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 MANGAN, C.V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Forwards info requested by Benedict during 850116 & 17...
 telcons. Matl describes functions of site operations review
 Committee & safety review & audit board required by
 SECY84-355. Info will be incorporated in FSAR Amend 18.

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January 23, 1985
(NMP2L 0326)

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Schwencer:

Re: Nine Mile Point Unit 2
Docket No. 50-410

Attached is the information requested by Mr. Benedict during telephone conference calls on January 16 and 17, 1985. This material provides functions of the SORC and SRAB as outlined in the Nine Mile Point Unit 2 Technical Specifications and the qualifications of the STA as required by SECY 84-355.

The enclosed information will be included in Amendment 18 of the Final Safety Analysis Report.

Very truly yours,



C. V. Mangano
Vice President

Nuclear Engineering & Licensing

DS:ja
Attachment
xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Niagara Mohawk Power Corporation)
(Nine Mile Point Unit 2))

Docket No. 50-410

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C. V. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 23rd day of January, 1985.

Christine Austin
Notary Public in and for
Onondaga County, New York

My Commission expires:

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4797507
My Commission Expires March 30, 1985

CHRISTINE AUSTIN
Molay Public in the State of New York
Created by Onondaga Co. No. 410702
By Commission Expires March 30, 19...

Nine Mile Point Unit 2 FSAR

13.4 OPERATION REVIEW AND AUDIT

13.4.1 Administrative Controls

Administrative controls are written rules, orders, instructions, procedures, policies, practices, and designation of authority and responsibility by management to ensure safety and quality of operation and maintenance of Nine Mile Point Nuclear Station Units 1 and 2. The Site Administrative Procedures describe the controls over all station procedures.

The General Superintendent Nuclear Generation is directly responsible for the safe, orderly, and efficient operation of both units onsite. The functional operation of each station is the responsibility of the respective Station Superintendents. In addition, the Station Superintendents are charged with responsibility for keeping the General Superintendent fully informed on all significant matters of station operation.

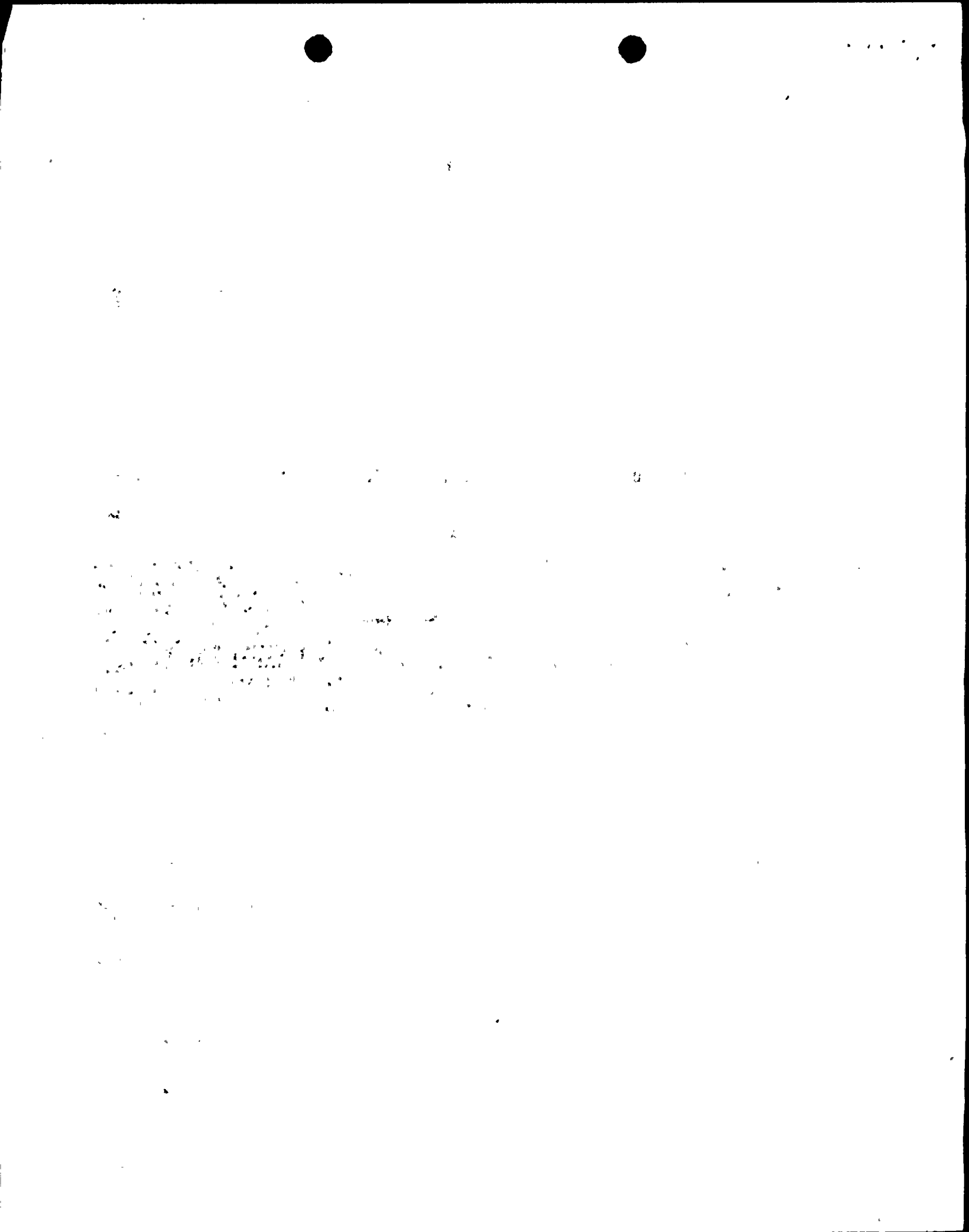
13.4.2 Safety Review and Audit of Operations

