

ATTACHMENT A

PAGE CHANGE SHEET

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6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review, Investigation, and Audit

1. Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
 - a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activity and Section 6 Inter Departmental Relationships.
 - b. The Station Manager or his designee shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
 - c. The Senior Vice-President Nuclear Operations or his designee shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
 - d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to an appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.
2. Deleted.
3. The shift manning for the station shall be as shown in Figure 6.1-1. The Assistant Superintendent Operating, Operating Engineer, Shift Engineers, and Shift Foreman shall have a Senior Reactor Operators License. The Fuel Handling Foreman shall have a Senior Reactor Operator or Limited Senior Reactor Operators License. The Vice President PWR Operations on the corporate level has responsibility for the Fire Protection Program. An Operating Engineer at the station will be responsible for implementation of the Fire Protection Program. A Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew necessary for safe shutdown of the plant (4 members) or any personnel required for other essential functions during a fire emergency.

6.1 (Continued)

- 6.1.4. Qualifications of the Station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1 "Selection and Training of Nuclear Power Plant Personnel", dated March 8, 1971 with the exception of the Health Physics Supervisor or Lead Health Physicist, who shall meet or exceed the qualifications of Radiation Protection Manager of Regulatory Guide 1.8 September, 1975. The Shift Control Room Engineer 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. The individual filling the position of Technical Superintendent shall meet the minimum acceptable level for "Technical Manager" as described in 4.2.4 of ANSI N18.1, 1971.
5. Retaining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel", dated March 8, 1971. A training program for the Fire Brigade shall be maintained under the direction of the Station Fire Marshall and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975 except that Fire Brigade training will be conducted quarterly.
6. Retraining shall be conducted at intervals not exceeding two years.
7. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

Offsite Review And Investigative Function

- A. The Superintendent of the Offsite Review and Investigative Function shall be appointed by the Manager of Quality Assurance/Nuclear Safety (QA/NS). The Corporate Audit Function shall be the responsibility of the Manager of QA/NS and shall be independent of Operations.

The Manager of QA/NS reports directly to the Chief Executive Officer and has the responsibility to set Corporate Policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the Manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate department to determine that QA/NS policy is being carried out.
1. The Superintendent of the Offsite Review and Investigative Function shall: (1) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (2) select each participant for this function, (3) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (4) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (5) approve and report in a timely manner all findings of noncompliance with NRC requirements and provide recommendations to the Station Manager, Vice President PWR Operations, Manager QA/NS, Assistant Vice President (AVP) Quality Programs and Assessment, and the Senior Vice President Nuclear Operations.

6.1.7.A.1 (Continued)

During periods when the Superintendent of the the Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate who satisfies the formal training and experience requirements for the Superintendent of the Offsite Review and Investigative Function.

The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

- (a) The safety evaluations for changes to procedures, equipment or systems as described in the safety analysis report and for tests or experiments completed under the provision of 10CFR 50.59 to verify that such actions did not constitute an unreviewed safety question. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of QA/NS.
- (b) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10CFR 50.59.
- (c) Proposed tests or experiments which involve an unreviewed safety question as defined in 10CFR 50.59.
- (d) Proposed changes in Technical Specifications or NRC facility operating licenses.
- (e) Noncompliance with NRC 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 as referred to it by the Onsite Review and Investigative Function.
- (g) Reportable Events requiring 24 hour notification to the Commission.
- (h) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- (i) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such change.
- (j) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, Vice President PWR Operations and AVP Quality Programs and Assessment.
- (k) Changes to Offsite Dose Calculation Manual (ODCM).
- (l) Changes to the PROCESS CONTROL PROGRAM.

6.1.7.A (Continued)

2. Station Audit Function

The Station Audit Function shall be the responsibility of the AVP Quality Programs and Assessment independent of PWR Operations. Such responsibility is delegated to the Nuclear Quality Program Manager.

