



**Northeast
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September 12, 1995

Docket No. 50-423
B15195

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
Facility Staff Qualifications

Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Facility Operating License No. NPF-49 by incorporating the changes to the Millstone Unit No. 3 Technical Specifications identified herein. This license amendment request is submitted pursuant to the requirements of 10CFR50.90.

Summary

NNECO proposes to change the Millstone Unit No. 3 Technical Specifications to permit an individual who does not have a current Senior Reactor Operator (SRO) license to hold the Operations Manager position. The position will require the individual to have held an SRO license at a pressurized water reactor (PWR). An individual serving in the capacity of the Assistant Operations Manager will hold a current SRO license for Millstone Unit No. 3, if the Operations Manager does not.

The proposed change supersedes the existing note which allowed a three year period while the Operations Manager obtained an SRO license.

Discussion

In Technical Specification 6.3.1, Millstone Unit No. 3 endorses ANSI N18.1-1971, "American National Standard for Selection and Training of Nuclear Power Plant Personnel" for facility staff qualifications. This standard requires the Operations Manager to hold an SRO license at the time of appointment to the position. NNECO has always interpreted this to require the Operations Manager to maintain a license. The proposed change will take an exception to that requirement, and not require the Operations Manager to hold or maintain an SRO license.

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In a letter dated September 1, 1994,⁽¹⁾ the Staff issued Amendment No. 94 which allowed a three year period while the Operations Manager obtained an SRO license. Since approval of that change, NNECO has created the position of Assistant Operations Manager. The position of Assistant Operations Manager is functionally equivalent to the Operations Middle Manager referenced in ANSI/ANS 3.1-1987, "American National Standard for Selection, Qualification, and Testing of Personnel for Nuclear Power Plants." Creation of this position provides a basis to make this a permanent change.

This proposed change will also create the flexibility to appoint an individual as Operations Manager who does not possess an SRO license. This will allow NNECO to select the best individual for this position. The existing requirement that the Operations Manager hold an SRO license forces NNECO to either select an individual from the much smaller pool of SRO licensed individuals, or delay the appointment until the selected individual has obtained an SRO license for Millstone Unit No. 3. Or, as evidenced by the previous change to this section, obtain a temporary exception via a technical specification change. Although an individual would not be appointed to this position without possessing the requisite knowledge to fulfill the role, requiring the Operations Manager to have held an SRO license at a PWR ensures that the individual has received formal training in the basic operation of unit equipment and in emergency event mitigation strategies.

In addition to the requirement that the Operations Manager have held an SRO license, if the Operations Manager does not possess a Millstone Unit No. 3 SRO license, an individual functioning as the Assistant Operations Manager will hold a Unit No. 3 SRO license. This additional requirement assures that the senior operations department staff has the benefit of the unit specific, advanced operational knowledge associated with the SRO license.

Description of Proposed Change

Section 6.3.1 on page 6-5 will be replaced with the following:

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:

- a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the Operations Manager shall have held a senior reactor operator license at

(1) V. L. Rooney letter to J. F. Opeka, "Issuance of Amendment (TAC No. M89536)," dated September 1, 1994.

a pressurized water reactor, and the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 3.

- b. The Health Physics Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

The introductory sentence and the requirement for the Health Physics Manager have not been changed. The format of this section has been changed to clearly present the exceptions that are taken.

Also, the footnote at the bottom of page 6-5 can be deleted. It is captured by the revision to Section 6.3.1.

There is no corresponding Bases for Section 6.

Attachment 1 provides a markup of the proposed changes, whereas Attachment 2 provides a proposed retyped page of the Millstone Unit No. 3 Technical Specifications.

Safety Assessment

The Millstone Unit No. 3 Operations Manager is currently required to hold an SRO license. In 1994, NNECO received a one-time exception which would allow a three year period while the current Operations Manager attended training. NNECO proposes a change to the Millstone Unit No. 3 Technical Specifications to eliminate the requirement that the Operations Manager obtain and maintain an SRO license. The proposed change would require the individual who serves as the Operations Manager to either hold a Millstone Unit No. 3 SRO license or have held an SRO license at a PWR. If the Operations Manager does not hold a Millstone Unit No. 3 SRO license, then an individual serving as the Assistant Operations Manager will be required to hold a Millstone Unit No. 3 SRO license. The individual serving as Assistant Operations Manager will meet the qualification requirements described in Section 4.3.8, "Operations" of ANSI/ANS 3.1-1987.

NNECO is committed to ANSI N18.1-1971 for Millstone Unit No. 3. ANSI N18.1-1971 requires the Operations Manager to hold, at time of appointment to the active position, an SRO license. This standard is intended to ensure that the Operations Manager has the necessary and relevant operational experience and knowledge for the particular reactor technology in question. NNECO maintains that an individual who holds or has held an SRO license at one PWR has sufficient and relevant operational experience and knowledge to fill the position of Operations Manager at another PWR.

The proposed specification which will require that either the

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Operations Manager or Assistant Operations Manager hold a Millstone Unit No. 3 SRO license is consistent with the requirements of 10CFR50.54(1) and ensures that a licensed off-shift senior operator is directing the licensed activities of the licensed operators. Requiring an ANSI/ANS 3.1-1987 qualified and licensed Assistant Operations Manager (when the Operations Manager does not hold a valid Millstone Unit No. 3 SRO license) is therefore consistent with the requirements of ANSI N18.1-1971 and ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position.