The two review bodies already in existence for Unit 1, the Site Operations Review Committee (SORC) and Safety Review and Audit Board (SRAB), will also function for Unit 2. These organizations are shown on Figure 13.4-1. The SORC and SRAB committees' methods, procedures, and practices comply with Sections 4.4 and 4.3 of ANSI N18.7-1976, respectively. Functions served by both of these committees are the same as those performed by committees for Unit 1 and are shown in Tables 13.4-1 and 13.4-2. Technical Review and control criteria's are shown on Table 13.4-3.

13.4.2.1 Site Operations Review Committee

Members of the SORC are managers or supervisors in the site organization. Qualifications for these positions relate to the discipline or position held by the members in the organization and are described in Section 13.1.1.2.

Records and minutes of meetings are kept on file at the site and are available upon request. Recommendations for changes to licenses as well as reports of abnormal operation or requests for technical assistance are forwarded to the Safety Review and Audit Board (SRAB) for review as



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TABLE 13.4-1

SITE OPERATIONS REVIEW COMMITTEE (SORC)

Function

The Site Operations Review Committee shall be responsible for:

- a. Review of all REPORTABLE EVENTS.
- b. Review of facility operations to detect potential safety hazards.
- c. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Chairman of the Safety Review and Audit Board.
- d. Investigation of violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Vice President - Nuclear Generation and to the Chairman of the Safety Review and Audit Board.

Authority

The Site Operations Review Committee shall:

- a. Render determinations in writing with regard to whether or not each item considered under (a) through (d) above constitutes an unreviewed safety question.
- b. Provide immediate written notification to the Vice President - Nuclear Generation and Chairman of the Safety Review and Audit Board of disagreement between the SORC and the General Superintendent - Nuclear Generation; however, the General Superintendent - Nuclear Generation shall have the responsibility for resolution of such disagreements.



1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for ensuring the integrity of the financial statements and for providing a clear audit trail.

2. The second part of the document outlines the specific procedures that should be followed when recording transactions. It details the steps from identifying the transaction to posting it to the appropriate accounts in the general ledger.

