



BWX Technologies, Inc.

September 9, 2021
21-045

ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S Nuclear Regulatory Commission
Washington D.C. 20555-0001

Reference: License SNM-42, Docket No. 70-27

Subject: Revision to Chapter 2, *Organization and Administration*, of License SNM-42 License Application

Dear Sir or Madam:

BWXT Nuclear Operations Group, Inc., Lynchburg (BWXT NOG-L), forwards to the U. S. Nuclear Regulatory Commission (NRC) the enclosed revisions to Chapter 2, *Organization and Administration*, of the License SNM-42 License Application (LA) in accordance with License Condition S-13. BWXT NOG-L has determined that the revisions, summarized below, meet the provisions as defined by License Condition S-13.

Chapter 2, Sections 2.1.6, 2.1.6.1, 2.1.6.2, 2.1.6.3 and 2.1.6.4 of the LA were updated to enhance alignment of Nuclear Criticality Safety (NCS) Staff qualification requirements with LA Chapter 5, *Nuclear Criticality Safety*, and BWXT NOG-L internal NCS engineering procedures. A copy of the revised Chapter 2 of the LA is included as an enclosure to this letter.

License Condition S-13 states that BWXT NOG-L may make changes to the License Application that do not reduce the effectiveness of the License Application, without prior NRC approval, if the change meets certain criteria listed below:

The change does not decrease the level of effectiveness of the safety basis as described in the License Application.

The changes to Chapter 2 of the License Application update the qualifications requirements for NCS Staff. The changes will not impact the safety basis as described in the License Application.

The change does not result in a departure from the approved methods of evaluation described in the License Application.

The changes to the License Application are administrative in nature and in no way affect the approved methods of evaluation as described in the License Application.

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The change does not result in a degradation of safety.

The changes to the License Application do not result in a degradation of safety.

The change does not affect compliance with applicable regulatory requirements.

The changes do not affect compliance with the applicable regulatory requirements. The performance requirements of 10 CFR 70.61 are maintained.

The change does not conflict with an existing license condition.

The changes are administrative in nature and do not conflict with any of the existing license conditions.

Within six months after each change is made, the licensee would submit the revised chapters of the License Application to the Director, Office of Nuclear Material Safety and Safeguards, using an appropriate method listed in 10 CFR 70.5(a), and a copy to the appropriate NRC Regional Office.

The submittal of this letter satisfies this requirement.

If you have questions or require additional information, please contact Chris Terry, Manager of Licensing and Safety Analysis, at cterry@bwxt.com or 434-522-5202.

Sincerely,



Richard J. Freudenberger
Manager, Environment, Safety, Health & Safeguards
BWXT Nuclear Operations Group, Inc. – Lynchburg

Enclosure

cc: NRC, J. Downs, Senior Project Manager
NRC, Resident Inspector
NRC, Region II

ENCLOSURE

Revised Chapter 2 of the SNM-42
License Application (20 pages)

SNM-42

CHAPTER 2

ORGANIZATION AND ADMINISTRATION

ORGANIZATION AND ADMINISTRATION

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CHAPTER 2

ORGANIZATION AND ADMINISTRATION

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2.0 Introduction

The basic safety philosophy of the site encompasses the commitment that license requirements will be literally complied with, and in the role of employer, that the company is responsible for providing employees with a safe work place. The site is committed to a Radiation Protection Program which strives to meet the ALARA (As Low As Reasonably Achievable) principle. Each employee is responsible for obeying safety limits and instructions, whether posted, outlined in procedures, or presented in training sessions. The Front Line Manager is the company's first line safety representative and is primarily responsible for promoting and enforcing safety standards and proper work methods. Advisory and staff functions assist line management in the analyses of operations within their control and provide guidance in the establishment of safe working practices and adherence to controls.

The safety function has lines of authority separate from those of production. Therefore, safety positions are able to coordinate and assist management, supervision, and the individual employee by providing direction towards a total safety effort. The safety function consists of a complex program that includes review and approval of operations, comprehensive training, and a system of audits and overchecks.

2.1 Organizational Responsibilities, Authority, and Qualifications

The functional organization responsible for nuclear criticality safety, radiation protection, industrial safety, emergency preparedness, and environmental protection is described below. The managerial positions for areas where personnel work directly with licensed material are also described.

2.1.1 General Manager

The General Manager has the ultimate responsibility for ensuring that operations at the Mt. Athos site are conducted safely and in compliance with applicable federal, state, and local regulations and license conditions. He shall oversee all Lynchburg facility operations. He shall delegate to his staff the various duties and responsibilities required to conduct day-to-day operations. The General Manager shall be the Chairman of the Safety Review Committee.

