

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

Replace the existing pages 349 and 351 with the attached revised pages. The pages have been retyped in their 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.



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 Manager Operations who, in lieu of meeting the senior reactor operator license requirements of ANSI N18.1-1971, shall 1) hold a senior reactor operator license at the time of appointment, or 2) have held a senior reactor operator license at Nine Mile Point Nuclear Station Unit 1 or at a similar unit, or 3) have been certified for equivalent senior reactor operator knowledge; the Manager Radiation Protection 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 of 10CFR Part 55, and shall include familiarization with relevant industry operational experience.

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)

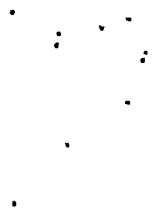
Function

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:

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| Chairman: | Plant Manager |
| Vice Chairman/Member: | Manager Operations |
| Vice Chairman/Member: | Manager Technical Support |
| Member: | Manager QA Operations |
| Member: | Manager Maintenance |
| Member: | Manager Chemistry |
| Member: | Manager Radiation Protection |



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 changes to the Nine Mile Point Unit 1 (NMP1) Technical Specifications (TS) contained herein represent revisions to NMP1 TS Sections 6.2.2i and 6.3.1.

NMP1 TS Section 6.2.2i currently states, "The Manager Operations, Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear shall hold senior reactor operator licenses." The proposed change to TS Section 6.2.2i 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 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 NMP1 Operations.

NMP1 TS Section 6.3.1 currently states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Manager Radiation Protection 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." The proposed change also revises NMP1 TS Section 6.3.1 to state, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for; the Manager Operations who, in lieu of meeting the senior reactor operator license requirements of ANSI N18.1-1971, shall 1) hold a senior reactor operator license at the time of appointment, or 2) have held a senior reactor operator license at Nine Mile Point Nuclear Station Unit 1 or at a similar unit, or 3) have been certified for equivalent Senior Reactor Operator knowledge; the Manager Radiation Protection 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



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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."

The proposed changes, which will reestablish the position of GSO, require either the Manager Operations or the GSO to have a Senior Reactor Operator (SRO) license. Additional restrictions on minimum qualifications for Manager Operations experience and knowledge have been proposed in order to ensure that the proposed change is consistent with the intent of 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). The GSO will meet the qualifications required by ANSI N18.1-1971 for the Operations Manager, including the requirement to have an SRO License at the time of appointment.

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 NMP1 Operations.

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. 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 established by the Nine Mile Point Nuclear Station generation administrative procedures. In addition, specific tasks may be delegated to the GSO by the Manager Operations. Examples of some of the tasks or functions which may be fully or partially assigned 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. Although some tasks in support of these responsibilities may be assigned to the GSO or to qualified members of the NMP1



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Operations department, the tasks will remain the basic responsibilities of the Manager Operations. The basic responsibilities of the Manager Operations will be:

- 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.
- Ensure branch personnel are properly trained and qualified, and provide oversight of the Operations Training Program.
- 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.
- Establish Operations branch goals and objectives to support station goals.

The basic responsibilities of the GSO will be established by Nine Mile Point Nuclear Station generation administrative procedures. Although some tasks in support of these responsibilities may be assigned by the GSO to qualified off-shift SROs, they remain the responsibilities of the GSO. 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. The basic responsibilities of the GSO will include the following.

- Report directly to the Manager Operations.
- Direct the actions of the operating shift through the on-duty SSS (SRO license required).
- 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.
- Supervise 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 plant Technical Specifications.
- Implement shift operations self assessment.
- 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 (an SRO license is required to perform the three functions listed below):
 1. Start up the unit and bring it to full power.
 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.
- Ensure that startup and operational testing is performed correctly (SRO license required).
- Issue written SSS instructions.

The proposed change to NMP1 TS Section 6.2.2i will effectively reinstate the GSO to the NMP1 organization, and it will also ensure that qualified persons maintaining SRO licenses will be available to direct the licensed activities of NMP1 operators. The proposed change to NMP1 TS Section 6.3.1 ensures that the Manager Operations position will be maintained by a person of SRO level knowledge and experience. These changes are administrative in that the manner in which the plant systems are operated is not altered. The changes provide additional oversight of NMP1 Operations 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 position of Manager Operations, as outlined in ANSI N18.1-1971, will be met by the person appointed to that position except as stated



in the proposed changes to NMP1 TS 6.2.2i and 6.3.1. The GSO will meet the same minimum education and experience requirements as specified in ANSI N18.1-1971 for the Operations Manager, including the requirement to have an SRO License at the time of appointment. However, the Manager Operations retains responsibility for oversight and direction of NMP1 Operations. In addition, any licensed activities (such as directing day-to-day licensed activities of operating crews) will only be performed by the person(s) with the SRO license(s).

NMP1 TS 6.2.1a. and the Nine Mile Point Nuclear Station generation administrative procedures require distinct lines of authority, responsibility, and communication. Those criteria are still met. In addition, the proposed changes meet the intent of 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.

CONCLUSIONS

The proposed changes are proactive actions being taken to enable the NMP1 Operations organization to apply increased management attention to both conduct of day-to-day operations and NMP1 Operations training issues. In addition, any licensed activities (such as directing day-to-day licensed activities of operating crews) will only be performed by the person(s) with the SRO license(s). The proposed changes meet the intent of the requirements of the SRP and ANSI N18.1-1971 with respect to minimum Operations management qualifications and experience.

