

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

Replace the existing page 349 and with the attached revised page 349. The page has been retyped in its entirety with marginal markings to indicate changes.

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h. Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an 8 to 12 hour day, nominal 40-hour week while the facility is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications on a temporary basis, the following guidelines shall be followed:

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

i. As a minimum, either 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.



ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Supporting Information and No Significant Hazards Consideration Analysis

INTRODUCTION

The proposed Nine Mile Point Unit 1 (NMP1) Technical Specifications (TS) change contained herein represents a revision to NMP1 TS Sections 6.2.2.i.

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 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."

NMP1 eliminated both the General Supervisor Operations (GSO) and the Supervisor Operations positions in December 1996 by implementation of NMP1 TS amendment #158. 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. NMPC promptly prepared the TS amendment request presented in this submittal to address this issue once an appropriate course of action was developed. 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.

NMPC believes the proposed change to the NMP1 TS should be instated as soon as possible to address the identified weaknesses. This will allow NMPC to be proactive in correcting potential obstacles to improvement in NMP1 operations. Niagara Mohawk also believes that the normal amendment process, requiring a public posting and comment period, would result in a delay that may have detrimental significance on 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 to NMP1 TS.

This proposed change, which will in effect reestablish the position of GSO, requires either the Manager Operations or the GSO to have a Senior Reactor Operator (SRO) license. Therefore, the proposed change is consistent with ANSI N18.1-1971 and the Standard Review Plan (SRP) 13.1.1-13.1.3.



Similar amendment requests submitted by nuclear utilities were approved by the NRC Staff for Arizona Public Service (approved October 24, 1988) and Washington Public Power Supply System (approved April 6, 1992).

ANALYSIS

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. 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.

Adding the position to the NMP1 Operations organization will enable more thorough managerial review of back-shift or non-normal working hours operations. It will also allow Operations management to give more attention to both emerging issues and long range Operations training oversight. Establishment of the position will provide for a broader management review of operational events and operations trends in order to determine an effective future strategy for continued improvement in overall NMP1 Operations performance.

The GSO will interface directly with both the Manager Operations and the Station Shift Supervisors (SSSs), and will communicate the expectations of the Manager Operations to operating shifts. During periods when the Manager Operations is not available, either the GSO or another person who meets or exceeds the position requirements will be designated to serve as Manager Operations. The Manager Operations retains overall authority and responsibility for the oversight of NMP1 Operations. The GSO will report directly to the Manager Operations and will assume responsibilities delegated by the Manager Operations. Examples of some of the functions which may be fully or partially delegated to the GSO include routine personnel scheduling, coordination of training, work planning, attending various management meetings, project-related work or tasks, and preparation of routine communications such as "night orders" to provide information to oncoming shifts. A more detailed listing of the basic responsibilities of the Manager Operations and GSO follows.

The basic responsibilities of the Manager Operations are established by Nine Mile Point Nuclear Station generation administrative procedures. Some of the responsibilities may be delegated to the GSO or to qualified off-shift SROs. These responsibilities will remain the basic responsibilities of the Manager Operations. Activities that may require the direction of licensed activities or licensed operators will only be performed if the Manager Operations holds an SRO license. If the Manager Operations does not hold an SRO license, those responsibilities will be met by the GSO. A listing of the basic responsibilities follows. Those tasks requiring an SRO license are so identified.

- Report directly to and be responsible to the Plant Manager.
- Establish and maintain the Operations branch organization and staff.
- Develop, implement, and coordinate programs and policies that ensure safe and reliable station operations.
- Provide overall guidance and direction to the Operations branch.
- Interface with other branch managers, as necessary, to coordinate joint activities and effect safe, reliable maintenance and operation of the unit.



