

October 29, 1984

Docket No. 50-220

Mr. B. G. Hooten  
Executive Director, Nuclear Operations  
Niagara Mohawk Power Corporation  
300 Erie Boulevard West  
Syracuse, New York 13202

Dear Mr. Hooten:

The Commission has issued the enclosed Amendment No. 65 to Facility Operating License No. DPR-63 for the Nine Mile Point Nuclear Station, Unit No. 1. The amendment consists of changes to the Technical Specifications in response to your request dated January 31, 1984.

The revision to the Technical Specifications makes changes to Section 6.0, "Administrative Controls."

A copy of the Safety Evaluation is also enclosed.

Sincerely,

Original signed by/

Robert A. Hermann, Project Manager  
Operating Reactors Branch #2  
Division of Licensing

Enclosures:

1. Amendment No. 65 to License No. DPR-63
2. Safety Evaluation

cc w/enclosures:  
See next page

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8411190026 841029  
PDR ADDCK 05000220  
P PDR

Mr. B. G. Hooten  
Niagara Mohawk Power Corporation  
Nine Mile Point Nuclear Station, Unit No. 1

cc:

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

NIAGARA MOHAWK POWER CORPORATION

DOCKET NO. 50-220

NINE MILE POINT NUCLEAR STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 65  
License No. DPR-63

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Niagara Mohawk Power Corporation (the licensee) dated January 31, 1984 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-63 is hereby amended to read as follows:

8411190030 841029  
PDR ADDCK 05000220  
P PDR

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 65, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Domenic B. Vassallo, Chief  
Operating Reactors Branch #2  
Division of Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 29, 1984

ATTACHMENT TO LICENSE AMENDMENT NO. 65

FACILITY OPERATING LICENSE NO. DPR-63

DOCKET NO. 50-220

Revise the Appendix A Technical Specifications by removing and inserting the following pages:

<u>Existing Page</u>	<u>Revised Page</u>
iv	iv
v	v
245 through 264	245 through 266

The revised areas are indicated by marginal lines.

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## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 Responsibility

- 6.1.1 The General Superintendent - Nuclear Generation shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.2 The Station Shift Supervisor - Nuclear (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President - Nuclear Generation shall be re-issued to station personnel on an annual basis.

### 6.2 Organization

#### Offsite

- 6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

#### Facility Staff

- 6.2.2 The facility organization shall be as shown on Figure 6.2-2 and:
  - a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
  - b. At least one licensed Operator shall be in the control room when fuel is in the reactor. During reactor operation, this licensed operator shall be present at the controls of the facility.
  - c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.
  - d. An individual qualified in radiation protection\* procedures shall be on site when fuel is in the reactor.

\* The Radiation Protection qualified individual and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.



Facility Staff (Cont'd)

- e. A licensed Senior Reactor Operator shall be required in the Control Room during power operations and when the emergency plan is activated. This may be the Station Shift Supervisor - Nuclear or the Assistant Station Shift Supervisor - Nuclear during power operations. When the emergency plan is activated, the Assistant Station Shift Supervisor - Nuclear becomes the Shift Technical Advisor and the Station Shift Supervisor - Nuclear is restricted to the control room until an additional licensed Senior Reactor Operator arrives.
- f. A licensed Senior Reactor Operator shall be responsible for all movement of new and irradiated fuel within the site boundary. All core alterations shall be directly supervised by a licensed senior reactor operator who has no other concurrent responsibilities during this operation. A Licensed Operator will be required to manipulate the controls of all fuel handling equipment except movement of new fuel from receipt through dry storage. All fuel moves within the core shall be directly monitored by a member of the reactor analyst group.
- g. A Fire Brigade of five (5) members\* shall be maintained on site as defined by 5.1 at all times.
- h. Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators and key maintenance personnel.

