

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

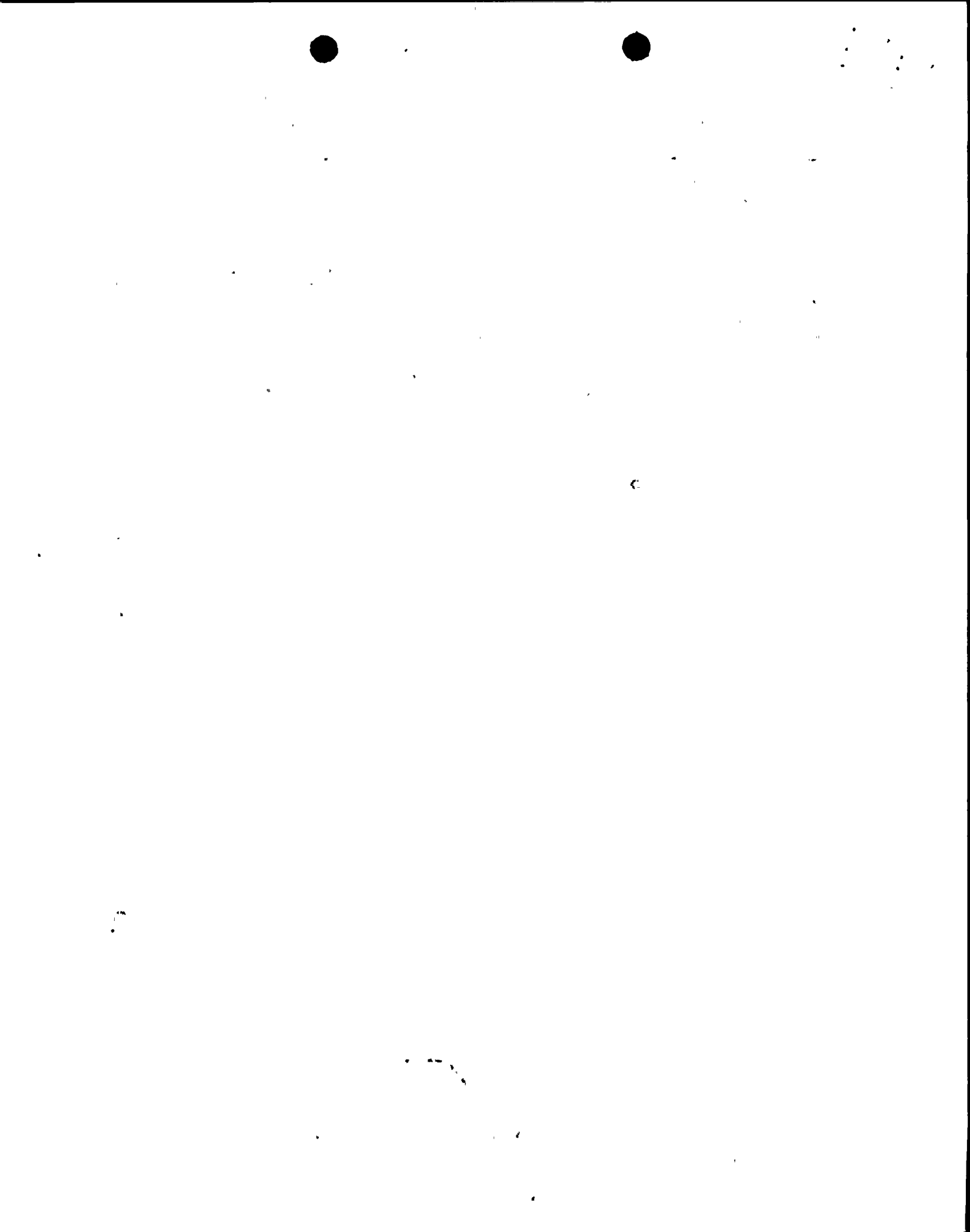
DOCKET NO. 50-410

Proposed Changes to Technical Specifications

The existing pages 6-1, 6-3, 6-18, 6-19 and 6-22 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. New page 6-1a has been added to accommodate the additional information recommended in Generic Letter 88-06, "Removal of Organization Charts from Technical Specifications."