- Foster principles of adherence to procedures, attention to detail, and maintaining a questioning attitude in all activities.
- Keep the Plant Manager advised of technical and administrative concerns and provide recommended actions.
- Designate activities performed by Shift Operations, Reactor Engineering, Operations Support, and Radwaste sections at NMP1.
- If the GSO does not hold an SRO license; direct the actions of the operating shift through the on-duty SSS (SRO License required).
- Ensure branch personnel are properly trained and qualified.
- Maintain familiarity with the requirements of regulatory agencies relative to station operations. Prepare or supervise the preparation of the necessary reports for these agencies, as directed.
- In accordance with the TS, is a Vice Chairman/Member of the Station Operations Review Committee (SORC).
- When designated, may act as Plant Manager in the Plant Manager's absence.
- Ensure the acceptable performance of reactor engineering; including core management and Special Nuclear Material accountability, storage, utilization, and disposition.
- Perform an annual review of SSS responsibilities to identify administrative functions that detract from or are subordinate to the management responsibility for safe operation of the station, and submit proposed changes to the Vice President and General Manager - Nuclear for approval (SRO License required).
- Establish Operations branch goals and objectives to support station goals.
- Provide oversight of the Operations Training Program.

The basic responsibilities of the GSO will be established by Nine Mile Point Nuclear Station generation administrative procedures. These responsibilities were formerly the responsibilities of the Manager Operations, who delegated some of them to the off-shift SSSs. Many of these responsibilities will be delegated directly to the GSO as part of the implementation of the proposed change. Some of these responsibilities may in turn be delegated by the GSO to qualified off-shift SROs. These responsibilities include the following (NOTE: Those activities that may require the direction of licensed activities of licensed operators will only be performed if the GSO holds an SRO license. If the GSO does not hold an SRO license, those responsibilities will be met by the Manager Operations, or by an off-shift SRO, who in this case will hold an SRO license).

- Report directly to the Manager Operations.
- Direct the actions of the operating shift through the on-duty SSS (SRO License required).
- Ensure strict compliance with the technical specifications (SRO License required). If the GSO does not hold an SRO license, the Manager Operations will perform this function.
- Function as the Manager Operations in the absence of the Manager Operations, as required.
- Establish regular review of required operating logs and records.
- Supervise the preparation of operating reports to ensure completeness, accuracy, and timeliness.
- Develop and communicate performance expectations to supervised personnel.



- Ensure the status of personnel qualifications and performance is maintained.
- Monitor development and implementation of on-the-job training (OJT) programs and provide guidance and direction to the Nuclear Training Department to ensure:
 1. Content of training and retraining programs (including Emergency Plan and Emergency Operating Procedures) for operating personnel provides a highly qualified and efficient operating force.
 2. Qualified replacement personnel are available when vacancies occur.
- Ensure the supervised personnel receive training in appropriate radiological protection practices, procedures, and ALARA principles.
- Promote safe working conditions and practices by ensuring supervised personnel receive required instructions concerning industrial safety.
- Ensure strict compliance with procedures, policies, regulations, and the TS.
- Implement the Shift Operations Self Assessment Program.
- Ensure performance of assigned surveillance and preventive maintenance activities in accordance with the Preventive Maintenance/Surveillance Test (PM/ST) schedule.
- Ensure equipment status control is maintained, and the equipment markup program is implemented properly.
- Ensure that the Operations staff is prepared to:
 1. Start up the unit and bring it to full power in a timely manner.
 2. Shut down the unit in a safe manner, if required.
 3. Operate the station in a safe reliable manner when at power and during transients.

An SRO License is required to perform the above functions.

- Ensure that startup and operational testing is performed correctly (SRO License required). If the GSO does not hold an SRO license, this function will be the responsibility of the Manager Operations.
- Issue written SSS instructions (SRO License required).

The change is administrative in that the manner in which the plant systems are operated is not altered, and involves the redistribution of Operations department management responsibilities in support of NMP1 efforts to restructure the nuclear organization for efficiency and effectiveness. There will be no changes to general operating shift composition, which is controlled by the NMP1 TS. All minimum education and experience requirements for the positions of Manager and GSO, as outlined in ANSI N18.1-1971, will be met by the personnel appointed to those positions. However, while the specific job functions of the position of Manager Operations have been redistributed, the Manager Operations still retains responsibility for oversight and direction of NMP1 Operations.

