

**Millstone Power Station Unit 3  
Safety Analysis Report**

**Chapter 13: Conduct of Operations**

## CHAPTER 13—CONDUCT OF OPERATIONS

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**NOTE: REFER TO THE CONTROLLED PLANT DRAWING FOR THE LATEST REVISION.**

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## CHAPTER 13 - CONDUCT OF OPERATIONS

### 13.1 ORGANIZATIONAL STRUCTURE

Information regarding the organizational structure is presented in Section 1.0 of the Quality Assurance Program Description (QAPD) Topical Report (Reference 13.1-1).

Dominion Nuclear Connecticut, Inc. (DNC) is an indirect wholly owned subsidiary of Dominion Energy, which is in turn wholly owned by Dominion Resources, Inc.

The majority owner, holding 93.4707 percent of the Millstone 3 nuclear plant, is DNC. The remaining 6.5293 percent is owned collectively by other electric utility entities. Their individual ownership shares are:

	<u>Percent</u>
DNC	93.4707
Green Mountain Power Corporation	1.7303
Massachusetts Municipal Wholesale Electric company (Massachusetts Electric)	<u>4.7990</u>
	100.00

The Principal Participants in the Millstone 3 license have designated DNC to act as agent and representative for all of the owners of Millstone 3. DNC is responsible for the design, construction, operation, and fuel management of the unit and is authorized to act as Lead Applicant in all matters relating to the license.

NNECO, formerly named the Millstone Point Company, was responsible for the design and construction of the Millstone Units 1, 2, and 3 nuclear plants. Millstone Units 1 and 2 are owned, operated and/or maintained by DNC.

#### 13.1.1 MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATION

The management and technical support organizations consist of DNC personnel. DNC is responsible for all support and operational activities. DNC is committed to ensuring that it maintains an acceptable organization and adequate resources to provide both on site and off site technical support for the operation of Millstone Units 1, 2 and 3 under both normal and emergency conditions.

### 13.1.1.1 Initial Design and Operating Responsibilities

Design and operating responsibilities are discussed in the following paragraphs in three general phases:

1. Design and construction activities (project phase)
2. Preoperational activities
3. Technical support for operations

#### 13.1.0.0(1) Design and Construction Activities (Project Phase)

Stone & Webster Engineering Corporation (SWEC), by contract with NUSCO, provided overall design and construction for the Millstone 3. Westinghouse Electric Corporation, also by contract with NUSCO, designed and furnished the nuclear steam supply system (NSSS). Administration of the contract with Westinghouse was assigned to SWEC. NUSCO, responsible to NNECO for design and construction of all aspects of the plant, provided varying degrees of direct design involvement in establishing the overall design.

##### 13.1.0.0(1)(a) Site Related Engineering Work

With Millstone 3, the third unit built on the site, the various kinds of site related engineering work required had been completed.

The meteorological tower met the requirements of NUREG-0654 prior to the Emergency Plan Start-Up Appraisal. Hydrologic studies performed with updated hurricane and storm surge models were used as the design basis for shoreline and intake structure protection from storm wave action. The demography of the surrounding area has been updated to reflect both present population and the most recent projections of future growth. Dose estimates for both routine and accidental releases have been made using the most recent five-year data base available from the meteorological tower and the updated demography. The thermal effects of the condenser cooling water plume on the ecological balance of offshore waters have been extensively studied and the studies documented in annual reports. Using these studies as a baseline, and with the most recent hydrodynamic and biological models, the combined environmental effects of all three Millstone units have been projected.

The details of this completed work are described in Chapter 2. Many of the studies, however, are ongoing and continuing past the startup of Millstone 3. For example, post-startup verification work was done to compare the hydrodynamic model projections of the three units cooling water plume to the plume as it actually occurs in the offshore waters.

Site-related engineering work in geology and seismology was performed by SWEC and their subcontractors. Information and reports generated by SWEC were reviewed by NUSCO for general information and content, as well as for comparison with work previously performed at the site.

#### 13.1.0.0(1)(b) Design of Plant and Ancillary Systems

Westinghouse designed the NSSS. SWEC incorporated this design into the overall plant design and has provided detailed design of the balance of plant systems and all ancillary systems required for their operation.

#### 13.1.0.0(1)(c) Review and Approval of Plant Features

SWEC provided review and approval of plant design features of Millstone 3 in accordance with its engineering procedures. This review was subject to NUSCO's subsequent selective review and approval based upon NUSCO's experience in the design and support of operations for Millstone 1 and 2 and support of operations for the CY plant. NUSCO's review and approval included coordinated review and concurrence by appropriate personnel of NNECO.

