

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

DOCKET NO. 50-410

Proposed Changes to Technical Specifications

The existing pages 6-1, 6-8, 6-9, 6-10, 6-11, 6-14 and 6-15 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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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 Executive Vice President - Nuclear Operations shall be reissued to all station personnel annually.

6.2 ORGANIZATION

6.2.1 Onsite and Offsite Organization

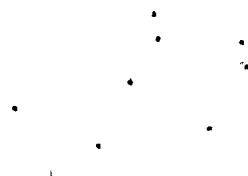
An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- 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 Executive Vice President - Nuclear Operations shall have corporate responsibility for overall plant nuclear safety. The Executive Vice President - Nuclear Operations 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;



ADMINISTRATIVE CONTROLS

6.5 REVIEW AND AUDIT

6.5.1 SITE OPERATIONS REVIEW COMMITTEE

FUNCTION

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

COMPOSITION

6.5.1.2 The SORC 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
Member:	Supervisor Reactor Analysis
Member:	Supervisor Technical Support
Member:	Engineer

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The SORC shall meet at least once every calendar month and as convened by the SORC Chairman or a designated alternate.

QUORUM

6.5.1.5 The quorum of the SORC necessary for the performance of the SORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or a designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The SORC shall be responsible for:

- a. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Executive Vice President - Nuclear Operations and to the Safety Review and Audit Board;



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ADMINISTRATIVE CONTROLS

6.5 REVIEW AND AUDIT

6.5.1 SITE OPERATIONS REVIEW COMMITTEE

6.5.1.6 (Continued)

- b. Review of all REPORTABLE EVENTS;
- c. Review of unit operations to detect potential hazards to nuclear safety;
- d. Performance of special reviews, investigations, or analyses and reports thereon as requested by the General Superintendent - Nuclear Generation or the Safety Review and Audit Board;
- e. Safety evaluations and analyses resulting from technical review and control activities 6.5.2.1, 6.5.2.2, 6.5.2.3, and 6.5.2.5.

DUTIES

6.5.1.7 The SORC shall:

- a. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6.a through e constitutes an unreviewed safety question.
- b. Provide written notification within 24 hours to the Executive Vice President - Nuclear Operations and 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 responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The SORC shall maintain written minutes of each SORC meeting that at a minimum, document the result of all SORC activities performed under the responsibilities and authority provisions of these Technical Specifications. Copies shall be provided to the Executive Vice President - Nuclear Operations and the Safety Review and Audit Board.

6.5.2 TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.1 Each procedure and program required by Specification 6.8 and other procedures that 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 that prepared the procedure, or changes thereto, but who may be from the same organization as the individual/group that prepared the procedure, or changes thereto. Approval of procedures and programs and changes thereto and their safety evaluations, shall be controlled by administrative procedures.

6.5.2.2 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 that prepared the proposed change, but who may be from the same organization as the individual/group that prepared the proposed change.

ADMINISTRATIVE CONTROLS

REVIEW AND AUDIT

TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.2 (Continued)

Proposed changes to the Technical Specifications shall be approved by the General Superintendent - Nuclear Generation.

6.5.2.3 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 that designed the modification, but who may be from the same organization as the individual/group that designed the modification. Proposed modifications to structures, systems, and components and the safety evaluations shall be approved before 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.

6.5.2.4 Individuals responsible for reviews performed in accordance with Specifications 6.5.2.1, 6.5.2.2, and 6.5.2.3 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.

6.5.2.5 Proposed tests and experiments that 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.

6.5.2.6 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 Executive Vice President - Nuclear Operations.

6.5.2.7 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 Executive Vice President - Nuclear Operations, and to the Chairman of the Safety Review and Audit Board.

6.5.2.8 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 Executive Vice President - Nuclear Operations and to the Chairman of the Safety Review and Audit Board.

ADMINISTRATIVE CONTROLS

REVIEW AND AUDIT

TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.9 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.

6.5.2.10 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 Executive Vice President - Nuclear Operations and to the Safety Review and Audit Board.

6.5.2.11 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 a designee before implementation of such changes.

6.5.2.12 Reports documenting each of the activities performed under Specifications 6.5.2.1 through 6.5.2.9 shall be maintained. Copies shall be provided to the Executive Vice President - Nuclear Operations and the Safety Review and Audit Board.

