

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



September 8, 2004

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555-0001

Serial Nos.: 04-314  
NL&OS/PRW R2  
Docket Nos. 50-245  
50-336  
50-423  
License Nos. DPR-21  
DPR-65  
NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNITS 1, 2, AND 3**  
**PROPOSED TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE**  
**CONSOLIDATED QUALITY ASSURANCE PROGRAM DESCRIPTION**

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) requests amendments in the form of changes to the Technical Specifications to Facility Operating License Numbers DPR-21, DPR-65 and NPF-49 for Millstone Power Station Units 1, 2 and 3, respectively. The proposed amendments are administrative in nature and are being requested in order to support the implementation of the proposed Dominion Nuclear Facility Quality Assurance Program (Topical Report DOM-QA-1).

On April 1, 2001, Dominion Resources, Inc. (Dominion) acquired the Millstone Power Station and DNC became the licensee thereof. At that point in time and continuing today, Dominion has operated its nuclear units under two separate quality assurance programs. Dominion has expressed its intent to the NRC to transition to a common quality assurance program for all of its sites. Accordingly, a proposed Topical Report was transmitted to the NRC by a letter (Serial No. 04-326) dated August 24, 2004. Review and approval of the enclosed amendment requests is requested in concert with the review and approval of the proposed Topical Report.

A discussion of the proposed changes is provided in Attachment 1. The marked-up and proposed technical specifications pages are provided in Attachments 2 and 3, respectively.

DNC has evaluated the proposed technical specification changes and has determined that they do not involve a significant hazards consideration as defined in 10 CFR 50.92. The basis for this determination is provided in Attachment 4. DNC has also determined that the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed changes. The basis for that determination is provided in Attachment 5.


The Site Operations Review Committee and Management Safety Review Committee have reviewed and concurred with the determinations.

As the changes are applicable to multiple dockets and are similar to administrative changes proposed for North Anna and Surry, Dominion requests that the NRC review of the attached license amendment requests be performed by the same staff person(s) and coordinated with the proposed Topical Report review in order to facilitate an efficient and consistent review. Approval of the proposed license amendments is requested to be in concert with the approval of the proposed Topical Report (Requested date: March 31, 2005), with the amendments being implemented within six months of approval.

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

Should you have any questions regarding this submittal, please contact Ms. Sheri Tew at 804-741-2368.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Eugene S. Grecheck', with a stylized, flowing script.

Eugene S. Grecheck  
Vice President – Nuclear Support Services

Attachments: (5)

Commitments contained in this correspondence: None.

cc: U.S. Nuclear Regulatory Commission  
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79 Elm Street  
Hartford, CT 06106-5127

COMMONWEALTH OF VIRGINIA     )  
  )  
COUNTY OF HENRICO            )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President - Nuclear Support Services of Dominion Nuclear Connecticut, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 8<sup>TH</sup> day of September, 2004.

My Commission Expires: May 31, 2006.

Vicki L. Hulse  
Notary Public

(SEAL)

**ATTACHMENT 1**

**PROPOSED TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE  
CONSOLIDATED QUALITY ASSURANCE PROGRAM DESCRIPTION**

**DISCUSSION OF TECHNICAL SPECIFICATION CHANGE**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNITS 1, 2, AND 3**

## **DISCUSSION OF TECHNICAL SPECIFICATION CHANGES**

On April 1, 2001, Dominion Resources, Inc. (Dominion) acquired the Millstone Power Station and established Dominion Nuclear Connecticut, Inc. (DNC) as the licensee thereof. At that point in time and continuing today, Dominion has operated its nuclear units under two separate quality assurance programs: one for the North Anna Power Station (NAPS) and Surry Power Station (SPS) and one for the Millstone Power Station (MPS). Dominion has expressed its intent to the NRC to transition to a common quality assurance program.

Under separate cover and in accordance with 10 CFR 50.54 (a), Dominion is forwarding its Consolidated Quality Assurance Program to the NRC for review and approval. Concurrent with that submittal, Dominion is forwarding proposed technical specification changes associated with the Consolidated Quality Assurance Program for each of its nuclear units. In accordance with 10 CFR 90, this correspondence contains the requested technical specification changes for Millstone Power Station Units 1, 2 and 3 (MPS 1, MPS 2, and MPS 3). This attachment provides the background information related to those proposed changes. Attachment 2 contains the marked up pages and Attachment 3 contains the retyped pages. The no significant hazards evaluation and environmental review are contained in Attachments 4 and 5 respectively.

