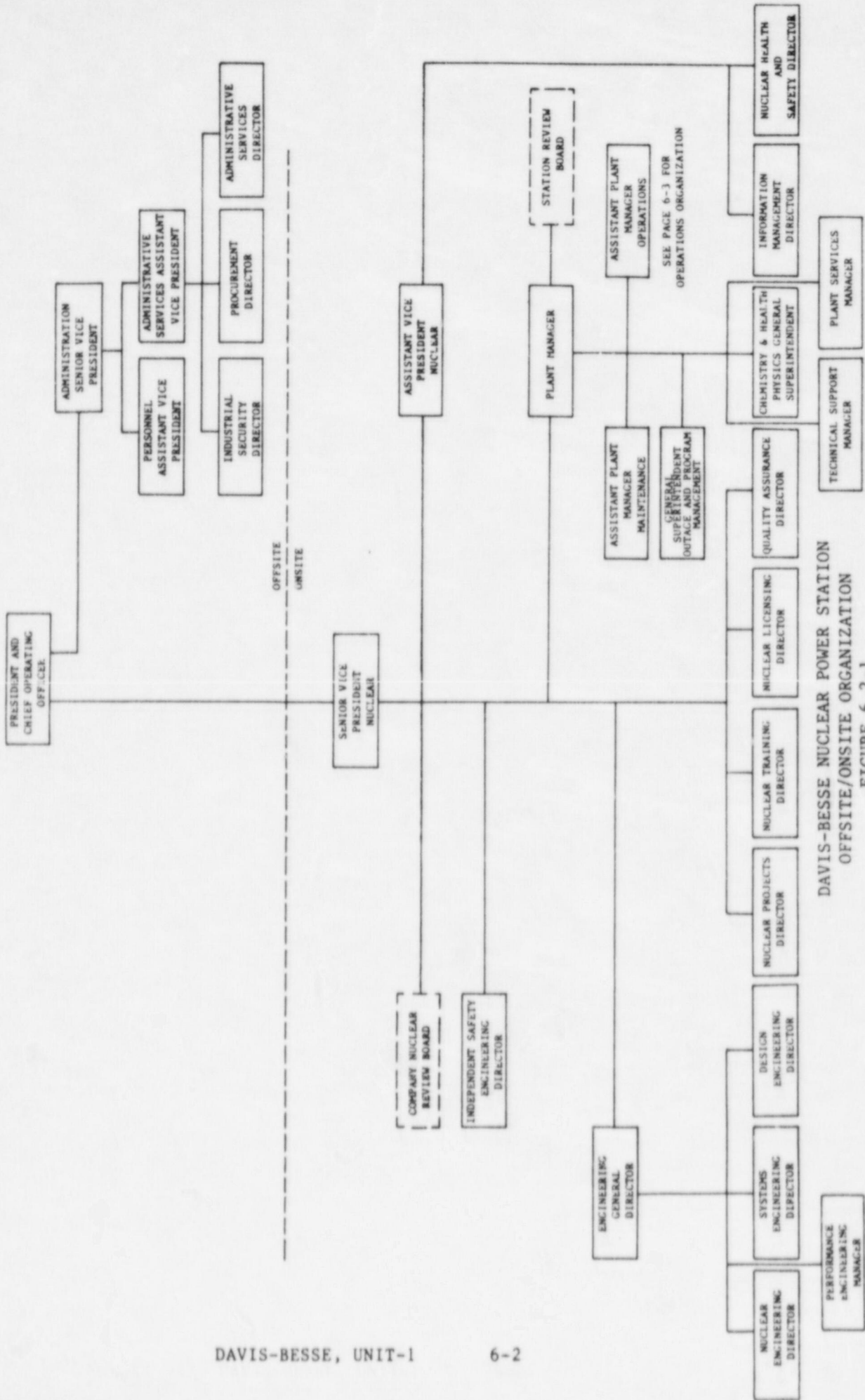
FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figures ~~6.2-2~~^{6.2-1 and} 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.
- 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.
- ~~f.~~ A site Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include 3 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.