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

\* The Radiation Protection qualified individual and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed four hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

Facility Staff (Cont'd)

- 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) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the General Superintendent - Nuclear Generation or designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Station Superintendent - Nuclear Generation or designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

Figure 6.2-1  
Nine Mile Point Nuclear Station  
Management Organization Chart

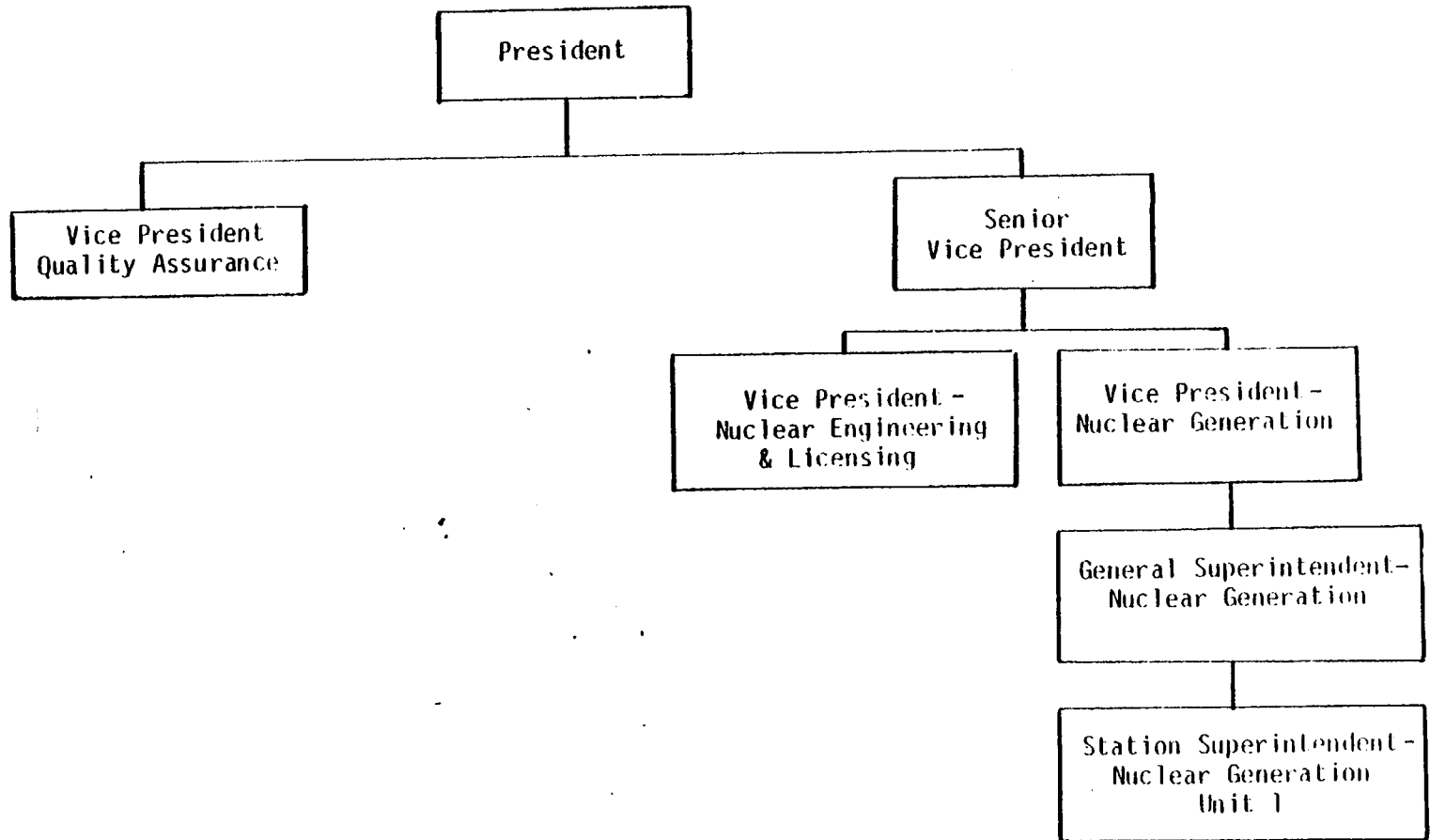


FIGURE K-2.7  
NINE MILE POINT NUCLEAR SITE  
INVESTIGATION ORGANIZATION

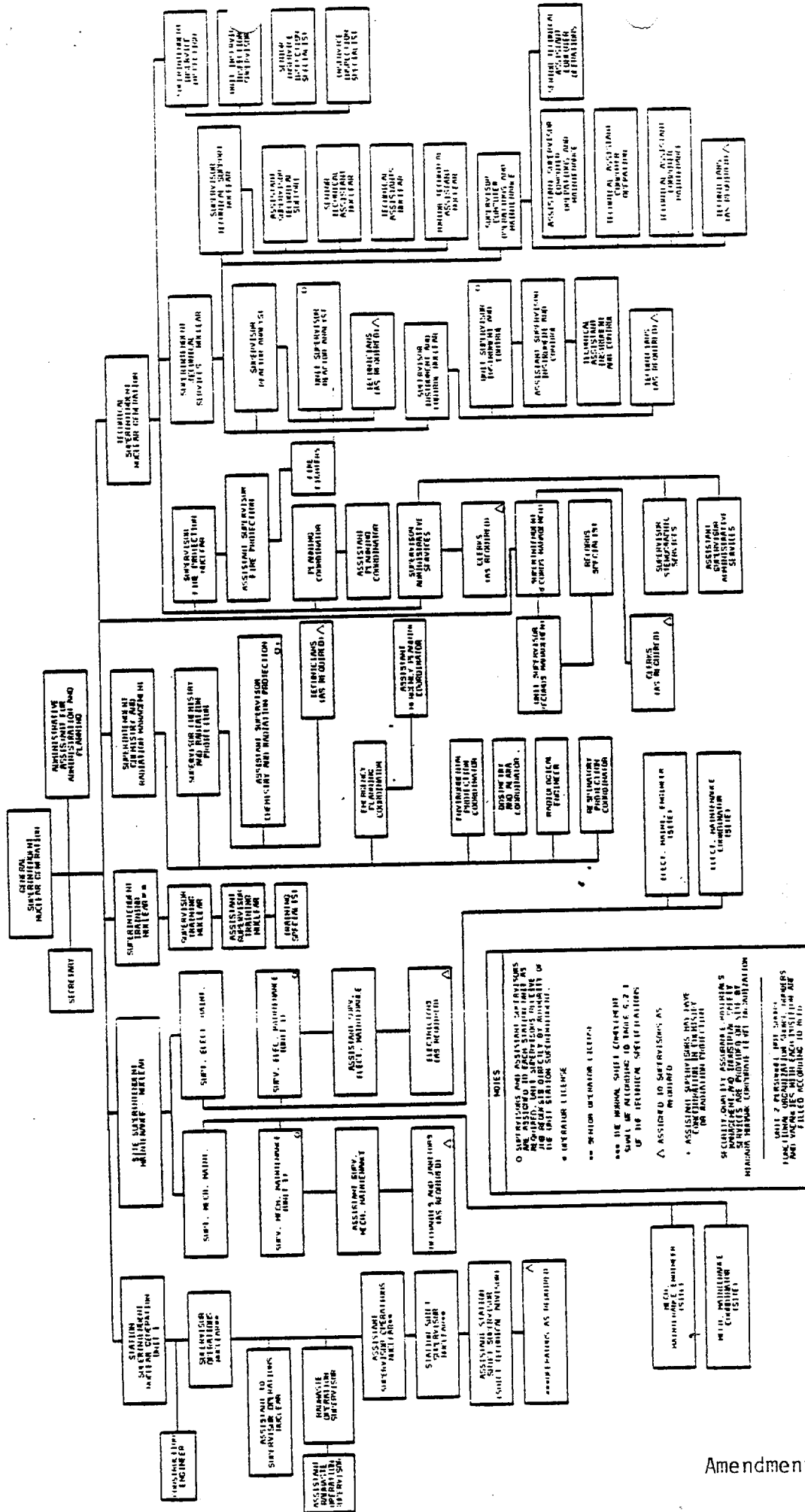


Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION(1) (6)

