

AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: 6441

FILE

FROM: Niagara Mohawk Power Corp. Syracuse, N.Y. 13202 T.J. Brosnan	DATE OF DOC: 11-22-72	DATE REC'D 11-24-72	LTR X	MEMO	RPT	OTHER
TO: Mr. Donald J. Skovholt	ORIG 3 signed	CC 37	OTHER	SENT AEC PDR <input checked="" type="checkbox"/> SENT LOCAL PDR <input checked="" type="checkbox"/>		
CLASS: <input checked="" type="checkbox"/> PROP INFO	INPUT	NO CYS REC'D 40	DOCKET NO: 50-220			

DESCRIPTION: Ltr re our 9-28-72 ltr....
furnishing addl info on Tech Specs & trans:

ENCLOSURES: Proposed Revisions to the Admin.
Controls section of the Tech Specs. for Nine
Mile Island Unit I....

(40 cys encl rec'd)

DO NOT REMOVE

PLANT NAMES: Nine Mile Island Unit I

ACKNOWLEDGED

FOR ACTION/INFORMATION

DL 11-24-72

BUTLER(L) W/ Copies	SCHWENGER(L) W/ Copies	SCHEMEL(L) W/ Copies	KNIGHTON(E) W/ Copies
CLARK(L) W/ Copies	STOLZ(L) W/ Copies	ZIEMANN(L) W/9 Copies	YOUNGBLOOD(E) W/ Copies
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KNIEL(L) W/ Copies	H. DENTON W/ Copies	DICKER(E) W/ Copies	

INTERNAL DISTRIBUTION

<input checked="" type="checkbox"/> REG FILE	TECH REVIEW	VOLLMER	HARLESS	WADE	E
<input checked="" type="checkbox"/> AEC PDR	HENDRIE	DENTON		SHAFAER	F & M
<input checked="" type="checkbox"/> OGC, ROOM P-506A	SCHROEDER	GRIMES	F & M	BROWN	E
<input checked="" type="checkbox"/> MUNITZING/STAFF	MACCARY	GAMMILL	SMILEY	G. WILLIAMS	E
CASE	LANGE(2)	KASTNER	NUSSBAUMER	E. GOULBOURNE	L
GIAMBUSSO	PAWLICKI	BALLARD		A/T IND	
BOYD-L(BWR)	SHAO	SPANGLER	LIC ASST.	BRAITMAN	
DEYOUNG-L(PWR)	KNUTH		SERVICE L	SALTZMAN	
<input checked="" type="checkbox"/> SKOVHOLT-L	STELLO	ENVIRO	MASON L		
P. COLLINS	MOORE	MULLER	WILSON L	PLANS	
REG. OPR	HOUSTON	DICKER	MAIGRET L	MCDONALD	
<input checked="" type="checkbox"/> FILE & REGION (2)	TEDESCO	KNIGHTON	SMITH L	<input checked="" type="checkbox"/> TUBE	
MORRIS	LONG	YOUNGBLOOD	GEARIN L	INFO	
STELLE	LAINAS	PROJ LEADER	DIGGS L	C. MILES	
	BENAROYA		TEETS L		
		REGAN	LEE L		

EXTERNAL DISTRIBUTION

<input checked="" type="checkbox"/> LOCAL PDR Oswego, N.Y.			
<input checked="" type="checkbox"/> DTIE (ABERNATHY)	(1)(5)(9)-NATIONAL LAB'S	1-PDR-SAN/LA/NY	
<input checked="" type="checkbox"/> NSIC (BUCHANAN)	1-R. CARROLL-OC, GT-B227	1-GERALD LELLOUCHE	
1-ASLB-YORE/SAYRE	1-R. CATLIN, E-256-GT	BROOKHAVEN NAT. LAB	
WOODWARD/H. ST.	1-CONSULANT'S	1-AGMED (WALTER KOESTER,	
<input checked="" type="checkbox"/> 16-CYS ACRS	SENT TO LIC. ASST.	Rm C-427, GT)	
	R. DIGGS ON 11-24-72	1-RD...MULLER...F-309GT	
	NEWMARK/BLUME/AGABIAN		



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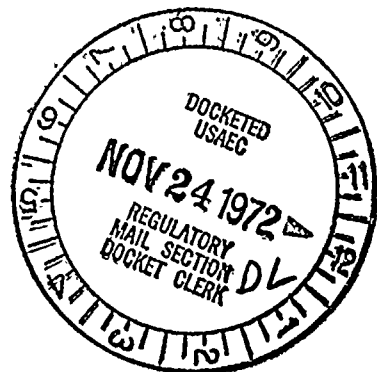
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NIAGARA MOHAWK POWER CORPORATION

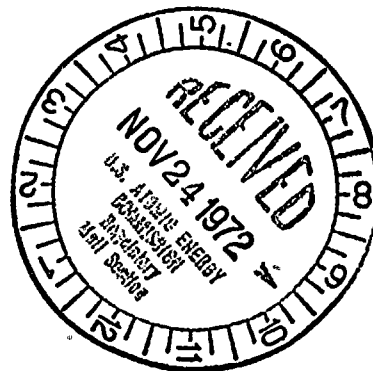


300 ERIE BOULEVARD WEST
SYRACUSE, N.Y. 13202



November 22, 1972

Mr. Donald J. Skovholt
Assistant Director for
Operating Reactors
Directorate of Licensing
United States Atomic Energy Commission
Washington, D. C. 20545



Dear Mr. Skovholt:

Re: Docket No. 50-220
License DPR-17

Regulatory

File Cy.

As requested in your letter of September 28, 1972, we submit proposed revisions to the Administrative Controls Section of the Technical Specifications and Bases for the Nine Mile Point Nuclear Station Unit 1. The proposed revisions adhere closely to the Guide Technical Specifications attached to your letter.

As stated in the "Technical Supplement to Petition for Conversion from Provisional Operating License to Full-Term Operating License," the reporting guidelines of Safety Guides 16 and 21 are being used at the Nine Mile Point Nuclear Station.

The above mentioned revisions have been reviewed and approved by both the Site Operations Review Committee and the Safety Review and Audit Board.

Sincerely,

T. J. Brosnan
Vice President and Chief Engineer

TJB/vk

Enclosure

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6.7 Reporting Requirements

The following information shall be submitted in addition to the reports listed in Table 6.7-1 and required by Title 10, Code of Federal Regulations.

