ATTACHMENT I

Revised Technical Specification Pages

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6.0 ADMINISTRATIVE CONTROLS

Administrative controls are the written rules, orders, instructions, procedures, policies, practices, and the designation of authorities and responsibilities by the management to obtain assurance of safety and quality of maintenance of a nuclear facility. These controls shall be adhered to.

6.1 RESPONSIBILITY

6.1.1 The Decommissioning Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 In all matters relating to the operation of the plant and to these Technical Specifications, the Decommissioning Manager shall report to and be directly responsible to the President of Yankee Atomic Electric Company.

6.2 ORGANIZATION

6.2.1 An on-site and an off-site organization shall be established for plant operation and corporate management. The on-site and off-site organization shall include the positions for activities affecting the safety of the facility.

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts shall be documented in the FSAR.

b. A single corporate officer shall have overall responsibility for plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support in the plant so that continued nuclear safety is assured.

c. There shall be an individual management position in the on-site organization having overall responsibility for safe operation of the plant; he/she shall have control over those on-site resources necessary for safe operation and maintenance of the plant.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work, on the average, an approximate 40-hour week. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

(1) An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.

(2) An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time.

(3) A break of at least 8 hours should be allowed between work periods, including shift turnover time.

(4) The use of overtime should be considered on an individual basis and not for the entire staff on shift.

Any deviation from the above guidelines shall be authorized by the Decommissioning Manager or his delegated representative, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be reviewed monthly by the Decommissioning Manager or his delegated representative to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility management/supervisory staff shall meet or exceed the minimum qualifications of ANSI 18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall also meet the minimum qualifications of Regulatory Guide 1.8, Revision 1.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility Certified Fuel Handlers shall be conducted in accordance with an NRC approved training program. A training program for the unit staff shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971.

6.5 REVIEW AND AUDIT

6.5.1 Independent Safety Review

An Independent Safety Review shall be a thorough review conducted by one or more qualified Independent Safety Reviewers. Persons performing these reviews shall be knowledgeable in the subject area being reviewed. Independent Safety Reviews must be completed prior to implementation of proposed activities.

a. Independent Safety Reviewers shall be individuals without direct responsibility for the performance of the activities under review; these reviewers may be from the same functionally cognizant organization as the individual or group performing the original work.

b. Independent Safety Reviewers shall have at least 5 years of professional experience and either a Bachelor's Degree in Engineering or the Physical Sciences or shall have equivalent qualifications in accordance with ANSI 18.1-1971. The Decommissioning Manager (or a designee) shall document the appointment of Independent Safety Reviewers.

c. The following subjects shall be independently reviewed by a qualified Independent Safety Reviewer:

1. safety evaluations for changes in the facility as described in the Final Safety Analysis Report (FSAR), changes in procedures as described in the FSAR, and tests or experiments not described in the FSAR to verify that such actions do not involve a change to the Technical

Specifications or will not involve an unreviewed safety question as defined in 10CFR50.59;

2. proposed changes to the programs required by Technical Specification 6.7, to verify that such changes do not involve a change to the Technical Specifications and will not involve an unreviewed safety question as defined in 10CFR50.59; and

3. proposed changes to the Technical Specification Bases.

6.5.2 Independent Review and Audit Committee (IRAC)

The IRAC is responsible for reviewing, auditing, and advising the President of Yankee Atomic Electric Company (or a designee) on matters related to the safe storage of irradiated fuel. This review and audit function is independent of line organization responsibilities.

a. The IRAC shall include a minimum of five members. Alternates may be substituted for regular members. The licensee shall designate in writing the chairman, the members, and alternates for the IRAC. The chairman shall not have management responsibilities for, or report to, the line organizations responsible for operation or maintenance of the fuel storage facility.

b. The IRAC shall collectively have experience and knowledge in the following functional areas:

1. fuel handling and storage (including the potential for criticality),
2. chemistry and radiochemistry,
3. engineering,
4. radiation protection, and
5. quality assurance.

If necessary, individuals with knowledge and experience in other functional areas may be utilized to provide advice to the IRAC.

c. The IRAC shall hold at least one meeting per quarter.

d. A quorum shall consist of three regular members or their duly appointed alternates. Those members representing the line organizations responsible for the operation and maintenance of the facility shall not constitute a majority of the

quorum. At least one member of the quorum shall be the chairman or the chairman's designated alternate.

e. As a minimum, the IRAC shall perform the following functions:

1. advise the Decommissioning Manager (or a designee) on all matters related to safe storage of irradiated fuel;

2. advise the management of the audited organization and the Decommissioning Manager (or a designee) of audit results as they relate to safe storage of irradiated fuel;

3. recommend to the management of the audited organization, and its management, any corrective action to improve the safe storage of irradiated fuel; and

4. notify the President of Yankee Atomic Electric Company of any safety significant disagreement between the IRAC and the Decommissioning Manager within 24 hours.

f. The IRAC shall be responsible for reviewing:

1. the safety evaluations for procedures, and changes thereto, completed under the provisions of 10 CFR 50.59 to verify that such actions do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after implementation of the affected procedure;