The Nuclear Quality Program Manager, or designated Corporate Staff or Supervision approved by the AVP Quality Program Manager, shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within a period of two years or as designated below:

- (a) Audit of the conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- (b) Audit of the adherence to procedures, training and qualification of the station staff once per year.
- (c) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months.
- (d) Audit of the performance of activities required by the Quality Assurance Program to meet the Criteria of 10CFR 50 Appendix "B",.
- (e) Audit of the Generating Stations Emergency Plan and Implementing Procedures.
- (f) Audit of the Facility Security Plan and implementing procedures.
- (g) Audit Onsite and Offsite Reviews.
- (h) Audit the Radiological Environmental Monitoring Program at least once per 12 months.
- (i) Audit the Facility Fire Protection Program and implementing procedures at least once per 24 months.
- (j) An independent Fire Protection and Loss Prevention Program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensed personnel or an outside fire protection firm.
- (k) 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.
- (l) The PROCESS CONTROL PROGRAM and implementing procedures at least once per 24 months.

6.1.7.A.2 (Continued)

(m) Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station Manager, the Manager of QA/NS, the Vice President PMR Operations, AVP Quality Programs and Assessment and Senior Vice President Nuclear Operations, and the Chief Operating Officer.

(n) Audit the Offsite Dose Calculation Manual (ODCM) at least once per 24 months.

6.1.7.A.3. Authority

The Manager of QA/NS reports to the Chief Executive Officer. The Manager of QA/NS has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

The AVP Quality Programs and Assessment reports to the Senior Vice President - Nuclear Operations. The AVP Quality Programs and Assessment has the authority to recommend unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operating Officer.

4. Records

(a) Reviews, audits and recommendations shall be documented and distributed as covered in 6.1.7.A.1 and 6.1.7.A.2

(b) Copies of documentation, reports, and correspondence shall be kept on file at the station.

5. Procedures

Written administrative procedures shall be prepared and maintained for the Offsite Review and Investigative functions described in specifications 6.1.7.A.1. These procedures shall cover the following

(a) Content and method of submission of presentations to the Superintendent of the Offsite Review and Investigative Function.

(b) Use of committees and consultants.

(c) Review and approval.

(d) Detailed listing of items to be reviewed.

(e) Method of (1) appointing personnel, (2) performing reviews and investigations, (3) reporting findings and recommendations of reviews and investigations, (4) approving reports, and (5) distributing reports.

(f) Determining satisfactory completion of action required based on approved findings and recommendations reported by personnel performing the review and investigative function.

6. Personnel

- (a) The persons, including consultants, performing the review and investigative function, in addition to the Superintendent of the Offsite Review and Investigative Function, shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated.

- (1) Nuclear power plant technology
- (2) Reactor operations
- (3) Utility operations
- (4) Power plant design
- (5) Reactor engineering
- (6) Radiological safety
- (7) Reactor safety analysis
- (8) Instrumentation and control
- (9) Metallurgy
- (10) Any other appropriate disciplines required by unique characteristics of the facility.

- (b) Individuals performing the Offsite Review and Investigative Function shall possess a minimum formal training and experience as listed below for each discipline.

(1) Nuclear Power Plant Technology

Engineering graduate or equivalent with 5 years experience in nuclear power field design and/or operation.

(2) Reactor Operations

Engineering graduate or equivalent with at least 5 years experience in nuclear power plant operations.

(3) Utility Operations

Engineering graduate or equivalent with at least 5 years of experience in utility operation and/or engineering.

(4) Power Plant Design

Engineering graduate or equivalent with at least 5 years of experience in power plant design and/or operation.

6.1.7.A.6(b) (Continued)

(5) Reactor Engineering

Engineering graduate or equivalent with at least 5 years of experience in nuclear plant engineering, operation, and/or graduate work in nuclear engineering or equivalent in reactor physics.

(6) Radiological Safety

Engineering graduate or equivalent with at least 5 years of experience in Radiation Control and Safety

(7) Safety Analysis

Engineering graduate or equivalent with at least 5 years experience in nuclear engineering.

(8) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

(9) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

- (c) The Superintendent of the Offsite Review and Investigative Function shall have experience and training which satisfy ANSI N18.1 - 1971 requirements for plant managers.

6.1.7.B Onsite Review and Investigative Function

1. The Onsite Review and Investigative Function shall be supervised by the Station Manager.

The Station Manager or his designee, shall: (a) Provide direction for the Onsite Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as a senior participant to provide appropriate direction; (b) Approve participants for this function; (c) Assure that a complement of more than one participant who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive interdisciplinary review coverage under this function; (d) Independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (e) Report all findings of noncompliance with NRC requirements, and provide recommendations; and (f) submit to the Offsite Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.7.A.1 which have been approved by the Onsite Review and Investigative Function.

