

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

The existing pages 245, 247, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261 and 270 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

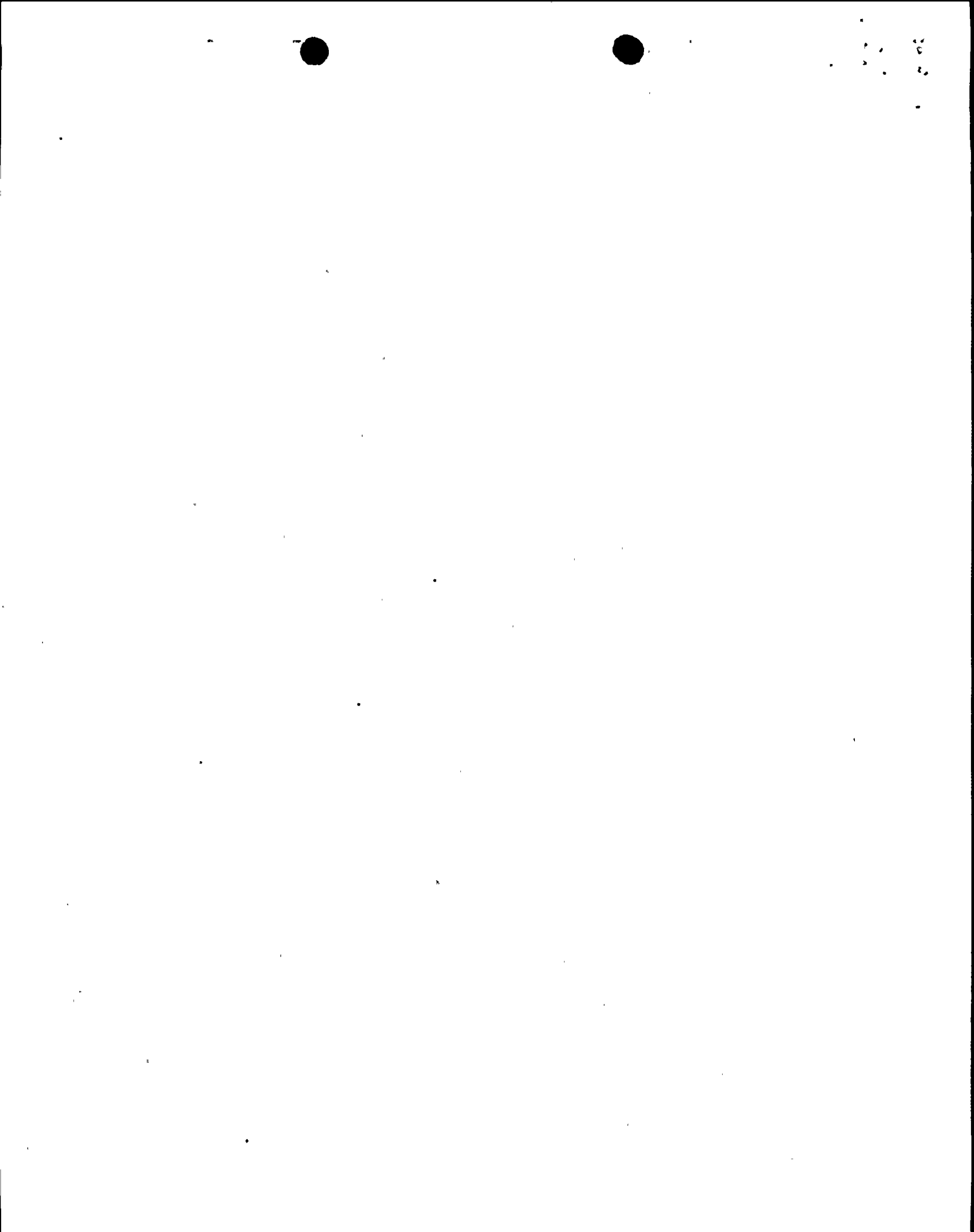
### 6.1 Responsibility

- 6.1.1 The Plant Manager 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 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 shall have corporate responsibility for overall plant nuclear safety. The Executive Vice President - Nuclear 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 Plant Manager shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the plant.