The General Manager shall have a bachelor's degree and at least 10 years of management experience in a nuclear-related field of endeavor.

2.1.2 Manager, Environment, Safety, Health & Safeguards Department

The Manager of the Environment, Safety, Health & Safeguards Department reports directly to the General Manager. He shall have overall responsibility for safety programs. His management authority and responsibility shall include Nuclear Safety & Licensing, Environmental Protection & Industrial Safety, and Nuclear Material Control & Accountability. He shall have the authority to suspend any activity to ensure safety or compliance.

The Manager of the Environment, Safety, Health & Safeguards Department shall have a bachelor's degree and at least six years' management experience in the nuclear industry.

2.1.3 Manager, Nuclear Safety & Licensing

The Manager of Nuclear Safety & Licensing shall report directly to the Manager of Environment, Safety, Health & Safeguards. He shall have responsibility for the day-to-day plant safety in the fields of Radiation Protection and Nuclear Criticality Safety. Reporting to him are the Manager of Licensing & Safety Analysis, the Manager of Nuclear Criticality Safety, and the Manager of Radiation Protection. The Manager of Nuclear Safety and Licensing shall have the authority to suspend any operation or activity that he judges to be unsafe or contrary to license conditions or other regulatory requirements.

The Manager of Nuclear Safety & Licensing shall have a bachelor's degree and at least six years in nuclear regulatory or safety-related responsibilities.

2.1.4 Manager, Licensing & Safety Analysis

The Manager of Licensing & Safety Analysis reports to the Manager, Nuclear Safety & Licensing. He shall be responsible for directing the Integrated Safety Analysis process, documenting and reporting the results of the analysis and for Licensing activities. He shall be responsible for the administration of License SNM-42 and for communication between the site and the U.S. Nuclear Regulatory Commission. He shall be responsible for administering nuclear safety training. He shall have the authority to suspend activities which he judges are unsafe or contrary to license or regulatory requirements.

The Manager of Licensing & Safety Analysis shall have a bachelor's degree and at least five years in nuclear regulatory or safety-related responsibilities.

2.1.5 Manager, Nuclear Criticality Safety

The Manager of Nuclear Criticality Safety shall report to the Manager of Nuclear Safety & Licensing. He shall be responsible for maintaining properly verified and validated calculational and evaluation capabilities in the area of nuclear criticality safety. He shall be responsible for providing criticality safety evaluations and audits and for ensuring independent Quality Assurance (QA) checks for all evaluations and calculations.

He shall be responsible for administration of the nuclear criticality safety program including the posting of limits and controls, issuance of nuclear criticality safety procedures, the technical content of Nuclear Criticality Safety training, and inspection and surveillance of SNM handling and processing. He shall have the

authority to suspend activities which he judges are unsafe or contrary to license or regulatory requirements.

The Manager of Nuclear Criticality Safety shall have a bachelor's degree in a physical science or engineering. He must have at least two years' experience as a nuclear criticality safety engineer at the Lynchburg facility or at least three years' experience as a nuclear criticality safety engineer at another nuclear facility.

2.1.6 Nuclear Criticality Safety Staff

Nuclear Criticality Safety Staff shall report to the Manager of Nuclear Criticality Safety. The NCS Staff is comprised of NCS Engineers, Senior NCS Engineers, and NCS Engineers-in-Training. The Staff shall be responsible for NCS evaluations, calculations, quarterly audits and weekly inspections. Senior NCS Engineers shall perform QA checks of work performed by other NCS Staff members as directed by the Manager of Nuclear Criticality Safety. A Nuclear Criticality Safety Engineer-in-Training may independently perform quarterly audits and weekly inspections if approved by the Manager of Nuclear Criticality Safety. The Staff shall serve as team members for an Integrated Safety Analysis (ISA) in the area of criticality safety. The NCS Staff shall have the authority to suspend activities which they judge to be unsafe or contrary to license or regulatory requirements. An NCS Staff member shall have, as a minimum, a bachelor's degree in a physical science or engineering.