~~The individual qualified in radiation protection procedures and the Fire Brigade Composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence, of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.~~ *fill the required positions*

~~**This change from 3 to 5 individuals will be implemented by start-up after the first refueling outage.~~



DAVIS-BESSE NUCLEAR POWER STATION
OFFSITE/ONSITE ORGANIZATION
FIGURE 6.2-1

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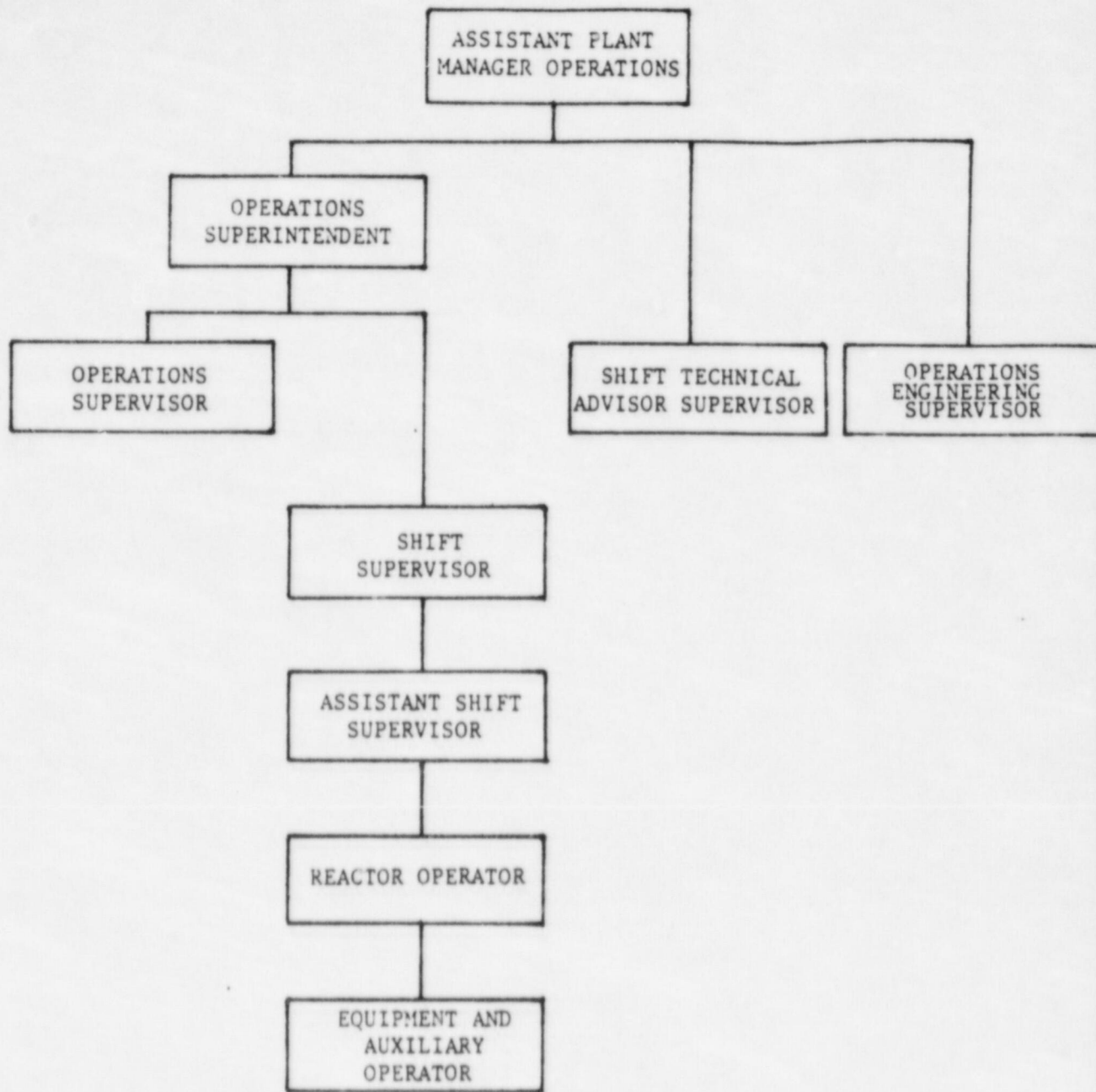
TABL. 6.2-1

MINIMUM SHIFT CREW COMPOSITION#

| LICENSE CATEGORY | APPLICABLE MODES | |
|-------------------------|------------------|---------------|
| | 1, 2, 3 & 4 | 5 & 6 |
| SOL | 1 | 1* |
| OL | 2 | 1 |
| Non-Licensed | 2 | 1 |
| Shift Technical Advisor | 1 | None Required |

*Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling supervising CORE ALTERATIONS.

#Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.



DAVIS-BESSE NUCLEAR POWER STATION
 OPERATIONS ORGANIZATION
 FIGURE 6.6-2

FACILITY STAFF OVERTIME

- 6.2.3 Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven-day period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, including shift turnover time.
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Plant Manager
Any deviation from the above guidelines shall be authorized by the Superintendent, his designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Individual overtime shall be reviewed by Station Management to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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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 (1) the ~~Radiation Protection Manager~~ who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who 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. *Chemistry and Health Physics General Superintendent*

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training *Director* Manager 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 Fire Marshall and shall meet or exceed the requirements of Section 27 of the NFPA Code-1978.

6.5 REVIEW AND AUDIT

6.5.1 STATION REVIEW BOARD (SRB)

FUNCTION

6.5.1.1 The Station Review Board (SRB) shall function to advise the ~~Station Superintendents~~ on all matters related to nuclear safety. *Plant Manager*

COMPOSITION

ADDITIONAL CHANGES PREVIOUSLY
PROPOSED BY LETTER
Serial No. 1235 Date 1-22-86

6.5.1.2 The Station Review Board shall be composed of the:

| | |
|-----------|---|
| Chairman: | Assistant Station Superintendent |
| Member: | Operations Engineer |
| Member: | Technical Engineer |
| Member: | Maintenance Engineer |
| Member: | Lead Instrument and Control Engineer |
| Member: | Nuclear and Performance Engineer |
| Member: | Chemist and Health Physicist |
| Member: | Nuclear Reliability Manager |
| Member: | Station Superintendent |

Insert "A"

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the SRB shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Station Review Board shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Station Superintendent to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.

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- c. Review of all proposed changes to Appendix "A" 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 preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President - Nuclear and to the Chairman of the Company Nuclear Review Board.
- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations and analyses and reports thereon as requested by the Chairman of the Company Nuclear Review Board.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Company Nuclear Review Board.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Company Nuclear Review Board.
- k. Review of any unplanned, accidental or uncontrolled radioactive releases, evaluation of the event, assurance that remedial action is identified to prevent recurrence, review of a report covering the evaluation and forwarding of the report to the Station Superintendent and to the CNRB.
- l. Review of the OFFSITE DOSE CALCULATION MANUAL and implementation of procedures at least once per 24 months.
- m. Review of the PROCESS CONTROL PROGRAM and implementation of procedures for processing and packaging of radioactive wastes at least once per 24 months.
- n. Review of the Annual Radiological Environmental Operating Report.
- o. Review of the Semiannual Radioactive Effluent Release Report.

INSERT "A"

Chairman: Station Review Board Chairman*
Member: Assistant Plant Manager, Operations
Member: Assistant Plant Manager, Maintenance
Member: Technical Support Manager
Member: Chemistry and Health Physics General Superintendent
Member: Plant Operations Engineering Supervisor
Member: An Engineering Director or Performance Engineering Manager
Member: Operations Quality Assurance Manager
Member: Plant Operations Superintendent

* Designated in writing by the Plant Manager. The Chairman will be drawn from SRB members.

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AUTHORITY

- 6.5.1.7 The Station Review Board shall:
- a. Recommend to the Station Superintendent 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 ^{Senior} Vice President, Nuclear and the Company Nuclear Review Board of disagreement between the SRB and the Station Superintendent; however, the Station Superintendent shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

- 6.5.1.8 The Station Review Board shall maintain written minutes of each meeting and copies shall be provided to the ^{Senior} Vice President, Nuclear and Chairman of the Company Nuclear Review Board.

6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)

FUNCTION

- 6.5.2.1 The Company Nuclear Review Board (CNRB) 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, and
 - h. Quality assurance practices.