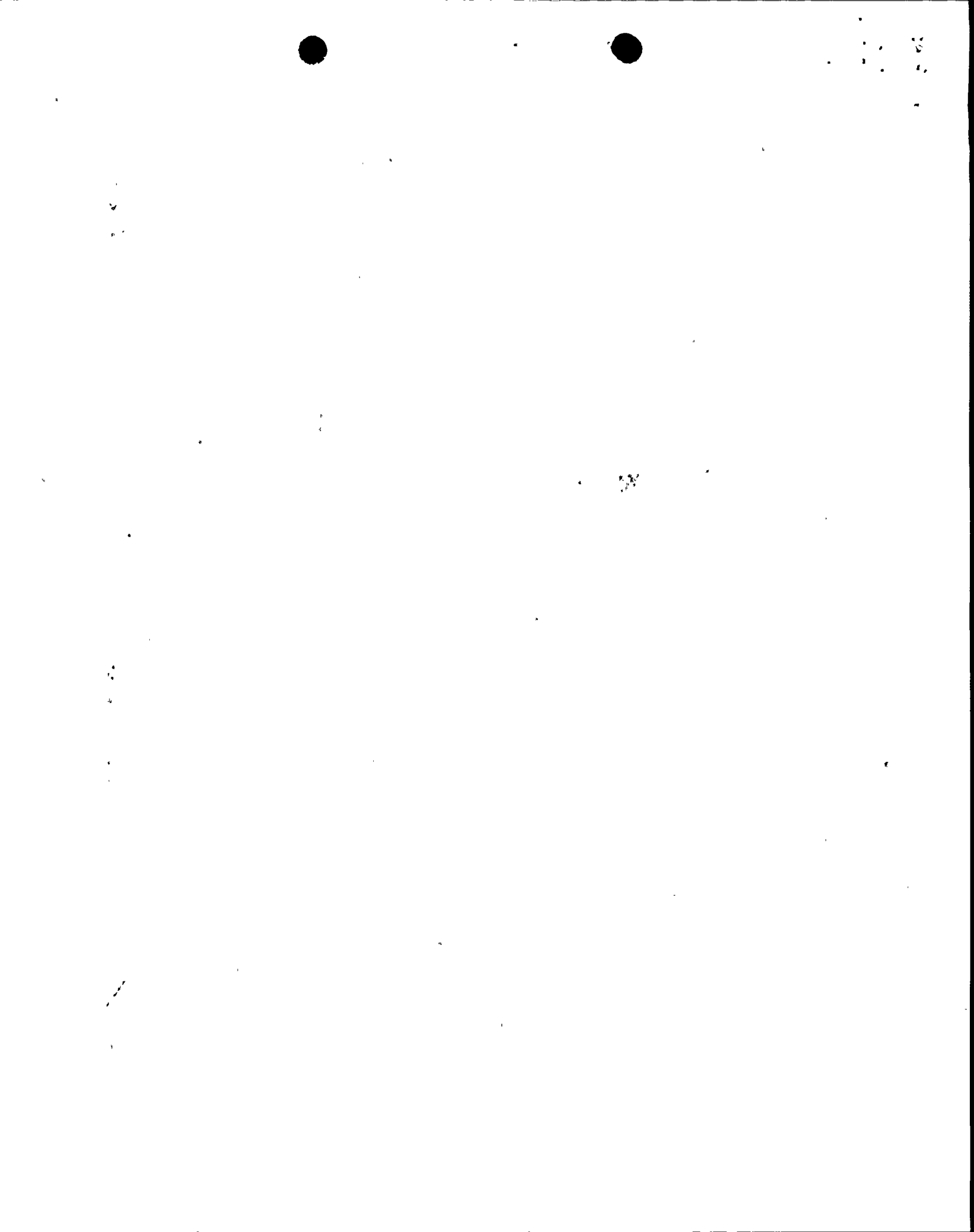


Facility Staff (Cont'd)

- 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 Manager, 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 to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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



### 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 Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and 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 Manager Training and shall meet or exceed the recommendations and requirements 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 Manager Training 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 Station Operations Review Committee (SORC)

