

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A)

Proposed changes to Section 6.5.2.8 and the addition of Section 6.5.3 of the current Nine Mile Point Unit 1 technical specifications are enclosed herein. The affected pages have been retyped in their entirety with marginal markings indicating the proposed changes.

Note: Our applications for amendments to the Nine Mile Point Unit 1 Operating License dated January 31, 1984 and February 1, 1984 involved the same sections affected by this application.

These proposed changes are independent from the previously proposed changes. Therefore, no additional marginal indications other than those affected by this application are provided.

B408100086 B40806
PDR ADOCK 05000220
P PDR



2 1/2

100

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE DPR-63

DOCKET NO. 50-220

Supporting Information

Physical Protection - Page 255

The proposed changes to the technical specifications are administrative in nature. The proposed changes do not remove the commitment to perform an independent audit of the facility security program, but solely remove it from being performed under the cognizance of the Safety Review and Audit Board. The annual review will be conducted by an organization that is independent of the security organization management and supervision. This organization will have expertise in the nuclear security field. The results of the review, with recommendations for corrections and improvements, will be reported to the Senior Vice President to whom the security organization ultimately reports. This will ensure that the findings receive the attention of higher corporate management. The Security Department, due to commitments in the approved Security and Safeguards Contingency Plan, will be responsible for ensuring that the above audits are initiated and conducted in a timely manner. This change is illustrated by the deletion of existing Section 6.5.2.8.f and the addition of Section 6.5.3. Also, since Section 6.5.2.8.f was deleted, Sections "g" and "h" have been relettered to "f" and "g."



11 11 11

ATTACHMENT C

NIAGARA MOHAWK POWER CORPORATION

LICENSE DPR-63

DOCKET NO. 50-220

No Significant Hazards Considerations Analysis

The proposed technical specification changes to Section 6.5 Review and Audit of the Nine Mile Point Unit 1 Administrative Controls involves no significant hazard considerations. Therefore, the operation of the plant in accordance with the proposed amendment will not 1) involve a significant increase in the probability or consequences of an accident previously evaluated, 2) create the possibility of a new or different kind of accident from any accident previously evaluated or 3) involve a significant reduction in a margin of safety. This determination is based on the fact that the revisions are purely administrative. This determination corresponds with example (i) of the Sholly Rule published in the Federal Register on April 6, 1983 which involves a purely administrative change.



11

Audits (Continued)

- d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10CFR50, at least once per two years.
- e. The Facility Emergency Plan and implementing procedures at least once every 12 months.
- f. The Facility Fire Protection Program and implementing procedures at least once per two years.
- g. Any other area of facility operation considered appropriate by the SRAB, the Vice President-Nuclear Generation or the Vice President-Nuclear Engineering and Licensing.

Authority

6.5.2.9 The SRAB shall report to and advise the Vice President-Nuclear Generation and Vice President-Nuclear Engineering and Licensing on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

Records

6.5.2.10 Records of SRAB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRAB meeting shall be prepared, approved and forwarded to the Vice President-Nuclear Generation and Vice President-Nuclear Engineering and Licensing within 30 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 e, f, g and h above, shall be prepared, approved and forwarded to the Vice President-Nuclear Generation and Vice President-Nuclear Engineering and Licensing within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above shall be forwarded to the Vice President-Nuclear Generation and Vice President-Nuclear Engineering and Licensing within 14 days following completion of the review.

6.5.3 Physical Protection

The Security Program shall be reviewed at least once every 12 months in accordance with 10CFR73.40(d) and 73.55(g)(4).