A Nuclear Criticality Safety Engineer must have met one of the following:

- 2.1.6.1 one year's experience as an NCS Engineer-in-Training performing NCS safety evaluations at the Lynchburg facility under the direct supervision of a qualified NCS Engineer or the Manager, Nuclear Criticality Safety, or
- 2.1.6.2 a Master's degree in physics or nuclear engineering and a minimum of six months' experience as an NCS Engineer-in-Training performing NCS safety evaluations at the Lynchburg facility under the supervision of a qualified NCS Engineer or the Manager, Nuclear Criticality Safety, or
- 2.1.6.3 two years' experience performing NCS safety evaluations in connection with SNM handling facilities, or
- 2.1.6.4 two years' experience performing reactor physics calculations and one year's experience performing NCS safety evaluations in connection with SNM handling facilities.

A Senior Nuclear Criticality Safety Engineer shall have shall have, as a minimum, two additional years of experience (over and above that required of an NCS

Engineer) performing NCS safety evaluations in connection with SNM handling facilities.

2.1.7 Training Specialist

The Training Specialist shall report to the Manager of Licensing & Safety Analysis. This position shall be responsible for nuclear related safety training activities.

The Training Specialist shall have a high school degree and seven years related experience in the nuclear field, a two-year degree with four years related experience in the nuclear field, or a bachelor's degree with two years related experience in the nuclear field.

2.1.8 Manager, Radiation Protection

The Manager of Radiation Protection shall report to the Manager of Nuclear Safety & Licensing. The Health Physics Front Line Manager, the Health Physicists and the Radiation Control Front Line Managers shall report to him. The Manager of Radiation Protection shall be responsible for the protection of personnel, property, and the environment from contamination with radioactive materials, the protection of personnel from external radiation exposure, and the administration of an effective ALARA program. He shall have the authority to suspend any activity that he judges to be contrary to good radiation protection practice or detrimental to the environment. He shall be responsible for the technical content of Radiation Protection Training programs.

The Manager of Radiation Protection shall have a bachelor's degree in a physical science or engineering and at least five years' experience as a Health Physicist which shall include at least two years' experience as a Health Physicist at a fuel fabrication facility.

2.1.9 Health Physicists

Health Physicists (HP) report to the Manager of Radiation Protection or the Health Physics Front Line Manager as appropriate. They shall be responsible for specific programs in the areas of personnel radiation protection, monitoring, and survey instrumentation, and environmental radiation protection. The Health Physicists shall establish programs for internal exposure control, environmental monitoring and emergency preparedness, external dosimetry and record keeping, facility contamination control, and radiation instrument calibration. They shall have the authority to suspend any activity that they judge to be contrary to good radiation protection practice or environmental radiation protection. Health Physicists shall perform as team members for an ISA in the areas of radiation protection.

A Health Physicist shall have, as a minimum:

- 2.1.9.1 a bachelor's degree in a physical science or engineering, course work in radiation protection, and one year's experience in applied health physics at a fuel fabrication facility, or
- 2.1.9.2 a bachelor's degree in radiation protection and one year's experience in applied health physics at a fuel fabrication facility, or
- 2.1.9.3 a master's degree in radiation protection and one year's experience in applied health physics at a nuclear facility, or
- 2.1.9.4 a bachelor's degree in a science or engineering, certification as a health physicist, and one year's experience in applied health physics at a nuclear facility.

2.1.10 Radiation Control Front Line Managers

Radiation Control Front Line Managers shall report to the Manager, Radiation Protection. They shall be responsible for directing and coordinating the activities of the radiation control technicians. They shall review the results of the technicians' daily activities and assist in the resolution of problems.

The Radiation Control Front Line Managers shall have formal training related to the functional duties within the radiation control areas, i.e., environmental protection, bioassay, contamination control, instrument calibration, etc., and four years' technical and supervisory experience in the radiation control field.

2.1.11 Radiation Control Technicians

Radiation Control Technicians shall report to the Radiation Control Front Line Managers. Radiation Control Technicians perform radiation and contamination surveys, perform calibration of radiation detection instruments, collect and issue personnel dosimetry devices, perform routine plant inspections and implement the air sampling program. They also perform inspections of radiation and criticality safety activities by observing conditions and acts of people in the areas.

The Radiation Control Technicians shall be trained in the aspects of radiation control needed to properly conduct their job. This training shall be provided and established by the Manager, Radiation Protection. The Radiation Control Technicians shall be under the direct supervision of a qualified individual within the Radiation Control Section until all of the necessary training is completed and Radiation Protection management is satisfied with the technician's performance. Previous direct experience can be used to determine the amount and extent of training necessary. They shall also be trained in the Nuclear Criticality Safety requirements of operations to the extent necessary to perform inspections.