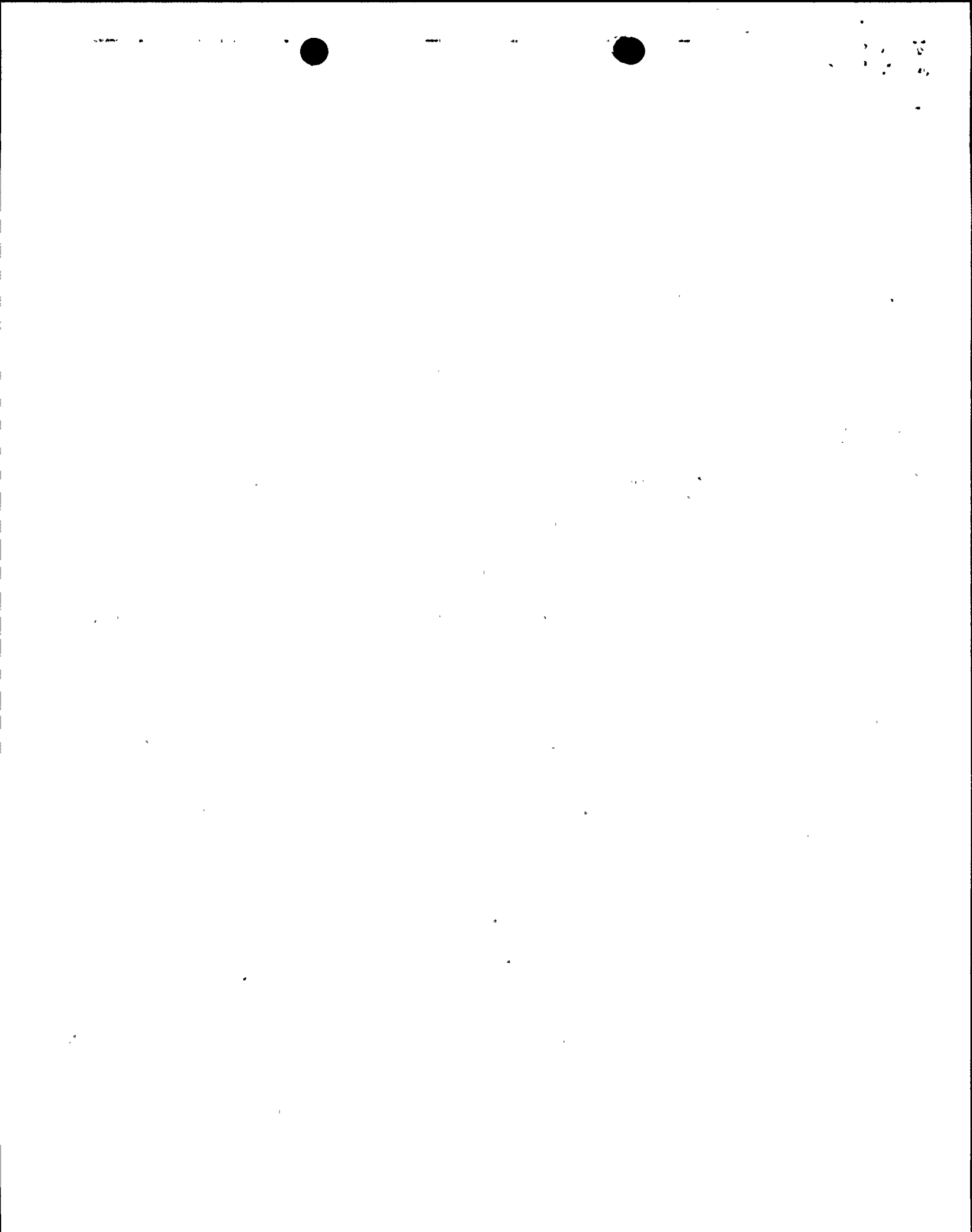
##### Function

6.5.1.1 The Station Operations Review Committee shall function to advise the Plant Manager on all matters related to nuclear safety.

##### Composition

6.5.1.2 The SORC shall be composed of the:

Chairman: Plant Manager  
Member: Manager Operations  
Member: Manager Maintenance  
Member: Manager Technical Support  
Member: Manager Health Physics  
Member: Manager Chemistry  
Member: Manager Radiation Protection  
Member: General Supervisor Instrument and Control Maintenance  
Member: General Supervisor System Engineering  
Member: General Supervisor Operations  
Member: Supervisor Reactor Engineering





### 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 or a designated alternate and five members including alternates.

### Responsibilities

- 6.5.1.6 The SORC 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 Plant Manager or 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 Vice President - Nuclear Generation and to the Safety Review and Audit Board.



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Authority

6.5.1.7 The SORC 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 written notification within 24 hours to the Vice President - Nuclear Generation and the Safety Review and Audit Board of disagreement between the SORC and the Plant Manager; however, the Plant Manager shall have the responsibility for resolution of such disagreements pursuant to 6.1.1 above.

Records

- 6.5.1.8 The SORC shall maintain written minutes of each meeting and copies shall be provided to the Vice President - Nuclear Generation 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 Plant Manager.