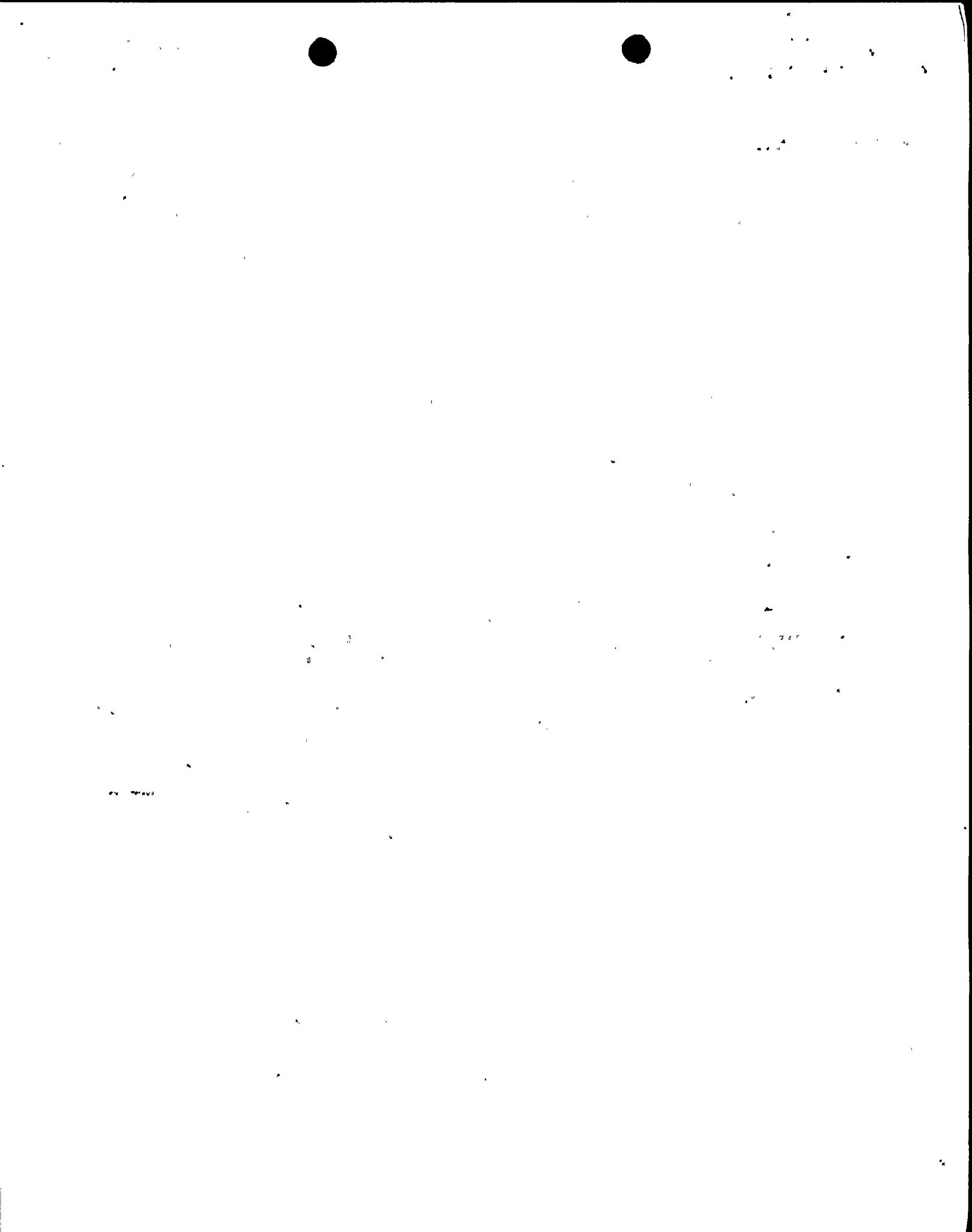
6.7.1 Routine Operating Reports:

Routine semiannual operating reports shall be submitted within 60 days after January 1 and July 1 of each year. Operations Reports shall be submitted in writing to the Deputy Director for Reactor Projects, Directorate of Licensing, USAEC, Washington, D. C. 20545. These reports should include the following:

a. Operations Summary

A summary of operating experience occurring during the reporting period that relates to the safe operation of the plant, including a summary of:

- (1) changes in plant design,
- (2) performance characteristics (e.g., equipment and fuel performance),
- (3) changes in procedures which were necessitated by (1) and (2) or which otherwise were required to improve the safety of facility operations,
- (4) results of surveillance tests and inspections required by these technical specifications,



- (5) the results of any periodic containment leak rate tests performed during the reporting period,
- (6) a brief summary of those changes, tests and experiments requiring authorization from the Commission pursuant to 10 CFR 50.59(a), and
- (7) any changes in the plant operating organization which involve positions for which minimum qualifications are specified in the Technical Specifications, or in personnel assigned to these positions.

b. Power Generation

A summary of power generated during the reporting period including:

- (1) gross thermal power generated (in MWh)
- (2) gross electrical power generated (in MWh)
- (3) net electrical power generated (in MWh)
- (4) number of hours the reactor was critical
- (5) number of hours the generator was on-line
- (6) histogram of thermal power vs. time

c. Shutdowns

Descriptive material covering all outages occurring during the reporting period. For each outage, information shall be provided on:

- (1) the cause of the outage,

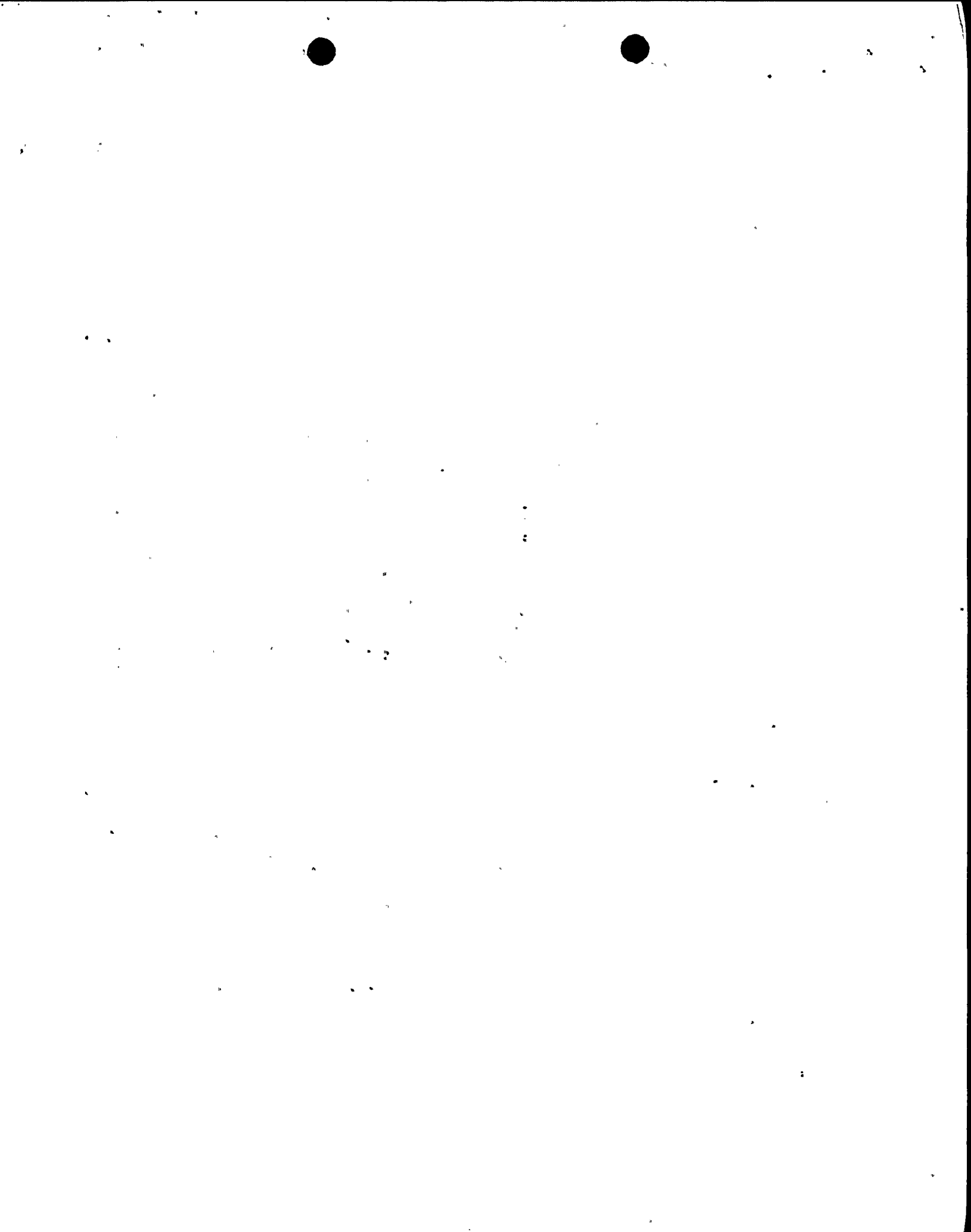


- (2) the method of shutting down the reactor; e.g., trip-automatic rundown, or manually controlled deliberate shutdown,
- (3) duration of the outage,
- (4) unit status during the outage; e.g., cold shutdown or hot shutdown,
- (5) corrective action taken to prevent repetition, if appropriate.

d. Maintenance

A discussion of safety-related maintenance (excluding preventative maintenance) performed during the reporting period on systems and components that are designated to prevent or mitigate the consequences of postulated accidents or to prevent the release of significant amounts of radioactive material. Included in this category are systems and components which are part of the reactor coolant pressure boundary defined in 10 CFR 50.2(v), any part of the engineered safety features, or associated service and control systems that are required for the normal operation of engineered safety features, part of any reactor protection or shutdown system, or part of any radioactive waste treatment handling and disposal system or other system which may contain significant amounts of radioactive material. For any malfunctions for which corrective maintenance was required, information shall be provided on:

- (1) the system or component involved,
- (2) the cause of the malfunction
- (3) the results and effect on safe operation,
- (4) corrective action taken to prevent repetition,



(5) precautions taken to provide for reactor safety during repair.

e. Changes, Tests and Experiments

A summary of all changes in the plant design and procedures that relate to the safe operation of the plant shall be included in the Operations Summary section of these semiannual reports. Changes, tests, and experiments performed during the reporting period that require authorization from the Commission pursuant to 10 CFR 50.59 (a) are covered in paragraph 6.7.4e of these technical specifications; however, those changes, tests, and experiments that do not require Commission authorization pursuant to §50.59(a) shall be addressed. The report shall include a brief description and the summary of the safety evaluation for those changes, tests, and experiments, carried out without prior Commission approval, pursuant to the requirements of §50.59(b) of the Commission's regulations.