Specific details of the changes for a program common to all Dominion's nuclear sites are contained in the separate submittal requesting approval of the Consolidated Quality Assurance Program. The majority of the administrative technical specifications that have been generically allowed to be moved to other licensee-controlled documents have been transferred to the MPS Quality Assurance Program in past licensing actions. To maintain consistency among the Dominion nuclear sites in adopting the common quality assurance program, additional minor changes, described below, are necessary.

### **Facility Staff Qualifications (includes footnote regarding Regulatory Guide 1.8)**

- **Applicability/T.S. Section**

1. MPS 1/ 5.3.1
2. MPS 2/ 6.3.1
3. MPS 3/ 6.3.1

- **Description**

Removes the reference to ANSI N18.1-1971 and replaces it with, "...as specified in the Quality Assurance Program."

### **Radiation Protection Manager Qualifications**

- **Applicability/T.S. Section**
  1. MPS 1/ 5.3.1.2
  2. MPS 2/ 6.3.1.c.
  3. MPS 3/ 6.3.1.b.
- **Description**
  1. Removes the reference to NRC Regulatory Guide 1.8, Revision 1, May 1977.
  2. Radiation Protection Manager qualifications are included in the qualifications of the facility staff in the Quality Assurance Program as described above.

### **Technical Specification Titles**

- **Applicability/T.S. Section**
  1. MPS 2/ 6.1.3
  2. MPS 3/ 6.1.3
- **Description**

Removes the reference to the Quality Assurance Program Topical Report and replaces it with, "...appropriate administrative documents."

### **Shift Technical Advisor (STA) Qualifications**

- **Applicability/T.S. Section**
  1. MPS 2/ 6.3.1.b
  2. MPS 3/ 6.2.4.1
- **Description**
  1. Removes the description of STA qualifications from the technical specifications.
  2. STA qualifications are included in the qualifications of the facility staff in the Quality Assurance Program as described above.

### **Facility Staff Training**

- **Applicability/T.S. Section**
  - 1) MPS 2/ 6.4
  - 2) MPS 3/ 6.4
- **Description**

Removes the reference to ANSI N18.1-1971 and replaces it with, "...as specified in the Quality Assurance Program."

**ATTACHMENT 2**

**PROPOSED TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE  
CONSOLIDATED QUALITY ASSURANCE PROGRAM DESCRIPTION**

**MARKED UP PAGES**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNITS 1, 2, AND 3**



5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

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5.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate, in writing, the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession of this responsibility.

5.1.2 The Shift Manager shall be responsible for the control room command function.

5.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit-specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Program Topical Report

APPROPRIATE  
ADMINISTRATIVE DOCUMENTS

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

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- 5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for: as specified in the Quality Assurance Program.
- 5.3.1.2 The operations manager or assistant operations manager shall be a CERTIFIED FUEL HANDLER.
- 5.3.1.2 The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.
-

6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Manager shall be responsible for the control room command function.

6.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Program Topical Report. *appropriate administrative documents*

6.2 ORGANIZATION6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the higher management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Program Topical Report.
- b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operation, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 FACILITY STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

ADMINISTRATIVE CONTROLSFACILITY STAFF (CONTINUED)

- d. A radiation protection technician 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:~~ as specified in the Quality Assurance Program.

6.3.2 ~~(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;

\* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

September 17, 2002

**ADMINISTRATIVE CONTROLS**

- c. Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences;
  - d. Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences;
  - e. Successful completion of the Memphis State University (MSU) STA program. (Note: This alternative is only acceptable for individuals who have completed the program prior to December 31, 1986); or
  - f. Successful completion of the Thames Valley State Technical College associate's degree in Nuclear Engineering Technology program, provided that the individual was enrolled in the program by October 1, 1987.
2. Dedicated STA: Must meet the STA training criteria of NUREG-0737, Item I.A.1.1, and have received specific training in plant design, and response and analysis of the plant for transients and accidents.

② The radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

September 17, 2002

TABLE 6.2-1<sup>(3)</sup>

MINIMUM SHIFT-CREW COMPOSITION<sup>(2)</sup>

LICENSE CATEGORY	APPLICABLE MODES	
	1, 2, 3 & 4	5 & 6
Senior Reactor Operator	2	1 <sup>(1)</sup>
Reactor Operator	2	1
Non-Licensed Operator	2	1
Shift Technical Advisor	1 <sup>(4)</sup>	None Required

- (1) Does not include the licensed Senior Reactor or Senior Reactor Operator Limited to Fuel Handling individual supervision CORE ALTERATIONS after the initial fuel loading.
- (2) The above shift crew composition and the qualified radiation protection technician of Section 6.2.2 may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided expeditious actions are taken to fill the required position.
- (3) Requirements for minimum number of licensed operators on shift during operation in modes other than cold shutdown or refueling are contained in 10CFR50.54(m).
- (4) The Shift Technical Advisor position can be filled by either of the two Senior Reactor Operators (a dual-role individual), if he meets the requirements of Specification 6.3.1.b.1 specified in the Quality assurance Program

**ADMINISTRATIVE CONTROLS****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 ANS~~ *as specified in the Quality Assurance Program* ~~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 of Regulatory Guide 1.8, Revision 3, May 2000.

## 6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Manager shall be responsible for the control room command function.

6.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit specific titles for the functions and responsibilities associated with these generic titles are identified in The Quality Assurance Program Topical Report. Appropriate administrative documents

## 6.2 ORGANIZATION

### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Program Topical Report.
- b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

### 6.2.2 FACILITY STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;



ADMINISTRATIVE CONTROLS

6.2.3 Deleted.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications ~~of ANSI NRB 1-1971 for comparable positions, except for:~~  
as specified in the Quality Assurance Program

- 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 radiation protection 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 NRB 1-1971~~ and 10 CFR Part 55.59 shall be maintained. as specified in the Quality Assurance Program

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 of Regulatory Guide 1.8, Revision 3, May 2000.

MILLSTONE - UNIT 3

6-5

Amendment No. 38, 59, 84, 90, 94,  
139, 132, 133, 171, 173,  
199, 212

**ATTACHMENT 3**

**PROPOSED TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE  
CONSOLIDATED QUALITY ASSURANCE PROGRAM DESCRIPTION**

**RETYPE PAGES**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNITS 1, 2, AND 3**

## 5.0 ADMINISTRATIVE CONTROLS

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5.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate, in writing, the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession of this responsibility.

5.1.2 The Shift Manager shall be responsible for the control room command function.

5.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit-specific titles for the functions and responsibilities associated with these generic titles are identified in appropriate administrative document.

## ADMINISTRATIVE CONTROLS

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### 5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications as specified in the Quality Assurance Program.

5.3.2 The operations manager or assistant operations manager shall be a CERTIFIED FUEL HANDLER.

## ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

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Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

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- b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operation, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 6.2.2 FACILITY STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

## ADMINISTRATIVE CONTROLS

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### FACILITY STAFF (CONTINUED)

- d. A radiation protection technician 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 as specified in the Quality Assurance Program.
- 6.3.2 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.

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**TABLE 6.2-1<sup>(3)</sup>****MINIMUM SHIFT-CREW COMPOSITION<sup>(2)</sup>**

LICENSE CATEGORY	<u>APPLICABLE MODES</u>	
	1, 2, 3 & 4	5 & 6
Senior Reactor Operator	2	1 <sup>(1)</sup>
Reactor Operator	2	1
Non-Licensed Operator	2	1
Shift Technical Advisor	1 <sup>(4)</sup>	None Required

- (1) Does not include the licensed Senior Reactor or Senior Reactor Operator Limited to Fuel Handling individual supervision CORE ALTERATIONS after the initial fuel loading.
- (2) The above shift crew composition and the qualified radiation protection technician of Section 6.2.2 may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided expeditious actions are taken to fill the required position.
- (3) Requirements for minimum number of licensed operators on shift during operation in modes other than cold shutdown or refueling are contained in 10CFR50.54(m).
- (4) The Shift Technical Advisor position can be filled by either of the two Senior Reactor Operators (a dual-role individual), if he meets the requirements specified in the Quality Assurance Program.

## ADMINISTRATIVE CONTROLS

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### 6.4 TRAINING

A retraining and replacement training program for the facility staff that meets or exceeds the requirements as specified in the Quality Assurance Program and 10 CFR Part 55.59 shall be maintained. |

6.5 Deleted.

## ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Manager shall be responsible for the control room command function.

6.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit specific titles for the functions and responsibilities associated with these generic titles are identified in appropriate administrative documents.

### 6.2 ORGANIZATION

#### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Program Topical Report.
- b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 6.2.2 FACILITY STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

## ADMINISTRATIVE CONTROLS

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6.2.3 Deleted.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.

**ATTACHMENT 4**

**PROPOSED TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE  
CONSOLIDATED QUALITY ASSURANCE PROGRAM DESCRIPTION**

**NO SIGNIFICANT HAZARDS EVALUATION**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNITS 1, 2, AND 3**

### **SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION**

This license amendment proposes transfer of certain administrative requirements from the administrative section of the Technical Specifications to the Consolidated Quality Assurance Program and to other licensee controlled documents. Changes are proposed for the following Technical Specifications:

- Facility Staff Qualifications: Removes references to ANSI N18.1-1971 and replaces it with "...as described in the Quality Assurance Program."
- Radiation Protection Manager Qualifications: Included in the qualifications of the facility staff in the Quality Assurance Program as described above.
- Technical Specification Titles: Removes the reference to the Quality Assurance Program Topical Report and replaces it with, "...appropriate administrative documents."
- Shift Technical Advisor Qualifications: Included in the qualifications of the facility staff in the Quality Assurance Program as described above.
- Facility Staff Training: Removes the reference to ANSI N18.1-1971 and replaces it with, "...as specified in the Quality Assurance Program."

Dominion Nuclear Connecticut, Inc. (DNC) has reviewed the proposed Technical Specifications changes relative to the requirements of 10 CFR 50.92 and determined that a significant hazards consideration is not involved. Specifically, operation of Millstone Power Station Units 1, 2, and 3 with the proposed changes will not:

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

The proposed changes do not involve a significant increase in the probability or consequence of an accident previously analyzed. The changes involve the transfer of requirements from the administrative section of the Technical Specifications to the Consolidated Quality Assurance Program and other licensee controlled documents. Therefore, the proposed changes are administrative in nature, and have no effect on a design basis accident, and will not increase the probability or consequences of any previously analyzed accident.

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

The implementation of the proposed changes does not create the possibility of an accident of a different type than was previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The transfer of requirements concerning facility staff qualifications from the administrative section of the Technical Specifications to the Consolidated Quality Assurance Program and other licensee controlled documents can not initiate a new or different kind of accident.

These changes do not alter the nature of events postulated in the UFSAR nor do they introduce any unique precursor mechanisms. Therefore, the proposed changes are administrative in nature and do not create the possibility of a new or different kind of accident from those previously analyzed.

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

The implementation of the proposed changes does not reduce the margin of safety. The proposed changes to transfer certain requirements from the administration section of the Technical Specification to the Consolidated Quality Assurance Program and other licensee controlled documents have no effect on design basis radiological events. It is thus concluded that the proposed changes are administrative in nature and the margin of safety will not be reduced by the implementation of the changes.

**ATTACHMENT 5**

**PROPOSED TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE  
CONSOLIDATED QUALITY ASSURANCE PROGRAM DESCRIPTION  
ENVIRONMENTAL IMPACT EVALUATION**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNITS 1, 2 AND 3**



### **ENVIRONMENTAL IMPACT EVALUATION**

10 CFR 51.22(c)(9) provides criteria for and identification of licensing and regulatory action eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not:

- 1) involve a significant hazards consideration,
- 2) result in a significant change in the type or a significant increase in the amounts of any effluents that may be released offsite, or
- 3) result in a significant increase in individual or cumulative occupational exposure.

Dominion Nuclear Connecticut, Inc. (DNC) has reviewed this license amendment and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 52.22(c), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the proposed license amendment. The basis for this determination is as follows:

- 1) The proposed license amendment does not involve a significant hazards consideration as described previously in Attachment 4 of this letter.
- 2) As discussed in the significant hazards evaluation, the changes proposed by this amendment to transfer certain requirements from the administrative section of the Technical Specifications to the Consolidated Quality Assurance Program and other licensee controlled documents does not result in a significant change or significant increase in the public dose consequences for Millstone Power Station Units 1, 2, and 3 design basis radiological accidents. It does not have any effect on any design basis accidents described in the Updated Final Safety Analysis Report (UFSAR) and will not result in plant changes that involve any significant increase in environmental impacts. The proposed changes will not affect the radioactive effluents during a radiological accident. Therefore, implementation of the proposed change will not result in a significant change in the types or increase in the amount of any effluents that may be released offsite.
- 3) The changes proposed by this amendment do not result in a significant increase in control room operator or plant worker doses during design basis radiological accidents. The changes are administrative in nature only and have no effect on any design basis accidents described in the UFSAR. Therefore, the proposed amendments will not result in a significant increase in individual or cumulative occupational radiation exposure.