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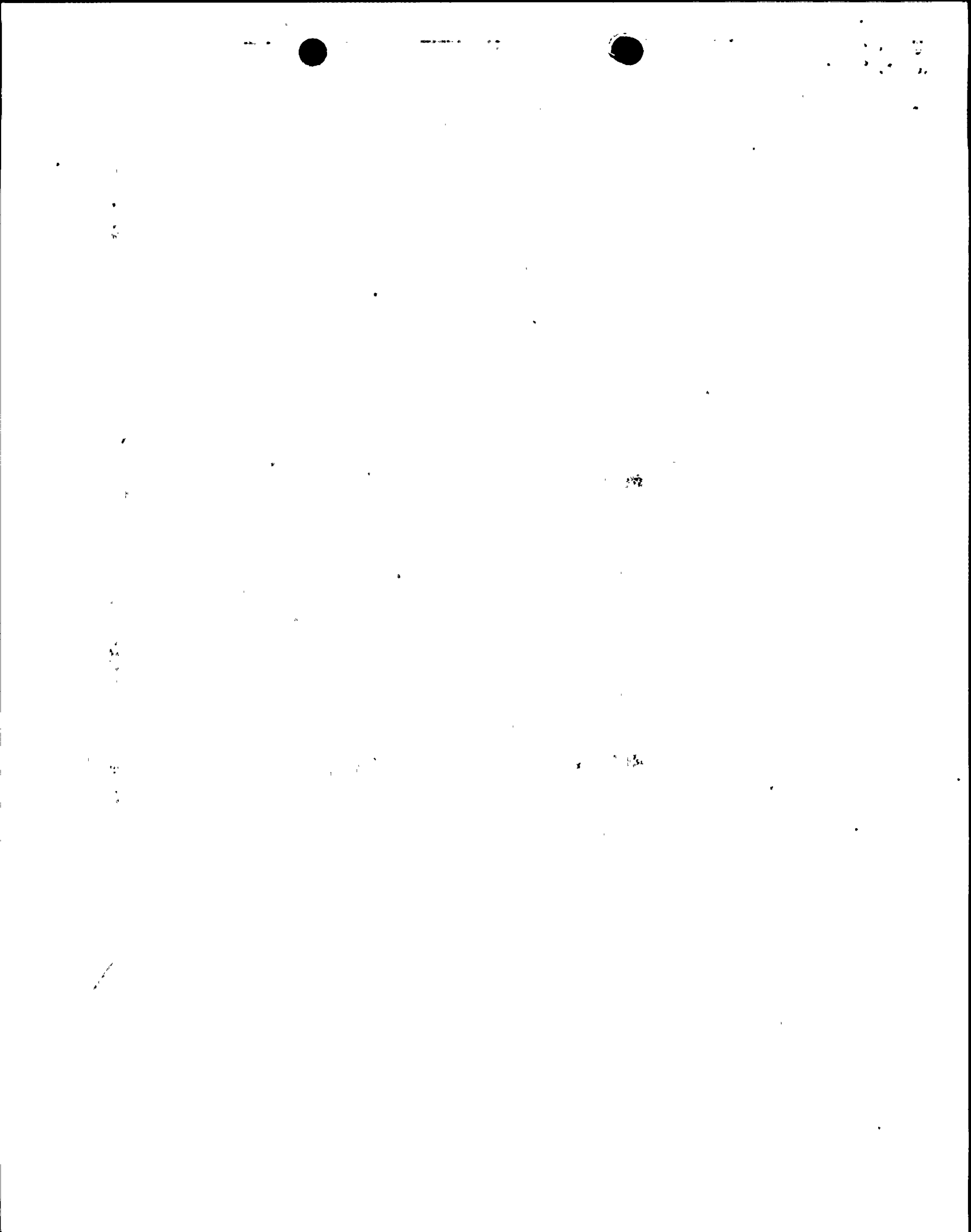
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Activities (Cont'd)

- 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 Plant Manager; or the Manager Technical Support as previously designated by the Plant Manager.
- 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 Plant Manager 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 Plant Manager, or the Manager Technical Support as previously designated by the Plant Manager.
- 6.5.2.6 The Plant Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President - Nuclear Generation.
- 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 Plant Manager and transmitted to the Vice President - Nuclear Generation 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 Plant Manager and transmitted to the Vice President - Nuclear Generation and to the Chairman of the Safety Review and Audit Board.



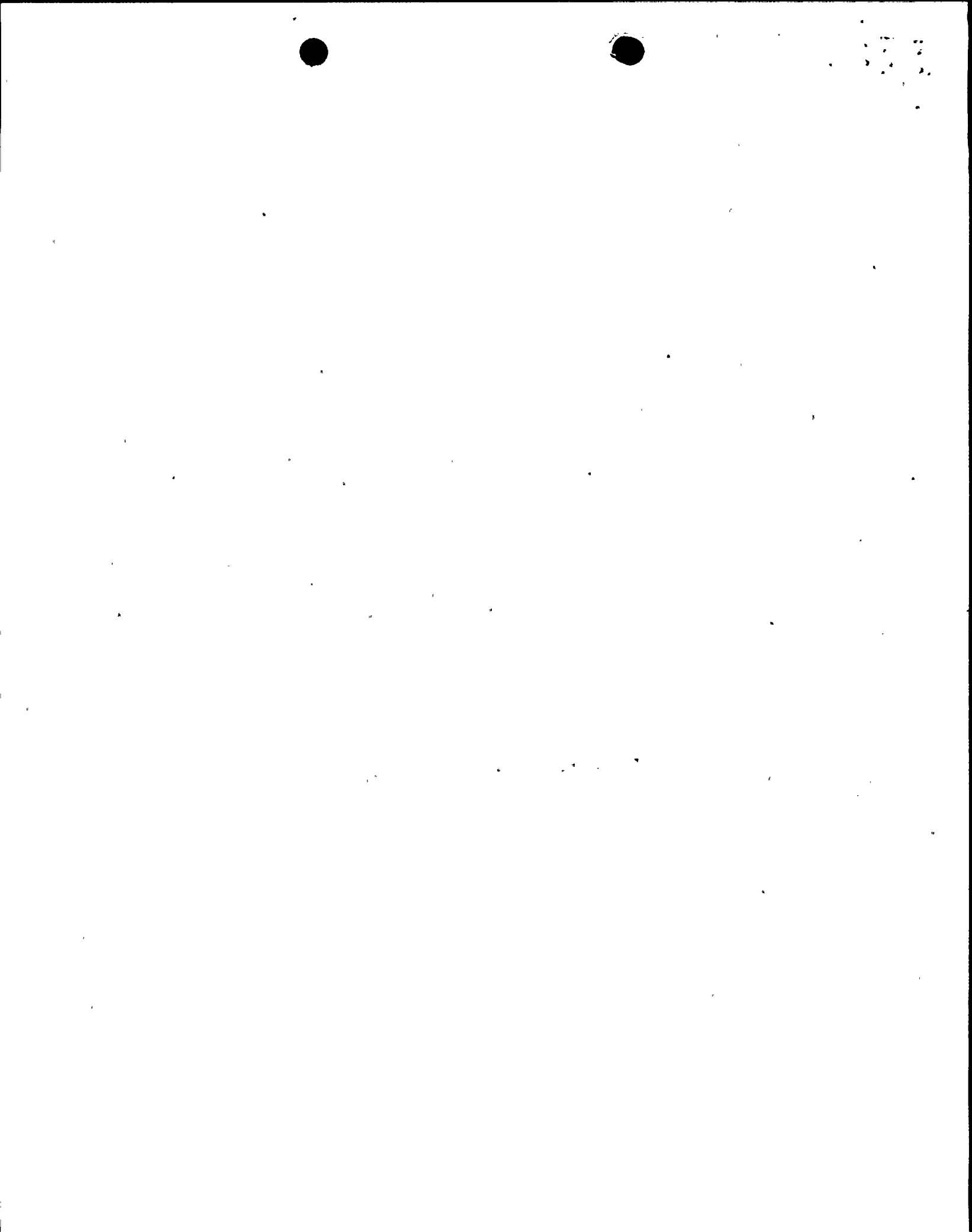
Activities (Cont'd)