This proposed change is similar to Amendment No. 178 of the Millstone Unit No. 2 Technical Specifications. That amendment was issued by the Staff on August 11, 1994. The conclusion of the Safety Evaluation for Amendment No. 178 states:

The Staff concludes that the specification that either the Operations Manager or the Assistant Operations Manager hold a Millstone Unit No. 2 SRO license, is consistent with the requirements of 10 CFR 50.54(1) and ensures that a licensed off-shift senior operator is directing the licensed activities of the licensed operators. Requiring an ANSI/ANS-3.1-1987 qualified and licensed Assistant Operations Manager when the Operations Manager does not hold a valid Millstone Unit 2 SRO license is consistent with the requirements of ANSI N18.1-1971 and ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position.

Therefore, the staff concludes that the proposed modifications and additions to the Millstone Unit 2 TS modifying the requirements for the operations management individual required to hold a valid Millstone Unit 2 SRO license is consistent with and meets the intent of the relevant review criteria and is, therefore, acceptable.

The change proposed for Millstone Unit No. 3 is equivalent to the change approved for Millstone Unit No. 2. In addition, the organizational structure established for the Millstone Unit No. 3 Operations Department is the same as that established for Millstone Unit No. 2.

Pased upon the above discussion, NNECO concludes that the proposed change is safe and meets the intent of 10CFR50.54(1).

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.92 and concluded that the change 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 changes would not:

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

The proposed change affects an administrative control, which was based on the guidance of ANSI N18.1-1971. ANSI N18.1-1971 recommended that the Operations Manager hold an 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 an SRO license. While the Operations Middle Manager position does not exist at Millstone Unit No. 3, NNECO has created the position of Assistant Operations Manager. The individual in this position would meet the requirements for, and would have responsibilities as recommended in, ANSI/ANS 3.1-1987 for the Operations Middle Manager position.

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 require the Operations Manager to either hold an SRO license at Millstone Unit No. 3 or have held an SRO at a PWR.

If the Operations Manager does not hold an SRO license at Millstone Unit No. 3, the specification will require the Assistant Operations Manager to hold, and continue to hold, an SRO license. The proposed change includes the requirement for the Operations Manager to have held a license for a similar unit (a PWR) in accordance with Section 4.2.2 of ANSI/ANS 3.1-1987. For those areas of knowledge that require an SRO license, the Assistant Operations Manager will provide the technical guidance normally provided by the Operations Manager.

The proposed change does not alter the design of any system, structure, or component, nor does it change the way plant systems are operated. It does not reduce the knowledge, qualifications, or skills of licensed operators, and does not affect the way the Operations Department is managed by the Operations Manager. The Operations Manager will continue to

maintain the effective performance of his personnel and ensure the plant is operated safely and in accordance with the requirements of the operating license. Additionally, the Control Room Operators will continue to be supervised by the licensed Shift Supervisors.

The proposed change does not detract from the Operations Manager's ability to perform his primary responsibilities. In this case, by having previously held an SRO license, the Operations Manager has achieved the necessary training, skills, and experience to fully understand the operation of plant equipment and the watch requirements for operators. In summary, the proposed change does not affect the ability of the Operations Manager to provide the plant oversight required of his position. Thus, it does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change to Technical Specification 6.3.1 does not affect the design or function of any plant system, structure, or component, nor does it change the way plant systems are operated. It does not affect the performance of NRC licensed operators. 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 by requiring the individual to have held an SRO license at a PWR. Based on the above, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed change involves an administrative control that is not related to the margin of safety. 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. The Control Room Operators will continue to be supervised by personnel who hold an SRO license. Thus, the proposed change does not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standards of 10CFR50.92 by providing certain examples

(51FR7751, March 6, 1986) of amendments that are not considered likely to involve an SHC. The change proposed herein is not enveloped by any of the proffered examples, however, this does not diminish the conclusion that the proposed change does not constitute an SHC.

Environmental Considerations

NNECO has reviewed the proposed licensed amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not increase the types and amounts of effluents that may be released offsite, 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 a categorical exclusion from the requirements for an environmental impact statement.

In accordance with 10CFR50.91(b), the State of Connecticut is being provided with a copy of this license amendment request.

Schedule

NNECO does not have a specific schedular requirement for the issuance of this change. As such, this change can be processed at the Staff's convenience. NNECO requests that the change be effective upon issuance, with implementation within 60 days.

Conclusion

As discussed above, the proposed change has been determined not to involve an SHC pursuant to 10CFR50.92. Allowing the Operations Manager to not maintain or hold an SRO, provided that the Assistant Operations Manager does so has been determined to be safe. Additionally, NNECO has determined that this license amendment request meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an environmental impact statement.

The Nuclear Safety Assessment Board has reviewed the proposed change and concurs with the above determinations.

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If you have any questions, please contact Mr. Ravi Joshi at (203)
440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: *E. A. DeBarba*
E. A. DeBarba
Vice President

Attachments (2)

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3

Mr. Kevin T.A. McCarthy, Director
Bureau of Air Management
Department of Environmental Protection
79 Elm Street
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Subscribed and sworn to before me

this 12th day of September, 1995

Gerard P. van Noorden

Date Commission Expires: 12/31/97

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Attachment 1

Millstone Nuclear Power Station, Unit No. 3
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Marked-up Page

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