6.1.7.B. (Continued)

2. The responsibilities of the personnel performing this function are stated below:

- (a) Review of procedures required by Specification 6.2 and changes thereto, and any other proposed procedures or changes thereto as determined by the Station Manager 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 NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence.
- (f) Review of facility operations to detect potential safety hazards.
- (g) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Offsite Review and Investigative Function.
- (h) Review of the Station Security Plan and shall submit recommended changes to the Director of Corporate Security and the AVP Quality Programs and Assessment in lieu of distribution in accordance with 6.1.7.B.4(a).
- (i) Review of the Emergency Plan and Station Implementing Procedures and identification of recommended changes.
- (j) Review of Reportable Events and actions taken to prevent recurrence.
- (k) Review of changes to the Offsite Dose Calculation Manual (ODCM).
- (l) Review of changes to the PROCESS CONTROL PROGRAM (PCP).

3. Authority

The Technical Staff Supervisor is responsible to the Station Manager and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation and administrative procedures relating to facility operations and shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the Vice President PWR Operations and the Superintendent of the Offsite Review and Investigative Function.

6.1.7.B (Continued)

4. Records

(a) Reports, reviews, investigations, and recommendations prepared and performed for Specification 6.1.7.B.2 shall be documented with copies to the Vice President PWR Operations, the Superintendent of the Offsite Review and Investigative Function, the Station Manager and the AVP Quality Programs and Assessment.

(b) Copies of all records and documentation shall be kept on file at the station.

5. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the Onsite Review and Investigative Function. These procedures shall include the following:

(a) Content and method of submission and presentation to the Station Manager, Vice President PWR Operations and the Superintendent of the Offsite Review and Investigative Function.

(b) Use of committees.

(c) Review and approval.

(d) Detailed listing of items to be reviewed.

(e) Procedures for administration of the quality control activities.

(f) Assignment of responsibilities.

6. Personnel

(a) The personnel performing the Onsite Review and Investigative Function, in addition to the Station Manager or his designee, shall consist of persons having expertise in:

- (1) Nuclear power plant technology
- (2) Reactor operations
- (3) Reactor engineering
- (4) Radiological safety
- (5) Instrumentation and control
- (6) Chemistry and Radiochemistry
- (7) Mechanical and electric systems.
- (8) Metallurgy

(b) Personnel performing the Onsite Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1 1971, Sections 4.2 and 4.4.

6.2. Plant Operating Procedures

1. Written procedures including applicable checkoff lists covering items listed below shall be prepared, implemented, and maintained:
 - A. Normal startup, operation, and shutdown of the reactor and other systems and components involving nuclear safety of the facility.
 - B. Refueling operations.
 - C. 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.
 - D. Emergency conditions involving potential or actual release of radioactivity - "Generating Stations Emergency Plan" and station emergency and abnormal procedures.
 - E. Instrumentation operation which could have an effect on the safety of the facility.
 - F. Preventive and corrective maintenance operations which could have an effect on the safety of the facility.
 - G. Surveillance and testing requirements.
 - H. Tests and experiments.
 - I. Procedures to ensure safe shutdown of the plant.
 - J. Station Security Plan and implementing procedures.
 - K. Fire Protection Program implementation.
 - L. Post Accident Sampling Program
 - M. Working hours of the Shift Engineer, Shift Control Room Engineer, Shift Foreman, and Nuclear Station Operator such that the heavy use of overtime is not routinely required.
2. Radiation control procedures shall be prepared, implemented and maintained. These procedures shall specify permissible radiation exposure limits and shall be consistent with the requirements of 10CFR 20. The radiation protection program shall meet the requirements of 10CFR 20.

6.2 (Continued)

3. Procedures for items identified in Specification 6.2.1 and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation and fuel handling, and by the Maintenance Assistant Superintendent and Technical Staff Supervisor in the areas of plant maintenance, instrument maintenance, and plant inspection. Procedures for items identified in Specification 6.2.2 and any changes to such procedures shall be reviewed and approved by the Technical Staff Supervisor and the Health Physics Supervisor/Chemistry Supervisor or designees. At least one person approving each of the above procedures shall hold a valid Senior Reactor Operator's license. In addition, these procedures and changes thereto must have the authorization of the Station Manager or designee before being implemented.

Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Production Superintendent. The "Maintenance/Modification Procedure" utilized for safety related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as required by 6.2.1. Procedures which do not fall within the requirements of 6.2.1 or 6.2.2 may be approved by the Department Heads.