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Superintendent - Nuclear Generation shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during the Superintendent's absence.

6.1.2 The Station Shift Supervisor - Nuclear (or during the Supervisor's absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Senior Vice President shall be reissued to all station personnel annually.

6.2 ORGANIZATION

6.2.1 Onsite and Offsite Organization

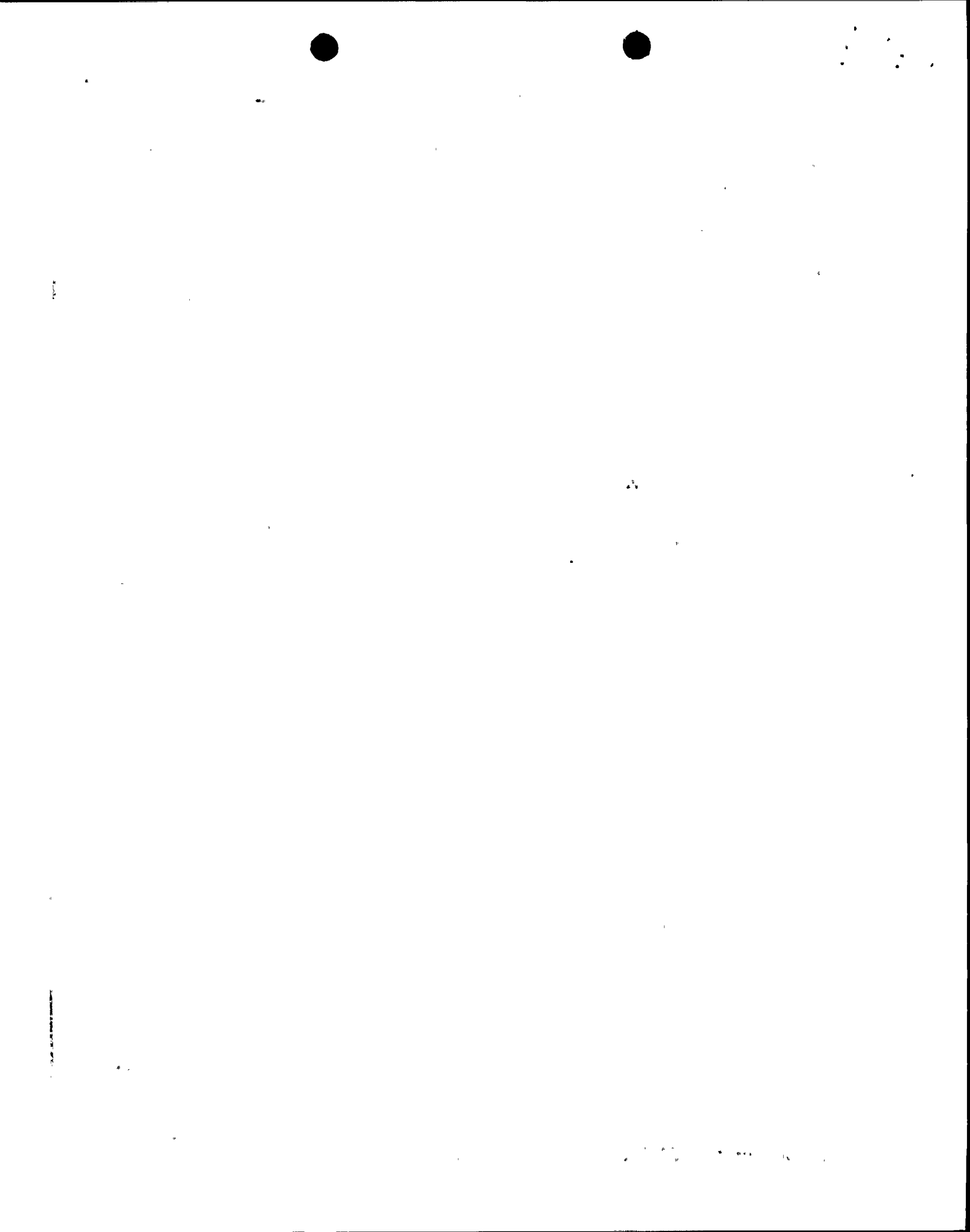
An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions or in equivalent forms of documentation. The organization charts shall be documented in the Final Safety Analysis Report, and the functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions are documented in procedures.
- b. The Senior Vice President shall have corporate responsibility for overall plant nuclear safety. The Senior Vice President shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. The General Superintendent - Nuclear Generation shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the plant.
- d. The persons responsible for the training, health physics and quality assurance functions may report to an appropriate manager onsite, but shall have direct access to responsible corporate management at a level where action appropriate to the mitigation of training, health physics and quality assurance concerns can be accomplished.

