

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385



NOV 19 2001

Docket No. 50-336
50-423
B18520

RE: 10 CFR 50.90

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

Millstone Nuclear Power Station, Unit Nos. 2 and 3
Modification to Technical Specification Change Request
Administrative Change to Clarify Operator Qualification Standards

By letter dated August 9, 2001,⁽¹⁾ Dominion Nuclear Connecticut, Inc. (DNC) proposed a change to the Millstone Unit Nos. 2 and 3 Technical Specifications (TS) to clarify the qualification standards of operators in response to Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants."⁽²⁾ Subsequent to the submittal, the Institute of Nuclear Power Operations (INPO) suggested alternative wording for this TS change. A revised footnote provides modified wording developed from discussions between DNC, the U.S. Nuclear Regulatory Commission (NRC) and INPO.

Qualification standards and training program requirements are provided in the Millstone Unit Nos. 2 and 3 TS under Specification 6.3, "Facility Staff Qualifications," (with the exceptions noted) and Specification 6.4, "Training." Specifications 6.3.1 and 6.4.1 within the August 9, 2001, letter state:

Specification 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:"

⁽¹⁾ Raymond P. Necci, Dominion Nuclear Connecticut, Inc. letter to U.S. Nuclear Regulatory Commission, "Technical Specification Change Request, Administrative Change To Clarify Operator Qualification Standards," dated August 9, 2001, (B18454).

⁽²⁾ U.S. Nuclear Regulatory Commission Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001.

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6.4.1:

"A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained."

Footnote "*" to Specifications 6.3.1 and 6.4.1 proposed in the August 9, 2001, letter read:

- * "As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines given in the National Academy for Nuclear Training (NANT) guideline document ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators."

The modified footnote * reads:

- * "As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000."

Modifying the footnote to refer to Revision 3 of Regulatory Guide (RG) 1.8,⁽³⁾ which endorses ANSI/ANS 3.1-1993,⁽⁴⁾ rather than National Academy for Nuclear Training (NANT) 2000 guideline document ACAD 00-003⁽⁵⁾ is consistent with NRC guidance presented in RIS 2001-01. The NRC states within RIS 2001-01, "RG 1.8 (Revision 2 or 3) and the NANT's guidelines for education and experience (those that were in effect in 1987 or those that were issued in January 2000) outline acceptable methods for implementing the Commission's regulations in this area."

The NRC staff has reviewed the NANT 2000 guidelines and considers them equivalent to the NRC's guidelines in Revision 3 of Regulatory Guide 1.8. Therefore, the proposed modification to the footnote does not change the approach or conclusions contained in the August 9, 2001, letter.

Attachments 1 and 2 provide a marked-up version of the appropriate pages of the current unit TS. Attachments 3 and 4 provide the retyped pages for each unit TS. This proposed modification to the footnote will not affect the conclusions of the Safety Summary, Significant Hazards Consideration discussion or the Environmental Consideration provided in the August 9, 2001, submittal.

⁽³⁾ U.S. Nuclear Regulatory Commission Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 3, May 2000.

⁽⁴⁾ American National Standards Institute/American Nuclear Society (ANSI/ANS) 3.1-1993, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," April 1993.


⁽⁵⁾ National Academy for Nuclear Training (NANT 2000 Guidelines) ACAD 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators," January 2000.

There are no regulatory commitments contained in this letter.

If you should have any questions regarding this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.



J. Alan Price, Vice President
Nuclear Technical Services - Millstone

Subscribed and sworn to before me

this 19th day of November, 2001



Notary Public

Date Commission Expires: _____

**SANDRA J. ANTON
NOTARY PUBLIC
COMMISSION EXPIRES
MAY 31, 2005**

Attachments: 1) Marked-up Unit No. 2 Technical Specification Pages
2) Marked-up Unit No. 3 Technical Specification Pages
3) Retyped Unit No. 2 Technical Specification Pages
4) Retyped Unit No. 3 Technical Specification Pages

cc: H. J. Miller, Region 1 Administrator
J. T. Harrison, NRC Project Manager, Millstone Unit No. 2
NRC Senior Resident Inspector, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
NRC Senior Resident Inspector, Millstone Unit No. 3

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Modification to Technical Specification Change Request
Administrative Change to Clarify Operator Qualification Standards
Marked-up Unit No. 2 Technical Specification Pages

Modification to Technical Specification Change Request
Administrative Change to Clarify Operator Qualification Standards
Marked-up Unit No. 2 Technical Specification Pages

A change to the following Technical Specification page has been proposed.