- 6.5.2.9 The Plant Manager 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 Vice President - Nuclear Generation 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 Plant Manager 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 Vice President-Nuclear Generation 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)





Composition

6.5.3.2 The Safety Review and Audit Board shall be composed of the:

Chairman: Staff Engineer or Manager or Vice President  
Member: Plant Manager or Designee  
Member: Staff Engineer - Nuclear  
Member: Staff Engineer - Mechanical or Electrical  
Member: Consultant (See 6.5.3.4)

Alternates

6.5.3.3 Alternate members shall be appointed in writing by the SRAB Chairman to serve on a temporary basis; however, no more than two alternates shall participate in SRAB activities at any one time.

Consultants

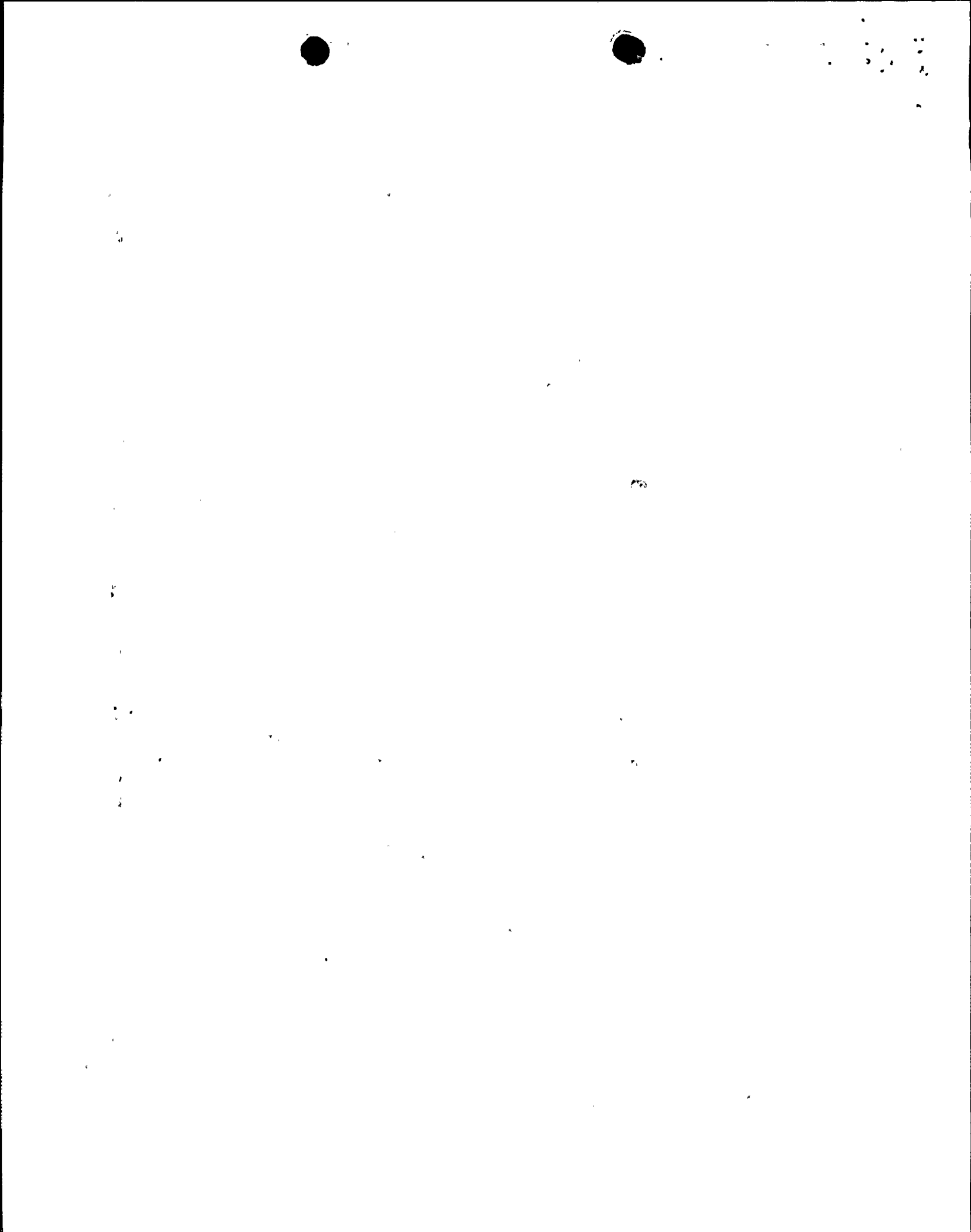
6.5.3.4 Consultants shall be utilized as determined by the SRAB Chairman to provide expert advice to the SRAB.