2.1.12 Manager, Environmental Protection & Industrial Safety

The Manager of Environmental Protection & Industrial Safety shall report directly to the Manager of Environment, Safety, Health & Safeguards. He shall have responsibility for the day-to-day plant safety in the fields of Environmental Protection and Industrial Safety. He shall have the authority to suspend any activity that in his judgment poses an unnecessary risk to employees, the environment, or to facility safety.

He shall be responsible for emergency preparedness, emergency equipment maintenance, and coordination of emergency team activities and assigning the Emergency Preparedness Officer (EPO), an Industrial Safety Specialist, who performs the duties of the EPO described in the Emergency Plan.

He shall be responsible for monitoring the Environmental Protection program to ensure compliance with local, State, and federal regulations relative to the non-radiological aspects of the control of air emissions, waste water treatment, solid waste management and the storage and transportation of hazardous materials. In addition, he is responsible for directing engineering changes to facilities to meet these requirements.

The Manager of Environmental Protection & Industrial Safety shall have a bachelor's degree and at least six years in environmental, regulatory or safety-related responsibilities.

2.1.13 Manager, Industrial Health & Safety

The Manager of Industrial Health & Safety shall report to the Manager of Environmental Protection & Industrial Safety. He shall be responsible for the industrial health and safety programs. He shall be responsible for the protection of plant personnel, equipment and material from fire and chemical hazards. He shall be responsible for training in fire protection, chemicals, and hazardous materials. He shall have the authority to suspend any activity that in his judgment poses an unnecessary risk to employees, the environment, or to facility safety.

The Manager of Industrial Health & Safety shall have a bachelor's degree in industrial safety or industrial hygiene (or equivalent) and at least three years' experience in industrial safety, industrial hygiene, or fire protection.

2.1.14 Industrial Health & Safety Specialists

Industrial Health & Safety Specialists shall report to the Manager of Industrial Health & Safety, except for the Emergency Preparedness Officer, who reports to the Manager of Environmental Protection and Industrial Safety. They shall provide technical support in the areas of Fire Protection, Industrial Safety, Chemical Safety, Industrial Hygiene and Emergency Preparedness. Industrial Health & Safety Specialists shall establish programs for chemical exposure monitoring, hazardous

materials, emergency response, hearing conservation, fire protection, respiratory protection (for non-radioactive hazards) and personal protective equipment, asbestos abatement, recordkeeping, general safety audits, OSHA compliance, accident investigation, and work-place environmental monitoring. Industrial Health & Safety Specialists shall perform as team members for an ISA in the areas of fire protection and chemical safety. With regards to team member experience for Chemical and Fire related ISA meetings, the complexity of the process modification is taken into consideration to ensure that experienced engineers are utilized for participation in these meetings. Engineers that are assigned either have training or experience commensurate with the type of hazards that may be present and may consult with engineers who are subject matter experts.

They shall have the authority to suspend any activity that in their judgment poses an unnecessary risk to employees, the environment, or to facility safety.

An Industrial Health & Safety Specialist shall possess, as a minimum:

- 2.1.14.1 A bachelor's degree in Fire Protection or Fire Protection Engineering, or
- 2.1.14.2 A bachelor's degree in Industrial Safety or Safety Engineering, or
- 2.1.14.3 A bachelor's degree in Industrial Hygiene or Occupational Health & Safety, or
- 2.1.14.4 A bachelor's degree in a physical science, course work in Industrial Safety, Industrial Hygiene, or Fire Protection, and one year's experience in Safety Program Administration, or
- 2.1.14.5 A non-degreed safety professional with 5 years experience in industrial or regulatory safety positions.
- 2.1.14.6 For these individuals to perform an ISA, they must have experience in fire protection and chemical safety commensurate with the process being evaluated.

2.1.15 Manager, Engineering Department

The Manager of the Engineering Department shall report to the General Manager. He shall have the overall safety responsibility for the various operations under his direction. He shall be responsible for ensuring that safety limits and controls are followed. He shall have the authority to suspend operations if necessary. He shall be responsible for obtaining approval per section 11.1 before altering processes or equipment or installing new processes or equipment that affect nuclear criticality safety, radiation protection, industrial health & safety, or license conditions.

The Manager of the Engineering Department shall have a bachelor degree and six years' management experience in a nuclear-related field. He must have a sufficient background in plant operations to provide the capability for making sound safety decisions.

