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 AUTH. NAME AUTHOR AFFILIATION
 MANGAN, C.V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests 2-yr extension to implementation date in amended rule 10CFR50.44(m) requiring min number of licensed operators & senior operators on shift at all times. TMI Item 1.A.1.3 implemented using shift technical advisor.

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October 6, 1983

Attn: Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Dear Mr. Denton:

The final rule regarding staffing at nuclear power plants was published in the Federal Register on July 11, 1983 as an amendment to Section 50.44(m) of Title 10 to the Code of Federal Regulations. The amended rule requires licensees of nuclear power units to provide a minimum number of licensed operators and senior operators on shift at all times to respond to normal and emergency conditions.

As indicated in our March 3, 1981 response to item I.A.1.3 of NUREG-0737, Niagara Mohawk will implement this requirement by using our licensed shift technical advisors. Although this approach was endorsed in the Nuclear Regulatory Commission's draft Policy Statement published in the Federal Register on July 25, 1983, Niagara Mohawk understands that a final decision is still pending. In the event that this approach proves unacceptable to the Nuclear Regulatory Commission, Niagara Mohawk herein requests a two year extension to the implementation date in the amended rule. Should such an extension be necessary, we request that notification be provided as soon as possible to allow for proper manpower scheduling and submittal of amended technical specifications.

Sincerely,

C. V. Mangan

C. V. Mangan
Vice President

Nuclear Engineering and Licensing

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