Meeting Frequency

6.5.3.5 The SRAB shall meet at least once per six months.

Quorum

6.5.3.6 The quorum of the SRAB necessary for the performance of the SRAB review and audit functions of these Technical Specifications shall consist of the Chairman or the Chairman's designated alternate and at least three SRAB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.



Review

6.5.3.7 The SRAB shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or operating license.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the SORC.



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## 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 Vice President - Nuclear Generation.
  - 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.



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Authority

6.5.3.9 The SRAB shall report to and advise the Executive Vice President - Nuclear 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 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 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 within 90 days following completion of the review.



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## 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 Vice President - Nuclear Generation.

## 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 NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President - Nuclear Generation and the SRAB shall be notified within 24 hours.
- 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 Vice President - Nuclear Generation 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 Plant Manager or designee prior to implementation and periodically as set forth in administrative procedures.



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## 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 Plant Manager 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.



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6.12 High Radiation Area (Continued)

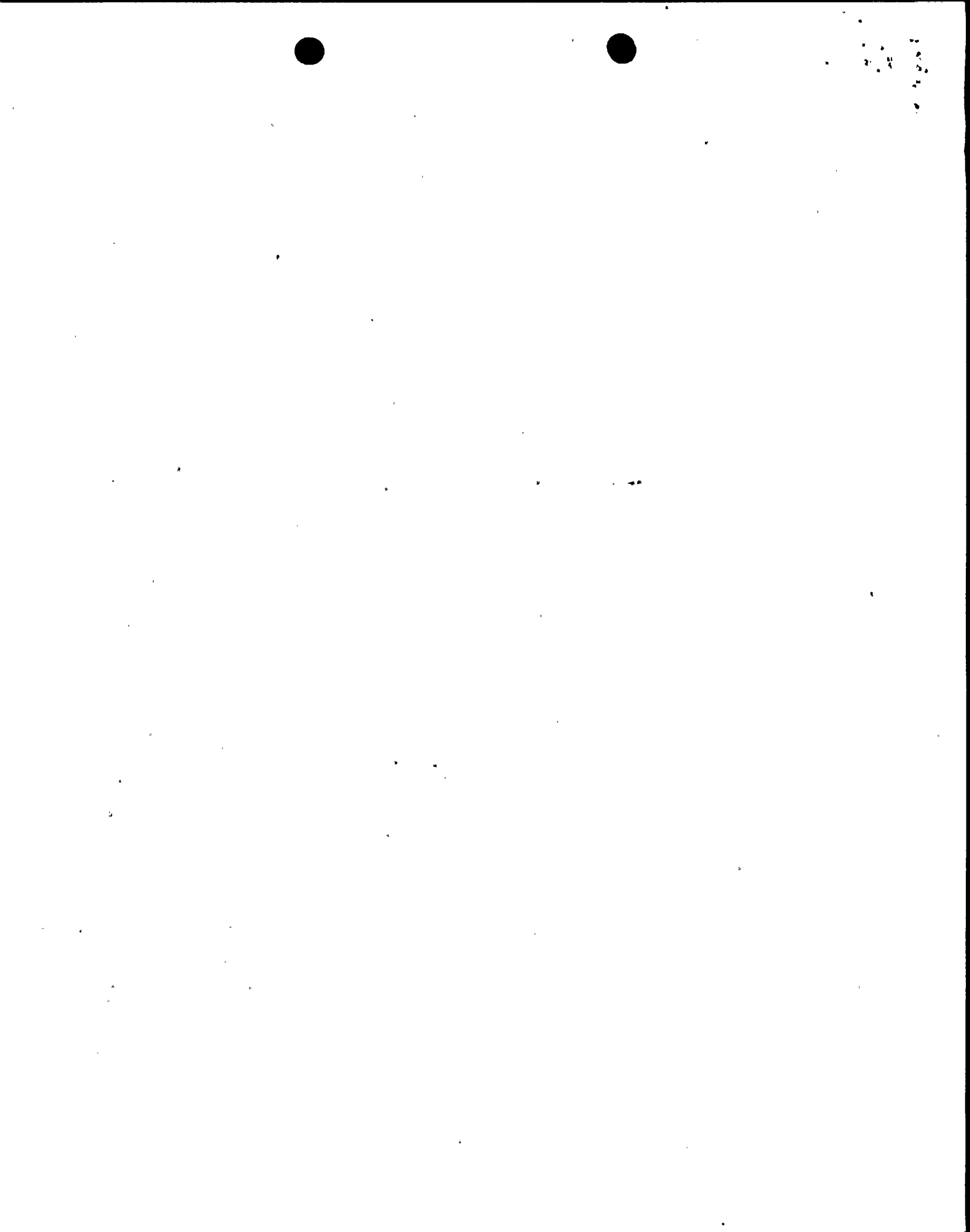
- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection, with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Manager Health Physics or designate in the Radiation Work Permit.