License	Normal Operation	Shutdown Condition	Operation(3)		Reactor Startups
			W/O Process	Computer	
Senior Operator	1	1(5)	1		1
Operator	2	1	2		3
Unlicensed(2)	2	1	3		2
Asst. Station Shift Supervisor (Shift Technical Advisor Function) (Senior Operator License)(7)	1	1(4)	1		1

Notes:

- (1) At any one time, more licensed or unlicensed operating people could be present for maintenance, repairs, refuel outages, etc.
- (2) Those operating personnel not holding an "Operator " or "Senior Operator" License.
- (3) For operation longer than eight hours without process computer.
- (4) Hot shutdown condition only.
- (5) An additional senior reactor operator who has no other concurrent responsibilities shall supervise all core alterations.
- (6) The Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed two hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.
- (7) The Assistant Station Shift Supervisor performs the Shift Technical Advisor function and shall hold a senior reactor operator license.

### 6.3 Facility Staff Qualifications

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

### 6.4 Training

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Superintendent-Training Nuclear and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Superintendent-Training Nuclear and Supervisor-Fire Protection, Nuclear and shall meet or exceed the requirements of Appendix R to 10CFR50.

### 6.5 Review and Audit

#### 6.5.1 Site Operations Review Committee (SORC)

##### Function

6.5.1.1 The Site Operations Review Committee shall function to advise the General Superintendent-Nuclear Generation on all matters related to nuclear safety.

##### Composition

6.5.1.2 The Site Operations Review Committee shall be composed of the:

Chairman:	General Superintendent - Nuclear Generation
Member:	Station Superintendent - Nuclear Generation
Member:	Technical Superintendent - Nuclear Generation
Member:	Superintendent Technical Services - Nuclear
Member:	Site Superintendent Maintenance - Nuclear
Member:	Supervisor Instrument and Control - Nuclear
Member:	Superintendent Chemistry and Radiation Management

Alternates

- 6.5.1.3 Alternate members shall be appointed in writing by the SORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in SORC activities at any one time.

Meeting Frequency

- 6.5.1.4 The SORC shall meet at least once per calendar month and as convened by the SORC Chairman.

Quorum

- 6.5.1.5 A quorum of the SORC shall consist of the Chairman and four members including alternates.

Responsibilities

- 6.5.1.6 The Site Operations Review Committee shall be responsible for:
- a. Review of all REPORTABLE EVENTS.
  - b. Review of facility operations to detect potential safety hazards.
  - c. Performance of special reviews investigations or analyses and reports thereon as requested by the Chairman of the Safety Review and Audit Board.
  - d. Investigation of violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Vice President - Nuclear Generation and to the Chairman of the Safety Review and Audit Board.

Authority

- 6.5.1.7 The Site Operations Review Committee shall:
- a. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (d) above constitutes an unreviewed safety question.
  - b. Provide immediate written notification to the Vice President - Nuclear Generation and Chairman of the Safety Review and Audit Board of disagreement between the SORC and the General Superintendent - Nuclear Generation; however, the General Superintendent - Nuclear Generation shall have the responsibility for resolution of such disagreements pursuant to 6.1.1 above.

Records

- 6.5.1.8 The Site Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President - Nuclear Generation and Chairman of the Safety Review and Audit Board.

6.5.2 Technical Review and Control

Activities

- 6.5.2.1 Each procedure and program required by Specification 6.8 and other procedures which affect nuclear safety, and changes thereto, shall be prepared by a qualified individual/organization. Each such procedure, and changes thereto, shall be reviewed by an individual/group other than the individual/group which prepared the procedure, or changes thereto, but who may be from the same organization as the individual/group which prepared the procedure, or changes thereto. Approval of procedures and programs and changes thereto and their safety evaluations, shall be controlled by administrative procedures.
- 6.5.2.2 Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be reviewed by an individual/group other than the individual/group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the Technical Specifications shall be approved by the General Superintendent-Nuclear Generation.