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

- a. Each on-duty shift shall be composed of at least the minimum shift crew shown in Table 6.2.2-1;



6.0 ADMINISTRATIVE CONTROLS

ORGANIZATION

UNIT STAFF

6.2.2 (Continued)

- b. At least one Licensed Operator shall be in the control room when fuel is in the reactor. In OPERATIONAL CONDITIONS 1, 2, or 3, at least one Licensed Senior Operator or Licensed Operator shall be at the controls of the unit.
- c. A Radiation Protection Technician* shall be on site when fuel is in the reactor;
- d. At least two Licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips.
- e. A Licensed Senior Operator shall be required in the control room during OPERATIONAL CONDITIONS 1, 2, and 3 and when the emergency plan is activated. This may be the Station Shift Supervisor - Nuclear, the Assistant Station Shift Supervisor - Nuclear or other individuals with a valid senior operator license. When the emergency plan is activated in OPERATIONAL CONDITIONS 1, 2, or 3 the Assistant Station Shift Supervisor - Nuclear becomes the Shift Technical Advisor and the Station Shift Supervisor - Nuclear is restricted in the control room until an additional Licensed Senior Operator arrives.

* The Radiation Protection Technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming crewman being late or absent.



6.0 ADMINISTRATIVE CONTROLS

ORGANIZATION

UNIT STAFF

6.2.2.i (Continued)

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Superintendent, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures so that individual overtime shall be reviewed monthly by the General Superintendent - Nuclear Generation or a designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- j. The Superintendent Operations Nuclear, Assistant Superintendent Operations Nuclear, Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear shall hold senior reactor operator licenses.