Technical Specification <u>Section Numbers</u>	<u>Title(s) of Section(s)</u>	Affected Page and <u>Amendment No.</u>
6.3.1	FACILITY STAFF QUALIFICATIONS	Page 6-2, Amendment No. 191
6.4	TRAINING	Page 6-5, Amendment No. 239

ADMINISTRATIVE CONTROLS

FACILITY STAFF (CONTINUED)

- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. (Table 6.2-1)
- e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12).

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6.3 FACILITY STAFF QUALIFICATIONS

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:

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- a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 2, then the Operations Manager shall have held a senior reactor operator license at a Pressurized Water Reactor and an individual serving in the capacity of the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 2.
- b. The Shift Technical Advisor (STA) who shall meet the requirements of Specification 6.3.1.b.1 or 6.3.1.b.2.
 - 1. Dual-role individual: Must hold a senior reactor operator's license at Millstone Unit No. 2, meet the STA training criteria of NUREG-0737, Item I.A.1.1, and meet one of the following educational alternatives:
 - a. Bachelor's degree in engineering from an accredited institution;
 - b. Professional Engineer's license obtained by the successful completion of the PE examination;

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Insert A

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6.4 TRAINING

A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.5 Deleted.

Insert A

INSERT 'A' - Pages 6-2 and 6-5

- * As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Modification to Technical Specification Change Request
Administrative Change to Clarify Operator Qualification Standards
Marked-up Unit No. 3 Technical Specification Pages

Modification to Technical Specification Change Request
Administrative Change to Clarify Operator Qualification Standards
Marked-up Unit No. 3 Technical Specification Pages

A change to the following Technical Specification page has been proposed.

<u>Technical Specification Section Numbers</u>	<u>Title(s) of Section(s)</u>	<u>Affected Page and Amendment No.</u>
6.3.1	FACILITY STAFF QUALIFICATIONS	Page 6-5, Amendment No. 173
6.4.1	TRAINING	Page 6-5, Amendment No. 173

6.3 FACILITY STAFF QUALIFICATIONS

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 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.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 Deleted.

Insert A

INSERT 'A' - Page 6-5

- * As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

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Attachment 3

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Modification to Technical Specification Change Request
Administrative Change to Clarify Operator Qualification Standards
Retyped Unit No. 2 Technical Specification Pages

ADMINISTRATIVE CONTROLS

FACILITY STAFF (CONTINUED)

- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. (Table 6.2-1)
- e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12).

6.3 FACILITY STAFF QUALIFICATIONS

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. 2, then the Operations Manager shall have held a senior reactor operator license at a Pressurized Water Reactor and an individual serving in the capacity of the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 2.
- b. The Shift Technical Advisor (STA) who shall meet the requirements of Specification 6.3.1.b.1 or 6.3.1.b.2.
 - 1. Dual-role individual: Must hold a senior reactor operator's license at Millstone Unit No. 2, meet the STA training criteria of NUREG-0737, Item I.A.1.1, and meet one of the following educational alternatives:
 - a. Bachelor's degree in engineering from an accredited institution;
 - b. Professional Engineer's license obtained by the successful completion of the PE examination;

* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.5 Deleted.

* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

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Attachment 4

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Modification to Technical Specification Change Request
Administrative Change to Clarify Operator Qualification Standards
Retyped Unit No. 3 Technical Specification Pages

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

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 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.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971* and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 Deleted.

* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.