Activities (Cont'd)

- 6.5.2.3 Proposed modifications to unit structures, systems and components that affect nuclear safety shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to structures, systems and components and the safety evaluations shall be approved prior to implementation by the General Superintendent-Nuclear Generation; or the Station Superintendent-Nuclear Generation; or the Technical Superintendent-Nuclear Generation as previously designated by the General Superintendent-Nuclear Generation.
- 6.5.2.4 Individuals responsible for reviews performed in accordance with Specifications 6.5.2.1, 6.5.2.2 and 6.5.2.3 shall be members of the station supervisory staff, previously designated by the General Superintendent-Nuclear Generation to perform such reviews. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary such review shall be performed by the appropriate designated station review personnel.
- 6.5.2.5 Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications and their safety evaluations shall be reviewed by the General Superintendent-Nuclear Generation; or by the Station Superintendent-Nuclear Generation, or the Technical Superintendent-Nuclear Generation as previously designated by the General Superintendent-Nuclear Generation.
- 6.5.2.6 The General Superintendent-Nuclear Generation shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President-Nuclear Generation.
- 6.5.2.7 The facility security program, and implementing procedures, shall be reviewed at least every 12 months. Recommended changes shall be approved by the General Superintendent-Nuclear Generation and transmitted to the Vice President-Nuclear Generation, and to the Chairman of the Safety Review and Audit Board.
- 6.5.2.8 The facility emergency plan, and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the General Superintendent-Nuclear Generation and transmitted to the Vice President-Nuclear Generation and to the Chairman of the Safety Review and Audit Board.

Activities (Cont'd)

- 6.5.2.9 The General Superintendent-Nuclear Generation shall assure the performance of a review by a qualified individual/organization of changes to the Radiological Waste Treatment systems.
- 6.5.2.10 Reports documenting each of the activities performed under Specifications 6.5.2.1 through 6.5.2.9 shall be maintained. Copies shall be provided to the Vice President-Nuclear Generation and the Safety Review and Audit Board.

6.5.3 Safety Review and Audit Board (SRAB)

Function

- 6.5.3.1 The Safety Review and Audit Board shall function to provide independent review and audit of designated activities in the areas of:
- a. nuclear power plant operations
  - b. nuclear engineering
  - c. chemistry and radiochemistry
  - d. metallurgy
  - e. instrumentation and control
  - f. radiological safety
  - g. mechanical and electrical engineering
  - h. quality assurance practices
  - i. (other appropriate fields associated with the unique characteristics of the nuclear power plant)

Composition

6.5.3.2 The Safety Review and Audit Board shall be composed of the:

Chairman: Staff Engineer or Manager or Vice President  
Member: General Superintendent-Nuclear Generation  
Member: Staff Engineer - Nuclear  
Member: Staff Engineer - Mechanical or Electrical  
Member: Staff Engineer - Environmental  
Member: Consultant (See 6.5.3.4)

Alternates

6.5.3.3 Alternate members shall be appointed in writing by the SRAB Chairman to serve on a temporary basis; however, no more than two alternates shall participate in SRAB activities at any one time.

Consultants

6.5.3.4 Consultants shall be utilized as determined by the SRAB Chairman to provide expert advice to the SRAB.

Meeting Frequency

6.5.3.5 The SRAB shall meet at least once per six months.

Quorum

6.5.3.6 A quorum of SRAB shall consist of the Chairman or his designated alternate and a majority of SRAB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

Review

6.5.3.7 The SRAB shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or operating license.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Site Operations Review Committee.

Audits

6.5.3.8 Audits of facility activities shall be performed under the cognizance of the SRAB. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.

Audits (Cont'd)

- b. The performance, training and qualifications of the entire facility staff at least once per year.
- c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.
- e. The Facility Emergency Plan and implementing procedures at least once every 12 months.
- f. The Facility Security Plan and implementing procedures at least once every 12 months.
- g. The facility Fire Protection Program and implementing procedures at least once per two years.
- h. Any other area of facility operation considered appropriate by the SRAB, the Vice President - Nuclear Generation or the Vice President - Nuclear Engineering and Licensing.

Authority

- 6.5.3.9 The SRAB shall report to and advise the Vice President - Nuclear Generation and Vice President - Nuclear Engineering and Licensing on those areas of responsibility specified in Section 6.5.3.7 and 6.5.3.8.