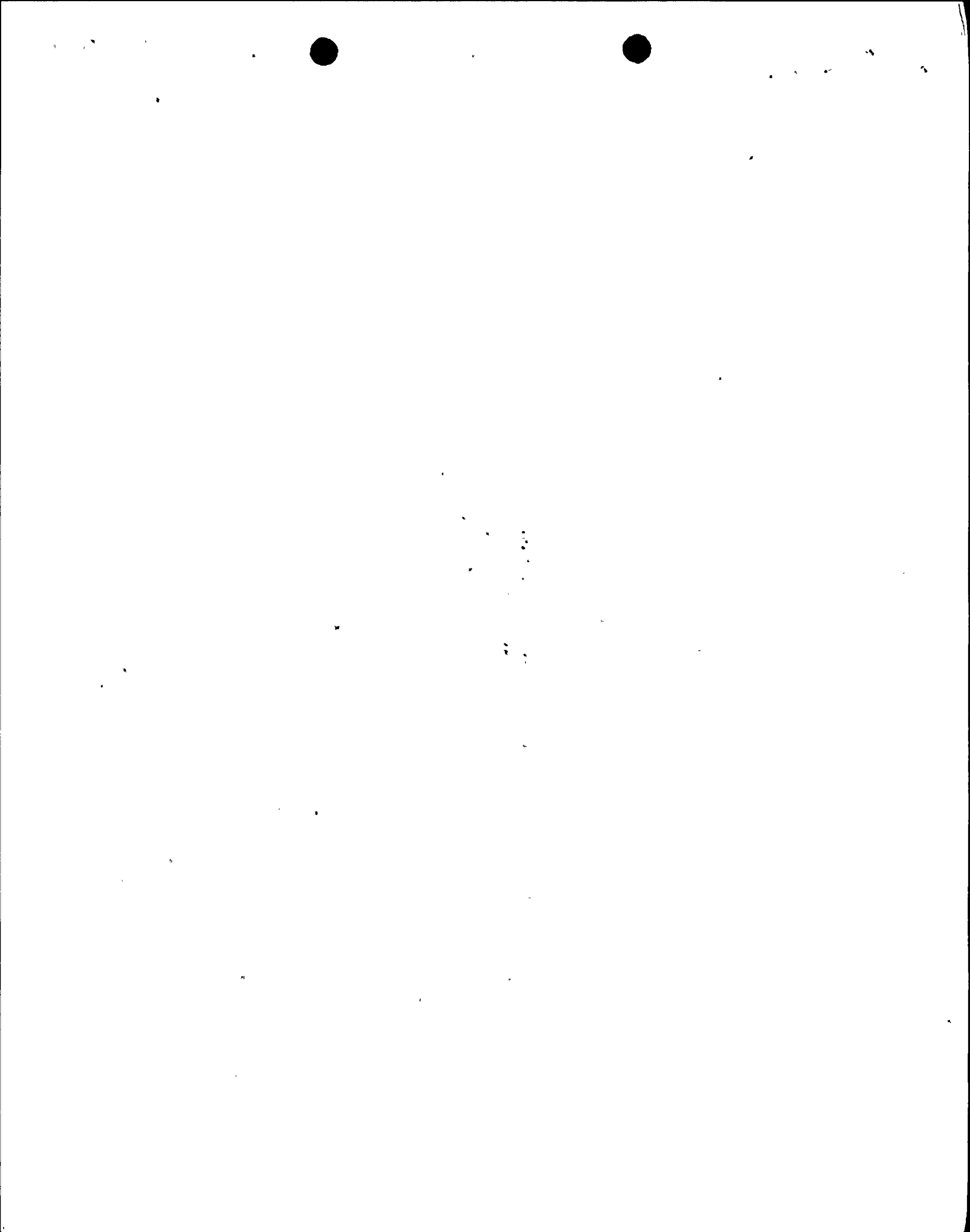
f. Radioactive Effluent Releases

A statement of the quantities of radioactive effluents released from the plant, with data summarized on a monthly basis following the format of Appendix A of USAEC Safety Guide 21 of January 1972:

(1) Gaseous Effluents

(a) Gross Radioactivity Releases

- (i) Total gross radioactivity (in curies), including noble and activation gases released.
- (ii) Maximum gross radioactivity release rate during any one-hour period.
- (iii) Total gross radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.
- (iv) Percent of technical specification limit.



(b) Iodine Releases

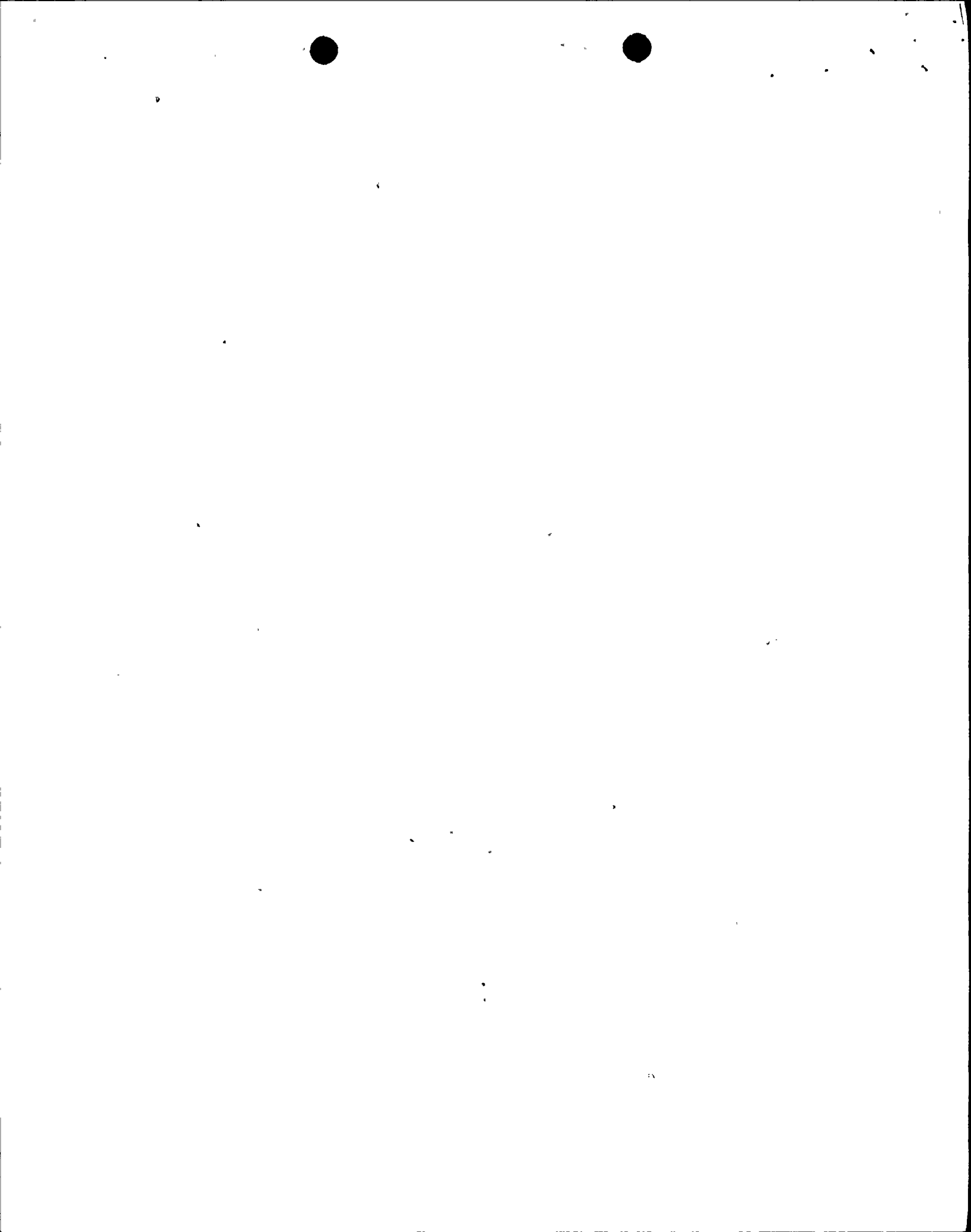
- (i) Total iodine radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.
- (ii) Percent of technical specification limit for I-131 released.