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP

FUNCTION

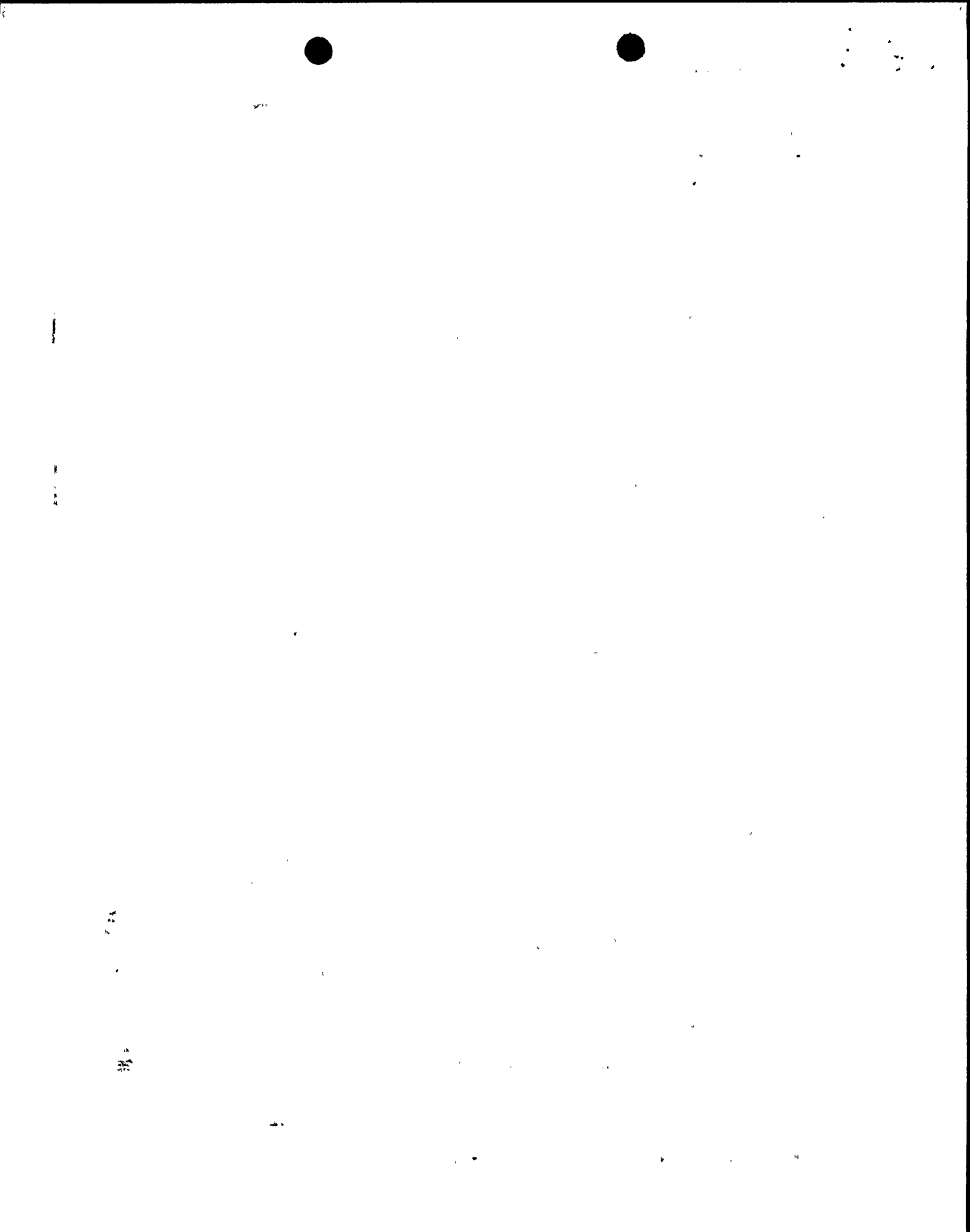
6.2.3.1 The Independent Safety Engineering Group (ISEG) shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Supervisor Technical Support - Nuclear.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years of professional level experience in his/her field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The principal function of the ISEG is to examine plant operating characteristics and the various NRC and industry licensing and service advisories, and to recommend areas for improving plant operations or safety. The ISEG will perform independent review of plant activities, including maintenance, modifications, operational concerns, and analysis and make recommendations to the Supervisor Technical Support - Nuclear.



ADMINISTRATIVE CONTROLS

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

6.9.1.2 The startup report shall address each of the tests identified in the Final Safety Analysis Report Subsection 14.2.12.2 and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted before March 1 of each year. The initial report shall be submitted before March 1 of the year after the plant achieves initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

a. A tabulation of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). The dose assignments to various duty functions may be estimated on the basis of pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totaling 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total

* This tabulation supplements the requirements of 10 CFR 20.407.



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ADMINISTRATIVE CONTROLS

REPORTING REQUIREMENTS

ROUTINE REPORTS

ANNUAL REPORTS

6.9.1.5 (Continued)

whole-body dose received from external sources should be assigned to specific major work functions.

