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May 27, 1994

Docket Nos. 50-423
B14811

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Administrative Controls - Section 6

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License NPF-49, by incorporating the change identified in the attachments into the Technical Specifications of Millstone Unit No. 3.

Description of the Proposed Change

Recent organizational changes have necessitated the reevaluation of the Millstone Unit No. 3 Operations Department. NNECO has determined that a need exists to revise the technical specification requirements regarding the necessary qualifications of the Operators Manager. NNECO has selected an individual for the Millstone Unit No. 3 Operations Manager position who currently does not hold a senior reactor operator (SRO) license at Millstone Unit No. 3. NNECO is proposing a revision to the Millstone Unit No. 3 Technical Specifications which will temporarily allow a non-licensed individual to fill the Operations Manager position. NNECO anticipates that the development of an individual with a SRO license for the Operations Manager position will take approximately three years. For the interim, NNECO is proposing a change to Technical Specification 6.3.1 "Facility Staff Qualifications" for Millstone Unit No. 3. The proposed technical specification change provides an alternative to the current requirement for the Operations Manager to hold a SRO license on the same unit; i.e., Millstone Unit No. 3.

The proposed revision to Technical Specification 6.3.1 would temporarily allow the Operations Manager to have held a SRO license for a similar unit (Westinghouse designed Pressurized Water Reactor) in accordance with Section 4.2.2 of ANSI/ANS-3.1-1987, provided at least one of the Operations Assistant(s) holds a SRO license on the unit. The proposed revision would be in effect for the period of three years from the issuance of the amendment. NNECO notes that the Operations Assistant(s) is not considered the Operations Middle Manager in

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accordance with the current guidance recommended in ANSI/ANS-3.1-1987.

Technical Specification 6.3.1 currently requires the Operations Manager to hold a SRO license for the unit. This requirement is consistent with the minimum qualifications recommended in ANSI N18.1-1971 (Selection and Training of Nuclear Power Plant Personnel).

The guidance that the Operations Manager hold a SRO license was revised in ANSI/ANS-3.1-1987. The 1987 revision of ANSI/ANS 3.1 states that in addition to the experience and educational requirements the Operations Manager shall meet one of four special requirements:

- Hold a SRO license, or
- Have held a license for a similar unit, or
- Have been certified at an appropriate simulator for equivalent senior operator knowledge, or
- Have been certified on plant operational knowledge based on the Operations Manager's job analysis.

The 1987 revision also states that if the Operations Manager does not hold an NRC SRO license, then the Operations Middle Manager shall hold a SRO license. With respect to NNECO's organizational structure, the Operations Middle Manager position does not exist within the Operations Department. For those areas of knowledge that require a SRO license, at least one of the Operations Assistants holds a SRO license and provides the technical guidance normally required by the Operations Manager.

NNECO is requesting that the NRC temporarily allow the Operations Manager to have held a SRO license at a similar Pressurized Water Reactor (PWR) other than Millstone Unit No. 3. The proposed technical specification change would be in effect for the period ending three years after the issuance of the amendment. NNECO is also requesting that the NRC approve a limited exception to ANSI N18.1-1971. Specifically, the exception will allow at least one of the Operations Assistants (instead of a Operations Middle Manager) to hold, and continue to hold, a SRO license if the Operations Manager does not hold a license for the unit.

As stated in the FSAR, the Operations Manager assures the safe and efficient operation of the assigned unit in accordance with applicable licenses, operating instructions and procedures, emergency procedures, and safety rules and regulations. The

Operations Manager normally has an SRO license and in the less frequent case, the Operations Assistant has an SRO license if the Operations Manager does not hold a SRO license for that unit. NNECO is proposing to include the following footnote in Technical Specification 6.3.1:

"For the period ending three years after the issuance of Amendment No. _____, the Operations Manager will be permitted to have held a senior reactor operator license at a similar Pressurized Water Reactor other than Millstone Unit No. 3 and at least one of the Operations Assistant(s) shall hold a senior reactor operator license."

Attachment 1 provides the markup version and Attachment 2 provides the retyped version of the proposed change to the Technical Specifications for Millstone Unit No. 3.