#### 13.1.0.0(1)(d) Site Layout for Environmental Effects and Security Provisions

Various figures in Chapter 2 show the location of the meteorological tower, environmental dosimetry stations, and the pattern of the condenser cooling water plume.

The detail description of management responsibilities and control philosophies are included in the security plan. The implementation schedule for major milestone events for establishing Millstone 3 security was as follows:

October 18, 1985-Rev. 0 of Security Plan for Millstone 3 became effective

November 9, 1985-Security Plan implemented (prior to fuel load)

#### 13.1.0.0(1)(e) Development of Safety Analysis Report

Preparation of the Millstone 3 FSAR was coordinated by NUSCO's Nuclear Licensing Group with support from NUSCO, NNECO, SWEC, and Westinghouse, and was submitted to the NRC in support of the November 1985 fuel load date.

#### 13.1.0.0(1)(f) Review and Approval of Material and Component Specifications

SWEC provided review and approval of material and component specifications in accordance with its engineering procedures. This review was subject to NUSCO's subsequent review and approval selectively based upon NUSCO's experience in the design and support of operations for Millstone 1 and 2 and support of operations for the CY plant. NUSCO's review and approval included coordinated review and concurrence by appropriate personnel of NNECO.

#### 13.1.0.0(1)(g) Procurement of Materials and Equipment

NUSCO procured the NSSS and the turbine generator for the Millstone 3 plant. SWEC procured the balance-of-plant materials, components, and systems. NUSCO exercised its right of approval of bid lists and contract awards for SWEC procured equipment on a selective basis.

### 13.1.0.0(1)(h) Management and Review of Construction Activities

SWEC was responsible for construction and management of construction forces for the Millstone 3 plant. NUSCO was responsible for supervision of the construction portion of the SWEC contract. To this end, NUSCO maintained from the start of site preparation an on site staff of experienced construction personnel under the direction of the on site NUSCO Superintendent--New Site Construction. Provisions for control of construction quality assurance aspects are in accordance with Chapter 17.

### 13.1.0.0(2) Preoperational Activities

#### 13.1.0.0(2)(a) Human Engineering Design Objectives in Control Room Layout

SWEC, under the direction of NUSCO and NNECO, developed human engineering design objectives that would enhance operator effectiveness during normal and abnormal plant operations.

The design phase review of the proposed control room layout was an iterative process involving SWEC, NUSCO, and NNECO. During the review process the original operational design objectives were continually validated to ensure an effective control room work space. NUSCO and NNECO remained continually involved in the design review of the control room by review of the design documents, utilizing mock-ups, and considerable operating experience from CY and Millstone 1 and 2.

#### 13.1.0.0(2)(b) Staff Recruiting and Training Programs

The staff recruiting program is designed to maintain adequate staffing. The training program is in accordance with Section 13.2.

#### 13.1.0.0(2)(c) Initial Testing

The development of plans for initial testing were as outlined in Chapter 14, Initial Test Program.

#### 13.1.0.0(2)(d) Plant Maintenance Programs

The development of the plant maintenance program included the initial staff buildup. In addition, prior to initial plant testing the generic mechanical/electrical test procedures were completed and the specific equipment and planned maintenance procedures development was initiated.

#### 13.1.0.0(2)(e) Emergency Plan

A full-scale emergency preparedness exercise was performed prior to initial start-up.

### 13.1.0.0(3) Technical Support for Operations

The organization providing technical support for operations is described in Section 1.0 of the QAPD Topical Report.

#### 13.1.1.2 Organizational Arrangement

The organizational arrangement is as described in Section 1.0 of the QAPD Topical Report (Reference 13.1-1).

### 13.1.2 OPERATING ORGANIZATION

#### 13.1.2.1 Unit Organization

The unit organizations are as shown in Reference 13.1-1.

#### 13.1.2.2 Assumption of Responsibility

In the event of unexpected contingencies of a temporary nature, the line of succession of authority and responsibility for overall station operation will be delegated in writing in accordance with Section 6.1, Responsibility, of the Technical Specifications.

#### 13.1.2.3 Operating Shift Crews

The minimum shift crew composition and license requirements during all modes of operation are contained in Section 6.2 of the Technical Specifications.

### 13.1.3 QUALIFICATIONS OF NUCLEAR PLANT PERSONNEL

#### 13.1.3.1 Qualification Requirements

13.1.3.1.1 Education and experience requirements are established by Section 6.3 of the Technical Specifications.

#### 13.1.4 REFERENCES

13.1-1 Quality Assurance Program Description Topical Report.

