

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION
DOCKET NO. 50-410
LICENSE NO. NPF-69

Proposed Changes to Technical Specifications

Replace existing pages 6-1a, 6-6, and 6-7 with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

6.0 ADMINISTRATIVE CONTROLS

ORGANIZATION

UNIT STAFF

6.2.2 (Continued)

- b. At least one Licensed Operator shall be in the control room when fuel is in the reactor. In OPERATIONAL CONDITIONS 1, 2, or 3, at least one Licensed Senior Operator or Licensed Operator shall be at the controls of the unit.
- c. A Radiation Protection Technician* shall be on site when fuel is in the reactor.
- d. At least two Licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips.
- e. A Licensed Senior Operator shall be required in the control room during OPERATIONAL CONDITIONS 1, 2, and 3 and when the emergency plan is activated. This may be the Station Shift Supervisor - Nuclear, the Assistant Station Shift Supervisor - Nuclear or other individuals with a valid senior operator license. When the emergency plan is activated in OPERATIONAL CONDITIONS 1, 2, or 3 and a dedicated Shift Technical Advisor is not on-shift, then the Assistant Station Shift Supervisor - Nuclear becomes the Shift Technical Advisor and the Station Shift Supervisor - Nuclear is restricted to the control room until an additional Licensed Senior Operator arrives.

*The Radiation Protection Technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming crewman being late or absent.

TABLE 6.2.2-1

MINIMUM SHIFT CREW COMPOSITION^{(a)(b)}

<u>POSITION</u>	<u>OPERATIONAL CONDITIONS</u>			
	<u>1,2</u>	<u>3</u>	<u>4,5</u>	<u>1,2,3</u> <u>4,5</u>
STATION SHIFT SUPERVISOR ^(d)	1	1	1 ^(e)	1 ^(c)
ASSISTANT STATION SHIFT SUPERVISOR ^(g)	1	1	NONE	1 ^(c)
OPERATOR	2,3 ^(h)	2	1	2 ^(c) , 3 ^{(c)(h)}
UNLICENSED ^(f)	2	2	1	3 ^(c)
SHIFT TECHNICAL ADVISOR ^(g)	1	1	NONE	1 ^(c)

TABLE NOTATIONS

- (a) At any one time, more licensed or unlicensed operating people could be present for maintenance, repairs, refuel outages, etc.
- (b) The shift crew composition may be one less than the minimum requirements of Table 6.2.2.-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change because an oncoming shift crewman scheduled to come on duty is late or absent.
- (c) For operation longer than 8 hours without process computer.
- (d) Any time the Shift Supervisor is absent from the control room while the unit is in OPERATIONAL CONDITION 1, 2, or 3, the Assistant Station Shift Supervisor when not in the STA function, or another individual with a valid Senior Operator license, shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.
- (e) An additional Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities shall supervise all core alterations.
- (f) Those operating personnel not holding an Operator or Senior Operator license.
- (g) The Assistant Station Shift Supervisor shall hold a Senior Operator's license and, if qualified, may perform the Shift Technical Advisor function when the Site Emergency Plan is activated in OPERATIONAL CONDITIONS 1, 2, or 3, if a dedicated Shift Technical Advisor is not available.
- (h) OPERATIONAL CONDITION 2 only.

ADMINISTRATIVE CONTROLS

ORGANIZATION

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Vice President - Nuclear Engineering.

6.2.4 SHIFT TECHNICAL ADVISOR

Normally, the Shift Technical Advisor (STA) shall be a dedicated position. If, however, a dedicated STA cannot be provided on a shift, then the Assistant Station Shift Supervisor (ASSS) shall function in a dual role (SRO/STA) and assume the duties of the Shift Technical Advisor when the Emergency Plan is activated in the OPERATIONAL CONDITIONS 1, 2, or 3. The STA shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The STA (and the ASSS, when fulfilling the role of the STA) shall have a bachelor's degree in a physical science, engineering, or a Professional Engineer's license issued by examination, and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 FACILITY STAFF QUALIFICATIONS

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, except for the Manager Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The Licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980, NRC letter to all licensees.