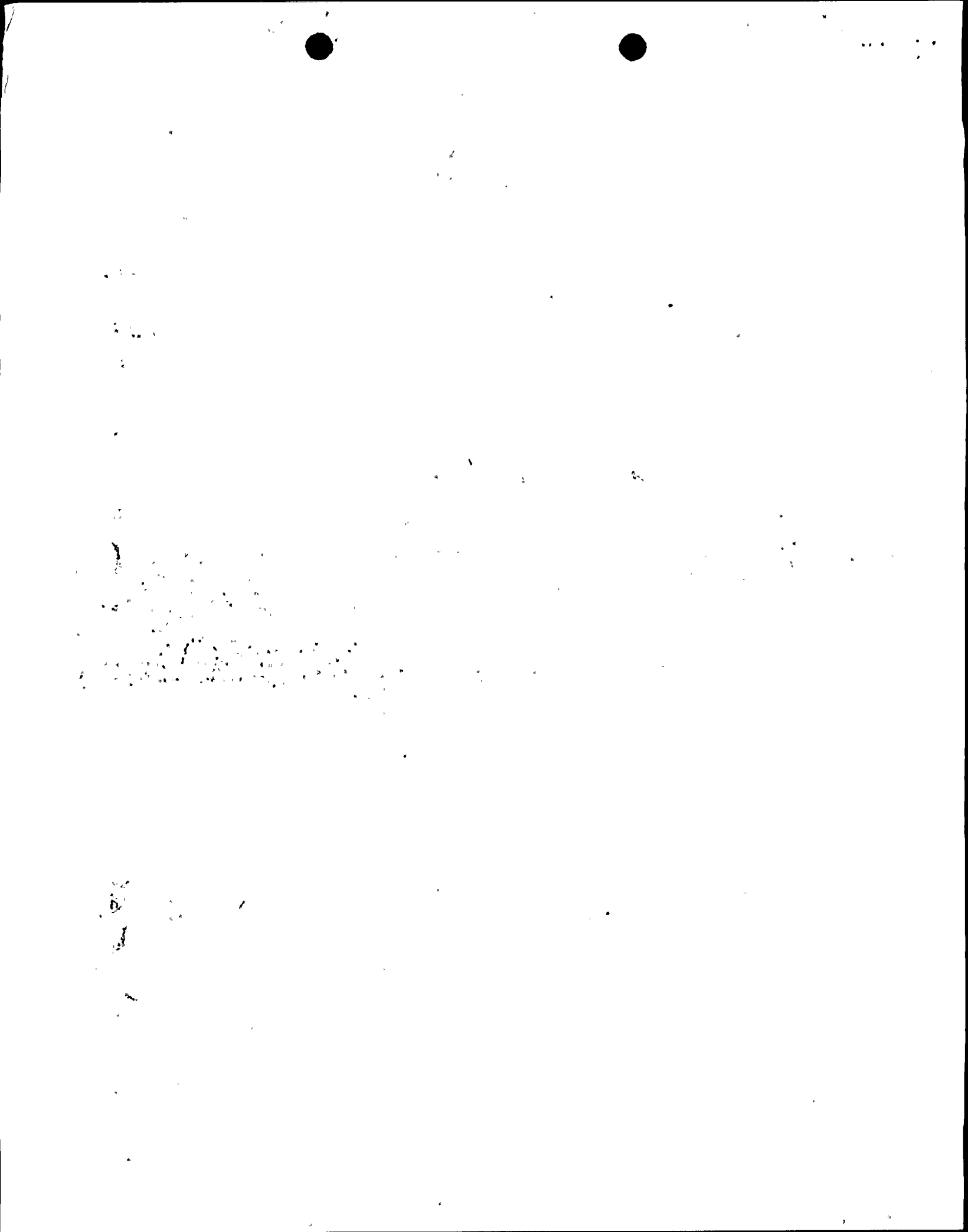
3. The final part of the document provides a summary of the key points discussed and offers some concluding thoughts on the overall process of recording transactions. It stresses the need for consistency and attention to detail throughout the entire process.

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TABLE 13.4-1 (Cont)

Records

The Site Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President - Nuclear Generation and Chairman of the Safety Review and Audit Board.



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TABLE 13.4-2

SAFETY REVIEW AND AUDIT BOARD (SRAB)

