ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

The existing pages 245, 247, 261, 261a, 265 and 266 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 245a has been added to accommodate the additional information recommended in Generic Letter 88-06, "Removal of Organization Charts from Technical Specifications."

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 his absence.

6.1.2 The Station Shift Supervisor - Nuclear (or during his 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 re-issued to station personnel on an annual basis.

6.2 Organization

Onsite and Offsite Organization

6.2.1 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.

Onsite and Offsite Organization (Cont'd)

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.

Facility 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 composition shown in Table 6.2-1.

b. At least one licensed Operator shall be in the control room when fuel is in the reactor. During reactor operation, this licensed operator shall be present at the controls of the facility.

c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.

d. An individual qualified in radiation protection* procedures shall be on site when fuel is in the reactor.

* The Radiation Protection qualified individual 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.

Facility Staff (Cont'd)

1) An individual should not be permitted to work more than 16 hours straight (excluding shift turnover time).

2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7 day period (all excluding shift turnover time).

3) A break of at least 8-hours should be allowed between work periods (including shift turnover time).

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 such that individual overtime shall be reviewed monthly by the General Superintendent - Nuclear Generation or designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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

6.8 Procedures (Continued)

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed and approved by the General Superintendent-Nuclear Generation or designee within 14 days of implementation.

6.9 Reporting Requirements

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

6.9.1 Routine Reports

a. Startup Report. 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 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 plant. The report shall address each of the tests identified in the FSAR and shall in general 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 Routine Reports (Cont'd)

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 power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

b. Annual Occupational Exposure Report. A tabulation shall be submitted on an annual basis which includes 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, 1/ e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience including documentation of challenges to the safety relief valves or safety valves, shall be submitted on a monthly basis, which will include a narrative of operating experience, in accordance with 10 CFR 50.4, no later than the 15th of each month following the calendar month covered by the report.

1/ This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.9.1 Routine Reports (cont'd)

Changes to the Offsite Dose Calculation Manual (ODCM): Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:

a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the Offsite Dose Calculation Manual to be changed, together with appropriate analyses or evaluations justifying the change(s);

b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and

c. Documentation of the fact that the change has been reviewed and found acceptable.

6.9.2 Fire Protection Program Reports

a. Submit a special report in accordance with 10 CFR 50.4 as follows:

- Notify the Regional Administrator of the appropriate Regional Office by telephone within 24 hours.
- Confirm by telegraph, mailgram or fascimile transmission no later than the first working day following the event, and
- Follow-up in writing within 14 days after the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to an operable status.

b. Submit a special report in accordance with 10 CFR 50.4 within 30 days following the event outlining the plans and procedures to be used to restore the inoperable equipment to an operable status.

6.9.3 Special Reports

Special reports shall be submitted in accordance with 10 CFR 50.4 Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

a. Reactor Vessel Material Surveillance Specimen Examination, Specification 4.2.2(b) (12 months)

b. Safety Class 1 Inservice Inspection, Specification (See Table 4.2.6(a)) (Three months)

c. Safety Class 2 Inservice Inspections, Specification (See Table 4.2.6(b)) (Three months)

d. Safety Class 3 Inservice Inspections; Specification (See Table 4.2.6(c)) (Three months)

e. Primary Containment Leakage Testing, Specification 3.3.3 (Three months)

f. Secondary Containment Leakage Testing, Specification 3.4.1 (Three months)

g. Sealed Source Leakage In Excess Of Limits, Specification 3.6.5.2 (Three months)

h. Calculate Dose from Liquid Effluent in Excess of Limits, Specification 3.6.15.a(2)(b) (30 days from the end of the affected calendar quarter).

i. Calculate Air Dose from Noble Gases Effluent in Excess of Limits, Specification 3.6.15.b(2)(b) (30 days from the end of the affected calendar quarter).

j. Calculate Dose from I-131, H-3 and Radioactive Particulates with half lives greater than eight days in Excess of Limits, Specification 3.6.15.b(3)(b) (30 days from the end of the affected calendar quarter).

k. Calculated Doses from Uranium Fuel Cycle Source in Excess of Limits, Specification 3.6.15.d (30 days from the end of the affected calendar year).

l. Inoperable Gaseous Radwaste Treatment System, Specification 3.6.16.b (30 days from the event).

m. Environmental Radiological Reports. With the level of radioactivity (as the result of plant effluents) in an environmental sampling medium exceeding the reporting level of Table 6.9.3-1, when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within thirty (30) days from the end of the calendar quarter a special report identifying the cause(s) for exceeding the limits, and define the corrective action to be taken.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

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 will be included in Section XIII of our Updated FSAR. 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 1 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, 6.2.2h 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 and to correct a typographical error. Specification 6.9.3a., which incorrectly references Specification 4.2.2(c), is being revised to correctly reference Specification 4.2.2(b).

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 1, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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 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 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 1, 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.