NMP1 Technical Specification 6.2.1.a. and the Nine Mile Point Nuclear Station generation administrative procedures require distinct lines of authority, responsibility, and



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communication. Those criteria are still met. In addition, the positions meet the SRO license criteria established by ANSI N18.1-1971 and the SRP 13.1.1-13.1.3. The NMP1 FSAR and the appropriate NMPC administrative procedures will be revised to ensure that only the licensed individual(s) may direct the licensed activities of licensed operators. This ensures that the appropriate standards for Operations management experience and training are maintained.

NMPC requests that the NRC consider this submittal an exigent TS amendment request. It is believed that prompt approval of the proposed change is necessary in order to allow NMP1 to be proactive in dealing with issues that may be restricting the effectiveness of NMP1 Operations. 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 to the NMP1 TS.

CONCLUSIONS

The proposed change is a proactive action being taken to enable the NMP1 Operations organization to apply increased management attention to both conduct of day-to-day operations and Operations training issues. The proposed change meets the requirements of the SRP and ANSI N18.1-1971 with respect to Operations management qualifications and experience.

The change is administrative in that the manner in which the plant systems are operated is not altered. This change is similar to amendment requests by other nuclear utilities that were previously approved by the NRC Staff.

Environmental Consideration

In accordance with 10CFR51.22, Attachment C contains a statement of categorical exclusion.

No Significant Hazards Consideration Analysis

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10CFR50.92 concerning the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91, the following analyses have been performed with respect to the requested change.

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 addition of the position of GSO and the requirement for either the GSO or the Manager Operations to have an SRO license is a restructuring of the Operations department. The proposed changes are administrative changes that provide additional Operations management oversight capabilities. The resulting organization meets the requirements of ANSI N18.1-1971 and SRP 13.1.1-13.1.3. No physical modification of the plant is involved and no changes to the methods in which plant systems are operated are required.



None of the precursors of previously evaluated accidents are affected, and no new failure modes are introduced. Therefore, this change 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 addition of the position of GSO and the requirement for either the GSO or the Manager Operations to have an SRO license is a restructuring of the Operations department. The proposed changes are administrative changes that provide additional Operations management oversight capabilities. The resulting organization meets the requirements of ANSI N18.1-1971 and SRP 13.1.1-13.1.3. No physical modification of the plant is involved and no changes to the methods in which plant systems are operated are required. As such, the change does not introduce any new failure modes or conditions that may create a new or different accident. Therefore, this change does not in itself create the possibility of a new or different kind of accident from any accident previously evaluated.

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 addition of the position of GSO and the requirement for either the GSO or the Manager Operations to have an SRO license is a restructuring of the Operations department. The proposed changes are administrative changes that provide additional Operations management oversight capabilities. The resulting organization meets the requirements of ANSI N18.1-1971 and SRP 13.1.1-13.1.3. No physical modification of the plant is involved and no changes to the methods in which plant systems are operated are required. As such, this change does not in itself adversely affect any physical barrier to the release of radiation to plant personnel or to the public. Therefore, the change does not involve a significant reduction in a margin of safety.



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ATTACHMENT C

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Eligibility for Categorical Exclusion

10CFR51.22 provides criteria for, and identification of, licensing and regulatory actions eligible for exclusion from performing an environmental assessment. Niagara Mohawk has reviewed the proposed amendment and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(10). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment.