The changes are administrative in that the manner in which the plant systems are operated is not altered.

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. Additional restrictions placed on the Manager Operations minimum qualification requirements for experience and SRO level knowledge for the resulting organization meet the intent 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.



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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. Additional restrictions placed on the Manager Operations minimum qualification requirements for experience and SRO level knowledge ensure the resulting organization meets the intent 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. Additional restrictions placed on the Manager Operations minimum qualification requirements for experience and SRO level knowledge ensure the resulting organization meets the intent 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

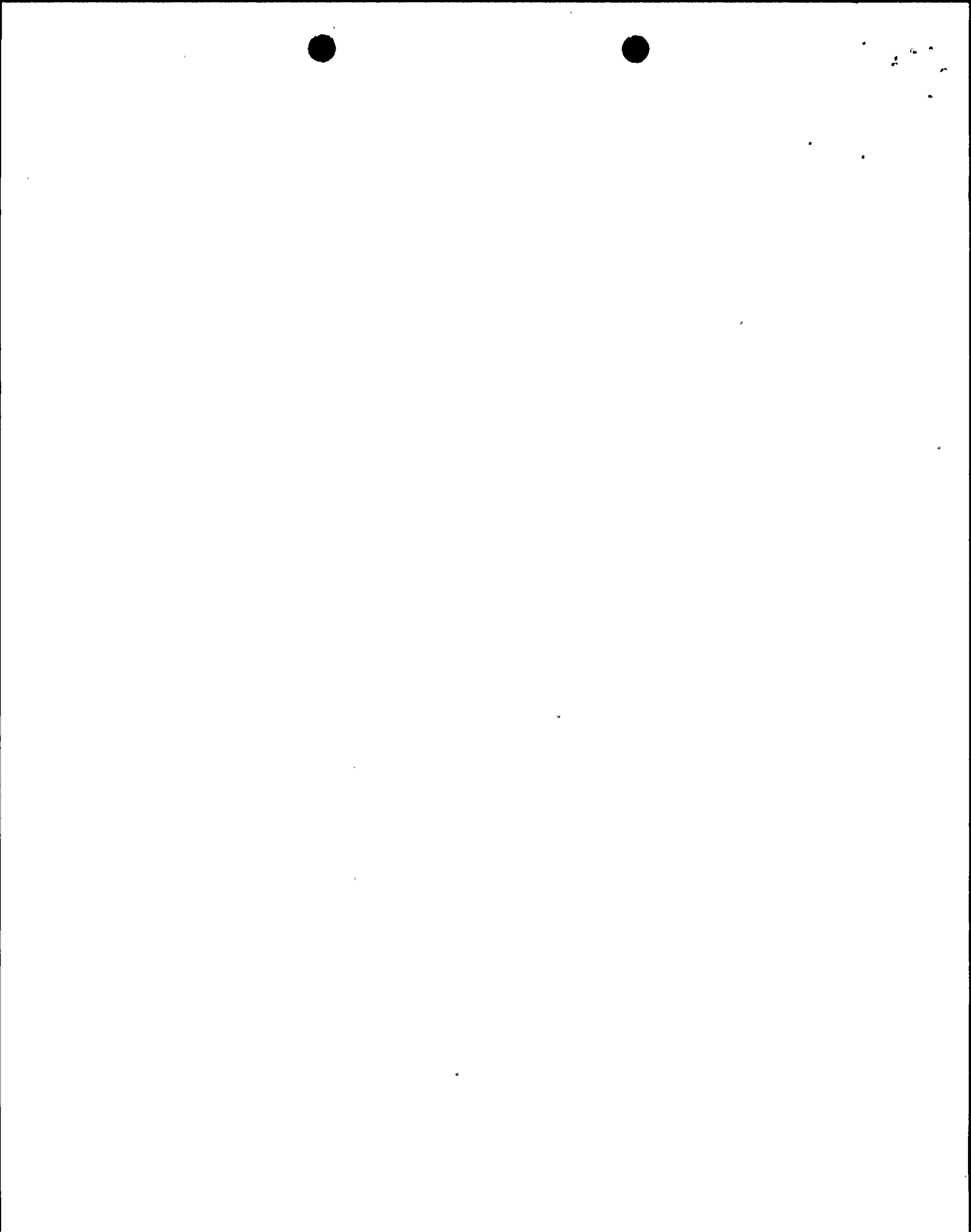
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Marked Copy of Proposed Changes to Current Technical Specification

The current version of pages 349 and 351 of the NMP1 Technical Specifications have been hand marked-up to reflect the proposed changes.



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the Manager Operations who, in lieu of meeting the Senior Reactor operator license requirements of ANSI N18.1-1971, shall 1) hold a senior reactor operator license at the time of appointment, or 2) have held a senior reactor operator license at Nine Mile Point Nuclear Station Unit 1 or at a similar unit, or 3) have been certified for equivalent senior reactor operator knowledge;

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 Manager Radiation Protection 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 of 10CFR Part 55, and shall include familiarization with relevant industry operational experience.

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:

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|-----------------------|------------------------------|
| Chairman: | Plant Manager |
| Vice Chairman/Member: | Manager Operations |
| Vice Chairman/Member: | Manager Technical Support |
| Member: | Manager QA Operations |
| Member: | Manager Maintenance |
| Member: | Manager Chemistry |
| Member: | Manager Radiation Protection |