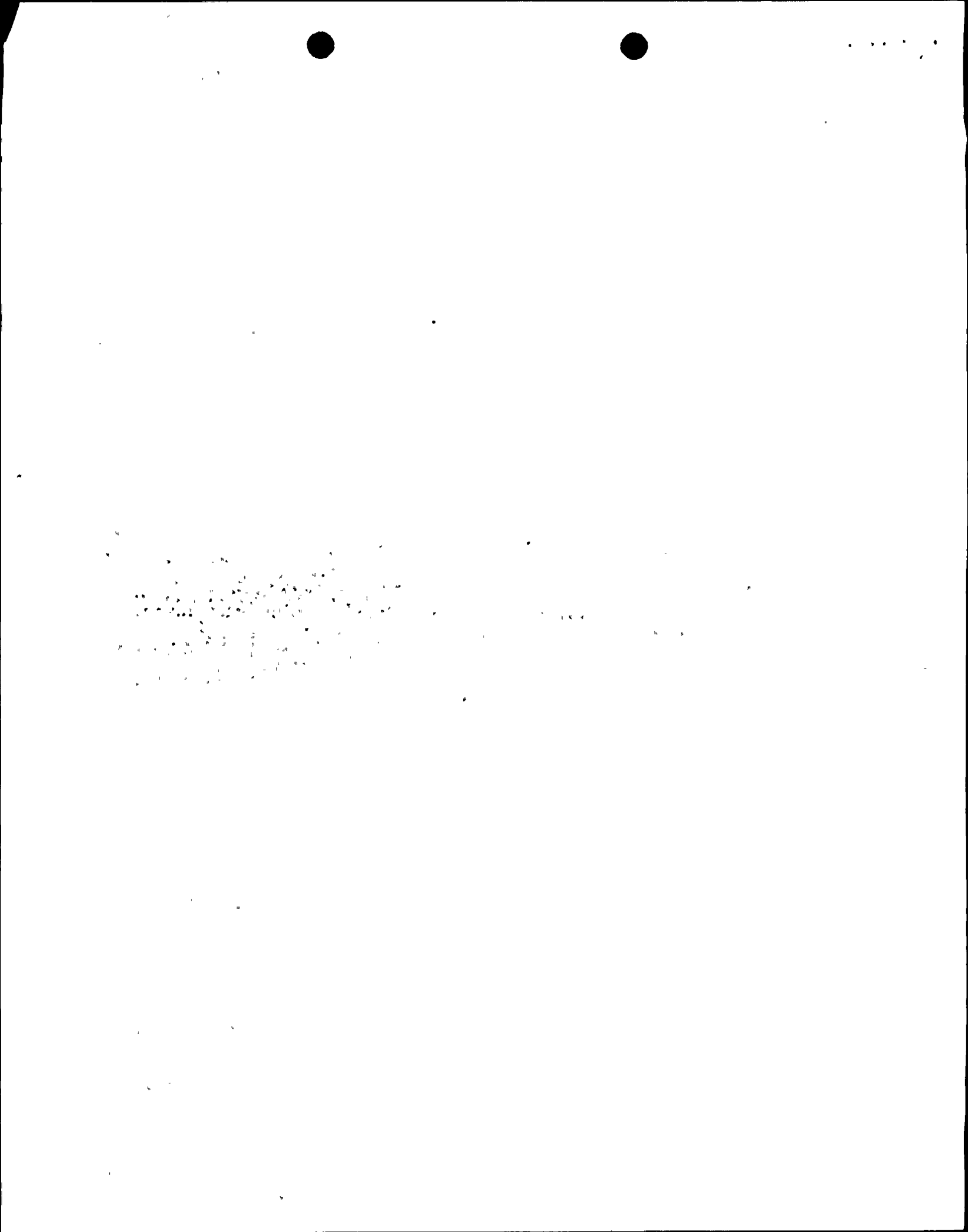
Function

The Safety Review and Audit Board provides independent review and audit of designated activities in the areas of:

1. Nuclear power plant operations.
2. Nuclear engineering.
3. Chemistry and radiochemistry.
4. Metallurgy.
5. Instrumentation and control.
6. Radiological safety.
7. Mechanical and electrical engineering.
8. Quality assurance practices.
9. Other appropriate fields associated with the unique characteristics of the nuclear power plant.

The SRAB shall review:

1. Safety evaluations for a) changes to procedures, equipment, or systems, and b) tests or experiments completed under the provision of 10CFR50.59 to verify that such actions did not constitute an unreviewed safety question.
2. Proposed changes to procedures, equipment, or systems that involve an unreviewed safety question as defined in 10CFR50.59.
3. Proposed tests or experiments that involve an unreviewed safety question as defined in 10CFR50.59.
4. Proposed changes in technical specifications or licenses.
5. Violations of applicable statutes, codes, regulations, orders, technical specifications, license requirements,



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TABLE 13.4-2 (Cont)

- or of internal procedures or instructions having nuclear safety significance.
6. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
 7. All events required by regulations or technical specifications to be reported to the NRC within 24 hr.
 8. Any indication of an unanticipated deficiency in design or operation of safety-related structures, systems, or components.
 9. Reports and meeting minutes of the Site Operations Review Committee (SORC).