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.2 The Company Nuclear Review Board shall be composed of the:

| | |
|-----------|--|
| Chairman: | Director, Fossil Facilities Engineering and Construction |
| Member: | General Superintendent, Transmission and Substations |
| Member: | Superintendent, Davis-Besse Station |
| Member: | Director, Nuclear Services |
| Member: | Director, Quality Assurance |
| Member: | General Superintendent, Fossil Generation Facilities |
| Member: | Director, Nuclear Safety |
| Member: | Director, Nuclear Facility Engineering |
| Member: | Others as deemed advisable by the CNRB Chairman* |

ALTERNATES

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

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the CNRB Chairman to provide expert advice to the CNRB.

MEETING FREQUENCY

6.5.2.5 The CNRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 A quorum of CNRS shall consist of the Chairman or his designated alternate and at least half of the appointed CNRB members or their alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

*Others as deemed advisable by the CNRB chairman, who are appointed to the Company Nuclear Review Board shall have an academic degree in an Engineering or Physical Science Field; and in addition, shall have a minimum of five years of technical experience, of which a minimum of three years shall be in one or more of the areas specified in Specification 6.5.2.1.

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REVIEW

6.5.2.7 The Company Nuclear Review Board 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 this Operating License.
- e. Violations of 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.
- i. Reports and meetings minutes of the Station Review Board.

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AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the CNRB. These audits shall encompass:

- a. The conformance of unit 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 station staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in unit 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 Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Station Emergency Plan and implementing procedures at least once per 12 months.
- f. The Station Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the CNRB.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

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AUTHORITY

6.5.2.9 The Company Nuclear Review Board shall report to and advise the ^{Senior Vice President, Nuclear} ~~President and Chief Operating Officer~~ on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of Company Nuclear Review Board activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each CNRB meeting shall be prepared, approved and forwarded to the ^{Senior Vice President, Nuclear} ~~President and Chief Operating Officer~~ and CNRB members within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the ~~President and Chief Operating Officer~~ and CNRB members within 14 days following completion of the review. ^{Senior Vice President, Nuclear}
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the ~~President and Chief Operating Officer~~ and CNRB members and to the management positions responsible for the areas audited within 30 days after completion of the audit. ^{Senior Vice President, Nuclear}

6.5 REPORTABLE EVENT ACTION

6.5.1 The following actions 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 SRB, and the results of this review shall be submitted to the CNRB and the ^{Senior} Vice President, Nuclear.

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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 and to the CNRB within 24 hours.~~ ^{Insert "B"}
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SRB. 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 CNRB and the Vice President, Nuclear within 14 days of the violation. *Senior*

6.8 PROCEDURES AND PROGRAMS

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, 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. The radiological environmental monitoring program.
- h. The Process Control Program.
- i. Offsite Dose Calculation Manual implementation.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the SRB and approved by the Station Superintendent prior to implementation and reviewed periodically as set forth in administrative procedures.

INSERT "B"

- b. The Safety Limit violation shall be reported to the NRC Operations Center by telephone as soon as possible and in all cases within one hour. In addition the Senior Vice President, Nuclear and the CNRB shall be notified within 24 hours.

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6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the SRB and approved by the Station Superintendent within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include makeup, letdown, seal injection, seal return, low pressure injection, containment spray, high pressure injection, waste gas, primary sampling and reactor coolant drain systems. The program shall include the following:

- (i) Preventive maintenance and/or periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

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6.8.4 (Cont.)

c. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the appropriate Regional Office unless otherwise noted.

STARTUP REPORT

6.9.1.1 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.

6.9.1.2 The report shall address each of the tests identified in the FSAR and shall 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.

6.9.1.3 Startup reports shall be submitted within (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

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power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL OPERATING REPORT^{1/}

6.9.1.4 Annual reports covering the activities of the unit during the previous calendar year shall be submitted prior to March 31 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

- a. 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^{2/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (described maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling 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 be assigned to specific major work functions.
- b. The complete results of steam generator tube inservice inspections (Specification 4.4.5.5.b).

MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics, shutdown experience and challenges to the Pressurizer Power Operated Relief Valve (PORV) and the Pressurizer Code Safety Valves shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office, to arrive no later than the 15th of each month following the calendar month covered by the report.

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

^{2/} This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

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