**FIGURE 13.1-1 DELETED BY PKG FSC 01-MP3-013**

## 13.2 TRAINING PROGRAMS

Formal training programs have been established to train and qualify the personnel who operate and maintain the Millstone nuclear units. These programs are structured to fulfill the requirements of 10 CFR 55 and 10 CFR 50.120 using training criteria set forth in ACAD 02-001 (Reference 13.2-1). Descriptions of the training program processes exist in a set of training department documents. The programs are based on a systems approach to training and are accredited by the National Academy for Nuclear Training. Initial accreditation of these programs was awarded on August 21, 1986, for operator training and on December 15, 1987, for maintenance and technical training. These programs are implemented for the following categories of nuclear power plant personnel:

- Non-licensed Operator
- Reactor Operator
- Senior Reactor Operator
- Shift Manager
- Continuing (Requalification) Training for Licensed Personnel
- Shift Technical Advisor
- Instrument and Control Technician
- Electrical Maintenance Personnel
- Mechanical Maintenance Personnel
- Chemistry Technician
- Radiological Protection Technician
- Engineering Support Personnel

### 13.2.1 REFERENCES

- 13.2-1 ACAD 02-001, National Academy for Nuclear Training, “The Objectives and Criteria for Accreditation of Training in the Nuclear Power Industry.”

### 13.3 EMERGENCY PLANNING

The staff-approved Millstone Nuclear Power Station Emergency Plan (Reference 13.3-1) addresses the criteria set forth in NUREG-0654, FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Revision 1, November 1980 and NUREG-0737, Supplement 1. As such, the Emergency Plan provides for an acceptable state of emergency preparedness and meets the requirements of 10 CFR Part 50 and Appendix E thereto.

#### 13.3.1 REFERENCES

13.3-1 J. F. Opeka letter to U.S. Nuclear Regulatory Commission Document Control Desk, transmitting Revision 6 to the Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Emergency Plan dated November 9, 1991, and subsequent revisions thereto submitted on an annual basis.

## 13.4 REVIEW AND AUDIT

A program describing the review and audit of activities important to and affecting station safety during the operational phase has been established and complies with Regulatory Guide 1.33, Rev. 2 “Quality Assurance Program Requirements (Operation).” The program provides a system to ensure that these activities are performed in accordance with company policy, rules, and approved procedures.

### 13.4.1 ONSITE REVIEW

Onsite review is conducted by committee(s) as described in the Quality Assurance Program Description (QAPD) Topical Report.

### 13.4.2 INDEPENDENT REVIEW

Independent review of activities affecting the unit's safety is performed by the Management Safety Review Committee, as described in the QAPD Topical Report.

### 13.4.3 AUDIT PROGRAM

The audit program for activities affecting safety-related systems, structures, or components is as described in the QAPD Topical Report.

### 13.4.4 INDEPENDENT SAFETY ENGINEERING GROUP FUNCTION (DELETED)

### 13.4.5 OTHER REVIEW GROUPS

Other review groups evaluate, on a periodic basis, the effectiveness of the units. These groups are: independent consultants, task forces, nuclear industry management assessments, insurance inspections, INPO Evaluation and Assistance Division, etc.

## 13.5 PLANT PROCEDURES

Administrative procedures are written on a department (or common department), unit, and station (or common station) level. Technical Procedures are written on a unit and department (or common department) level. These procedures are required for controlling the specifics of station operations, including specifications; maintenance and modification; periodic test, inspection, calibration, and special processes; and plant and equipment operation.

### 13.5.1 ADMINISTRATIVE PROCEDURES

#### 13.5.1.1 Conformance with Regulatory Guide 1.33

Regulatory Guide 1.33, Rev. 2, issued February 1978, Quality Assurance Program Requirements, is used as guidance for the preparation of administrative and station procedures.

#### 13.5.1.2 Preparation of Procedures

Preparation, review and approval of procedures is as described in the Quality Assurance Program Description Topical Report.

#### 13.5.1.3 Procedures

Administrative Procedures include Department, Unit, and Station Procedures that cover a wide range of topics. Major areas are described as follows.

