Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Dominion

AUG - 9 2001

Docket Nos. 50-336
50-423
B18454

RE: 10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit Nos. 2 and 3
Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) proposes to amend Operating License Nos. DPR-65 and NPF-49 by incorporating a change into the Millstone Unit Nos. 2 and 3 Technical Specifications to clarify the qualification standards of the operators in response to Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants."

Attachment 1 provides a discussion of the proposed change and the Safety Summary. Attachment 2 provides the Significant Hazards Consideration discussion. Attachments 3 and 4 provide a marked-up version of the appropriate pages of the current Unit Technical Specifications. Attachments 5 and 6 provide the retyped pages for each Unit Technical Specifications (TS).

Environmental Considerations

DNC has evaluated the proposed change against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.22. DNC has determined that the proposed change meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). This determination is based on the fact that the change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 to clarify operator qualification standards, and that the amendment request meets the following specific criteria.

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(i) The proposed change involves no significant hazards consideration.

As demonstrated in Attachment 2, the proposed change does not involve a significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released off site.

The proposed change will clarify operator qualification standards. The proposed change will not change the design basis of the plant. The proposed change will not result in an increase in power level, will not increase the production of radioactive waste and byproducts, and will not alter the flowpath or method of disposal of radioactive waste or byproducts. Therefore, the proposed change will not increase the type and amounts of effluents that may be released off site.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed change will not result in changes in the configuration of the facility. The proposed change will only clarify operator qualification standards. There will be no change in the level of controls or methodology used for processing radioactive effluents or the handling of solid radioactive waste. There will be no change to the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from the proposed change.

Conclusions

The proposed change does not involve an impact on public health and safety (see the Safety Summary provided in Attachment 1) and does not involve a Significant Hazards Consideration (SHC) pursuant to the provisions of 10 CFR 50.92 (see the SHC provided in Attachment 2).

Site Operations Review Committee and Nuclear Safety Assessment Board

The Site Operations Review Committee and Nuclear Safety Assessment Board have reviewed and concurred with the determinations.

Schedule

The Millstone Unit 2 and 3 operator training programs are accredited by the National Nuclear Accrediting Board and are based primarily on ACAD 91-012,[1] the predecessor

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[1] National Academy for Nuclear Training (NANT), ACAD 91-012, "Guidelines for Training and Qualification of Licensed Operators," 1991.

to ACAD 00-003.[2] There are some differences in education and experience guidance between the ACAD 91-012 and ACAD 00-003. Continuing to follow the education and experience guidance of ACAD 91-012, while being required to document on U.S. Nuclear Regulatory Commission (NRC) Form 398, "Personal Qualification Statement Licensee" the exceptions and waivers to NANT 2000/ACAD 00-003,[2] will result in a significant amount of effort being put forth by DNC personnel to develop the waivers/exceptions and a corresponding increase in effort by NRC personnel for review. If the Unit 2 and 3 TS were changed to clarify that the reactor operator (RO) and senior reactor operator (SRO) training program qualify RO and SRO applicants to the education and experience guidelines of NANT 2000/ACAD 00-003, waivers and exceptions would not be necessary. In order to prevent this impact on resources, it is requested that this Technical Specification change be processed expeditiously. We request issuance of this amendment by November 30, 2001, with the amendment to be implemented within 30 days of issuance.

State Notification

In accordance with 10 CFR 50.91(b), a copy of this License Amendment Request is being provided to the State of Connecticut.

There are no regulatory commitments contained in this letter.

If you should have any questions regarding this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

Raymond P. Necci, Vice President
Nuclear Operations - Millstone

Subscribed and sworn to before me

this 9th day of August, 2001

Notary Public

SANDRA J. ANTON
NOTARY PUBLIC
COMMISSION EXPIRES
MAY 31, 2005

Date Commission Expires: _____

(2) National Academy for Nuclear Training (NANT Guidelines) ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators," January 2000.