2.1.16 Manager, Waste Operations

The Manager of Waste Operations shall report to the Manager of Environmental Protection & Industrial Safety. He shall be responsible for overseeing operations of the wastewater treatment facility and the solid waste treatment facilities. He shall be responsible for ensuring that safety limits and controls are followed. He shall have the authority to suspend operations if necessary. He shall be responsible for obtaining approval per section 11.1 before altering processes or equipment or installing new processes or equipment that affect nuclear criticality safety, radiation protection, or license conditions.

The Manager of Waste Operations shall have a bachelor's degree and three years' experience in a waste treatment operation or related field.

2.1.17 Manager, Quality Control Department

The Manager of the Quality Control Department shall report to the General Manager. He shall be responsible for the Quality Control and Quality Assurance Programs. He shall have the overall safety responsibility for the various operations under his direction. He shall be responsible for ensuring that safety limits and controls are followed. He shall have the authority to suspend operations if necessary. He shall be responsible for obtaining approval per section 11.1 before altering processes or equipment or installing new processes or equipment that affect nuclear criticality safety, radiation protection, industrial health & safety or license conditions.

The Manager of the Quality Control Department shall have a bachelor's degree and six years' management experience in a nuclear-related field. He must have a sufficient background in plant operations to provide the capability for making sound safety decisions.

2.1.18 Manager, Quality Engineering

The Manager of Quality Engineering shall report to the Manager of Quality Control. He shall be responsible for overseeing the QA audit program.

The Manager of Quality Engineering shall have a bachelor's degree and three years' management experience, or equivalent work experience including a minimum of ten years' NOG-L management experience. The Manager of Quality Engineering shall also have sufficient background in plant operations to provide the capability of oversight of the Quality Audit function.

2.1.19 Manager, Operations Department

The Manager of the Operations Department shall report to the General Manager. He shall have the overall safety responsibility for the various operations under his direction. He shall be responsible for ensuring that safety limits and controls are followed. He shall have the authority to suspend operations if necessary. He shall be responsible for obtaining approval per section 11.1 before altering processes or equipment or installing new processes or equipment that affect nuclear criticality safety, radiation protection, or license conditions.

The Manager, Operations shall have a bachelor degree and six years' management experience in a nuclear-related field. He must have a sufficient background in plant operations to provide the capability for making sound safety decisions.

2.1.20 Manager, Uranium Processing and Research Reactors Department

The Manager of the Uranium Processing and Research Reactors Department shall report to the General Manager. He shall be responsible for operations in Recovery, downblending, uranium fuel fabrication, Research Test Reactors, R&D and associated reclamation. He shall have the authority to suspend operations if necessary. He shall be responsible for obtaining approval per section 11.1 before altering processes or equipment or installing new processes or equipment that affect nuclear criticality safety, radiation protection, or license conditions.

The Manager of the Uranium Processing and Research Reactors Department shall have a bachelors' degree and six years' management experience in a nuclear-related field. He must have a sufficient background in plant operations to provide the capability for making sound safety decisions.

2.1.21 Manager, Security Department

The Manager of the Security Department shall report to the General Manager. He shall have overall responsibility for Security. He shall have the authority to suspend any activity to ensure security and compliance.

The Manager of the Security Department shall have at least a bachelors' degree and six years' management experience at a nuclear facility, or related field.

2.1.22 Health Physics Front Line Manager at the LTC

The Health Physics Front Line Manager at the Lynchburg Technology Center ("LTC") shall report to the Radiation Protection Manager. The Health Physicists and the Health Physics Technicians at the LTC shall report to him. He shall be responsible for the radiation protection program as it relates to activities at the LTC. He shall have the authority to suspend any activity he judges to be unsafe, contrary to license conditions, or contrary to good radiation protection practice.

The LTC Health Physics Front Line Manager shall have a bachelor's degree in physical science or engineering and at least five years experience as a health physicist.

2.1.23 Health Physics Technicians at the LTC

Health Physics Technicians at the LTC shall report to the Health Physics Front Line Manager. They perform radiation and contamination surveys, perform calibration of radiation detection instruments, collect and issue personnel dosimetry devices, perform routine plant inspections and implement the air-sampling program.

The LTC Health Physics Technicians shall be trained in the aspects of radiation protection needed to properly conduct their job. This training shall be provided and established by the Manager, Radiation Protection. The Health Physics Technicians shall be under the direct supervision of a qualified individual until all of the necessary training is completed and Radiation Protection management is satisfied with the technician's performance. Previous direct experience can be used to determine the amount and extent of training necessary.