(c) Particulate Releases

- (i) Gross radioactivity (beta and gamma) released (in curies) excluding background radioactivity.
- (ii) Gross alpha radioactivity released (in curies) excluding background radioactivity.
- (iii) Total gross radioactivity (in curies) of nuclides with half-lives greater than eight days.
- (iv) Percent of technical specification limit for particulate radioactivity with half-lives greater than eight days.

(2) Liquid Effluents

- (a) Gross radioactivity (beta and gamma) released (in curies) excluding tritium and average concentration released to the unrestricted area.
- (b) Total tritium and alpha radioactivity (in curies) released and average concentration released to the unrestricted area.
- (c) Total dissolved gas radioactivity (in curies) and average concentration released to the unrestricted area.
- (d) Total volume (in liters) of liquid waste released.



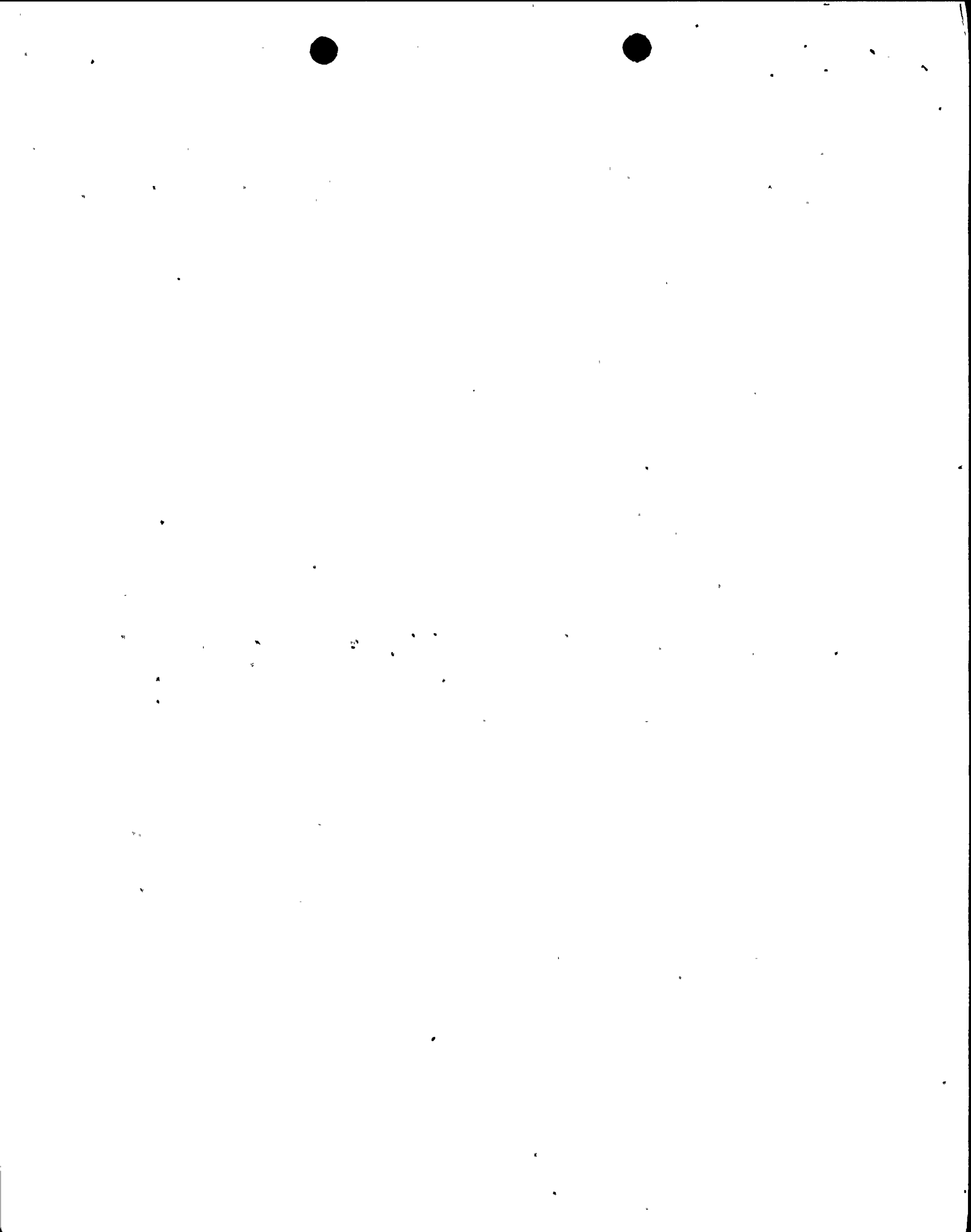
- (e) Total volume (in liters) of dilution water used prior to release from the restricted area.
- (f) The maximum concentration of gross radioactivity (beta and gamma) released to the unrestricted area (averaged over the period of release).
- (g) Total gross radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.
- (h) Percent of technical specification limit and 10 CFR Part 20 concentration limits for unrestricted areas.

(3) Solid Waste

- (a) The total amount of solid waste packaged (in cubic feet).
- (b) The total estimated radioactivity (in curies) involved.
- (c) The dates of shipment and disposition (if shipped offsite).

g. Environmental Monitoring

- (1) For each medium sampled, e.g., air, lake bottom, surface water, soil, fish, the following information shall be provided:
 - (a) Number of sampling locations,
 - (b) Total number of samples,
 - (c) Number of locations at which levels are found to be significantly above local backgrounds,
 - (d) Highest, lowest, and the annual average concentrations or levels of radiation for the sampling point with the highest average and description of the location of that point with respect to the site.