ATTACHMENT D

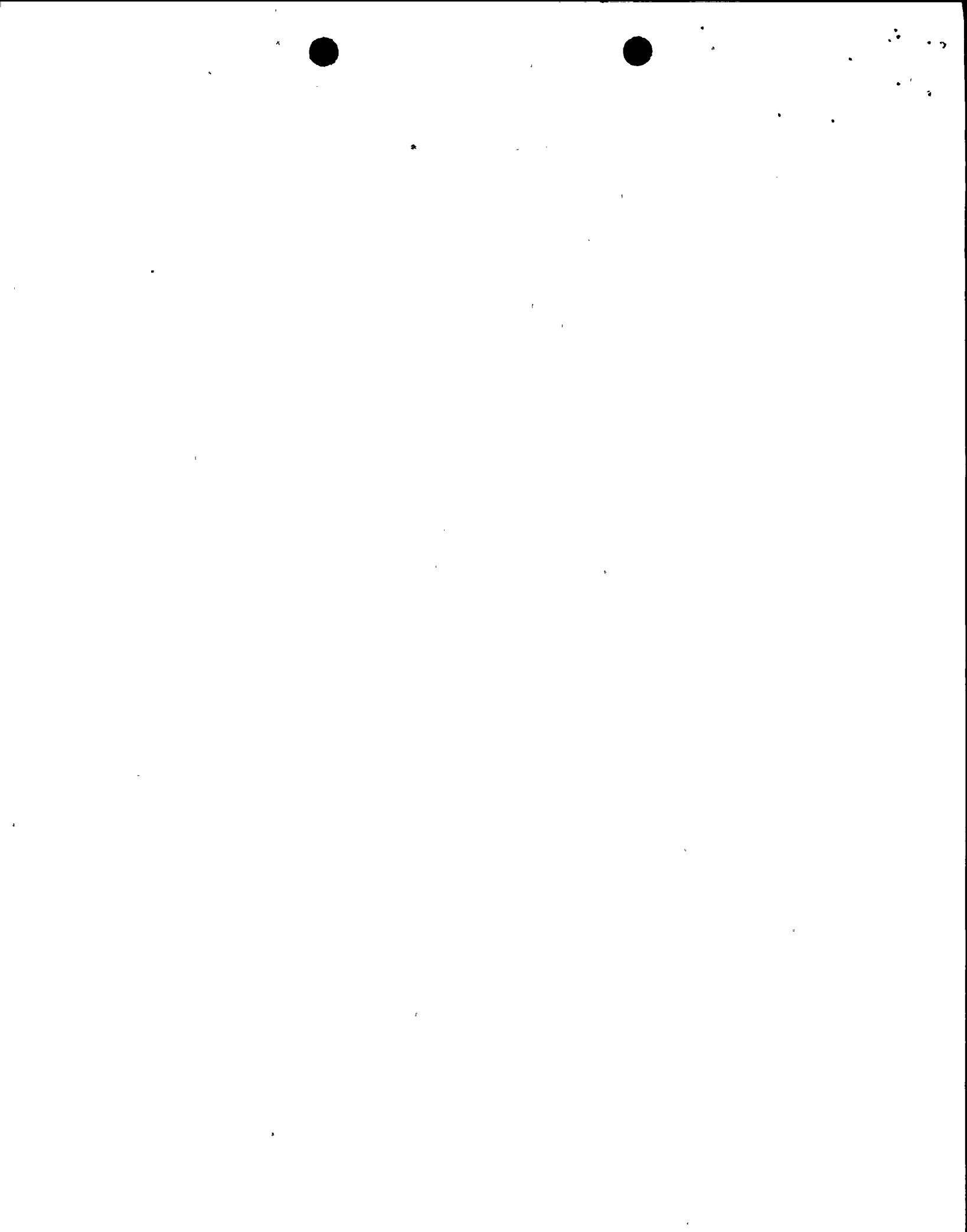
NIAGARA MOHAWK POWER CORPORATION

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Marked Copy of Proposed Changes to Current Technical Specification

The current version of page 349 of the NMP1 Technical Specifications has been hand marked-up to reflect the proposed changes.



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- i. ^{or the General Supervisor Operations shall hold a senior reactor operator license. The} The Manager Operations, Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear shall hold senior reactor operator licenses.



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ATTACHMENT E

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Request for Exigent Consideration

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NMPC believes that the GSO position should be reinstated at NMP1 as soon as possible to help address the identified weaknesses. This will allow NMPC to be proactive in correcting potential obstacles to improvement in NMP1 operations. Niagara Mohawk also 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.



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