2.1.24 Managers of Non-NOG-L Divisions

Managers at the Mt. Athos site from non-NOG-L divisions shall report functionally to the General Manager for the purposes of safety and compliance with regulations and with the license while operations under their direction are being conducted in areas covered by this application. They shall have the overall safety responsibility for operations under their direction. They shall have the authority to suspend operations if necessary. They shall be responsible for obtaining approval per section 11.1 before altering process or equipment or installing new process or equipment that affect nuclear criticality safety, radiation protection, or license conditions.

Managers from Non-NOG-L Divisions shall have a bachelor's degree and sufficient background in plant operations to provide the capability for making sound safety decisions.

2.1.25 Manager, Environmental Engineering

The Manager of Environmental Engineering shall report to the Manager of Environmental Protection & Industrial Safety. He shall be responsible for monitoring the Environmental Protection program to ensure compliance with local, State, and federal regulations relative to the non-radiological aspects of the control of air emissions, waste water treatment, solid waste management and the storage and transportation of hazardous materials. In addition, he shall be responsible for directing engineering changes to facilities to meet these requirements. The Environmental Protection Engineers shall report to him.

The Manager of Environmental Engineering shall have a bachelor's degree in Chemistry, Biology, Engineering or a related subject and at least three years' experience in environmental protection.

2.1.26 Environmental Protection Engineers

Environmental Protection Engineers shall report to the Manager of Environmental Engineering. They shall provide technical support for air permitting, wastewater permitting, pollution prevention, solid waste management and waste treatment operations.

Environmental Protection Engineers shall have a bachelor's degree in a physical science, course work in the physical sciences and one year's experience.

2.1.27 Manager, Nuclear Materials Control

Reference: Fundamental Nuclear Material Control Plan, §4.1.1.

2.1.28 Committee Chairmen

Chairmen of committees described in Chapter 2 shall have at least a bachelor's degree and two years experience in the nuclear industry.

2.2 Safety Committees

2.2.1 Change Review Board

2.2.1.1 Purpose

The Change Review Board (CRB) shall review and approve changes or additions to processes or equipment that involve the use of licensed material and could significantly affect its safety or the safety of personnel.

2.2.1.2 Meeting Frequency

The CRB shall meet as often as necessary to review and approve proposed changes.

2.2.1.3 Membership

The membership of the CRB shall consist of the following, as a minimum:

Chairman - A manager, appointed by the General Manager, meeting the qualifications of 2.1.28.

Member - Manager, Nuclear Safety & Licensing

Member - Manager, Environmental Protection & Industrial Safety

- ***Member** - Section Manager from Operations
- ***Member** - Section Manager from Engineering
- ***Member** - Manager(s) representing Non-NOG-L Divisions for changes in operations under their control.

*The managers from Operations and Engineering must be present only when changes to Lynchburg facility processes and equipment are to be approved. The non-NOG-L Division Manager(s) must be present only when changes to non-NOG-L processes and equipment are to be approved.

Alternates for any of the above positions are designated by position, procedure or in writing to the Chairman by the member.

A Vice-Chairman shall be appointed in writing by the General Manager.

2.2.1.4 Quorum

Full attendance is required for approval of proposed changes.

2.2.1.5 Records and Reports

Meeting minutes shall be maintained on file for three years. Summary reports of committee activities shall be presented to the Safety Review Committee for their review and recommendations, if appropriate. If actions are required, they shall be tracked to completion.

2.2.2 ALARA Committee

2.2.2.1 Purpose

The ALARA Committee shall ensure development and implementation of the ALARA program. The Committee shall accomplish this by establishing goals and objectives for implementing the ALARA philosophy; establishing a system to measure the success of program goals and objectives; and periodically reviewing results and implementing corrective actions when attainment of specific objectives appears to be jeopardized.

2.2.2.2 Meeting Frequency

The ALARA Committee shall meet at least once each calendar quarter.

2.2.2.3 Membership

ALARA Committee membership shall consist of the following, as a minimum:

- Chairman** - Appointed by the General Manager and meeting the qualifications in §2.1.28.
- Vice Chairman** - Manager, Nuclear Safety & Licensing
- Member** - Representative of Radiation Protection, meeting the qualifications in §2.1.9.
- Member** - Representative of Engineering
- Member** - Representative Operations
- Member** - Representative of Environmental Protection
- Member** - Representative of Nuclear Materials Control
- Member** - LTC Health Physics Front Line Manager

Alternates for any of the above members shall be designated in writing to the Chairman by the member.