Records

- 6.5.3.10 Records of SRAB activities shall be prepared, approved and distributed as indicated below:
  - a. Minutes of each SRAB meeting shall be prepared, approved and forwarded to the Vice President - Nuclear Generation and Vice President - Nuclear Engineering and Licensing within 30 days following each meeting.

Records (Cont'd)

- b. Reports of reviews encompassed by Section 6.5.3.7 e,f,g and h above, shall be prepared, approved and forwarded to the Vice President - Nuclear Generation and Vice President - Nuclear Engineering and Licensing within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.3.8 above, shall be forwarded to the Vice President - Nuclear Generation and Vice President - Nuclear Engineering and Licensing within 14 days following completion of the review.

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 Sections 50.72 and 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC and the results of this review submitted to the SRAB and the Vice President - Nuclear Generation.

6.7 Safety Limit Violation

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit violation shall be reported to the Commission, the Vice President - Nuclear Generation and to the SRAB immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the SRAB and the Vice President - Nuclear Generation within 10 days of the violation.

## 6.8 Procedures

- 6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33 except as provided in 6.8.2 and 6.8.3 below.
- 6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed and approved by the General Superintendent-Nuclear Generation or designee prior to implementation and periodically as set forth in each document.
- 6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:
- a. The intent of the original procedure is not altered.
  - b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
  - c. The change is documented, reviewed and approved by the General Superintendent-Nuclear Generation or designee within 14 days of implementation.

## 6.9 Reporting Requirements

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Director of Inspection and Enforcement Regional Office I, King of Prussia, Pennsylvania 19406, unless otherwise noted.

### 6.9.1 Routine Reports

- a. Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1 Routine Reports (Cont'd)

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

- b. Annual Occupational Exposure Report. A tabulation shall be submitted on an annual basis which includes the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, 1/ e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience including documentation of challenges to the safety relief valves or safety valves, shall be submitted on a monthly basis, which will include a narrative of operating experience, to the Director, Office of Management Information and Program Control, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office of I&E, no later than the 15th of each month following the calendar month covered by the report.

1/ This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.



6.9.2 Fire Protection Program Reports

- a. Submit a special report to the appropriate Regional Office as follows:
  - Notify the Director of the appropriate Regional Office by telephone within 24 hours.
  - Confirm by telegraph, mailgram or facsimile transmission no later than the first working day following the event, and
  - Follow-up in writing within 14 days after the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to an operable status.
- b. Submit a special report to the Director of the appropriate Regional Office within 30 days following the event outlining the plans and procedures to be used to restore the inoperable equipment to an operable status.

6.9.3 Unique Reporting Requirements

Special reports shall be submitted to the Director of Regulatory Operations Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Reactor Vessel Material Surveillance Specimen Examination, Specification 4.2.2(c) (12 months)
- b. Safety Class 1 Inservice Inspection, Specification (See Table 4.2.6(a)) (Three months)
- c. Safety Class 2 Inservice Inspections, Specification (See Table 4.2.6(b)) (Three months)
- d. Safety Class 3 Inservice Inspections; Specification (See Table 4.2.6(c)) (Three months)
- e. Primary Containment Leakage Testing, Specification 3.3.3 (Three months)
- f. Secondary Containment Leakage Testing, Specification 3.4.1 (Three months)
- g. Sealed Source Leakage In Excess Of Limits, Specification 3.6.5.2 (Three months)

## 6.10 Record Retention

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. REPORTABLE EVENT REPORTS.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to Operating Procedures.
- g. Records of radioactive shipments.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.

## 6.10 Record Retention (Continued)

- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these 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 meetings of the SORC and the SRAB.

## 6.11 Radiation Protection Program

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

## 6.12 High Radiation Area

- 6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(?) of 10 CFR 20, each high radiation area normally accessible\* by personnel in which the intensity of radiation is greater than 100 mrem/hr\*\* but less than 1000 mrem/hr\*\* shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit in accordance with site approved procedures. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

## 6.12 High Radiation Area (Continued)

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection, with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Radiation Protection Supervisor or designate in the Radiation Work Permit.