- (2) If statistically significant variations of offsite environmental concentrations with time are observed, correlation of these results with effluent releases shall be provided.

h. Occupational Personnel Radiation Exposure

A tabulation of personnel exposures shall be reported for the year (or first six months) in the following groups: less than 100 mRem, 100 - 500 mRem, 500 - 1250 mRem, 1250 - 2500 mRem, 2500 - 5000 mRem, above 5000 mRem. An explanation for all personnel exposures greater than 500 mRem for the year (or first six months) shall be provided.

i. Exposures to Individuals and Population Groups

If effluents or environmental monitoring data indicate the likelihood of public intakes in excess of 3 percent of those that could result from continuous exposure to the concentration values listed in Appendix B, Table II, Part 20, estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided for that particular exposure mode involved.

6.7.2 Reporting of Abnormal Events

a. Abnormal Occurrence Reports

Notification shall be made within 24 hours by telephone or telegraph to the Director of the Regional Regulatory Operations Office, followed by a written report within 10 days to the Deputy Director for Reactor Projects, Directorate of Licensing (cc. to the Director of the Regional Regulatory Operations Office) in the event of the abnormal occurrences as defined in Section 1.0. The written report on these abnormal occurrences, and to the extent possible, the preliminary telephone and telegraph notification, shall: (1) describe, analyze and evaluate safety implications, (2) outline the measures taken to assure that the cause of the condition is determined, and (3) indicate the corrective action (including any changes made to the procedures and to the quality assurance program) taken to prevent repetition of the occurrence and of similar occurrences involving similar components or systems.



In addition, the written report for the incident shall relate any failures or degraded performance of systems and components to similar equipment failures that may have previously occurred at the plant. The evaluation of the safety implications of the incident should consider the cumulative experience obtained from the record of previous failures and malfunctions of the affected systems and components or of similar equipment.

6.7.3 Reporting of Unusual Events

A written report shall be forwarded within 30 days to the Deputy Director for Reactor Projects, Directorate of Licensing, and to the Director of the Regional Regulatory Operations Office, in the event of:

- a. Discovery of any errors in the transient or accident analysis, or in the methods used for such analyses, as described in the Safety Analyses Report or in the bases for the Technical Specifications, which involve an unreviewed safety question as defined in Section 50.59(c) of 10 CFR 50.
- b. Any variance from performance specifications contained in the Technical Specifications or in the Safety Analyses Report, which involves an unreviewed safety question as defined in Section 50.59(c) of 10 CFR 50.
- c. Any condition involving a possible single failure which, for a system designed against assumed single failures, could result in a loss of the capability of the system to perform its safety function.

6.7.4 Special Reports

Special reports shall be submitted in writing within 90 days to the Deputy Director for Reactor Projects, Directorate of Licensing, USAEC, Washington, D. C. 20545.

Special reports shall be submitted covering inspections, tests and maintenance that are appropriate to assure safe operation of the plant. These reports shall include:

- a. Primary and Secondary Containment Leak Rate Tests

Each integrated leak rate test of the primary containment shall be the subject of a summary technical report including results of the local leak rate tests since the last report. The report as described in the AEC Guide



on Containment Testing dated January 16, 1966, shall include data, analysis, and interpretations of the results which demonstrate compliance in meeting the specified leak rate limits.

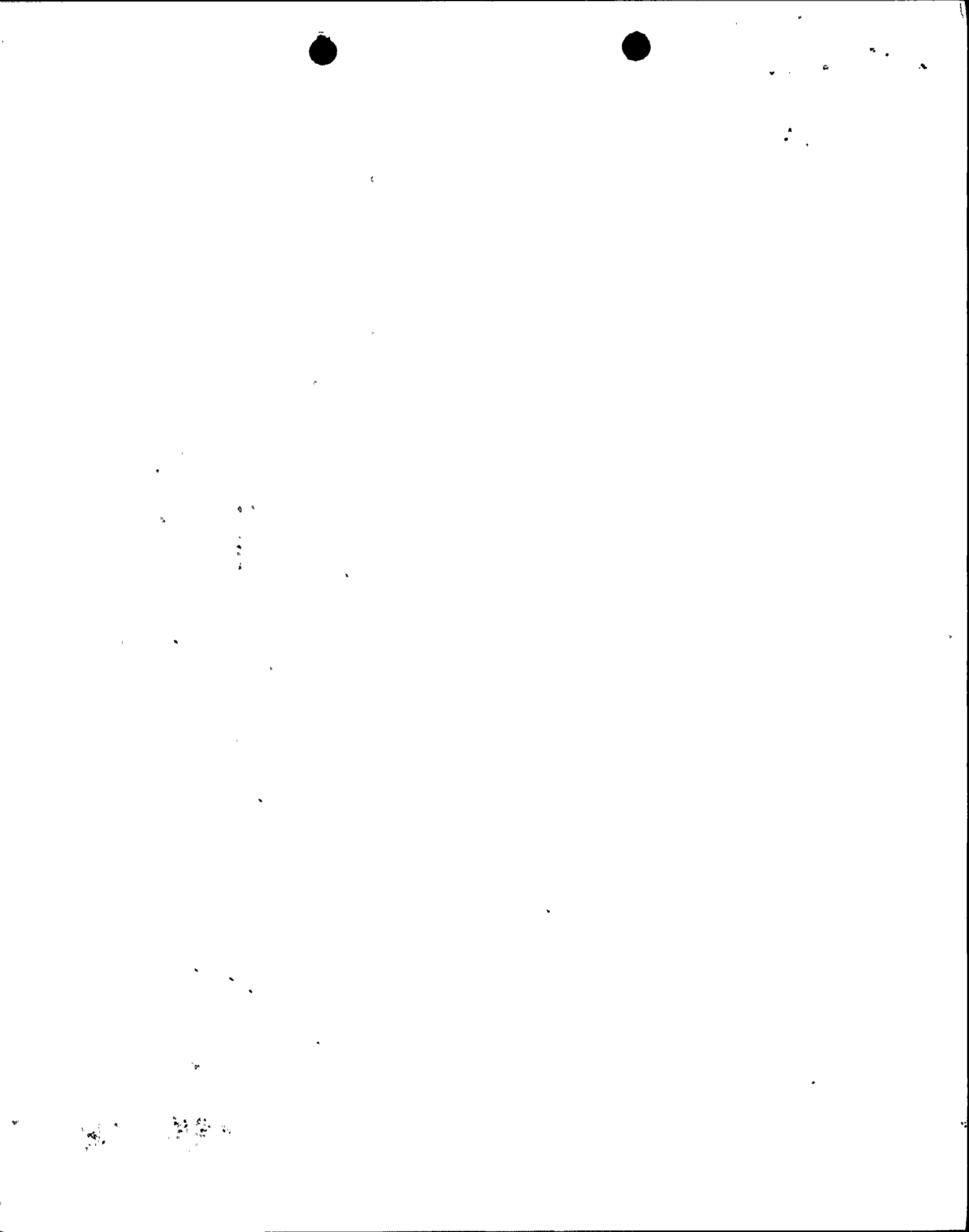
Each integrated leak rate test of the secondary containment shall be the subject of a summary technical report. This report should include data on the wind speed, wind direction, outside and inside temperatures during the test, concurrent reactor building pressure, and emergency ventilation flow rate. The report shall also include analyses and interpretations of these data which demonstrate compliance with the specified leak rate limits.