2.2.2.4 Quorum

A quorum shall consist of the Chairman or Vice Chairman and a simple majority of the members.

2.2.2.5 Records and reports

Meeting minutes shall be maintained on file for at least three years. Summary reports of committee activities shall be presented to the Safety Review Committee for their review and recommendations, if appropriate. If actions are required, they shall be tracked to completion.

2.2.3 Emergency Preparedness Committee

2.2.3.1 Purpose

The Emergency Preparedness Committee (EPC) shall oversee and direct implementation of the emergency plan.

2.2.3.2 Meeting Frequency

The EPC shall meet at least once each calendar quarter.

2.2.3.3 Membership

Membership of the EPC shall consist of the following, as a minimum:

- Chairman** - Appointed by the General Manager and meeting the qualifications in §2.1.28
- Vice Chairman** - Manager, Environmental Protection & Industrial Safety
- Member** - Representative of Licensing & Safety Analysis

- Member -** Representative of Nuclear Criticality Safety meeting the qualification in §2.1.6
- Member -** Representative of Radiation Protection meeting the qualifications in §2.1.9
- Member -** An Industrial Health and Safety Specialist
- Member -** An Environmental Protection Engineer
- Member -** Representative of Industrial Engineering
- Member -** Representative of Security
- Member -** Representative of Nuclear Materials Control
- Member -** Representative of Waste Operations

Alternates for any of the above members shall be designated in writing to the Chairman by the member.

2.2.3.4 Quorum

A quorum shall consist of the Chairman or Vice Chairman and a simple majority of the members.

2.2.3.5 Records and reports

Meeting minutes shall be maintained on file for at least three years. Summary reports of committee activities shall be presented to the Safety Review Committee for their review and recommendations, if appropriate. If actions are required, they shall be tracked to completion.

2.2.4 Safety Review Committee

2.3.4.1 Purpose

The Safety Review Committee shall assess the adequacy and effectiveness of the safety programs at the Site, especially those that relate to nuclear criticality safety and radiation protection. The Safety Review Committee shall also review the effectiveness of the other safety committee activities and recommend actions to correct weaknesses.

2.2.4.2 Meeting Frequency

The Safety Review Committee shall meet at least once each calendar quarter.

2.2.4.3 Membership

The following individuals shall be members of the Safety Review Committee:

- Chairman -** General Manager

- Vice Chairman** - Manager, Environment, Safety, Health & Safeguards
- Member** - Manager, Security Department
- Member** - Manager, Uranium Processing and Research Reactors Department
- Member** - Manager, Quality Control Department
- Member** - Manager, Operations Department
- Member** - Manager, Engineering Department
- Member** - Chairman, ALARA Committee
- Member** - Chairman, EPC
- Member** - Chairman, CRB
- Member** - Chairman, Industrial Health & Safety Committee
- Member** - Selected representative(s) from Non-NOG-L Divisions working at the site

Alternates for any of the above members are designated by position, procedure, or in writing to the Chairman by the member.

2.2.4.4 Quorum

A quorum shall consist of the Chairman or Vice Chairman and a simple majority of the members.

2.2.4.5 Records

Committee records shall be kept on file for at least three years.

2.2.5 Industrial Health and Safety Committee

2.2.5.1 Purpose

The Industrial Health and Safety Committee shall assess the adequacy and effectiveness of the Health and Safety programs at the Site, especially those that relate to fire protection and chemical safety.

2.2.5.2 Meeting Frequency

The Industrial Health and Safety Committee shall meet at least once each calendar quarter.

2.2.5.3 Membership

The following individuals shall be members of the Industrial Health and Safety Committee:

- Chairman** - Appointed by General Manager
- Vice Chairman** - Manager, Environmental Protection & Industrial Safety
- Member**- Manager, Industrial Health & Safety

| | |
|-----------------|---|
| Member - | Representative of Uranium Processing and Research Reactors |
| Member- | Representative of Industrial Engineering |
| Member- | Representative of Operations |
| Member- | Representative of Environment, Safety, Health, & Safeguards |
| Member- | Representative of RTRT |
| Member- | Representative of Quality Control |
| Member- | Representative of Security |
| Member - | Selected representative(s) from Non-NOG-L Divisions working at the site |

Alternates for any of the above members shall be designated in writing to the Chairman by the member.

2.2.5.4 Quorum

A quorum shall consist of the Chairman or Vice Chairman and a simple majority of the members.

2.2.5.5 Records

Committee records shall be kept on file for at least three years.