##### Standing Orders to Operating Personnel

Administrative procedures define the authorities and responsibilities of operating personnel. The procedures specify the number of personnel with reactor operator and senior reactor operator licenses required to be on site or at the controls in all plant conditions. (Figure 13.5–1 shows the area of the control room which has been designated “at the controls.”) These procedures contain the necessary directives to implement Sections i, j, k, l, and m of 10 CFR 50.54. The administrative procedures direct the proper maintenance, review, and disposition of operating records, establish requirements for shift turnover, and establish the authority and responsibilities of the person in charge of the control room to limit access. Procedures also direct the assignment of shift personnel to duty stations, establish limits for scheduled working hours, provide methods of timely and concise feedback of operating experience to applicable plant staff, and describe methods used to verify operational activities are performed correctly. Procedures also provide for shift turnover such that all necessary information is properly transmitted to the oncoming shifts.

##### Crane Operations

Personnel involved with crane operations over the fuel pool are qualified and conduct crane operations in accordance with ANSI B30.2-1976 (Chapter 2-3), Overhead and Gantry Cranes.

### Special Orders of a Transient or Self-Cancelling Character

Night orders can be issued when appropriate to provide guidance to operating shifts. When used, night orders are of a temporary nature. When appropriate, night orders are incorporated into either a special procedure or an administrative procedure if the need becomes permanent.

### Equipment Control Procedures

Instructions are written to specify proper methods of obtaining clearances on plant equipment for maintenance or construction and to specify procedures for control of jumper, lifted lead, and bypass control. The clearance procedure assigns responsibility for clearance issue to the shift manager. A licensed operator, after ensuring he or she is aware of the effect of the activity on the system, is required to authorize all maintenance, tests, and surveillances performed on plant systems. Upon completion of the item, the document is returned to the operator for acceptance or for the purpose of returning the system to service. The administrative procedures which control these evolutions provide the required explicit notification of operational personnel whenever a safety related system is removed from and returned to service. The clearance procedure also contains certain restrictions on the issuance of a clearance. The work control procedures for control of jumper, lifted lead, and bypass control allow temporary alterations to critical structures, systems, or components to facilitate tests, maintenance, or operations. They specify administrative procedures to be followed in performing such alterations.

### Control of Maintenance and Modifications

Administrative procedures implement the review and approval requirements for maintenance and modifications. These procedures include the control of plant modifications and maintenance on safety-related equipment. These procedures establish a framework of special process and maintenance procedures.

### Master Surveillance Testing Schedule

An administrative work control procedure establishes a master test control list, implements the surveillance test program, and assigns responsibility for review and approval of surveillance procedures in accordance with Technical Specifications. Written surveillance procedures are controlled as Department or Common Department procedures.

### Procedures for Logbook Usage and Control

An administrative department procedure establishes the requirements for logbook usage and control.

### Maintenance and Testing of Safety-Related Systems

The Work Control Process is used for administratively controlling maintenance and testing of safety-related systems so that prior to the removal of a safety-related system from service, the credited redundant system is verified operable. For equipment that requires specific surveillance

in accordance with Technical Specifications, surveillance testing is verified to be up to date or the successful surveillance testing of the credited redundant system is completed prior to removing the system from service.

These procedures are reviewed and approved, if necessary, to ensure operability of safety systems prior to taking credit for the system(s) to satisfy Technical Specification requirements.

Independent position verification of safety-related components/systems (valves, breakers, and control switches) with no indication in the control room are performed prior to the return-to-service of the component/system.

### Special Procedures

Special procedures are prepared as necessary to support infrequently performed activities which are not to be included in the permanent list of procedures. A special procedure can be written for any type of procedure (i.e., maintenance, operating, testing). The format of a special procedure is the same as the applicable type of administrative or technical procedure. All requirements for review, approval, revisions, and changes are the same as for permanent procedures.

## 13.5.2 OPERATING AND MAINTENANCE PROCEDURES

Operating and maintenance procedures are divided into several categories which are described in the following subsections. The list of these procedures is contained in the Master Document Index.

Operating and maintenance procedures preparation is the responsibility of the appropriate department head. When a procedure is written, the applicable department Head/Manager is responsible to forward the procedure for review and approval in accordance with Technical Specifications.

Plant operations are performed in accordance with written and approved Station and Department procedures.

### 13.5.2.1 Operations Department Procedures

#### 13.5.2.1.1 General Operating Procedures

These procedures cover major plant evolutions. The list of these procedures is controlled by NDM 4, "Controlled Document Distribution," and is contained in the Electronic Master Document Index. Step-by-step instructions are provided for the function or task with the appropriate cross reference to system operating procedures for details of specific system operation. Appropriate precautions and limitations are included.

#### 13.5.2.1.2 System Operating Procedures

These procedures provide step-by-step details for system operations with appropriate prerequisites, precautions, and limitations. Each procedure covers the expected modes of operation of the system as well as startup, shutdown, filling and venting, and standby operation as applicable. The list of these procedures is controlled by NDM 4, “Controlled Document Distribution,” and is contained in the Electronic Master Document Index.