- b. An analysis and report shall be submitted to the Atomic Energy Commission for all incidents where a safety limit is exceeded. It shall include a complete analysis of the circumstances leading up to and resulting from the situation together with recommendations to prevent a recurrence.
- c. Special Maintenance Report

In the event a redundant component (or system) is determined to be out of service for periods longer than those specified in other sections, it shall be the subject of a special maintenance report. This report shall be submitted to the Atomic Energy Commission within seven days of the above determination and shall describe:

- (1) The nature of the problem and the specific steps to be taken to remedy the situation.
- (2) An estimate of the time required to return the component (or system) to an operable condition.
- (3) The amount of component (or system) redundancy remaining or the availability of other system(s) to perform the same function as the inoperable component (or system).
- (4) Surveillance requirements on the operable component (or system).

Any significant changes of the information supplied in (1), (2), (3), or (4) shall be reported to the AEC within seven days.



- d. The normal shift complement shall consist of three licensed reactor operators, including at least one Senior Reactor Operator. In the unlikely event it becomes necessary to consider scheduled operation with only two licensed operators, including one Senior Reactor Operator, a written request for approval of such action and a report shall be submitted to the Atomic Energy Commission. The report shall contain necessary information to justify the requested authorization including the basis for proposed action, duration of authorization requested, and plans to achieve normal shift complement.