Audits of facility activities shall be performed under cognizance of the SRAB. These audits shall encompass:

1. Conformance of facility operation to all provisions contained within the technical specifications and applicable license conditions at least once a year.
2. Performance, training, and qualifications of the entire facility staff at least once a year.
3. Results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once each 6 months.
4. Performance of all activities required by the quality assurance program to meet the criteria of Appendix B 10CFR50 at least once every 2 yr.
5. The facility Emergency Plan and Implementing Procedures at least once every 1 yr.
6. The facility Security Plan and Implementing Procedures at least once every 1 yr.
7. The facility Fire Protection Program and Implementing Procedures at least once every 2 yr.

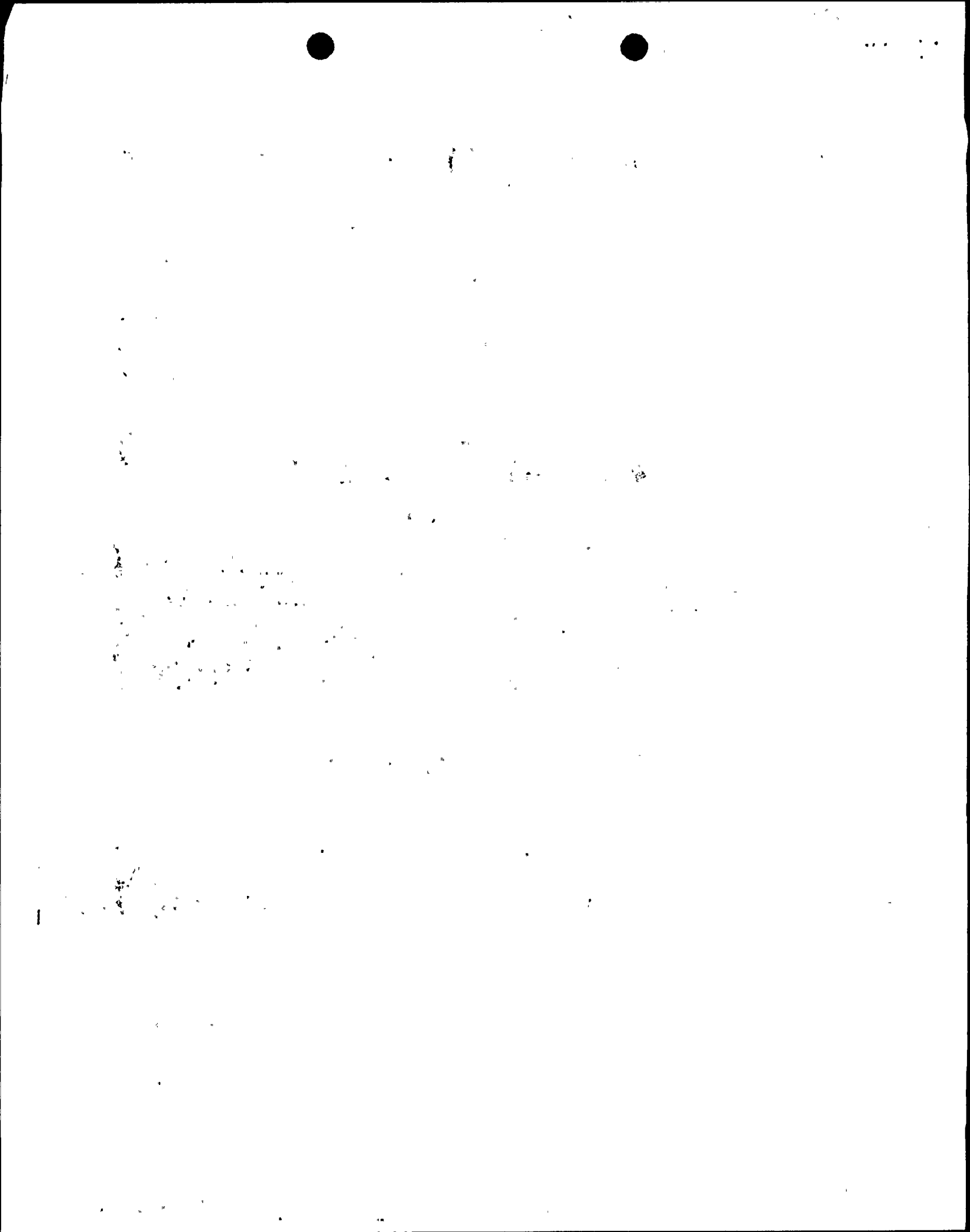


TABLE 13.4-2 (Cont)

8. Any area of facility operation considered appropriate by the SRAB, Vice President Nuclear Generation, or Vice President Nuclear Engineering and Licensing.
9. The radiological environmental monitoring program and the results thereof at least once per 12 months.
10. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
11. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

Authority

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. The SRAB shall report to the Manager, System Security, regarding security audits.

