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AUTH. NAME: ABBOTT, R. B. AUTHOR AFFILIATION: Niagara Mohawk Power Corp.  
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SUBJECT: Forwards application for amend to license DPR-63 & proposed change to TS.W/supporting info.

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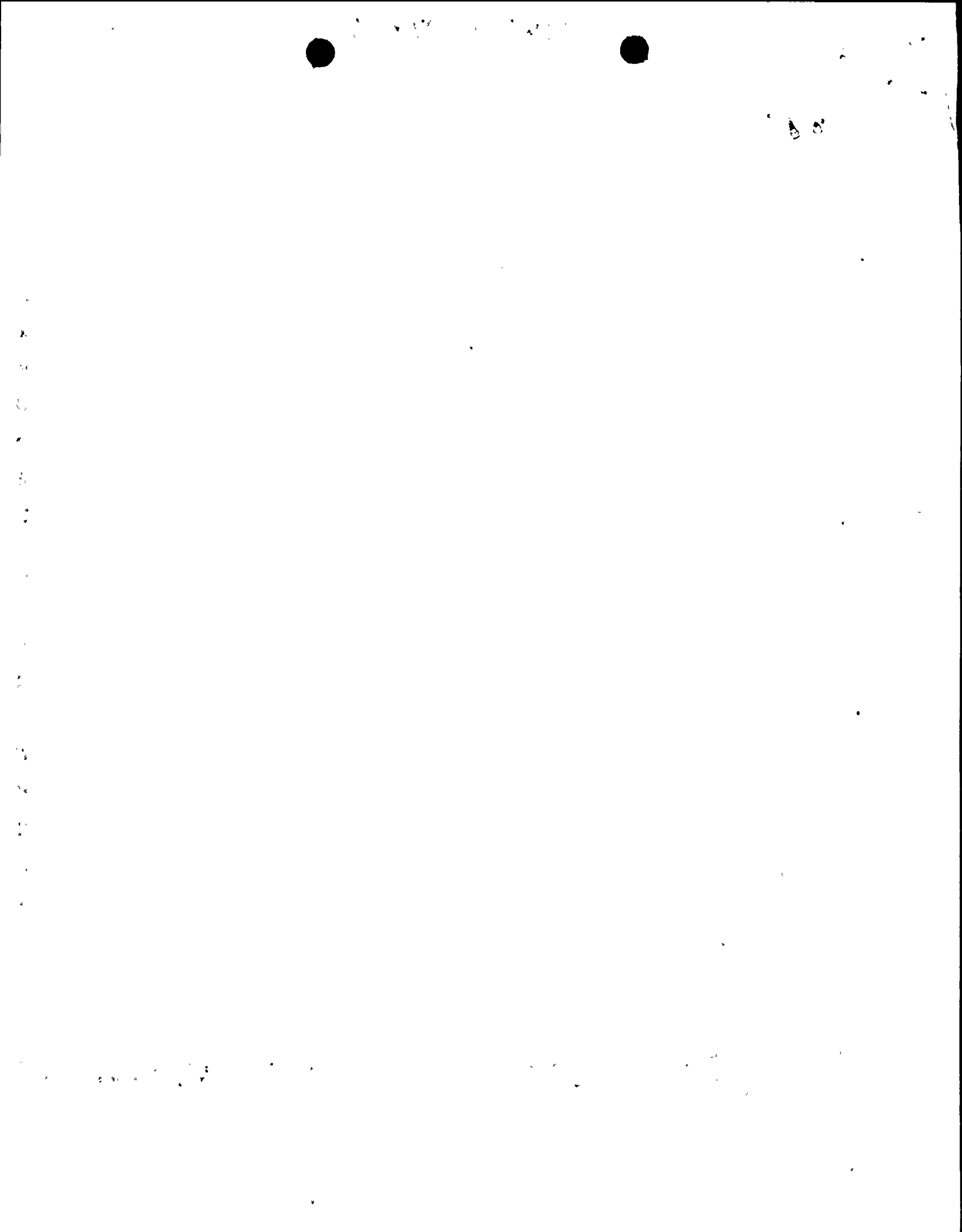
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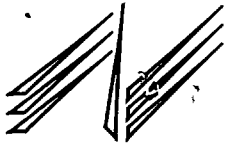
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NIAGARA MOHAWK