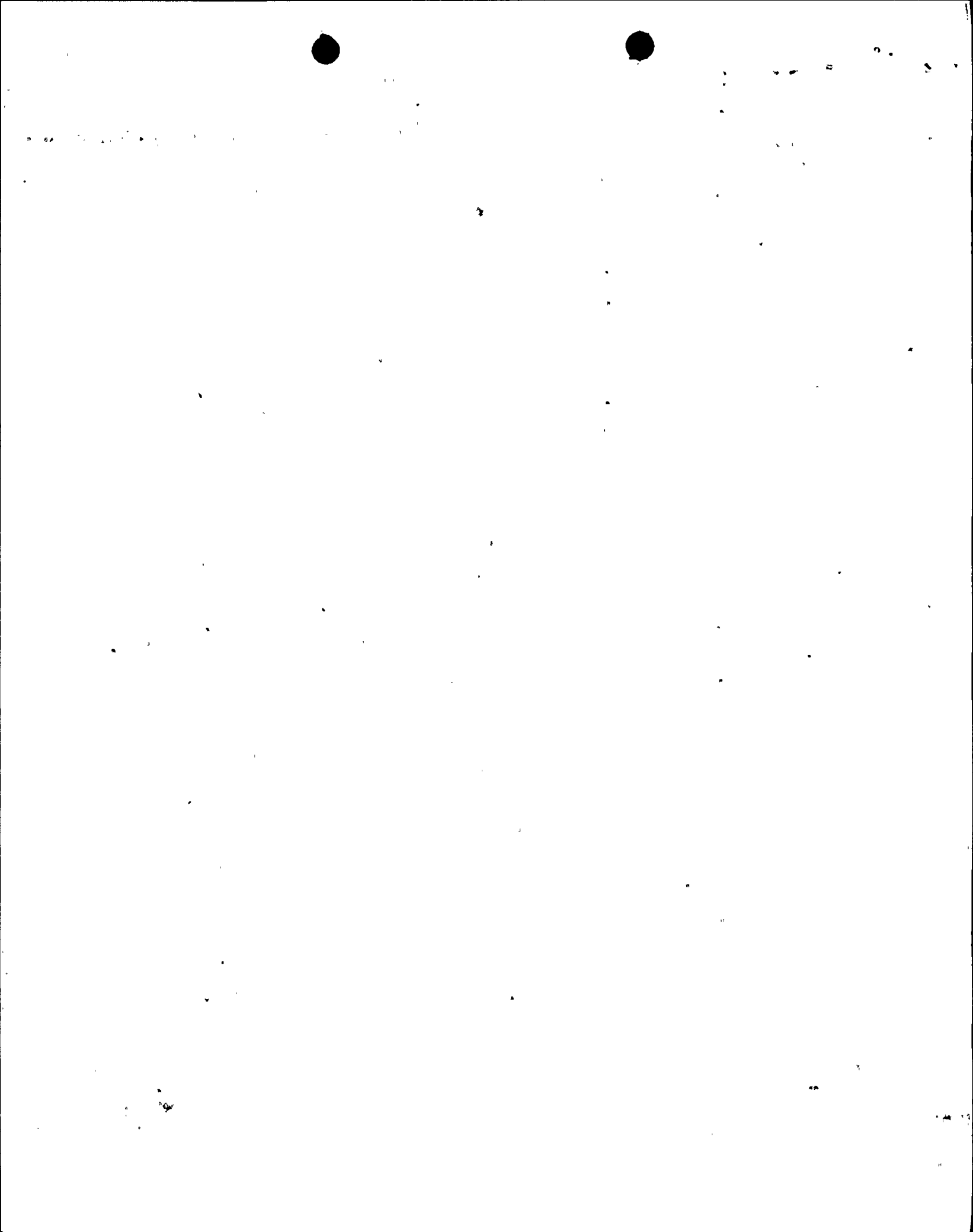


TABLE 6.7-1
REPORTING SUMMARY

<u>AEC Regulation</u>	<u>Report</u>	<u>Notification Within</u>	<u>Written Report Within¹</u>				
			<u>10 Days</u>	<u>15 Days</u>	<u>30 Days</u>	<u>6 Mo.</u>	<u>1 Yr.</u>
20.403(a)	Severe Accident Involving Licensed Material	Immediately			DRO		
20.402	Loss of Licensed Material	Immediately			DRO		
73.42	Special Nuclear Material Unaccounted for	Immediately ²		DNMS			
40.64(c)	Theft or Unlawful Diversion of Source Material	Immediately		DNMS			
70.52	Accidental Criticality or Loss of Special Nuclear Material	Promptly	None ³				
70.53	Special Nuclear Material Status	None					AEC ⁴
70.54	Transfer of Special Nuclear Material	Promptly ⁴					
	Receipt of Special Nuclear Material		AEC ⁴				
40.64(a)	Transfer of Source Material	Promptly ⁴					
	Receipt of Source Material	None	AEC ⁴				
20.403(b)	Accidents Involving Licensed Material	24 hours			DRO		

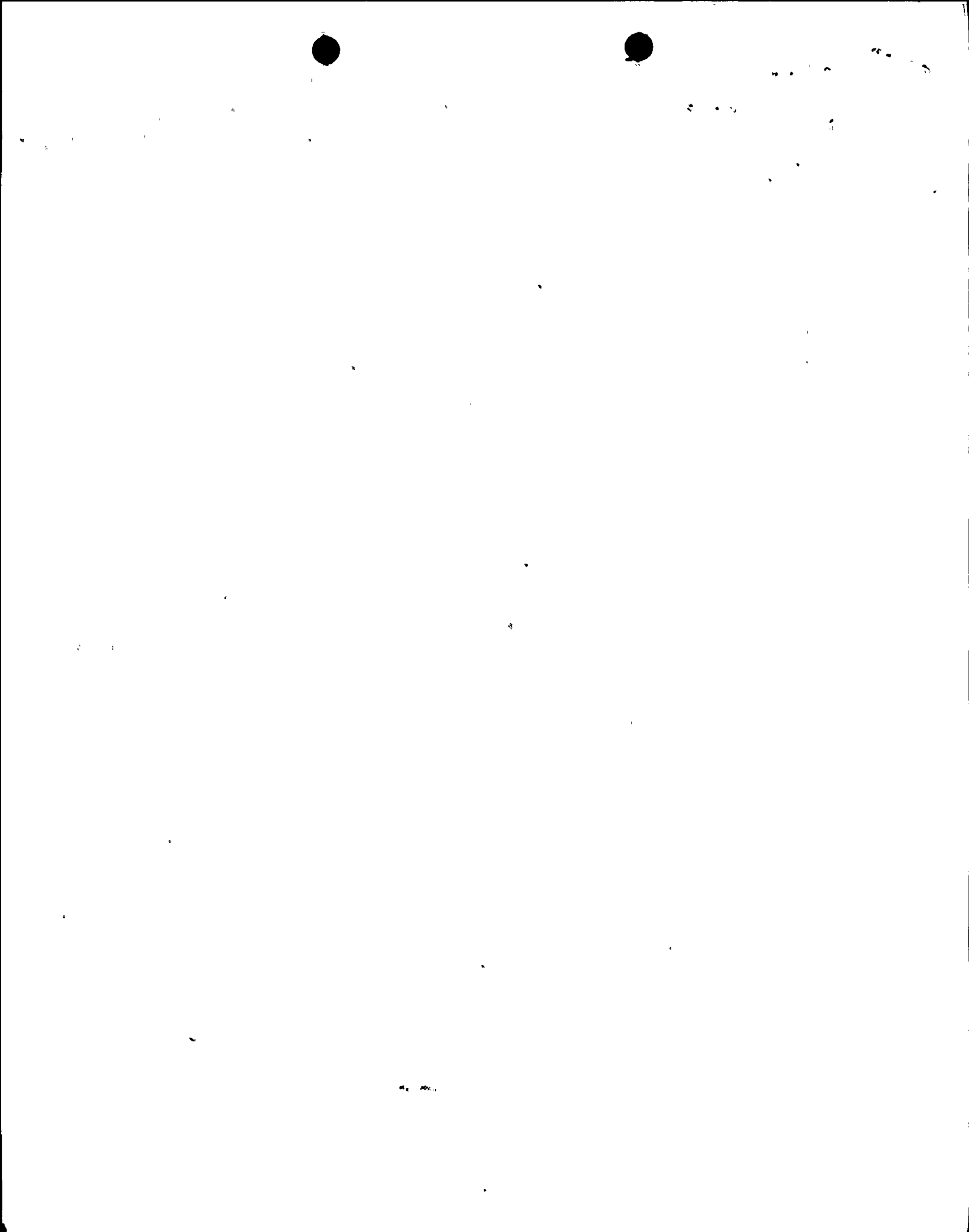


TABLE 6.7-1 (Continued)

REPORTING SUMMARY

AEC Regulation	Report	Notification Within	Written Report Within ¹			
			10 Days	15 Days	30 Days	6 Mo. 1 Yr.
20.405(a)	Overexposure or Excessive Radiation Level	None ⁶			DRO	
20.407	Personnel Exposure and Monitoring	None				DR
20.408	Personnel Exposure (Terminated Employees)	None			DR ⁵	
50.36	Semiannual Operating	None				DL
50.36	Abnormal Occurrence	24 hours	DL/DRO			
50.36	Unusual Events				DL/DRO	
50.59(d)	Changes, Test, and Experiments	DL ⁷				

1 DR-Director of Regulation, DL - Directorate of Licensing, DRO - Directorate of Regulatory Operations
DNMS - Division of Nuclear Materials Safeguards.

2 To Director of the AEC District Safeguards Office.

3 See Regulation 70.53

4 U. S. Atomic Energy Commission, P. O. Box E, Oak Ridge, Tennessee 37830, whenever transfer occurs.

5 Within 30 days after determining exposure or 90 days after termination, whichever is earlier.

6 See Regulation 20.403.

7 Request for AEC authorization is required prior to performing the change, test, or experiment in this category.

