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SUBJECT: Forwards application for amend to TS for license DPR-63.
 Amend revises Sections 6.1,6.2,6.5,6.6 & 6.7, to reflect
 restructuring of Nuclear Div upper mgt organization &
 include correction of clerical error.

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May 15, 1998
NMPIL 1315

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 the Nine Mile Point Unit 1 (NMP1) Technical Specifications (TS) as set forth in Appendix A of Operating License DPR-63. Enclosed as Attachment A are the proposed changes to the NMP1 TS. The supporting information and analysis pursuant to 10 CFR 50.92 which demonstrate that the proposed changes do not involve a significant hazards consideration are included as Attachment B. For information and comparison, illustrations representing the proposed (new) and previous (old) Nuclear Division upper management organizations are provided as Attachment C. The basis for concluding that this application meets the criteria of 10 CFR 51.22 for categorical exclusion from performing an environmental assessment is included as Attachment D. Also, to assist the NRC Staff with their review, hand mark-up copies of the current TS pages are provided as Attachment E.

The proposed changes to the TS contained herein revise Sections 6.1, "Responsibility"; 6.2, "Organization"; 6.5, "Review and Audit"; 6.6, "Reportable Occurrence Action"; and 6.7, "Safety Limit Violation." The proposed changes reflect a restructuring of the NMPC Nuclear Division upper management organization and involve position title changes and reassignments of responsibilities. These proposed changes are intended to improve efficiency and enhance senior management oversight of NMPC's nuclear generation facilities. The new organizational structure will continue to provide clear management control and effective lines of authority and communication between the organizational units involved in the management, operation, and technical support for the safe operation of the facility.

The proposed changes also include the correction of a clerical error that was identified while preparing this amendment application. The correction of this error is an editorial change only and is unrelated to the proposed management reorganization.

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Realignment of the Nuclear Division upper management organization was deemed necessary to address the need for continued performance improvements. In addition to the changes affecting NMP1, the organizational realignment also results in concomitant changes to the NMPC Nine Mile Point Unit 2 (NMP2) TS. The amendment application for NMP2 is being submitted under separate cover letter. Because the proposed changes are important to the continued development of a competitive business structure, NMPC desires to implement the changes as soon as possible. It is therefore requested that prompt attention be given to both the NMP1 and NMP2 TS amendment applications. It is further requested that both applications be approved by July 1, 1998, and issued concurrently, with 30 days allowed for implementation.

Pursuant to 10 CFR 50.91(b)(1), NMPC has provided a copy of this license amendment application and the associated analysis regarding no significant hazards consideration to the appropriate state representative.

Very truly yours,



John H. Mueller
Chief Nuclear Officer

JHM/CDM/lmc
Attachments

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