



**Constellation  
Nuclear**

**Nine Mile Point  
Nuclear Station**

*A Member of the  
Constellation Energy Group*

June 17, 2002  
NMP1L 1674

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

RE:                   Nine Mile Point Unit 1  
                          Docket No. 50-220  
                          DPR-63  
                          TAC No. MB2442

***Subject:           Transmittal of Revised Replacement Pages for the Application for Amendment to the Technical Specifications Incorporating the Recommendations of Generic Letter 89-01***

Gentlemen:

By letter dated October 19, 2001 (NMP1L 1617), Niagara Mohawk Power Corporation transmitted an application for amendment to the Nine Mile Point Unit 1 (NMP1) Technical Specifications (TSs) as set forth in Appendix A of Operating License DPR-63. The application proposed changes to: (1) implement programmatic controls for radiological effluent technical specifications (RETS) in the Administrative Controls section of the TSs, (2) relocate existing procedural details to licensee-controlled documents or new programs to accommodate the incorporation of Generic Letter (GL) 89-01 and the relevant portions of the Standard Technical Specifications (NUREG-1433), and (3) update the references to 10 CFR 20.1 - 20.602 with the corresponding references to 10 CFR 20.1001 - 20.2402.

On April 10, 2002, a conference call was held between the NRC Staff and representatives of Nine Mile Point Nuclear Station, LLC, (NMPNS), the current licensee, to discuss the proposed wording of certain TS requirements. After consideration of the Staff's concerns regarding the proposed wording of TS 6.12, "High Radiation Area," NMPNS hereby transmits revised replacement pages 371a, 371b, 372, and 372a for the TS amendment application dated October 19, 2001. Transmittal of these revised pages resolves the Staff's concerns by adopting the wording of NUREG-1433, Revision 2. This revision has been reviewed in accordance with Section 6.5 of the TSs and no changes to the No Significant Hazards Consideration analysis are required.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on  
June 17, 2002.

Very truly yours,

  
John T. Conway  
Site Vice President

JTC/CDM/jm  
Enclosures

cc: Mr. H. J. Miller, NRC Regional Administrator, Region I  
Mr. G. K. Hunegs, NRC Senior Resident Inspector  
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)  
Mr. John P. Spath  
NYSERDA  
286 Washington Avenue Ext.  
Albany, NY 12203-6399  
Records Management

2. Shall become effective after the approval of the plant manager or a designee; and
3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Radioactive Effluent Release Report for the period of the report in which any change in 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 (i.e., month and year) the change was implemented.

6.12 High Radiation Area

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

6.12.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of a Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
  1. A radiation monitoring device that continuously displays radiation dose rates in the area, or
  2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or
  4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
    - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
    - (ii) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

6.12.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
  1. All such door and gate keys shall be maintained under the administrative control of the Station Shift Supervisor - Nuclear, radiation protection manager, or his or her designee.
  2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess one of the following:
  1. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
  3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

- (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
  - (ii) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
- 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
- f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.