6.12.2 In addition to the requirements of 6.12.1 areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem\*\* shall be provided with locked doors to prevent unauthorized entry, and the hard keys or access provided by magnetic keycard shall be maintained under the administrative control of the Station Shift Supervisor or designate on duty and/or the Radiation Protection Supervisor or designate. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify in accordance with site approved procedures accordingly, the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote, such as use of closed circuit TV cameras, may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem\*\* that are located within large areas, such as the drywell, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

\* by accessible passage and permanently fixed ladders

\*\* measurement made at 18" from source of radioactivity

6.13 Fire Protection Inspection

6.13.1 An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.

6.13.2 An inspection and audit by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.

6.14 Systems Integrity

Procedure shall be established, implemented and maintained to meet or exceed the requirements and recommendations of Section 2.1.6.a of NUREG 0578.

6.15 Iodine Monitoring

Procedures shall be established, implemented and maintained to meet or exceed the requirements and recommendations of Section 2.1.8.c of NUREG 0578.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 65 TO FACILITY OPERATING LICENSE NO. DPR-63

NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT NUCLEAR STATION, UNIT NO. 1  
DOCKET NO. 50-220

1.0 Introduction

By application dated January 31, 1984, Niagara Mohawk Power Corporation (the licensee) requested an amendment to Appendix A of Operating License No. DPR-63 for Nine Mile Point Nuclear Power Station, Unit No. 1. This amendment changes the Administrative Controls section of the Technical Specifications pertaining to the following:

1. A definition of responsibility has been added for the Station Shift Supervisor. (Section 6.1)
2. Footnotes have been added to accommodate any unexpected absences for the Radiation Protection qualified individual, the Fire Brigade and for the Shift Crew Composition. (Section 6.2)
3. Provisions for limiting overtime were added to meet the requirements of TMI Item I.A.1.3, NUREG-0737. (Section 6.2)
4. The requirements for minimum shift crew composition were changed to require two Senior Reactor Operators on shift. Further, at least one Senior Reactor Operator is required in the Control Room during power operation and when the Emergency Plan is activated. In the case where the Emergency Plan is activated, the Assistant Station Shift Supervisor assumes the function of the Shift Technical Advisor and the other Senior Reactor Operator on shift is restricted to the Control Room until the arrival of an additional Senior Reactor Operator. (Table 6.2-1)
5. The responsibility of the Site Operation Review Committee has been changed by removing the following items (Section 6.5.1):
  - a. Review of procedures required by Specification 6.8.
  - b. Review of proposed tests and experiments that affect nuclear safety.
  - c. Review of proposed changes to Appendix "A" Technical Specifications.

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- d. Review of proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Review of Plant Security Plan and implementing procedures.
- f. Review of Emergency Plan and implementing procedures.

These items were removed from the Site Operations Review Committee because the heavy workload restricted the smooth, efficient and timely operation of each meeting. However, the requirement for review and control of these items is still required by the Technical Specifications. A new section 6.5.2 Technical Review and Control has been created. This section incorporated those items deleted from the Site Operations Review Committee. To summarize, this section requires an independent review by members of the plant supervisory staff and, if necessary, additional cross-disciplinary review. As stated in this section, approval from the General Superintendent - Nuclear Generation or the Station Superintendent - Nuclear Generation; or their designee, is required for many of the items. Section 6.5.2.10 states that reports documenting each of the activities performed under 6.5.2 shall be maintained. The procedure(s) will assure that cross-disciplinary review, if required, is obtained.

- 6. The reporting requirements of the Technical Specifications have been changed to meet the revision to the requirements in reporting of 10 CFR Part 50, Sections 50.72 and 50.73 that became effective January 1, 1984. The change was requested of the licensee by the Commission in Generic Letter No. 83-43. (Sections 6.6 and 6.9)
- 7. Several purely administrative changes such as those required to achieve consistency in numbering or change in nomenclature are included to support the actions described above. Further, section 6.15, Environmental Qualification was deleted for consistency because the references have been superseded by a new regulation and the new regulation (10 CFR 50.49) does not require this subject to be addressed as part of the Technical Specifications.