Records

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

1. 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.
2. Audit reports encompassed by the above shall be forwarded to the Vice President Nuclear Generation and Vice President Nuclear Engineering and Licensing and to management positions responsible for the areas audited within 90 days after completion of the audit. However, audit reports, made in connection with Nuclear Security, are submitted to the Manager, System Security, only.
3. Reports of reviews encompassed by items 5, 6, 7 and 8 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.

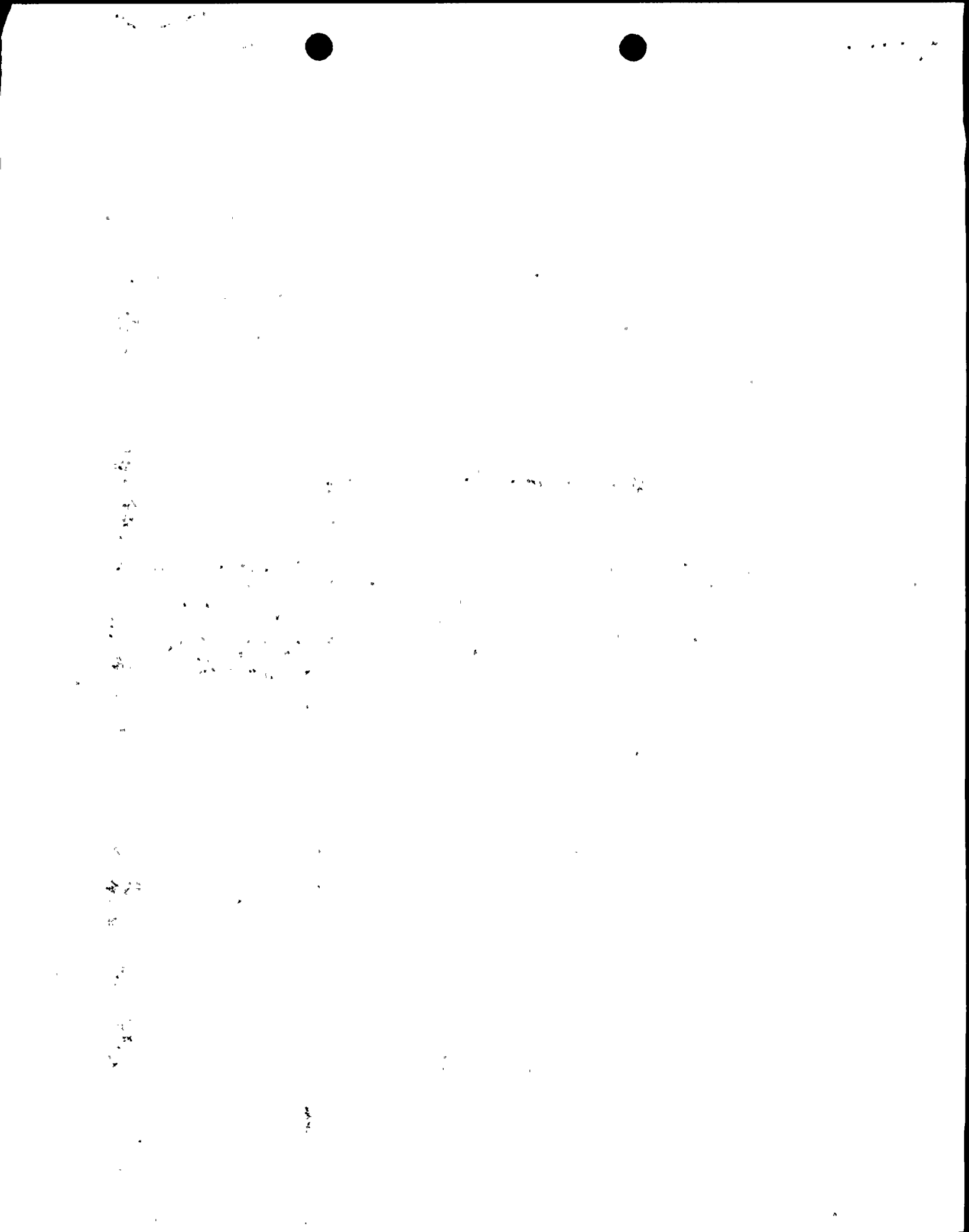


TABLE 13.4-3

TECHNICAL REVIEW AND CONTROL

CRITERIA

- 1) Each procedure and program : which affect nuclear safety, and changes thereto, shall be prepared by a qualified individual/organization. Each such procedure, and changes thereto, shall be reviewed by an individual/group other than the individual/group which prepared the procedure, or changes thereto, but who may be from the same organization as the individual/group which prepared the procedure, or changes thereto. Approval of procedures and programs and changes thereto and their safety evaluations, shall be controlled by administrative procedures.
- 2) Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed technical Specifications change shall be reviewed by an individual/group other than the individual/group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the technical Specifications shall be approved by the General Superintendent-Nuclear Generation.
- 3) Proposed modifications to unit structures, systems and components that affect nuclear safety shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to structures, systems and components and the safety evaluations shall be approved prior to implementation by the General Superintendent-Nuclear Generation; or the Station Superintendent-Nuclear Generation; or the Technical Superintendent-Nuclear Generation as previously designated by the General Superintendent-Nuclear Generation.
- 4) Individuals responsible for reviews performed in accordance with functions 1, 2 and 3 shall be members of the station supervisory staff, previously designated by the General Superintendent - Nuclear Generation to perform such reviews. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the appropriate designated station review personnel.
- 5) Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications and their safety evaluations shall be reviewed by the General Superintendent-Nuclear Generation; or by the Station Superintendent-Nuclear Generation, or the Technical Superintendent-Nuclear Generation as previously designated by the General Superintendent-Nuclear Generation.
- 6) The General Superintendent-Nuclear Generation shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President-Nuclear Generation.
- 7) The facility security program, and implementing procedures, shall be reviewed at least every 12 months. Recommended changes shall be approved by the General Superintendent-Nuclear Generation and transmitted to the Vice President-Nuclear Generation, and to the Chairman of the Safety Review and Audit Board.
- 8) The facility emergency plan, and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the General Superintendent-Nuclear Generation and transmitted to the Vice President-Nuclear Generation and to the Chairman of the Safety Review and Audit Board.