Attachments(6): 1) Discussion of the Proposed Changes and the Safety Summary
2) Significant Hazards Consideration
3) Marked-up Unit 2 Technical Specification Pages
4) Marked-up Unit 3 Technical Specification Pages
5) Retyped Unit 2 Technical Specification Pages
6) Retyped Unit 3 Technical Specification Pages

cc: H. J. Miller, Region I Administrator
J. T. Harrison, NRC Project Manager, Millstone Unit No. 2
NRC Senior Resident Inspector, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
NRC Senior Resident Inspector, Millstone Unit No. 3

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Discussion of the Proposed Changes and the Safety Summary

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Discussion of the Proposed Changes and the Safety Summary

Introduction

On January 18, 2001, the U.S. Nuclear Regulatory Commission (NRC) issued Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants."[1] This RIS states "The staff encourages all facility licensees to review their requirements and commitments related to [reactor operator] RO and [senior reactor operator or SRO] SO education and experience and to update their documentation (e.g., [Final Safety Analysis Report] FSAR, [Technical Specifications] TS, and training program descriptions) to enhance consistency and minimize confusion." To accomplish this, in part, Dominion Nuclear Connecticut, Inc. (DNC) is proposing a change to Specifications 6.3 "Facility Staff Qualifications" and 6.4 "Training" of the Unit 2 and 3 TS to clarify that applicants for RO or SRO qualification shall meet or exceed the standards given in the National Academy for Nuclear Training (NANT) guideline document[2] entitled "Guidelines for Initial Training and Qualification of Licensed Operators." The NANT operates under the auspices of the Institute of Nuclear Power Operations (INPO). It integrates the training efforts of all U.S. nuclear utilities, the activities of the National Nuclear Accrediting Board (NNAB) and the training-related activities of INPO.

Background

In 1987, 10 CFR Part 55, was amended to codify the NRC's policy related to operator training. Part 55.31(a)(4), requires that (1) operator license applicants submit evidence that they have successfully completed a facility licensee's requirements to be licensed as an operator and (2) an authorized representative of the facility licensee certify successful completion of the requirements on NRC Form 398, "Personal Qualification Statement Licensee." In lieu of providing evidence, 10 CFR 55.31(a)(4) allows the NRC to accept certification that the applicant has successfully completed an NRC approved training program that is based on a systems approach to training (SAT) and that uses a simulation facility acceptable to the NRC.

The Statement of Consideration accompanying the 1987 rule change indicated that "a facility licensee's training program would be considered approved by the NRC when it [was] accredited by the National Nuclear Accrediting Board." The NRC staff reviewed the industry's accredited licensed operator training program experience guidelines in effect at the time of the 1987 Part 55 rule change and determined that they were considered equivalent to the baseline experience criteria of Regulatory Guide (RG) 1.8,

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(1) U.S. Nuclear Regulatory Commission Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001.

(2) National Academy for Nuclear Training (NANT 2000 Guidelines) ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators," January 2000.

Revision 2.[3] RG 1.8, Revision 2 was published in conjunction with the Part 55 rule change, and provided guidance on an acceptable method for implementing the revised regulation. Therefore, when 10 CFR 55.31(a)(4) was promulgated, an accredited training program, based on an SAT process, together with the specific experience criteria contained in the training program accreditation guidelines at that time, was an acceptable alternative method for complying with the Commission's regulations on training and qualification of nuclear power plant workers.

The NRC staff states in RIS 2001-01,

> "some facility licensees did not respond to [Generic Letter] GL 87-07[4] and/or failed to update their licensing basis documents to eliminate inconsistencies and contradictions. This has made it difficult for the NRC staff to determine whether some license applicants have successfully completed their facility licensee's requirements to be licensed as an RO or SO. The fact that every facility licensee has voluntarily obtained and periodically renewed the accreditation of its licensed operator training program suggests that every facility licensee is implementing the [current] education and experience guidelines endorsed by the NNAB. The NRC staff understands that the current version of those guidelines are outlined by the National Academy for Nuclear Training (NANT) in its "Guidelines for Initial Training and Qualification of Licensed Operators" (NANT 2000 guidelines)[2] which were issued in January 2000."