6.5.3 SAFETY REVIEW AND AUDIT BOARD

FUNCTION

6.5.3.1 The Safety Review and Audit Board (SRAB) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Quality assurance practices and
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant

The SRAB shall report to and advise the Executive Vice President - Nuclear Operations on those areas of responsibility in Specifications 6.5.3.7 and 6.5.3.8.

COMPOSITION

6.5.3.2 The SRAB shall be composed of the:

Chairman: Vice President, Manager or Staff Engineer
Member: General Superintendent - Nuclear Generation
Member: Staff Engineer - Nuclear
Member: Staff Engineer - Mechanical or Electrical
Member: Staff Engineer - Environmental
Member: Consultant (Specification 6.5.3.4)

ADMINISTRATIVE CONTROLS

REVIEW AND AUDIT

SAFETY REVIEW AND AUDIT BOARD

AUDITS

6.5.3.8 (Continued)

- j. Any other area of unit operation considered appropriate by the SRAB or the Executive Vice President - Nuclear Operations.
- k. The Fire Protection Program and implementing procedures at least once per 24 months.
- l. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- m. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

AUTHORITY

6.5.3.9 The SRAB shall report to and advise the Executive Vice President - Nuclear Operations on those areas of responsibility specified in Sections 6.5.3.7 and 6.5.3.8.

RECORDS

6.5.3.10 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 Executive Vice President - Nuclear Operations within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.3.7b, e, g, h shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear Operations within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.3.8 shall be forwarded to the Executive Vice President - Nuclear Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.



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ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.72 and 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the SRAB and the Executive Vice President - Nuclear Operations.

6.7 SAFETY LIMIT VIOLATION

The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Executive Vice President - Nuclear Operations and the SRAB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared in accordance with 10 CFR 50.73. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission within 30 days of the violation, and to the SRAB, and the Executive Vice President - Nuclear Operations within 14 days.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

PROCEDURES

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory guide 1.33, Revision 2, February 1978
- b. The applicable procedures required to implement the requirements of NUREG-0737
- c. Refueling operations



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ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

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Supporting Information and No Significant Hazards Consideration Analysis

The proposed changes to Sections 6.1, 6.2, 6.5, 6.6 and 6.7 of the Technical Specifications are administrative in nature and reflect a change in the management organization of our Nuclear Division. The change in the management organization is the result of Niagara Mohawk Power Corporation's determination to provide the highest level of management expertise and experience in the operation of the Corporation's nuclear facilities and to assure that the goals of improved overall performance are achieved.

The Board of Directors of Niagara Mohawk Power Corporation has created the position of Executive Vice President - Nuclear Operations and has appointed Mr. Lawrence Burkhardt III to this position. As Executive Vice President - Nuclear Operations, Mr. Burkhardt assumes the authority and functions formerly performed by the Senior Vice President. In his new capacity, Mr. Burkhardt will be responsible for all aspects of Nuclear Engineering and Licensing and operation of Nine Mile Point Unit 2.

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 10 CFR 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.

The proposed amendment incorporates a management organizational change to improve the overall performance of Nine Mile Point Unit 2. The Corporation has identified Mr. Lawrence Burkhardt III as having the requisite skills and experience to substantially enhance Niagara Mohawk's nuclear management organization. Therefore, the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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 management organization change has been initiated to utilize the skills and knowledge of Mr. Lawrence Burkhardt III to enhance our management capabilities. The Board of Directors of Niagara Mohawk Power Corporation has created the position of Executive Vice President - Nuclear Operations and has designated Mr. Lawrence Burkhardt III as Executive Vice President - Nuclear Operations for Niagara Mohawk. As Executive Vice President - Nuclear Operations, Mr. Burkhardt assumes the authority and functions associated with Nine Mile Point Unit 2 formerly performed by the Senior Vice President. In his new capacity, Mr. Burkhardt will be responsible for all aspects of nuclear engineering, nuclear licensing, and operation of Nine Mile Point Unit 2. Therefore, the proposed amendment will not create the possibility of a new or different kind of accident.

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 change in the management organization is the result of Niagara Mohawk Power Corporation's determination to provide the highest level of management expertise and experience in the operation of Nine Mile Point Unit 2 nuclear facility and to insure that the goal of improved overall performance at Nine Mile Point Unit 2 is achieved. Therefore, this organizational change will not affect the margin of safety.

As determined by the analysis above, this proposed amendment involves no significant hazards consideration.