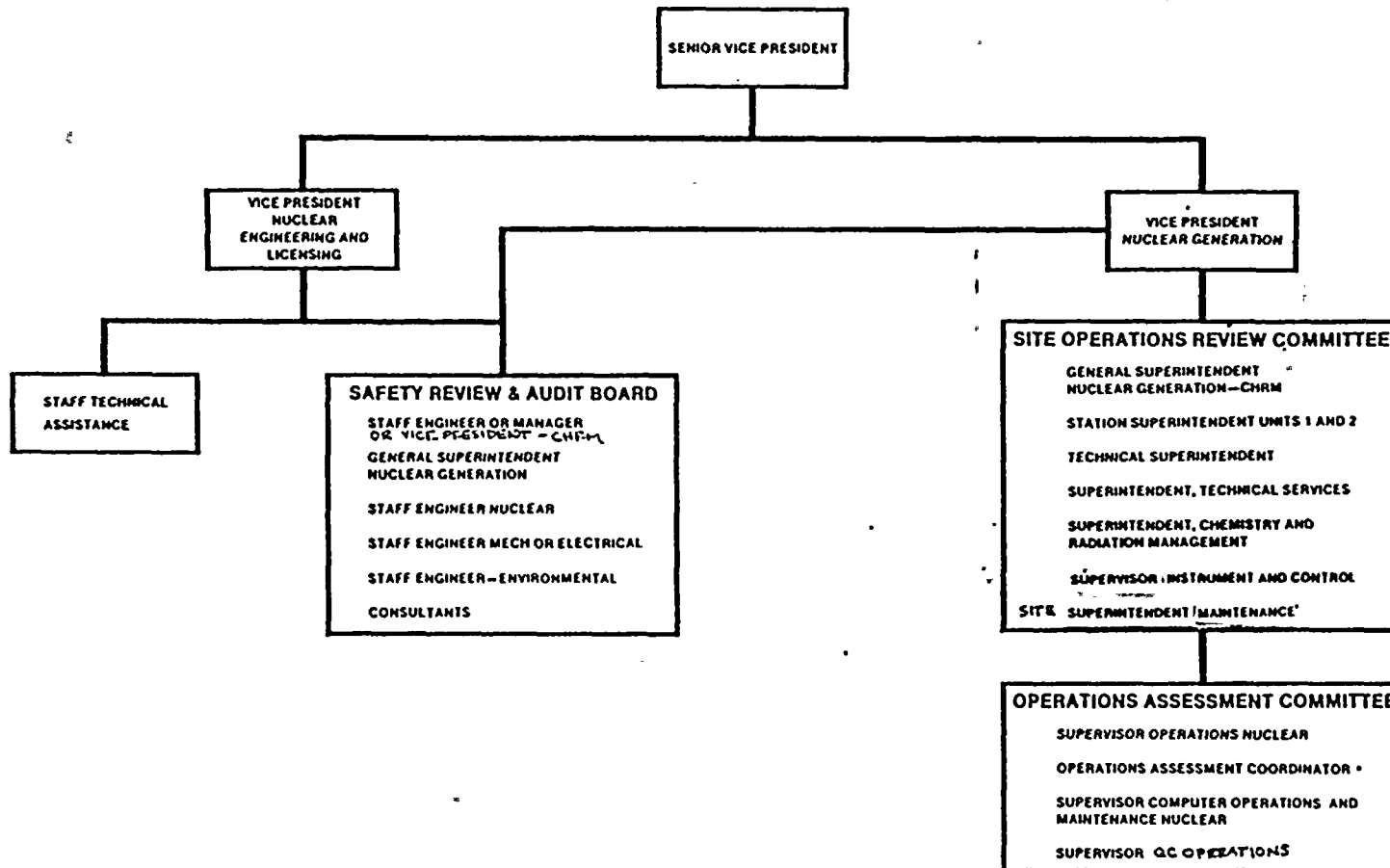
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TABLE 13.4-3 (Cont)

- 9) The General Superintendent-Nuclear Generation shall assure the performance of a review by a qualified individual/organization of changes to the Radiological Waste Treatment systems.
- 10) Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Nuclear Generation and to the Safety Review and Audit Board.
- 11) Review of changes to the Process Control Program and the Offsite Dose Calculation Manual. Approval of any changes shall be made by the General Superintendent - Nuclear Generation or his designee before implementation of such changes.
- 12) Reports documenting each of the activities performed under function 1 through function 9 shall be maintained. Copies shall be provided to the Vice President - Nuclear Generation and the Safety Review and Audit Board.



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*THE OPERATIONS ASSESSMENT COORDINATOR IS A STAFF MEMBER OF THE TECHNICAL SERVICES DEPARTMENT

FIGURE 13.4-1

SAFETY REVIEW AND AUDIT OF
OPERATIONS ORGANIZATION

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT-UNIT 2
FINAL SAFETY ANALYSIS REPORT

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Nine Mile Point Unit 2 FSAR

Institute of Nuclear Power Operations (INPO), and internal staff efforts.