- b. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included: (1) Reactor power history starting 48 hours before the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed before exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Cleanup system flow history starting 48 hours before the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.
- c. Documentation of all challenges to safety/relief valves; and
- d. Any other unit unique reports required on an annual basis.

MONTHLY OPERATING REPORTS

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam system safety/relief valves, shall be submitted monthly in accordance with 10 CFR 50.4 no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.7 Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The initial report shall be submitted before May 1 of the year after the plant achieves initial criticality.

The Annual Radiological Environmental Operating Report shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison, as appropriate, with preoperational studies, operational controls,

* A single submittal may be made for a multiple unit site. The submittal should combine those sections that are common to all units at the site.



ADMINISTRATIVE CONTROLS

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.8 (Continued)

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), pursuant to Specifications 6.13 and 6.14, respectively, as well as any major change to liquid, gaseous, or solid radwaste treatment systems pursuant to Specification 6.15. It shall also include a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

The Semiannual Radioactive Effluent Release Reports shall also include the following: an explanation of why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Specification 3.3.7.9 or 3.3.7.10, respectively, and a description of the events leading to liquid holdup tanks exceeding the limits of Specification 3.11.1.4.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, of the Code of Federal Regulations (10 CFR), the following records shall be retained for at least the minimum period indicated.

6.10.1.1 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety
- c. All REPORTABLE EVENTS submitted to the Commission
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications
- e. Records of changes made to the procedures required by Specification 6.8.1
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results
- h. Records of annual physical inventory of all sealed source material of record



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ATTACHMENT B

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Supporting Information and No Significant Hazards Consideration Analysis

This proposed Technical Specification change is to remove the onsite and offsite organizational charts from Section 6.2, "Organization," and to include general requirements that capture the essential aspects of the organizational structure reflected in these charts.

The required content of the administrative controls section of the Technical Specifications is specified in 10 CFR 50.36.c(5). The regulation requires that the Technical Specifications contain the controls and provisions that are necessary to assure operation of the facility in a safe manner and does not specifically require inclusion of organizational charts in the Technical Specifications.

The requirements of 10 CFR 50.34(b)(6)(i) are that the applicant's organizational structure be included in the Final Safety Analysis Report (FSAR). The onsite and offsite management organizational charts are included in Chapter 13 of the FSAR and will be updated in accordance with 10 CFR 50.71. It is also Niagara Mohawk's practice to inform the NRC of organizational changes affecting our nuclear facilities. We intend to continue this practice for future organizational changes. In addition, the general organizational requirements recommended in Generic Letter 88-06 will be incorporated into Section 6.2 of the Technical Specifications.

Niagara Mohawk has reviewed the Nine Mile Point Unit 2 Technical Specifications and there are no other references to the organization charts in other sections which are impacted by this proposed change.

An administrative change is also being proposed for Section 6.2. Specifically, 6.22.i is being revised to allow the Plant Superintendent to authorize deviations from the overtime guidelines for plant operators. In addition, changes to Section 6.9 have been proposed to make them consistent with the reporting requirements of 10 CFR 50.4 for submittal of reports.

10 CFR 50.91 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 10 CFR 50.91 and 10 CFR 50.92, the following analysis has been performed:

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.



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The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because deletion of the organizational charts from the Technical Specifications does not affect plant operation. The remaining changes are administrative in nature and do not affect plant operation.

The operation of Nine Mile Point Unit 2, 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 amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed changes are administrative in nature and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

The proposed amendment does not involve a significant reduction in a margin of safety because Niagara Mohawk, through its Quality Assurance programs, its commitment to maintain only qualified personnel in positions of responsibility, and other required controls, assures that safety functions will be performed at a high level of competence. Therefore, removal of the organization charts from the Technical Specifications and the proposed administrative changes will not affect the margin of safety.