6.12.2 In addition to the requirements of 6.12.1 areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem\*\* shall be provided with locked doors\*\*\* to prevent unauthorized entry, and the hard keys or access provided by magnetic keycard shall be maintained under the administrative control of the Station Shift Supervisor or designate on duty and/or the Manager Health Physics or designate. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify in accordance with site approved procedures accordingly, the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote, such as use of closed circuit TV cameras, may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem\*\* that are located within large areas, such as the drywell, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

\* by accessible passage and permanently fixed ladders

\*\* measurement made at 18" from source of radioactivity

\*\*\* The requirement for locked doors to prevent unauthorized entry does not apply to areas which may temporarily exceed 1000 mrem/hr during the hydrogen water chemistry tests to be conducted during approximately a six-week period following startup from the spring 1986 refueling outage.



ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Supporting Information and No Significant Hazards Consideration Analysis

The proposed Technical Specification changes to Sections 6.1, 6.2, 6.4, 6.5, 6.6, 6.7, 6.8 and 6.12 are administrative in nature and are intended to provide consistency with NUREG-0123, "Standard Technical Specifications for General Electric Boiling Water Reactors" and to reflect management changes resulting from the reorganization of Niagara Mohawk's Nuclear Division.

The major changes in the Nuclear Division reorganization which impact the Administrative Controls Section of the Technical Specifications are: (1) The elimination of the position of General Superintendent-Nuclear Generation and the establishment of the position of Vice President-Nuclear Generation. The Vice President-Nuclear Generation reports to the Executive Vice President - Nuclear (formerly called Executive Vice President - Nuclear Operations) and is directly responsible for the safe and efficient operation of Nine Mile Point Units 1 and 2 and (2) the delegation of responsibility for overall unit operation and Station Operations Review Committee (SORC) Chairmanship from the General Superintendent-Nuclear Generation to the Plant Manager (formerly called Station Superintendent- Nuclear Generation).

The proposed change to Section 6.1, "Responsibility", provides for the Plant Manager to assume the responsibility for overall unit operation currently held by the General Superintendent - Nuclear Generation. The title of the Executive Vice President - Nuclear Operations has also been changed to Executive Vice President - Nuclear.

Changes are being proposed to Section 6.2, "Organization", such that the Plant Manager will now assume responsibility for overall unit operation currently held by the General Superintendent - Nuclear Generation. In addition, the authority to deviate from guidelines for limiting working hours of facility staff is being changed from the Plant Superintendent to the Plant Manager. The review of individual overtime on a monthly basis by the General Superintendent - Nuclear Generation is being changed such that procedural controls will assure that excessive hours have not been assigned. The titles of Superintendent Operations Nuclear and Assistant Superintendent Operations Nuclear in Section 6.2.2.j are being revised to the General Supervisor Operations and Supervisor Operations as a result of the Nuclear Division reorganization. The new title of Executive Vice President - Nuclear has also been reflected in Section 6.2.

The proposed changes to Section 6.4, "Training", reflect the title change from Superintendent-Training Nuclear to Manager Training resulting from the reorganization of the Nuclear Division.

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Section 6.5, "Review and Audit" is being proposed for change to revise the SORC. The title of the Site Operations Review Committee (SORC) in Section 6.5.1 is being changed to the Station Operations Review Committee to be consistent with the reorganization which is establishing distinct lines of authority and responsibility for Nine Mile Point Units 1 and 2 (unitizing). The acronym SORC is used thereafter in the Technical Specifications. Section 6.5.1.1 is being proposed for change such that SORC will advise the Plant Manager, rather than the General Superintendent-Nuclear Generation, on all matters relating to nuclear safety. Section 6.5.1.2 is being proposed for change to revise the composition of the SORC such that the Plant Manager assumes the responsibility of Chairman currently held by the General Superintendent - Nuclear Generation. In addition, the titles of SORC members are being revised to be consistent with the management positions of the reorganized Nuclear Division. The SORC membership will now consist of the Manager Operations, Manager Maintenance, Manager Technical Support, Manager Health Physics, Manager Chemistry, Manager Radiation Protection, General Supervisor Instrument and Control Maintenance, General Supervisor System Engineering, General Supervisor Operations and Supervisor Reactor Engineering. Although the titles of the individuals comprising SORC have changed, the same functional areas will be covered by the current composition of SORC members with the addition of the functional areas of Operations, System Engineering and Reactor Engineering.