The NRC staff goes on to state they have reviewed the NANT 2000 guidelines, i.e., ACAD 00-003,[2] and consider them to be equivalent to the NRC's guidelines in Revision 3 of RG 1.8.[5] In RIS 2001-01 the NRC states, "unless otherwise informed by a facility licensee, the NRC believes the education and experience guidelines described in the NANT 2000 guidelines [i.e. ACAD 00-003] are the facility licensee's education and experience requirements to be licensed as an RO or SRO."

Description Of The Proposed Change To The Technical Specifications

ANSI N18.1-1971[6] which is endorsed by the original version of RG 1.8[7] defines the qualification standards of the facility staff, including the operators, with the exceptions

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(3) U.S. Nuclear Regulatory Commission Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2.

(4) U.S. Nuclear Regulatory Commission Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - and Conforming Amendments," dated March 19, 1987.

(5) U.S. Nuclear Regulatory Commission Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 3, dated May 2000.

(6) American National Standards Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.

(7) U.S. Nuclear Regulatory Commission Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 0, dated March 1971.

listed. Under Specification 6.3 "Facility Staff Qualifications," within the Millstone Nos. 2 and 3 TS, Specification 6.3.1 states (excluding the exceptions listed):

> "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions,"

Under Specification 6.4 "Training," within the TS, Unit No. 2 Specification 6.4 and Unit 3 Specification 6.4.1 state:

> "A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.59 shall be maintained."

RIS 2001-01 states, "*the NRC staff has revised NRC Form 398 to make it clear that when a facility licensee certifies, pursuant to 10 CFR 55.31(a)(4), that an applicant has successfully completed a Commission-approved, SAT-based training program, it means that the applicant meets or exceeds the minimum education and experience guidelines currently outlined by the NANT[2] (and by extension, Revision 3 of RG 1.8).* [emphasis added] Facility licensees can use revised NRC Form 398 to document any exceptions or waivers that the applicant has taken from the baseline education and experience criteria outlined by the NANT."

The Unit Nos. 2 and 3 TS indicate that the operators, as members of the facility staff, are qualified to ANSI N18.1-1971/RG 1.8, Revision 0. However, the NRC, as indicated above, is expecting a licensee's RO's and SRO's to be qualified to the education and experience guidelines of NANT 2000, i.e., ACAD 00-003, and by extension RG 1.8, Revision 3, with any necessary exceptions or waivers documented on individual NRC 398 Forms.

The Millstone Unit Nos. 2 and 3 operator training programs are accredited by the NNAB and are based primarily on ACAD 91-012[8] the predecessor to ACAD 00-003. There are some differences in education and experience guidance between the ACAD 91-012 and ACAD 00-003. Continuing to follow the education and experience guidance of ACAD 91-012, while being required to document on NRC Form 398 the exceptions and waivers to NANT 2000/ACAD 00-003,[2] will result in a significant amount of effort being put forth by DNC personnel to develop the waivers/exceptions and a corresponding increase in effort by NRC personnel for review. If the Unit Nos. 2 and 3 TS are changed to clarify that the RO/SRO training program qualifies operator and senior reactor operator applicants to the education and experience guidelines of NANT 2000/ACAD 00-003, waivers and exceptions will not be necessary. In order to prevent this impact on resources, it is requested that this Technical Specification change be processed expeditiously.

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[8] National Academy for Nuclear Training, ACAD 91-012, "Guidelines for Training and Qualification of Licensed Operators," 1991.

The proposed change will clarify the Unit Nos. 2 and 3 TS by adding a footnote "*" to Specification 6.3.1 as shown below.

> "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions,"

The same footnote "*" will be added to Unit 2 Specification 6.4 and Unit 3 Specification 6.4.1 as shown below.

> "A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained."

The proposed footnote * will read:

> * As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines given in the National Academy for Nuclear Training (NANT) guideline document ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators."