Safety Assessment

Providing an alternative to the requirement for the Operations Manager to hold an SRO license on Millstone Unit No. 3 does not alter the design or operation of any unit system, component, or structure. It does not change the way any system is operated, does not reduce the knowledge, qualifications or skills of any watchstander, and does not affect the way the Operations Department is managed. The change permits the Operations Manager to establish qualifications with respect to the operational knowledge and skills required of the position through means other than the SRO licensing process.

The 1987 edition of the relevant standard (ANSI/ANS-3.1-1987) permits the Operations Manager to establish equivalent operational knowledge (to holding an SRO license on the unit in question) through one of four methods. Note that ANSI N18.1-1971 is the edition invoked by the Millstone Unit No. 3 Technical Specifications; and that Millstone Unit No. 3 does not currently employ an Operations Middle Manager as called out in the 1987 edition. NNECO has elected to restrict the alternatives to two: either hold an SRO license on the unit in question, or have held a license for a similar unit. Further, NNECO has elected to limit its use of the second alternative to a period of not more than three years after issuance of an amendment. When the Operations Manager does not hold an SRO license, the proposed change requires that an Operations Assistant hold an SRO license, in addition to the requirement placed on the non-licensed Operations Manager. This additional requirement on the Operations Assistant assures that the senior Operations

Department staff has the benefit of the unit-specific, advanced operational knowledge associated with the SRO license.

The Operations Manager will also have been licensed as an SRO at a similar PWR. For the purpose of this change, "similar unit" is intended to apply to a unit of the same nuclear steam supply system (NSSS) vendor (i.e., Westinghouse), and with emergency operating procedures based on the same Owners Group Emergency Response Guidelines (ERGs). While specific criteria may vary with different Westinghouse NSSS units, the fundamental philosophical basis remains the same. In addition, while different NSSS vendors may implement design criteria through different means, and use slightly different techniques in the analysis of design and licensing basis accidents, a given NSSS vendor is generally consistent in the design and safety analysis from plant to plant. Specifically, systems associated with the normal and accident operation of a Westinghouse supplied NSSS, including Reactor Coolant System, Emergency Core Cooling Systems, Nuclear Instrumentation, and the Reactor Protection System, typically do not vary significantly, in design or operation, from plant to plant. Therefore, requiring the Operations Manager to have been previously licensed as an SRO at a similar unit will assure he has the necessary knowledge and experience to fully understand the basic operation of unit equipment and for ensuring the unit is operated in accordance with license requirements. Furthermore, this assures the Operations Manager will have an understanding of the basis for emergency event mitigation strategies. These factors in turn assure that the non-licensed Operations Manager has the background, when coupled with unit-specific technical information readily available within the operations staff, to make sound decisions concerning nuclear safety, plant efficiency, reliability, and those actions necessary to protect the health and safety of the public.

Not holding a current SRO license means that the Operations Manager need not be enrolled in the Licensed Operator Requalification Training (LORT) Program. This is acceptable because the Operations Manager achieves similar objectives to those of LORT through his day-to-day involvement in the management of the unit. For example, the Operations Manager stays abreast of changes to the unit through participation as a member of the Plant Operations Review Committee, and through the supervisory role with respect to procedure change activities in the Operations Department. The Operations Manager maintains familiarity with, and exercises control over, the content of LORT (and other operator training programs) through membership on the Training Program Control Committee for the unit's operator training programs. Furthermore, the Training Program Implementing Procedures for the accredited operator training

programs require a variety of Operations Manager oversight activities, including regular observations of crew performance on the simulator, and periodic supervisory assessments of training in all training environments. Hence, participating in LORT is not essential to stay current on unit configuration, procedures, or training.

Finally, sufficient licensed and non-licensed individuals with in-depth plant specific knowledge and experience are available to the Operations Manager and Shift Supervisor during normal and accident conditions. First and foremost, operating crews contain multiple licensed operators, with appropriate team skills, to minimize the chance for operating error or inappropriate decisions. Secondly, a unit Duty Officer or similar representative is designated to provide around-the-clock assistance to the Shift Supervisor. All unit Duty Officers have SRO equivalent knowledge on Millstone Unit No. 3. In addition, this change will specifically require at least one of the Operations Assistants to hold an SRO on the unit should the Operations Manager not be licensed. This ensures a senior member of the Operations Department staff, conversant not only in the operation of the unit, but the operation of the department as well, is available to provide assistance to the non-licensed Operations Manager. And during emergency events, the Station Emergency Response Organization is configured to provide management oversight and plant-specific technical support to the Shift Supervisor.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed change and has concluded that it does not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed change does not involve an SHC because the change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change affects only an administrative control, which was based on the existing industry guidance in ANSI N18.1-1971, that recommended the Operations Manager hold a SRO license. The current guidance in Section 4.2.2 of ANSI/ANS-3.1-1987 recommends, as one option, that the Operations Manager have held a license for a similar unit and the Operations Middle Manager hold a SRO license. The Operations Middle Manager position does not exist at NNECO. Therefore, the proposed change requests an exception to ANSI

N18.1-1971 to allow use of ANSI/ANS-3.1-1987 in a limited circumstance. Specifically, the proposed revision to Technical Specification 6.3.1 would temporarily allow the Operations Manager to have held a SRO at a PWR other than Millstone Unit No. 3. The proposed revision would be in effect for the period ending three years after the Staff's approval for this request.

The proposed exception to ANSI N18.1-1971 will allow at least one of the Operations Assistants (instead of a Operations Middle Manager) to hold, and continue to hold, a SRO license, if the Operations Manager does not hold a license. The proposed change includes the requirement if the Operations Manager does not hold a SRO license at Millstone Unit No. 3, he shall have held a license for a similar unit in accordance with Section 4.2.2 of ANSI/ANS-3.1-1987. For those areas of knowledge that require a SRO license, at least one of the Operations Assistants holds a SRO license and provides technical guidance normally required by the Operations Manager.

The proposed change does not alter the design of any system, structure, or component. It does not change the way any plant systems are operated. It does not reduce the knowledge, qualifications, or skills of any operator on watch, and does not affect the way the Operations Department is managed by the Operations Manager in maintaining the effective performance of his personnel and to ensure the plant is operated safely and in accordance with the requirements of the Operating License.

The proposed change does not detract from the Operations Manager's ability to perform his primary responsibilities. In this case, by having previously held a SRO license for a similar unit, he will have gained the necessary training, skills, and experience to fully understand the operation of plant equipment and the watch requirements for operators.

The proposed change does not weaken the supervisory chain that presently exists in the Operations Department. All Control Room operators will continue to be supervised by the licensed Shift Supervisor.

In summary, the proposed change does not affect the ability of the Operations Manager to provide the plant oversight required of his position. In addition, it does not have any affect on the probability or consequences of any previously evaluated accident.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change to Technical Specification 6.3.1 does not affect the design or function of any plant system, structure, or component. It does not affect, in any way, the performance of NRC licensed operators, nor does it change the way any plant equipment is operated. Operation of the plant in conformance with technical specifications and other license requirements will continue to be supervised by personnel who hold an NRC SRO license. The proposed change to Technical Specification 6.3.1 ensures that the Operations Manager will be a knowledgeable and qualified individual. The proposed change does not introduce any new failure modes.

3. Involve a significant reduction in a margin of safety.

The proposed change involves only an administrative control which is not related to the margin of safety as defined in the technical specifications. The proposed change does not reduce the level of knowledge or experience required of an individual who fills the Operations Manager position, nor does it affect the conservative manner in which the plant is operated. All Control Room operators will continue to be supervised by personnel who hold a SRO license.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are considered not likely to involve an SHC. The change proposed herein is not enveloped by a specific example. The proposed change affects only an administrative control. There is no impact on the probability or consequences of an accident previously evaluated nor is the potential for creation of any new accidents. There is also no reduction in any margin of safety.

Environmental Consideration

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not increase the type and amounts of effluents that may be released off-site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for categorical exclusion from the requirements for an environmental impact statement.

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The Millstone Site Nuclear Review Board has reviewed the proposed changes and has concurred with the above determinations.

In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

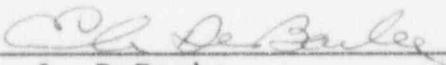
Regarding our proposed schedule for this amendment, we request issuance at your earliest convenience with amendment effective as of the date of issuance, to be implemented within 30 days of issuance. Due to the unusual nature of the request, we are available to assist the NRC Staff as required.

Please contact Mr. G. P. van Noordennen, at (203) 665-3288, if you should have any questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
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Subscribed and sworn to before me

this 27th day of May, 1994



Date Commission Expires: 3/31/95