Section 6.5.1.5 is being proposed for change such that a SORC quorum will consist of the Chairman or a designated alternate and five members rather than the Chairman and four members. This revision will ensure that the SORC quorum constitutes a majority.

Section 6.5.1.6c is being revised to allow the Plant Manager, in addition to the Safety Review and Audit Board (SRAB), to request that SORC perform special reviews, investigations or analyses and reports thereon. The requirement of Section 6.5.1.6d to forward reports of investigations of Technical Specification violations to the Executive Vice President - Nuclear Operations is being revised to the Vice President - Nuclear Generation. The requirement of Section 6.5.1.7b to provide immediate written notification to the Executive Vice President - Nuclear Operations and the SRAB of disagreements between SORC and the SORC Chairman is being revised to require written notification to the Vice President - Nuclear Generation and the SRAB within 24 hours. Section 6.5.1.8 is being revised to require that written minutes of each SORC meeting be provided to the Vice President - Nuclear Generation instead of the Executive Vice President - Nuclear Operations. Sections 6.5.3.9 and 6.5.3.10 are being revised to reflect the new title of Executive Vice President - Nuclear.

The administrative responsibilities in Section 6.5.2, "Technical Review and Control", currently held by the General Superintendent - Nuclear Generation will now be assumed by the Plant Manager. Section 6.5.2 is also being proposed for revision to transfer those administrative responsibilities currently held by the Executive Vice President - Nuclear Operations to the Vice President - Nuclear Generation and to change the title of the Technical Superintendent - Nuclear Generation to the Manager Technical Support.



The composition of SRAB in Section 6.5.3.2 is being proposed for change such that the Plant Manager or designee will replace the General Superintendent - Nuclear Generation as a member. The SRAB composition is also being changed to eliminate the position of Staff Engineer - Environmental as a member. The position of Staff Engineer - Environmental was added to the SRAB membership to address environmental concerns during the construction and startup phases of Nine Mile Point Unit 2. Since Nine Mile Point Unit 2 is now in operation, the need for an environmental staff engineer as a full time SRAB member is no longer required. An alternate member will be designated by the SRAB Chairman to represent the environmental functional area when necessary. The quorum of SRAB in Section 6.5.3.6 is being proposed for revision from the current requirement of the Chairman or his designated alternate and a majority of SRAB members to the Chairman or his designated alternate and at least three SRAB members. Additional administrative changes regarding SRAB include the removal from Section 6.5.3.7e of "violations of applicable statutes" as requiring SRAB review and the responsibility for designating SRAB audits in Section 6.5.3.8h from Executive Vice President - Nuclear Operations to Vice President - Nuclear Generation.

Section 6.6, "Reportable Occurrence Action", is being proposed for change such that the results of reviews of reportable events will be submitted to the Vice President - Nuclear Generation rather than the Executive Vice President - Nuclear Operations.

Section 6.7, "Safety Limit Violation", is being proposed for change from the requirement to immediately notify the Commission, the Executive Vice President - Nuclear Operations and the SRAB of a safety limit violation, to notify the NRC Operations Center by telephone as soon as possible and in all cases within 1 hour and to notify the Executive Vice President - Nuclear Operations and the SRAB within 24 hours. An additional change involves the submittal of Safety Limit Violation Reports to the Vice President - Nuclear Generation rather than the Executive Vice President - Nuclear Operations.

Section 6.8, "Procedures", is being proposed for change such that the review and approval of procedures, including changes, currently performed by the General Superintendent - Nuclear Generation will now be assumed by the Plant Manager. The current wording of Section 6.8.2 which requires the review and approval of procedures "periodically as set forth in each document" is being revised to read "periodically as set forth in administrative procedures".

Section 6.12, "High Radiation Area", is being proposed for change such that the administrative functions of the Radiation Protection Supervisor will now be performed by the Manager Health Physics. This change is consistent with the revised functional responsibilities of the Nuclear Division reorganization.

The changes in the management organization of the Nuclear Division are the result of Niagara Mohawk's determination to provide the highest level of management expertise in the operation of the Corporation's nuclear facilities and to assure that the goals of improved overall performance are achieved. The reorganization was designed to reduce the span of control for management in order to streamline and improve communication within the Nuclear Division organization. The new organization establishes clearer functional lines of responsibility, eliminates redundant functions and reduces situations where work performed by one group must be forwarded to another group which reports



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to a different part of the organization. The reorganization reflects Niagara Mohawk's effort to establish distinct lines of authority and responsibility for Nine Mile Point Units 1 and 2 in order to unitize operations. These changes are also intended to provide consistency with the Administrative Controls Section of the Nine Mile Point Unit 2 Technical Specifications. The proposed changes will also enhance our overall management capability by freeing up senior level people from administrative responsibilities.

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 changes are intended to enhance the overall management capability and performance of Nine Mile Point Unit 1 by freeing up senior level people from administrative responsibilities. These changes also reflect Niagara Mohawk's intent to provide the highest level of management expertise and experience in the Nuclear Division and to assure that the goals of improved overall performance are achieved.

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed 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, the proposed administrative changes to the Technical Specifications will not affect the margin of safety.

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