Attachments 3 and 4 provide a marked-up version of the appropriate pages of the current unit TS. Attachments 5 and 6 provide the retyped pages for each unit TS.

Safety Summary

The proposed clarification modifies the Unit Nos. 2 and 3 TS to avoid confusion between the qualification standards of the facility staff, who are qualified to ANSI N18.1-1971/RG 1.8 Revision 0, and the operators who will be qualified to the education and experience guidelines outlined by National Academy for Nuclear Training ACAD 00-003 "Guidelines for Initial Training and Qualification of Licensed Operators" and by extension RG 1.8 Revision 3. Changing to ACAD 00-003 allows the licensed operator training program to reflect current NRC and industry standards with respect to the education and experience requirements applicants must have to apply for an RO or SRO license. The training of the operators themselves is not affected, this change only modifies the education and experience requirements they must meet to qualify for the operator training program. The RO and SRO applicant (or upgrade) still must learn and be tested on the same material, demonstrate their proficiency on the facility simulator, and meet other requirements. Consequently, this change has no impact on the capability of licensed operators, it only modifies and provides alternative qualifications for entry into the program.

This change will not alter any regulatory requirements or have an impact on the acceptance criteria for any design basis accident described in the respective Unit Nos. 2 or 3 Updated Final Safety Analysis Report. The proposed change has no impact on

plant operation, does not alter any plant configuration, or system, structure, component functions, or their operation.

RIS 2001-01 indicates that this type of change, to update the facility licensing basis, would be considered administrative in nature. Since the change is solely administrative it cannot affect the likelihood, consequences, or introduce a new or different kind of accident. Therefore, DNC considers the proposed change to each Technical Specification to be safe and acceptable.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Significant Hazards Consideration

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Significant Hazards Consideration

Description of the Proposed Change

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) proposes to amend Operating License Nos. DPR-65 and NPF-49 by incorporating an administrative change into the Millstone Unit Nos. 2 and 3 Technical Specifications (TS) to clarify the qualification standards of the operators in response to Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants."

Significant Hazards Consideration

In accordance with 10 CFR 50.92, DNC has reviewed the proposed change and concluded that the change does not involve a Significant Hazards Consideration (SHC). The basis for this conclusion is that the three criteria of 10 CFR 50.92(c) are not compromised. The proposed change does not involve an SHC because the change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed administrative clarification modifies the Unit Nos. 2 and 3 TS to avoid confusion between the qualification standards of the facility staff, who are qualified to American National Standards Institute (ANSI), "Selection and Training of Nuclear Power Plant Personnel," ANSI N18.1-1971/Regulatory Guide 1.8, Revision 0, "Qualification and Training of Personnel for Nuclear Power Plants," and the operators who will be qualified to the education and experience guidelines outlined by National Academy for Nuclear Training (NANT 2000 Guidelines), ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators." The training of the operators themselves is not affected, this change only modifies the education and experience requirements they must meet to qualify for the operator training program. The reactor operator and senior reactor operator applicant (or upgrade) still must learn and are tested on the same material, demonstrate their proficiency on the facility simulator and meet other requirements. Consequently, this change has no impact on the capability of licensed operators, it only modifies and provides alternative qualifications for entry into the program.

   This change will not alter any regulatory requirements or have an impact on the acceptance criteria for any design basis accident described in the respective Unit Nos. 2 or 3 Updated Final Safety Analysis Report (UFSAR).

The change has no impact on plant equipment operation. Since the change is solely an administrative change to the Technical Specifications, it cannot affect the likelihood or consequences of accidents. Therefore, this change will not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed change has no impact on plant operation. Since the proposed change is solely an administrative change to the Technical Specifications, it does not affect plant operation in any way.