2.3 Approval Authority for Personnel Selection

The following managers shall be appointed by the General Manager:

- Manager, Environment, Safety, Health & Safeguards Department
- Manager, Security Department
- Manager, Uranium Processing and Research Reactors Department
- Manager, Quality Control Department
- Manager, Engineering Department
- Manager, Operations Department
- Manager, Nuclear Safety & Licensing
- Manager, Environmental Protection & Industrial Safety

Other managers specified in Section 2 shall be appointed by their respective Department Manager.

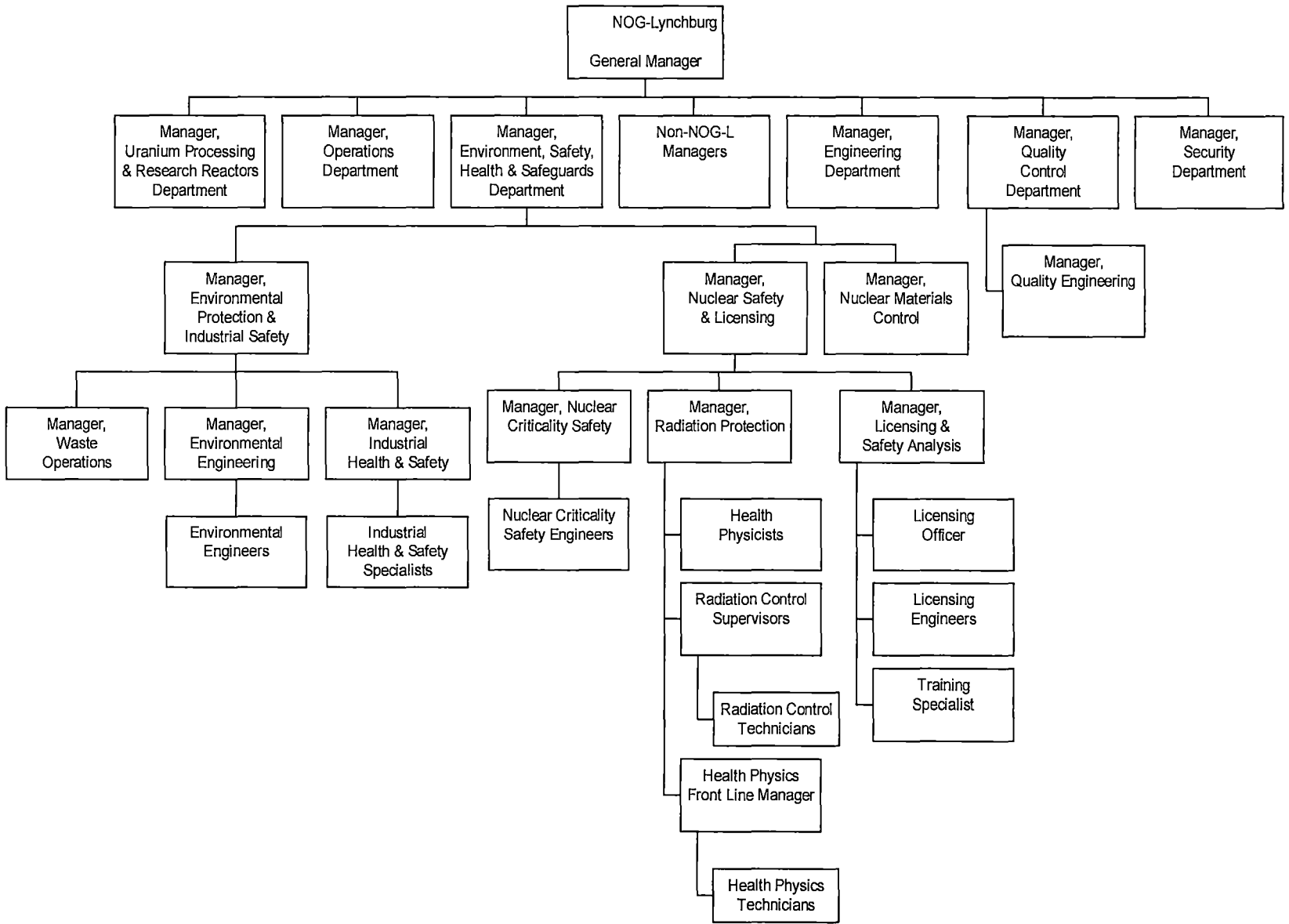


Figure 2-1: Site Organization Chart