2. changes to structures, systems, or components important to the safe storage of irradiated fuel to verify that such changes do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after implementation of the change;

3. tests or experiments involving the safe storage of irradiated fuel to verify that such tests or experiments do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after performance of the test or experiment;

4. proposed changes to the YNPS Technical Specifications or the license;

5. violations of codes, regulations, orders, license requirements, or internal procedures/instructions having nuclear safety significance;

6. indications of unanticipated deficiencies in any aspect of design or operation of structures, systems, or components that could affect safe storage of irradiated fuel;

7. significant accidental, unplanned, or uncontrolled radioactive releases, including corrective action(s) to prevent recurrence;

8. significant operating abnormalities or deviations from normal and expected performance of equipment that affect safe storage of irradiated fuel;

9. the performance of the corrective action system; and

10. internal and external experience information related to the safe storage of irradiated fuel that may indicate areas for improving facility safety.

Reports or records of these reviews shall be forwarded to the Decommissioning Manager within 30 days after completion of the review.

g. The IRAC's audit responsibilities shall encompass:

1. conformance of irradiated fuel storage to provisions contained within the YNPS Technical Specifications and applicable license conditions at least once per 12 months;

2. the training and qualifications of facility staff at least once per 12 months;

3. implementation of all programs required by YNPS Technical Specification 6.7 at least once per 24 months;

4. actions taken to correct deficiencies occurring in structures, systems, components, or methods of operation that affect safe storage of irradiated fuel at least once per 6 months;

5. facility operations, modifications, maintenance, and Surveillance related to the safe storage of irradiated fuel to verify independently that these activities are performed safely and correctly at least once per 24 months; and

6. other activities and documents as requested by the Decommissioning Manager (or a designee).

Reports of records of these audits, including any recommendations for improving the safe storage of irradiated fuel, shall be forwarded to the Decommissioning Manager (or a designee) within 30 days after completion of the audit.

6.5.3 Records

Written records of reviews and audits shall be maintained. As a minimum, these records shall include:

a. Results of the activities conducted under the provisions of Specifications 6.5.1 and 6.5.2;

b. Recommendations to the management of the audited organization;

c. An assessment of the safety significance of review or audit findings;

d. Documentation of reviews conducted under Specification 6.5.1.c; and

e. Determination of whether each item considered under Specifications 6.5.2.f.1 through 6.5.2.f.3 involves an unreviewed safety question as defined in 10CFR50.59.

Pages 6-10 through 6-12 have been deleted.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73, and

b. Each REPORTABLE EVENT shall be reviewed by an Independent Safety Reviewer and the results of this review shall be submitted to the Independent Review and Audit Committee (IRAC) and the Decommissioning Manager.

6.7 PROCEDURES AND PROGRAMS

6.7.1 Written procedures shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.2 through 5.2.9 and 5.3 of ANSI N18.7-1972 and Appendix "A" of Regulatory Guide 1.33, Revision 2, except as provided in 6.7.2 and 6.7.3 below. The written procedures shall also cover the activities relating to:

a. Fire Protection Program implementation.
b. PROCESS CONTROL PROGRAM implementation.
c. OFF-SITE DOSE CALCULATION MANUAL implementation.
d. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.7.2 Each procedure and administrative policy of 6.7.1 above, and changes thereto, shall be reviewed by an Independent Safety Reviewer and approved by the Decommissioning Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

6.7.3 Deleted.

6.7.4 Temporary changes to procedures of 6.7.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom is a Certified Fuel Handler.

c. The change is documented and approved by the Decommissioning Manager within 14 days of implementation.

6.7.5 The following programs shall be established, implemented, and maintained:

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR, Part 20, Appendix B, Table II, Column 2;

3) Monitoring, sampling, and analysis of radioactive liquid, and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;

4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released

6.9.2 (continued)

f. Records of transient or operational cycles for the Reactor Pressure Vessel.

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

h. Records of inservice inspections performed pursuant to Technical Specifications.

i. Records of Quality Assurance activities required by the QA manual.

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

k. Records of Independent Safety Reviews and the IRAC meetings, and Records of the Plant Operational Review Committee (PORC) and the Nuclear Safety Audit and Review Committee (NSARC), the review and audit functions which preceded the Independent Safety Review function and IRAC.

l. Records for Environmental Qualification.

m. Records of analysis required by the Radiological Environmental Monitoring Program.

n. Records of the service lives of all snubbers, including the date at which the service life commences and associated installation and maintenance records.

o. Records of reviews performed for changes made to the OFF-SITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.10 RADIATION PROTECTION PROGRAM

6.10.1 Procedures for personnel radiation protection shall be prepared consistent with requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposures.

6.12 PROCESS CONTROL PROGRAM (PCP)

6.12.1 Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.9.2.o. This documentation shall contain:

1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and

2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of federal, state, or other applicable regulations.

b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager.

6.13 OFF-SITE DOSE CALCULATION MANUAL (ODCM)

6.13.1 Changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.9.2.o. This documentation shall contain:

1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and

2) A determination that the change will maintain the level of the radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.