4. Temporary changes to procedures identified in Specifications 6.2.1 and 6.2.2 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 Onsite Review and Investigative function and approved by the Station Manager or designee within 14 days of implementation.
5. Drills of the emergency procedures described in Specification 6.2.1.D shall be conducted at the frequency specified in the Generating Station Emergency Plan. These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

6.3 Action to be Taken in the Event of a Reportable Event in Plant Operation:

Any Reportable Event shall be promptly reported to the Vice President PWR Operations or his designated alternate. The incident shall be promptly reviewed pursuant to Specification 5.1.7.B.i.(j) and a separate report for each reportable event shall be prepared in accordance with the requirements of 10CFR 50.73.

6.4 Action to be Taken in the Event a Safety Limit is Exceeded:

If a safety limit is exceeded, the reactor shall be tripped immediately and reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the Vice President PWR Operations or his designated alternate. The incident shall be reviewed pursuant to Specification 6.1.7.A.1 and 6.1.7.B.1 and a separate report for each occurrence shall be prepared in accordance with 10CFR 50.36.

6.5 Plant Operating Records

1. Records relative to the following items shall be retained for at least five years:
 - A. Records of normal plant operation, including power levels and periods of operation at each power level.
 - B. Record of principal maintenance activities, including inspection, repair and replacements, regarding principal items of equipment pertaining to nuclear safety.
 - C. Records and reports of Reportable Events and Safety Limit occurrences.
 - D. Records and periodic checks, inspection and/or calibrations performed to verify the Surveillance Requirements (Section 4 of these Specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded.
 - E. Records of changes made to procedures required by Specifications 6.2.1 and 6.2.2.
 - F. Records of radioactive shipments.
 - G. Records of physics tests and other tests pertaining to nuclear safety.
 - H. Records of sealed source and fission detector leak tests and results.
 - I. Shift Engineers Logs.
 - J. By-product material inventory records.
2. Records relative to the following items shall be retained for the duration of the Operating License:
 - A. Substitution or replacement of principal items of equipment pertaining to nuclear safety.
 - B. Records and drawing changes reflecting plant design modifications made to systems and equipment described in the Safety Analysis Report.

6.5.2 (Continued)

- C. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- D. Updated, corrected, and as-built drawings of the plant.
- E. Records of plant radiation and contamination surveys.
- F. Records of offsite environmental monitoring surveys.
- G. Records of radiation exposure for all plant personnel, including all contractors and visitors to the plant in accordance with 10 CFR 20.
- H. Records of radioactivity in liquid and gaseous wastes released to the environment.
- I. Records of transient or operational cycling for those components that have been designed to operate safely for a limited number of transient or operational cycles.
- J. Records of training and qualification for current members of the station staff.
- K. Inservice inspections and testing performed pursuant to the Technical Specifications.
- L. Minutes of meetings and results of reviews performed by the Offsite and Onsite Review Functions.
- M. Records of secondary water sampling and water quality.
- N. Records for environmental qualification of components required by the Environmental Qualification (EQ) Program.
- O. Records of the service lives of all snubbers covered by Specification 3.22 including the date at which the service life commences and associated installation and maintenance records.
- P. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR 50.59.
- Q. Records of Quality Assurance activities required by the Q.A. Manual.
- R. Records of reactor tests and experiments.

ATTACHMENT B

DETAILED DESCRIPTION AND SUMMARY

This proposed change includes revisions to Section 6 of the Zion Technical Specifications (TS) that are desired to reflect Generic Letter 88-06 recommendations and the corporate and station reorganizations.

Generic Letter 88-06 proposed methods to delete the organizational charts currently contained in TS. The removal of organization charts is a line item improvement that the NRC will review and approve quickly if the proposal conforms to the guidance provided in the Generic Letter. Although the organizational charts have previously been removed, the following statements are being added to capture the essence of the Generic Letter:

- A. Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
 - 1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organization Authority, Activities; Section 6 Interdepartmental Relationships.
 - 2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
 - 3. The Senior Vice President-Nuclear Operations shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
 - 4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

The changes noted above satisfy the guidance of Generic Letter 88-06. The following summary provides a list of other changes that are being proposed to support the corporate and station reorganization. This list also contains other minor changes that have been identified as being necessary:

- 1. "Assistant Vice President and General Manager Nuclear Stations" to "Vice President PWR Operations".