   The change does not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. The change does not alter the way any structure, system, or component functions and does not alter the manner in which the plant is operated. The change does not introduce any new failure modes. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

   Since the proposed change is solely an administrative change to the Technical Specifications, it does not affect plant operation in any way. The proposed change does not impact any acceptance criteria for the design basis accidents described in the respective Unit Nos. 2 or 3 UFSAR and does not impact the consequences of accidents previously evaluated. Therefore, the proposed change will not result in a reduction in a margin of safety.

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Attachment 3

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Marked-up Unit No. 2 Technical Specification Pages

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Marked-up Unit No. 2 Technical Specification Pages

A change to the following Technical Specification page has been proposed.

Technical Specification Section Numbers	Title(s) of Section(s)	Affected Page and Amendment No.
6.3.1	FACILITY STAFF QUALIFICATIONS	Page 6-2, Am. No. 191
6.4	TRAINING	Page 6-5, Am. No. 239

FACILITY STAFF (CONTINUED)

d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. (Table 6.2-1)

e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12). | 191 11/3/95

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions, except for: ||

a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 2, then the Operations Manager shall have held a senior reactor operator license at a Pressurized Water Reactor and an individual serving in the capacity of the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 2. | 190 11/2/95

b. The Shift Technical Advisor (STA) who shall meet the requirements of Specification 6.3.1.b.1 or 6.3.1.b.2.

1. Dual-role individual: Must hold a senior reactor operator's license at Millstone Unit No. 2, meet the STA training criteria of NUREG-0737, Item I.A.1.1, and meet one of the following educational alternatives:

a. Bachelor's degree in engineering from an accredited institution;

b. Professional Engineer's license obtained by the successful completion of the PE examination;

Insert A-footnote *

6.4 TRAINING

A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.5 Deleted.

Insert A - footnote *

INSERT 'A' - Pages 6-3 and 6-5

* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines given in the National Academy for Nuclear Training (NANT) guideline document ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators."

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Attachment 4

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Marked-up Unit No. 3 Technical Specification Pages

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Marked-up Unit No. 3 Technical Specification Pages

A change to the following Technical Specification page has been proposed.

Technical Specification Section Numbers	Title(s) of Section(s)	Affected Page and Amendment No.
6.3.1	FACILITY STAFF QUALIFICATIONS	Page 6-5, Am. No. 173
6.4.1	TRAINING	Page 6-5, Am. No. 173

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions, except for:

a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the Operations Manager shall have held a senior reactor operator license at a pressurized water reactor, and the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 3.
b. The Health Physics Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 Deleted.

Insert A - footnote *

INSERT 'A' - Page 6-5

* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines given in the National Academy for Nuclear Training (NANT) guideline document ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators."

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Attachment 5

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Retyped Unit No. 2 Technical Specification Pages

FACILITY STAFF (CONTINUED)

d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. (Table 6.2-1)

e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12).

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions, except for:

a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 2, then the Operations Manager shall have held a senior reactor operator license at a Pressurized Water Reactor and an individual serving in the capacity of the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 2.

b. The Shift Technical Advisor (STA) who shall meet the requirements of Specification 6.3.1.b.1 or 6.3.1.b.2.

1. Dual-role individual: Must hold a senior reactor operator's license at Millstone Unit No. 2, meet the STA training criteria of NUREG-0737, Item I.A.1.1, and meet one of the following educational alternatives:

a. Bachelor's degree in engineering from an accredited institution;

b. Professional Engineer's license obtained by the successful completion of the PE examination;

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* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines given in the National Academy for Nuclear Training (NANT) guideline document ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators."

6.4 TRAINING

A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.5 Deleted.

* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines given in the National Academy for Nuclear Training (NANT) guideline document ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators."

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Attachment 6

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Technical Specification Change Request
Administrative Change To Clarify Operator Qualification Standards
Retyped Unit No. 3 Technical Specification Pages

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions, except for:

a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the Operations Manager shall have held a senior reactor operator license at a pressurized water reactor, and the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 3.
b. The Health Physics Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 Deleted.

* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines given in the National Academy for Nuclear Training (NANT) guideline document ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators."