FEB 2 8 2007

L-PI-07-013
10 CFR 50.90

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant Units 1 and 2
Dockets 50-282 and 50-306
License Nos. DPR-42 and DPR-60

License Amendment Request (LAR) to Revise Technical Specification (TS) 5.2.2 and TS 5.3 Qualification Requirements for Shift Technical Advisors

Pursuant to 10 CFR 50.90, the Nuclear Management Company, LLC (NMC) hereby requests an amendment to the TS for the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2 to revise TS 5.2.2, "Plant Staff", and TS 5.3, "Plant Staff Qualifications", requirements for shift technical advisor qualifications. These proposed changes meet the guidance of the Commission Policy Statement on Engineering Expertise on Shift, are consistent with the guidance of NUREG-1431, "Standard Technical Specifications, Westinghouse Plants", and provide plant staffing flexibility. NMC has evaluated the proposed changes in accordance with 10 CFR 50.92 and concluded that they involve no significant hazards consideration.

Exhibit A contains the licensee's evaluation of this LAR. Exhibit B provides a markup of TS pages. Exhibit C provides retyped TS pages.

NMC requests approval of this LAR within one calendar year of the submittal date. Upon NRC approval, NMC requests 90 days to implement the associated changes. In accordance with 10 CFR 50.91, NMC is notifying the State of Minnesota of this LAR by transmitting a copy of this letter and exhibits to the designated State Official.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on FEB 2 8 2007

Thomas J. Palmisano
Site Vice President, Prairie Island Nuclear Generating Plant Units 1 and 2
Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC
State of Minnesota

Exhibits:

A. Licensee's Evaluation
B. Proposed Technical Specification Changes (markup)
C. Proposed Technical Specification Changes (retyped)

Exhibit A

LICENSEE'S EVALUATION

License Amendment Request (LAR) to Revise Technical Specification (TS) 5.2.2 and TS 5.3 Qualification Requirements for Shift Technical Advisors

1.0 DESCRIPTION

This LAR is a request to amend Operating Licenses DPR-42 and DPR-60 for Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2.

The Nuclear Management Company, LLC (NMC) requests Nuclear Regulatory Commission (NRC) review and approval of proposed revisions to TS 5.2.2, "Plant Staff", and TS 5.3, "Plant Staff Qualifications", requirements for shift technical advisor qualifications. The proposed changes will specify that personnel who perform the function of shift technical advisor (STA) shall meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift, published in Federal Register 50 FR 43621, October 28, 1985. This change will allow qualified personnel to perform the function of STA without also holding a senior reactor operator (SRO) license. The Technical Specifications, with the revisions proposed in this LAR, meet applicable regulatory guidance.

2.0 PROPOSED CHANGE

A brief description of the associated proposed TS changes is provided below along with a discussion of the justification for each change. The specific wording changes to the TS are provided in Exhibits B and C.

> **TS 5.2.2, "Plant Staff":** This LAR proposes to modify the plant staff requirements for STAs in paragraph 5.2.2.f by requiring them to meet the qualifications specified in the Commission Policy Statement on Engineering Expertise on Shift. This change is acceptable because it applies regulatory guidance in accordance with the guidance of NUREG-1431, "Standard Technical Specifications, Westinghouse Plants", Revision 3.1 (NUREG-1431).

TS 5.3, "Plant Staff Qualifications": This LAR proposes to modify the plant staff qualification requirements in paragraph 5.3.1 by removing the exception for STAs and renumbering the subsequent exceptions. This change with the change to TS 5.5.2.f, will consolidate STA qualification requirements in one place and remove the requirement for the STA to hold an SRO license. This change is acceptable because STAs will be required to meet the qualifications specified in the Commission Policy Statement on Engineering Expertise on Shift.

In summary these changes are acceptable because they are consistent with current regulatory guidance.

3.0 BACKGROUND

Following the Three Mile Island, Unit 2 (TMI-2) accident in 1979, the NRC established requirements for STAs to provide engineering and accident assessment advice to the control room shift management. Subsequent to issuance of the original requirements, the regulatory guidance for STA qualifications and the organizational approach for providing STAs evolved. The current guidance provided in the Commission Policy Statement on Engineering Expertise on Shift, issued on October 28, 1985, allows: 1) personnel with STA qualifications and senior reactor operator license (shift supervisor) qualifications to perform the dual function of STA and control room shift management; or 2) personnel with only STA qualifications to perform the function of STA separate from control room shift management.

The organizational approach to provide the STA function at PINGP has also evolved. In a previous license amendment, the PINGP TS were revised to allow separate personnel to perform the functions of STA and control room shift management. However, the license amendment retained the requirement for the STA to hold an SRO license which is not required under the guidance of the Commission Policy Statement on Engineering Expertise on Shift. This LAR proposes TS changes which will make the PINGP TS more consistent with the format and content guidance of NUREG-1431 and require STAs to meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift for personnel that are performing only the STA function. With these TS changes the plant will continue to operate safely and the health and welfare of the public is protected.

4.0 TECHNICAL ANALYSIS

PINGP is a two unit plant located on the right bank of the Mississippi River approximately 6 miles northwest of the city of Red Wing, Minnesota. The facility is owned by the Northern States Power Company (NSP) and operated by NMC. Each unit at PINGP employs a two-loop pressurized water reactor designed and supplied by Westinghouse Electric Corporation. The initial PINGP application for a Construction

Permit and Operating License was submitted to the Atomic Energy Commission (AEC) in April 1967. The Final Safety Analysis Report (FSAR) was submitted for application of an Operating License in January 1971. Unit 1 began commercial operation in December 1973 and Unit 2 began commercial operation in December 1974.

The PINGP was designed and constructed to comply with NSP's understanding of the intent of the AEC General Design Criteria (GDC) for Nuclear Power Plant Construction Permits, as proposed on July 10, 1967. PINGP was not licensed to NUREG-0800, "Standard Review Plan (SRP)."

Current TS Requirements, Basis and Limitations

Current TS 5.3.1, "Plant Staff Qualifications", provides an exception from the general qualification requirements for the plant staff which requires the STA to hold an SRO in addition to 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. Regulatory guidance does not include an SRO in the qualifications for an STA; the following discussion provides the basis for its inclusion in the PINGP TS.

By letter dated September 13, 1979, the NRC issued new requirements to all operating nuclear power plants established as a result of the NRC review of the TMI-2 accident which included requirements for an STA. The STA requirement was first incorporated into the PINGP TS by license amendments (LA) 46 (Unit 1) and 40 (Unit 2) (LA 46/40) issued on March 2, 1981, which revised the TS minimum shift crew composition table, Table TS.6.1-1, to include the STA and revised TS 6.1.D to state:

> Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for . . . (2) 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.

The LAR which requested this change to the TS did not specify a method for implementation of the STA function at PINGP.

An LAR was submitted on August 14, 1987, and supplemented August 27, 1987, January 4, 1988, and February 10, 1988, which created a new position of Shift Manager to implement the Commission Policy Statement on Engineering Expertise on Shift and to fill the dual roles of licensed SRO and STA. This LAR resulted in NRC issuance of LA 82/75 which revised the TS plant organizational chart, Figure TS.6.1-2, to show the Shift Manager position with the requirement to be a licensed Senior Reactor Operator. The TS did not explicitly state that the Shift Manager would perform the dual roles of SRO and STA.

On February 25, 1991, an LAR was submitted to delete the plant organizational chart from the TS and added new Specifications that captured the essential aspects of the

organizational structure. Subsequently, the NRC issued LA 105/98 which revised TS 6.1.D to state that the Shift Manager would be required to meet the qualifications that an STA is required to meet as follows:

> Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for . . . (2) the Shift Manager 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.

LA 105/98 also revised the TS minimum shift crew composition table, Table TS 6.1-1, by changing "Shift Technical Advisor" to "Shift Manger" and added a footnote stating, "The Shift Manager performs the functions of the Shift Technical Advisor".

An LAR was submitted December 14, 1995, to conform PINGP TS Administrative Controls (Chapter 6) to NUREG-1431, Revision 1 administrative controls guidance. In keeping with the philosophy of NUREG-1431, generic titles were proposed in lieu of specific position titles. The resulting license amendment, LA 141/132, issued on December 7, 1998, removed the TS minimum shift crew composition table, Table TS 6.1-1 (and the requirement for the Shift Manager to perform the dual role of licensed SRO and STA), relocated personnel qualifications from TS 6.1.D to TS 6.3, and revised the qualifications requirements to state:

> Each member of the plant staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 1, September 1975 except for (1) personnel who perform the function of shift technical advisor shall hold an SRO license and have a bachelors 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 . . ..

Although the means for providing the STA function at PINGP had not changed, the TS no longer contained the title "Shift Manager" and did not specify the dual function role of this position.

The license amendment to convert PINGP TS to improved TS (ITS), LA 158/149, moved the TS administrative controls to Chapter 5 of the TS and made further changes to Shift Manager and STA requirements. NMC requested changes to the TS which would enable the plant to establish the licensed Shift Manager as a position separate from the licensed STA position. The STA qualifications previously in TS 6.3 were retained in ITS 5.3.1 with no changes except for updating an internal TS cross-reference.

The changes incorporated in LA 158/149 allowed plant organizational flexibility with respect to the Shift Manager and STA positions but the requirements for the STA to hold an SRO license remained in the TS. This requirement exceeds the current guidance for STA qualifications and imposes an unnecessary burden on PINGP

operations. This requirement means that additional personnel must be trained as a licensed SRO which increases training department resource requirements. The PINGP TSs are the only ones in the NMC fleet (Palisades Nuclear Plant, Point Beach Nuclear Plant and Monticello Nuclear Generating Plant) which require personnel who perform the STA function to hold an SRO license and do not include reference to the Commission Policy Statement on Engineering Expertise on Shift. The proposed changes in this LAR will make the NMC fleet TS requirements for STA qualifications consistent.

Proposed TS Chapter 5.0 changes

This LAR proposes to relocate the qualification requirements for the STA position from TS 5.3.1 to paragraph TS 5.2.2.f by adding a sentence which states, "This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift." The qualification requirements are also reformatted by removing specific attributes and relying on the contents of the Commission Policy Statement to convey the qualifications requirements. The proposed changes allow plant management organizational flexibility under the guidance of the Commission Policy Statement which allows either a combined licensed SRO and STA position or a separate STA position.

Basis for Proposed TS Revisions

Current TS 5.3.1 requires the personnel who perform the function of STA to hold an SRO license, have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training requirements delineated. The proposed TS changes remove these requirements from TS 5.3.1 and in lieu TS 5.2.2.f will require the personnel who perform the STA function to meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift, published 10/28/85 (50 FR 43621). This policy provides the following guidance:

> The intent of this policy guidance may be satisfied by either of the options described below.
>
> . . . .
>
> Either Option 1 or Option 2 may be used on each shift. A utility may use Option 1 on some shifts and Option 2 on other shifts, or may use the same option on every shift. If Option 1 is used for a shift, then the separate STA position may be eliminated for that shift.
>
> *Option 1: Combined SRO/STA Position*
>
> This option is satisfied by assigning an individual with the following qualifications to each operating shift crew as one of the SROs (preferably the Shift Supervisor) required by 10 CFR 50.54(m)(2)(i):

a. License as a senior operator on the nuclear power unit(s) to which assigned, and
b. Meets the STA training criteria of NUREG-0737, Item I.A.1.1, and one of the following educational alternatives:
   (1) Bachelor's degree in engineering from an accredited institution;
   (2) Professional Engineer's [PE] license obtained by the successful completion of the PE examination;
   (3) Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences; or
   (4) Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

Option 2: Continued Use of STA Position

This option is satisfied by placing on each shift a dedicated Shift Technical Advisor (STA) who meets the STA criteria of NUREG-0737, Item I.A.1.1. The STA should assume an active role in shift activities. For example, the STA should review plant logs, participate in shift turnover activities, and maintain an awareness of plant configuration and status.

The Commission's Policy Statement references NUREG-0737, Item I.A.1.1, "Shift Technical Advisor", which provides the following additional guidance for STA qualifications:

> The STA shall have a bachelor's degree or equivalent in a scientific or engineering discipline and have received specific training in the response and analysis of the plant for transients and accidents. The STA shall also receive training in plant design and layout, including the capabilities of instrumentation and controls in the control room. The licensee shall assign normal duties to the STAs that pertain to the engineering aspects of assuring safe operations of the plant, including the review and evaluation of operating experience.

As demonstrated in the above quotes, the STA qualification guidance provided by the Commission's Policy Statement envelopes the current TS 5.3.1 requirements with the exception that an SRO license is not required for personnel performing the separate STA (only) function. With the qualifications specified in these documents, the STA is able to perform the intended function of on-shift technical advisor to the shift supervisor without the requirement for an SRO license. The requirement for personnel performing the function of STA to hold an SRO license restricts plant operations organizational flexibility and places an undue burden on training resources. Thus, this LAR proposes changes which remove the current extraneous SRO license requirement from the PINGP TS.

With the changes proposed to TS 5.2.2.f, this paragraph substantively contains the

same requirements as NUREG-1431, Revision 3.1 which provides TS format and content guidance for Westinghouse nuclear plants such as PINGP. This change will also simplify TS requirements for the STA function and qualifications by placing them in one location in the TS.

Conclusions

This LAR proposes TS changes which will invoke the Commission Policy Statement on Engineering Expertise on Shift as the basis for shift technical advisor qualifications and remove an extraneous requirement for the shift technical advisor to hold a senior reactor operator license. The shift technical advisor will continue to be qualified to perform the function of on-shift technical advisor to the shift supervisor in accordance with the applicable regulatory guidance. Operation and maintenance of the Prairie Island Nuclear Generating Plant with the proposed TS revisions will continue to protect the health and safety of the public.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

The Nuclear Management Company has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below for each of these characterizations:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

This license amendment request proposes to add a new sentence to Technical Specification 5.2.2 specifying that personnel who perform the function of shift technical advisor shall meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift and remove shift technical advisor qualification requirements from Technical Specification 5.3.1. This change will allow qualified personnel to perform the function of shift technical advisor without also holding a senior reactor operator license.

The proposed changes are administrative changes to Technical Specifications Chapter 5, the administrative chapter of the Technical Specifications. Shift technical advisors perform the function of on-shift technical advisor to the shift supervisor and do not operate the plant. Therefore, the changes proposed in this license amendment request do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

This license amendment request proposes to add a new sentence to Technical Specification 5.2.2 specifying that personnel who perform the function of shift technical advisor shall meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift and remove shift technical advisor qualification requirements from Technical Specification 5.3.1. This change will allow qualified personnel to perform the function of shift technical advisor without also holding a senior reactor operator license.

The Technical Specification changes proposed in this license amendment are administrative, do not change the manner in which the plant is operated, and do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

This license amendment request proposes to add a new sentence to Technical Specification 5.2.2 specifying that personnel who perform the function of shift technical advisor shall meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift and remove shift technical advisor qualification requirements from Technical Specification 5.3.1. This change will allow qualified personnel to perform the function of shift technical advisor without also holding a senior reactor operator license.

The proposed changes are administrative changes to Technical Specifications Chapter 5, the administrative chapter of the Technical Specifications. Shift technical advisors perform the function of on-shift technical advisor to the shift supervisor and do not operate the plant. Thus, the Technical Specification changes proposed in this license amendment request do not involve a significant reduction in a margin of safety.

Based on the above, the Nuclear Management Company concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

Title 10 Code of Federal Regulations 50.36, "Technical specifications":

> (c) Technical specifications will include items in the following categories:
>
> (5) *Administrative controls.* Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. Each licensee shall submit any reports to the Commission pursuant to approved technical specifications as specified in Section 50.4.

This license amendment request proposes changes to provisions relating to plant organization and management in Technical Specification Chapter 5, "Administrative Controls". Training and qualification requirements for personnel performing the shift technical advisor function would be removed from Technical Specification 5.3.1, including the requirement to hold a senior reactor operator license, and replaced with a new sentence in Technical Specification paragraph 5.2.2.f requiring the guidance of the Commission Policy Statement on Engineering Expertise on Shift to be met. With these proposed changes, regulatory guidance applicable to the shift technical advisor position will continue to be met and the plant Technical Specifications continue to provide administrative controls relating to organization and management which assure operation of the facility in a safe manner.

Thus with the changes proposed in this license amendment request, the requirements of Title 10 Code of Federal Regulations 50.36 continue to be met and the plant Technical Specifications will continue to provide the basis for safe plant operation.

Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants", Revision 3, May 2000

The most recent version of Regulatory Guide 1.8, Revision 3, (RG 1.8) provides guidance for the Shift Technical Advisor position. (The Prairie Island Nuclear Generating Plant is committed to Regulatory Guide 1.8, Revision 1, September 1975, which pre-dates NRC requirements for Shift Technical Advisors. Regulatory Guide 1.8, Revision 3, is cited here for completeness and to demonstrate how the changes proposed in this license amendment compare to current regulatory guidance. This discussion is not a commitment to Regulatory Guide 1.8, Revision 3.)

RG 1.8 endorses an industry standard, ANSI/ANS-3.1-1993, as an acceptable method for complying with the guidance regarding the Shift Technical Advisor function provided in the Commission Policy Statement on Engineering Expertise on Shift with the exceptions provided in the RG 1.8. Paragraph 2.13 of RG 1.8 states:

> In addition to the qualification described in the standard, the STA [Shift Technical Advisor] should assume an active role in shift activities and should reflect the

> guidance provided in the "Policy Statement on Engineering Expertise on Shift" (see 50 FR 43621, October 28, 1985). "Assume an active role in shift activities" means performing at least three shifts per quarter as the STA. If an STA has not assumed an active role in shift activities, the STA should receive training sufficient to ensure that the STA is cognizant of changes to the facility and procedures that occurred during the absence.

Current plant procedures are consistent with the guidance of RG 1.8 in that they require the Shift Technical Advisor to maintain proficiency for the function by performing at least three shifts per quarter. If a Shift Technical Advisor has not met this requirement, they are required to perform three shifts under the instruction of another Shift Technical Advisor and review current operator update documents. This license amendment proposes to remove the requirement for Shift Technical Advisors to hold a Senior Reactor Operator license and does not change other current plant requirements for the Shift Technical Advisor function. Thus, with the changes proposed in this license amendment request, the guidance of Regulatory Guide 1.8, Revision 3 is met as discussed above and the plant Technical Specifications will continue to provide the basis for safe plant operation.

NUREG-1431, "Standard Technical Specifications, Westinghouse Plants"

NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 3.1 (NUREG-1431) provides format and content guidance for Technical Specifications for plants with Westinghouse Nuclear Steam Supply Systems and has been approved for use by the Nuclear Regulatory Commission.

NUREG-1431 provides the following guidance for the shift technical advisor function in paragraph 5.2.2.f:

> An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

This license amendment request proposes to add the last sentence of NUREG-1431 to the Prairie Island Nuclear Generating Plant Technical Specifications paragraph 5.2.2.f and remove the detailed qualification requirements for personnel performing the shift technical advisor position from Technical Specification 5.3.1. With these changes, the Prairie Island Nuclear Generating Plant Technical Specification requirements for the shift technical advisor position are substantively the same as the guidance provided in NUREG-1431.

Thus, with the changes proposed in this license amendment request, the guidance of NUREG-1431 is met as discussed above and the plant Technical Specifications will continue to provide the basis for safe plant operation.

Regulatory Requirements/Criteria Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Exhibit B

Proposed Technical Specification Changes (markup)

Technical Specification Pages

5.0-4
5.0-5

2 pages follow

5.2 Organization

5.2.2 Plant Staff (continued)

have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

e. The operations manager or assistant operations manager shall hold an SRO license. In addition, the duty shift manager shall hold an SRO license.

f. In MODES 1, 2, 3, and 4, the shift technical advisor shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 1, September 1975 except for (1) ~~personnel who perform the function of shift technical advisor shall hold an SRO license and have a bachelors 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, (2)~~ the operations manager who shall meet the requirements of ANSI N18.1-1971, except that NRC license requirements are as specified in TS 5.2.2.e, and (2~~3~~) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in NMC letter dated March 19, 2003.

5.3.2 For the purpose of 10 CFR 55.4, a licensed senior reactor operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

Exhibit C

Proposed Technical Specification Changes (retyped)

Technical Specification Pages

5.0-4
5.0-5

2 pages follow

5.2 Organization

5.2.2 Plant Staff (continued)

have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

e. The operations manager or assistant operations manager shall hold an SRO license. In addition, the duty shift manager shall hold an SRO license.

f. In MODES 1, 2, 3, and 4, the shift technical advisor shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 1, September 1975 except for (1) the operations manager who shall meet the requirements of ANSI N18.1-1971, except that NRC license requirements are as specified in TS 5.2.2.e, and (2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in NMC letter dated March 19, 2003.

5.3.2 For the purpose of 10 CFR 55.4, a licensed senior reactor operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).