2. "Assistant Superintendent Maintenance" to "Maintenance Assistant Superintendent".
3. "Rad Chem Supervisor" to "Health Physics Supervisor".
4. "Radiation/Chemical Technicians" to "Radiation Protection and Chemistry Technicians". This change also references the two different training programs that exist for Radiation Protection Technicians and Chemistry Technicians.
5. "Services Superintendent" to "Technical Superintendent".
6. "Supervisor of the Offsite Review" to "Superintendent of the Offsite Review".
7. The Superintendent in Item 6 above shall be appointed by the "Manager of Quality Assurance/Nuclear Safety (QA/NS)" rather than by the "Chairman and President".
8. Approving and reporting of all findings of noncompliance with NRC requirements will now be to the "Vice President PWR Operations, Manager QA/NS, Assistant Vice President (AVP) Quality Programs and Assessment, and the Senior Vice President Nuclear Operations" rather than "Assistant Vice President and General Manager Nuclear Stations, Manager of Quality Assurance and the Vice President of Nuclear Operations".
9. The station audit function shall now be the responsibility of the "AVP Quality Programs and Assessment" rather than the "Manager of Quality Assurance". This is independent of "PWR Operations" rather than the "Production Department". This responsibility can be delegated to the "Nuclear Quality Programs Manager".
10. As part of the audit function, all findings of noncompliance with NRC requirements.....shall be reported to ".....the Manager of QA/NS, the Vice President PWR Operations, AVP Quality Programs and Assessment, the Senior Vice President Nuclear Operations, and the Chief Operating Officer". This is instead of "...Assistant Vice President and General Manager Nuclear Stations, Manager of Quality Assurance, Vice President of Nuclear Operations and to the Executive Vice President of Construction, Production, and Engineering".
11. The Manager of QA/NS reports to the "Chief Executive Officer". This is instead of to the "Chairman and President".
12. The Manager of QA/NS has the authority to order unit shutdown. This is instead of the Manager of Quality Assurance or the Supervisor of Offsite Review.

13. The AVP Quality Programs and Assessments reports to the Senior Vice President Nuclear Operations. He has the authority to recommend unit shutdown. If disagreements occur, they shall be reported to the Manager of QA/NS and the Chief Operating Officer.
14. Review of the security plan and recommended changes shall be submitted to the "Director of Corporate Security and the AVP Quality Programs and Assessment" rather than to the "Assistant Vice President and General Manager Nuclear Stations".

The Zion Technical Specifications Section 6 page 302 has been retyped and the following editorial change is being made at this time.

Specification 6.1.6.A.1 (a), (b), and (c) deleted the word "Section".

Specification 6.1.5 change from "fo" to "for".

Specification 6.1.7.A.2(m) from "(OCDM)" to "(ODCM)".

ATTACHMENT C

Evaluation of Significant Hazard Consideration

Commonwealth Edison has evaluated the proposed amendment and determined that it involves no significant hazard consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazard consideration if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequence of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The proposed Technical Specification amendment requests several changes. The first proposed revision corrects several position titles that change due to corporate reorganization. The second proposed revision revises TS 6.1 to be in agreement with NRC Generic Letter 88-06. The third revision adds clarification to reporting and responsibility requirements of new corporate officer titles. The last change is a minor editorial correction.

None of the proposed changes are initiating events for an accident, therefore, the probability of an occurrence of an accident is not affected. Specification 6.1.1 has been revised to capture the essence of the organizational features included in the organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions contained in the Quality Assurance Manual or the Management Plan for Nuclear Operations. Therefore, safe plant operation is not affected and the consequences of any accident presented in the UFSAR are not imparted by this change. The remaining changes address organizational title changes and editorial changes. All of these changes are administrative in nature and the consequences of an accident as described in the UFSAR are not affected.

The proposed changes do not revise any functional or design parameters used at the Station. These changes do not modify any equipment or systems or cause the unit to be operated in a different manner. Therefore, the possibility of a new or different kind of accident is not created.

All of the proposed changes are administrative, editorial or typographical and as such, do not affect any margin of safety. The proposed organizational changes do not affect safe operation of the plant. Updating position titles, and editorial changes do not affect safe plant operations.

For the preceding reasons, Commonwealth Edison believes all the changes proposed for the Technical Specification amendment do not involve any significant hazard considerations.