INPO has made available a document entitled Nuclear Power Plant Shift Technical Advisor--Recommendations for Position Description, Qualifications, Education and Training. A copy of Revision 0 of this document, dated April 30, 1980, is attached as a supplement to this task. Sections 5 and 6 of the INPO document describe the education, training, and experience requirements for STAs. The NRC staff finds that the descriptions as set forth in Sections 5 and 6 of Revision 0 to the INPO document are an acceptable approach for the selection and training of personnel to staff the STA positions. The INPO document provides interim guidance for a utility in planning its STA program over the long term.

Applicants for operating licenses shall provide a description of their STA training program and their plans for requalification training on a schedule consistent with the NRC licensing review schedule. This description shall indicate the level of training attained by STAs and demonstrate conformance with the qualification and training requirements.

Applicants for operating licenses shall provide a description of the long-term STA program, including qualification, selection criteria, training plans, and plans, if any, for the eventual phase-out of the STA program on a schedule consistent with the NRC licensing review schedule.

Nine Mile Point Unit 2 Position

The STA qualifications (Table 13.1-4) meet Enclosure A of SECY 84-355. Training requirements (Section 13.2) include specific training in plant design and arrangement, and the capabilities of the instruments and controls in the control room. STAs review and evaluate operating experience reports, including engineering aspects of ensuring safe operations.