#### 13.5.2.1.3 Annunciation Response Procedures

These procedures provide step-by-step details for appropriate system operation in response to annunciators. Annunciator alert plant personnel of a changing conditions which could lead to off normal system performance. The list of these procedures is controlled by NDM 4, “Controlled Document Distribution,” and is contained in the Electronic Master Document Index.

#### 13.5.2.1.4 Abnormal Operating Procedures

Abnormal Operating Procedures are prepared for abnormal operation of the unit. Abnormal operation is a condition that could degrade into an emergency or could violate Technical Specifications if proper action were not taken. These procedures identify the symptoms of the abnormal condition, automatic actions that may occur, and the appropriate immediate and subsequent operator actions. The list of these procedures is controlled by NDM 4, “Controlled Document Distribution,” and is contained in the Electronic Master Document Index.

#### 13.5.2.1.5 Emergency Operating Procedures

Emergency Operating Procedures are prepared for conditions which might possibly lead to injury of plant personnel or the public if the release of radioactivity in excess of established limits occurs. These procedures include symptoms of the emergency conditions, automatic actions that may or should occur, and immediate and subsequent operator actions. All immediate actions are required to be memorized by the operator since the primary responsibility for detection of an emergency and initiation of corrective action rests upon the operator. Emergency operating procedures are prepared based upon Revision 1B to the Westinghouse Owners Group Emergency Guidelines, and subsequent revision thereto, as implemented pending approval by the NRC. The list of these procedures is controlled by NDM 4, “Controlled Document Distribution,” and is contained in the Electronic Master Document Index.

#### 13.5.2.1.6 Operations Surveillance Procedures

These procedures provide step-by-step details for system or component surveillance. These procedures verify the operability of the system or component in accordance with Technical Specifications. The list of these procedures is controlled by NDM 4, “Controlled Document Distribution,” and is contained in the Electronic Master Document Index.

### 13.5.2.2 Department Procedures

Procedures are written by the chemistry, radiation protection, instrumentation and controls, condition based maintenance, security, generation test, maintenance services, material control, nuclear document services, computer services, engineering and any other group. These procedures control the specific activities of these departments in support of unit or station operation (may be common or unit specific). Station calibration procedures written by the Maintenance or Instrument Action and Control departments are also Common or Unit specific procedures.

#### 13.5.2.2.1 Radiation Protection Procedures

Radiation protection procedures support Section 12.5 and 10 CFR 20 requirements.

#### 13.5.2.2.2 Emergency Preparedness Procedures

Emergency preparedness procedures support and implement the Emergency Plan.

#### 13.5.2.2.3 Instrumentation and Control Procedures

Instrumentation and Control Procedures are prepared for the performance of periodic calibration, testing, and channel checking of safety-related plant instrumentation and all instruments used to satisfy technical specification requirements. These procedures ensure measurement accuracies adequate to maintain plant safety parameters within operational and safety limits. In addition, instrumentation and control procedures outline the periodic calibration and accuracy requirements of test equipment necessary to support the calibration of safety related instrumentation.

#### 13.5.2.2.4 Condition Based Maintenance Procedures

Condition Based Maintenance Procedures are prepared to monitor the condition of safety related and balance of plant equipment.

#### 13.5.2.2.5 Chemistry Procedures

Chemistry procedures are prepared covering the routine analysis and sampling methods to ensure compliance with plant chemistry and discharge limits.

#### 13.5.2.2.6 Radioactive Waste System Procedures

Procedures for operation of radwaste systems are included in system operating procedures.

#### 13.5.2.2.7 Plant Security Instructions

This topic is discussed in Section 13.6.

#### 13.5.2.2.8 Material Control Procedures

This topic is covered by administrative procedures in Section 13.5.1.3.

#### 13.5.2.2.9 Maintenance Procedures

Maintenance procedures are prepared to cover safety-related work which requires a specific technique or sequence not normally part of an individual's routine skill.

The procedures support the requirements and programs of Section 13.5.1.3 which covers administrative control of maintenance.

#### 13.5.2.2.10 Fire Protection Procedures

The Fire Protection Program is described in Section 9.5.1. The list of these procedures is controlled by NDM 4, "Controlled Document Distribution," and is contained in the Electronic Master Document Index.

#### 13.5.2.2.11 Special Procedures

This topic is covered by administrative procedures (refer to FSAR Section 13.5.1.3, Procedures).



*Withheld under 10 CFR 2.390 (d) (1)*

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