GENERATION  
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093/TELEPHONE (315) 349-1812  
FAX (315) 349-4417

May 16, 1997  
NMP1L 1221

RICHARD B. ABBOTT  
Vice President and  
General Manager - Nuclear

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: Nine Mile Point Unit 1  
Docket No. 50-220  
DPR-63

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) hereby transmits an Application for Amendment to Nine Mile Point Unit 1 (NMP1) Operating License DPR-63. Also enclosed as Attachment A is the proposed change to the NMP1 Technical Specifications (TS) set forth in Appendix A of the above mentioned license. A marked copy of the affected current NMP1 TS page is provided as Attachment D of our application to assist your review. Supporting information and analyses which demonstrate that the proposed change involves no significant hazards consideration pursuant to 10CFR50.92 are included as Attachment B. The basis for concluding that this request meets the criteria of 10CFR51.22 for categorical exclusion from performing an environmental assessment is included as Attachment C. An explanation of why NMPC considers that this request should be processed as an exigent request is provided as Attachment E.

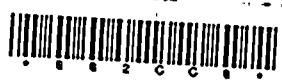
Nine Mile Point Senior Management review of recent performance of NMP1 has identified the need for additional management oversight of NMP1 Operations in the areas of operator training and performance enhancement. NMP1 eliminated both the General Supervisor Operations (GSO) and the Supervisor Operations positions in December 1996 by implementation of NMP1 TS amendment #158. Reestablishment of the GSO position will serve to enhance the oversight of operations through a redistribution of responsibilities between the Manager Operations and the proposed GSO position. The proposed NMP1 TS change contained herein represents a revision to the administrative controls contained within NMP1 TS Sections 6.2.2.i.

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NMP1 TS Section 6.2.2.i currently states, "The Manager Operations, Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear shall hold senior reactor operator licenses." The proposed change revises this section to state, "As a minimum, either

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the Manager Operations or the General Supervisor Operations shall hold a senior reactor operator license. The Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear shall hold senior reactor operator licenses."

The proposed change reflects NMP1's intention to restructure the NMP1 Operations organization for effectiveness and efficiency. While the specific job functions of the Manager Operations will be redistributed, the Manager Operations still retains responsibility for the oversight and direction of NMP1 Operations. The requirements for either the Manager Operations or the General Supervisor Operations to have a senior reactor operator license, and that only the licensed individual(s) may direct the licensed activities of licensed operators, ensures that the requirements for experience and training for Operations management personnel are maintained.

The proposed change is consistent with the Standard Review Plan (SRP) 13.1.1-13.1.3 and ANSI N18.1-1971. It is also consistent with NMP1 TS Section 6.2.1.a with respect to lines of authority and responsibility, and communication.

Similar amendment requests by Arizona Public Service (approved October 24, 1988) and Washington Public Power Supply System (approved April 6, 1992) have previously been approved by the NRC Staff.

NMPC requests that the proposed change to the NMP1 TS be instated as soon as possible to be proactive in correcting potential obstacles to improvement in NMP1 operation. Niagara Mohawk believes that the normal amendment process, requiring a public posting and comment period, would result in a delay that may have significance for NMP1 operations. For these reasons NMPC requests that this TS amendment application be considered as an exigent request in order to allow the reorganization of NMP1 Operations to be completed in a timely manner. NMPC feels that the reduced period of time for public comment will still allow adequate time for external review of this change to the Administrative Controls Section of the NMP1 TS.

Pursuant to 10CFR50.91(B)(1), Niagara Mohawk has provided a copy of this license amendment and the associated analyses regarding no significant hazards consideration to the appropriate state representative.

Very truly yours,



R. B. Abbott

Vice President and General Manager - Nuclear

RBA/KLL/cmK  
Attachments



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xc: Mr. H. J. Miller, NRC Regional Administrator  
Mr. S. S. Bajwa, Acting Director, Project Directorate, I-1, NRR  
Mr. B. S. Norris, Senior Resident Inspector  
Mr. D. S. Hood, Senior Project Manager, NRR  
Mr. J. P. Spath  
    NYSERDA  
    2 Empire Plaza, Suite 1901  
    Albany, NY 12223-1253  
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