In a telecon on May 23, 1984, the staff and the licensee agreed it was appropriate that the period of time to accommodate unexpected absences discussed in item 2 above be changed from four to two hours and that the new Section 6.5.2 be changed in Subsections 6.5.2.7 and 6.5.2.8 to clarify audit frequency requirements at a minimum of 12 months rather than periodically. These clarifying remarks do not represent a substantive change to the items noticed in the Federal Register on April 25, 1984 (49 FR 17866).

## 2.0 Evaluation

The specifics of our evaluation are as follows:

- Section 6.1.1        The proposed change is a change in position title only. It is acceptable.
- Section 6.1.2        This is an additional specification that delineates the management responsibility for the control room command function. It is consistent with the Standard Technical Specifications (STS) as endorsed by Chapter 16 of the Standard Review Plan (SRP) and is, therefore, acceptable.
- Section 6.2.2.d      The proposed change, the addition of an asterisked note concerning less-than-minimum required staffing for radiation protection and fire brigade personnel, is generally acceptable because it is consistent with the STS as endorsed by Chapter 16 of the SRP. However, the time period originally specified (four hours) was not acceptable; with the reduction to two hours, discussed above, it is acceptable.
- Section 6.2.2.e      This proposed additional specification establishes the requirements for a licensed SRO in the control room. The specification is consistent with the NRC's response of December 28, 1983, to the licensee's letter of October 6, 1983, concerning how the licensee intended to meet the requirement for an additional SRO on shift. The proposed specification is, therefore, acceptable.
- Section 6.2.2.f      The proposed change is a numbering change only and is, therefore, acceptable.
- Section 6.2.2.g      The proposed change is the same as that proposed for 6.2.2.d and, as modified, it is acceptable.
- Section 6.2.2.h      The proposed additional specification concerning overtime work limitations is consistent with Generic Letter 83-02 and is, therefore, acceptable.
- Figure 6.2.2        The proposed changes to the plant organization effect primarily an increase in the number of plant staff positions. These are acceptable. However, the positions of Supervisor Mechanical Maintenance and Supervisor Electrical Maintenance have been deleted. In the old organization, these positions represented



the additional supervision available for outages. This additional supervision is still shown by the footnote to the Table. The change is strictly administrative and, therefore, acceptable.

Table 6.2-1

With the exception of Footnotes (6) and (7), the proposed changes are editorial only and are acceptable. Footnote (7) addresses the same matter as does Specification 6.2.2.e and is, therefore, acceptable. Footnote (6), which is consistent with the Standard Technical Specifications as endorsed by Chapter 16 of the SRP is acceptable with the time period (four hours) changed to two hours. We further note that Footnote (2) has been corrected such that "Operating" reads "Operator."

Section 6.5.1.6  
Section 6.5.1.7  
Section 6.5.2

The proposed changes to the responsibilities and functions of the Site Operations Review Committee (SORC) are generally acceptable because all of SORC's original functions will continue to be performed, some by SORC and the rest by other parts of the plant organization as has been approved for other plants. In this context, proposed Specifications 6.5.1.6 and 6.5.1.7 are acceptable with the following changes that have been accepted by the licensee.

Section 6.5.2.7  
Section 6.5.2.8

"Periodic" review of the security program and the emergency plan has been specified as at least once per 12 months, as is required by STS endorsed by Chapter 16 of the SRP.

Section 6.5.3

The proposed changes are editorial in nature and are, therefore, acceptable.

Section 6.6  
Section 6.9

The proposed changes are acceptable because they make the specification consistent with the requirements of Generic Letter 83-43.

Section 6.8

The proposed changes to specifications 6.8.2 and 6.8.3 are acceptable because they make these specifications consistent with the changes made to Specifications 6.5.1.6, 6.5.1.7, and 6.5.2.

The deletion of the Environmental Qualification Section, 6.15, from the Technical Specifications is acceptable because equipment is required to be qualified by 10 CFR 50.49. The other changes to the Technical Specifications are strictly editorial and are, therefore, acceptable.

### 3.0 Environmental Considerations

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 4.0 Conclusion

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Benedict

Dated: October 29, 1984