6.4 TRAINING

A retraining and replacement training program for the unit staff shall be maintained under the direction of the Manager Training, shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI/ANS 3.1-1978 and Appendix A of 10 CFR 55, and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980, NRC letter to all licensees, and shall include familiarization with relevant industry operational experience. A training program for the Fire Brigade shall be maintained under the direction of the Manager Training and the Supervisor - Fire Protection Nuclear and shall meet or exceed the requirements of Appendix R to 10 CFR 50.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION
DOCKET NO. 50-410
LICENSE NO. NPF-69

Supporting Information and No Significant Hazards Consideration Analysis

The proposed change is to Technical Specification Section 6.2, and is the separation of the Shift Technical Advisor (STA) and the Assistant Station Shift Supervisor (ASSS) into two separate positions. This change, as set forth in Attachment A, is consistent with option 2 (dedicated STA) of Generic Letter 86-04, "Policy Statement on Engineering Expertise on Shift," but also allows Unit 2 to exercise option 1 (the current dual-role SRO/STA) when necessary. Separating the current dual-role position (SRO/STA) into two positions (dedicated STA) will provide an enhanced shift management compliment to address off-normal situations requiring use of the Site Emergency Plan and Emergency Operating Procedures, i.e.:

- a. The Station Shift Supervisor assumes the duties of the Emergency Director.
- b. The ASSS assumes the duties of the SRO directing activities governed by the Emergency Operating Procedures.
- c. The STA assumes the duties addressed in Administrative Procedure AP-4.0, "Conduct of Operations."

The proposed change consists of two parts. The first part consists of adding words to Technical Specifications 6.2.2.e and 6.2.4, in order to clearly indicate that a shift will normally utilize a dedicated STA, and that a dual-role ASSS/STA will be used only when a dedicated STA is not available. The second part consists of the complete revision of Table 6.2.2-1, to reflect not only the dedicated STA position, but also to simplify the table by regrouping the columns under operational conditions, eliminating one footnote and clarifying footnotes (d), (g), and (h). In addition, the current Table 6.2.2-1 contains an error. The third column (shift composition for operation longer than 8 hours without the process computer) does not indicate that an extra Operator is required during Operational Condition 2. This omission has been corrected in this proposed change.

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in Section 50.92 about the issue of no significance hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed:

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed change will provide an additional person, on-shift, responsible for assisting with off-normal conditions, and will therefore help to mitigate the consequences of an accident. In addition, having a dedicated STA on-shift, by relieving the ASSS of the STA function, will help facilitate the initiation of the Emergency Operating Procedures.

Concerning the correction to Table 6.2.2-1, the last column of the current table (Operational Mode 2) has always required an extra Operator to be on-shift at all times while the unit is operating in Operational Mode 2 (Startup). The third column of the current table appears to omit this requirement for periods of operation longer than 8 hours without the process computer, but this is not the intent of this column. The omission of the extra Operator requirement from the third column has not affected operating shift composition in the past because of the Mode 2 column, which requires the extra operator at all times while in Mode 2 (regardless of the condition of the process computer) and thus takes precedence over the third column for Mode 2). Therefore, this change will have no effect on the operation of the unit, and is being proposed in order to correct the apparent inconsistency in the table and prevent the possibility of any future confusion.

The proposed change does not involve a physical modification to the plant, a new mode of operation or a change to the USAR transient analyses. No Limiting Condition for Operation (LCO), ACTION Statement, or Surveillance Requirement is affected by any of the proposed changes.

The operation of Nine Mile Point Unit 2, 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 proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because the effect of the proposed change is to add an additional person on shift who is trained to assist with off-normal conditions, and who will relieve the ASSS of the burden of assuming the STA functions during an accident. As noted above, the correction to the third column of Table 6.2.2-1 will have no effect on the operation of Nine Mile Point Unit 2. Normal plant operation will not be affected, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

The proposed amendment does not involve a significant reduction in a margin of safety because the effect of the proposed change is to add an additional person on shift who is trained to assist with off-normal conditions, and who will relieve the ASSS of the burden of assuming the STA functions during an accident. As noted above, the correction to the third column of Table 6.2.2-1 will have no effect on the operation of Nine Mile Point Unit 2, and thus will not affect any margins of safety. Normal plant operation will not be affected, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.