

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

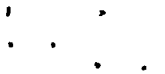
LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A).

Existing pages 246, 250, and 251 will be replaced with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

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Facility Staff (Cont'd)

- e. A licensed Senior Reactor Operator shall be required in the Control Room during power operations, hot shutdown, and when the emergency plan is activated. This may be the Station Shift Supervisor-Nuclear or the Assistant Station Shift Supervisor-Nuclear or another Senior Reactor Operator during power operations or hot shutdown. When the emergency plan is activated during normal operations or hot shutdown, the Assistant Station Shift Supervisor-Nuclear becomes the Shift Technical Advisor and the Station Shift Supervisor-Nuclear is restricted to the control room until an additional licensed Senior Reactor Operator arrives.
- f. A licensed Senior Reactor Operator shall be responsible for all movement of new and irradiated fuel within the site boundary. All core alterations shall be directly supervised by a licensed senior reactor operator who has no other concurrent responsibilities during this operation. A Licensed Operator will be required to manipulate the controls of all fuel handling equipment except movement of new fuel from receipt through dry storage. All fuel moves within the core shall be directly monitored by a member of the reactor analyst group.
- g. A Fire Brigade of five (5) members* shall be maintained on site as defined by 5.1 at all times.
- h. Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the facility is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications on a temporary basis, the following guidelines shall be followed:

* The Radiation Protection qualified Individual and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.



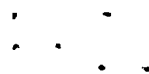
Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION⁽¹⁾ ⁽⁶⁾

<u>License</u>	<u>Normal Operation</u>	<u>Shutdown Condition</u>	<u>Operation⁽³⁾ W/O Process Computer</u>	<u>Reactor Startups</u>
Senior Operator	1	1 ⁽⁵⁾	1	1
Operator	2	1	2	3
Unlicensed ⁽²⁾	2	1	3	2
Asst. Station Shift Supervisor (Shift Technical Advisor Function) (Senior Operator License) ⁽⁷⁾	1	1 ⁽⁴⁾	1	1

Notes:

- (1) At any one time, more licensed or unlicensed operating people could be present for maintenance, repairs, refuel outages, etc.
- (2) Those operating personnel not holding an "Operator" or "Senior Operator" License.
- (3) For operation longer than eight hours without process computer.
- (4) Hot shutdown condition only.
- (5) An additional senior reactor operator who has no other concurrent responsibilities shall supervise all core alterations.
- (6) The Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed two hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.
- (7) The Assistant Station Shift Supervisor performs the Shift Technical Advisor function during normal operations or hot shutdown and shall hold a senior reactor operator license. Normally the Assistant Station Shift Supervisor is a combined Assistant Station Shift Supervisor/Shift Technical Advisor; however, there may be instances when a shift may be staffed by two Senior Reactor Operators plus a dedicated Shift Technical Advisor.



6.3 Facility Staff Qualifications

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Shift Technical Advisor who shall have a bachelor's degree in a physical science or engineering or a professional engineer license issued by examination and shall have received specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 Training

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Superintendent-Training Nuclear and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Superintendent-Training Nuclear and Supervisor-Fire Protection, Nuclear and shall meet or exceed the requirements of Appendix R to 10CFR50.

6.5 Review and Audit

6.5.1 Site Operations Review Committee (SORC)

Function

6.5.1.1 The Site Operations Review Committee shall function to advise the General Superintendent-Nuclear Generation on all matters related to nuclear safety.

Composition

6.5.1.2 The Site Operations Review Committee shall be composed of the:

Chairman: General Superintendent - Nuclear Generation
Member: Station Superintendent - Nuclear Generation
Member: Technical Superintendent - Nuclear Generation
Member: Superintendent Technical Services - Nuclear
Member: Site Superintendent Maintenance - Nuclear
Member: Supervisor Instrument and Control - Nuclear
Member: Superintendent Chemistry and Radiation Management



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ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

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Supporting Information and No Significant Hazards Considerations Analysis

The proposed amendment to Sections 6.2.2 and 6.3 and Table 6.2-1 of the Technical Specifications reflect changes required to make the Technical Specifications conform to the Nuclear Regulatory Commission's Policy Statement on Engineering Expertise on Shift.

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in Section 50.92 about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed:

The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

These administrative changes will bring the Technical Specifications into agreement with the NRC Policy Statement on Engineering Expertise on Shift. The Assistant Station Shift Supervisor function, training and educational background will meet the applicable NRC requirements. Qualifications of other staff members has not changed. Therefore, this change will not increase the probability or consequence of an accident.

The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes are administrative and do not create the possibility of a new or different kind of accident.

The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

The proposed administrative changes do not change staffing levels or staff training. Consequently, there is no reduction in margin of safety.

