

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

The existing pages 245, 252, 253, 254, 255, 258, 259 and 260 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 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 Executive Vice President - Nuclear Operations 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 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.

Alternates

- 6.5.1.3 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 in SORC activities at any one time.

Meeting Frequency

- 6.5.1.4 The SORC shall meet at least once per calendar month and as convened by the SORC Chairman.

Quorum

- 6.5.1.5 A quorum of the SORC shall consist of the Chairman and four members including alternates.

Responsibilities

- 6.5.1.6 The Site Operations Review Committee shall be responsible for:
- a. Review of all REPORTABLE EVENTS.
 - b. Review of unit 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 Executive Vice President - Nuclear Operations and to the Safety Review and Audit Board.

Authority

- 6.5.1.7 The Site Operations Review Committee shall:
- a. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (d) above constitutes an unreviewed safety question.
 - b. Provide immediate written notification 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 the responsibility for resolution of such disagreements pursuant to 6.1.1 above.

Records

- 6.5.1.8 The Site Operations Review Committee shall maintain written minutes of each meeting and 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 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.
- 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 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.

Activities (Cont'd)

- 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 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.
- 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 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.
- 6.5.2.6 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.

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Activities (Cont'd)

- 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 his 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 (SRAB)

Function

- 6.5.3.1 The Safety Review and Audit Board 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
 - i. (other appropriate fields associated with the unique characteristics of the nuclear power plant)

Audits

- 6.5.3.8 Audits of facility activities shall be performed under the cognizance of the SRAB. These audits shall encompass:
- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
 - b. The performance, training and qualifications of the entire facility staff at least once per year.
 - c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
 - d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10CFR50, at least once per two years.
 - e. The Facility Emergency Plan and implementing procedures at least once every 12 months.
 - f. The Facility Security Plan and implementing procedures at least once every 12 months.
 - g. The Facility Fire Protection Program and implementing procedures at least once per two years.
 - h. Any other area of facility operation considered appropriate by the SRAB or the Executive Vice President - Nuclear Operations.
 - i. The radiological environmental monitoring program and the results thereof at least once per 12 months.
 - j. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
 - k. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes at least once per 24 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 Section 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 30 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.3.7 e,f,g and h above, 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 Section 6.5.3.8 above, shall be forwarded to the Executive Vice President - Nuclear Operations within 90 days following completion of the review.

6.6 Reportable Occurrence Action

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Sections 50.72 and 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC and the results of this review submitted to the SRAB and the Executive Vice President - Nuclear Operations.

6.7 Safety Limit Violation

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

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit violation shall be reported to the Commission, the Executive Vice President - Nuclear Operations and to the SRAB immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. 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.

6.8 Procedures

- 6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33 except as provided in 6.8.2 and 6.8.3 below.
- 6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed and approved by the General Superintendent-Nuclear Generation or designee prior to implementation and periodically as set forth in each document.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

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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 1.

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 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 incorporates a management organizational change to improve the overall performance of Nine Mile Point Unit 1. 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 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 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 1 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 1. Therefore, the proposed amendment will 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 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 1 nuclear facility and to insure that the goal of improved overall performance at Nine Mile Point Unit 1 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.

