

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during the Plant Manager's absence.

6.1.2 The Station Shift Supervisor - Nuclear (or during the Supervisor's absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President and General Manager - Nuclear shall be reissued to all station personnel annually.

6.2 ORGANIZATION

6.2.1 Onsite and Offsite Organization

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions or in equivalent forms of documentation. The organization charts shall be documented in the Final Safety Analysis Report, and the functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions are documented in procedures.
- b. The Vice President and General Manager - Nuclear shall have corporate responsibility for overall plant nuclear safety. The Vice President and General Manager - Nuclear shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured. In addition, the Chief Nuclear Officer provides oversight of the Nuclear Division through the direct reporting structure of the Vice President and General Manager - Nuclear and the independent direct reporting structure of the Nuclear Safety Assessment and Support organization.
- c. The Plant Manager shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the plant.
- d. The persons responsible for the training, health physics and quality assurance functions may report to an appropriate manager onsite, but shall have direct access to responsible corporate management at a level where action appropriate to the mitigation of training, health physics and quality assurance concerns can be accomplished.

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

- a. Each on-duty shift shall be composed of at least the minimum shift crew shown in Table 6.2.2-1;

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ORGANIZATION

UNIT STAFF

6.2.2.i (Continued)

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures so that individual overtime shall be reviewed monthly by the Vice President and General Manager - Nuclear or a designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- j. The General Supervisor Operations, Supervisor Operations, Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear shall hold senior reactor operator licenses.

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP

FUNCTION

6.2.3.1 The Independent Safety Engineering Group (ISEG) shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Vice President - Nuclear Safety Assessment and Support.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years of professional level experience in his/her field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The principal function of the ISEG is to examine plant operating characteristics and the various NRC and industry licensing and service advisories, and to recommend areas for improving plant operations or safety. The ISEG will perform independent review of plant activities, including maintenance, modifications, operational concerns, and analysis and make recommendations to the Vice President - Nuclear Safety Assessment and Support.

ADMINISTRATIVE CONTROLS

6.5 REVIEW AND AUDIT

6.5.1 STATION OPERATIONS REVIEW COMMITTEE

FUNCTION

6.5.1.1 The Station Operations Review Committee (SORC) shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The SORC shall be composed of the

Chairman:	Plant Manager
Vice-Chairman/Member:	Manager Operations
Vice-Chairman/Member:	Manager Technical Support
Member:	Manager QA Operations
Member:	Manager Maintenance
Member:	Manager Chemistry
Member:	Manager Radiation Protection

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SORC Chairman or Vice-Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The SORC shall meet at least once every calendar month and as convened by the SORC Chairman, Vice-Chairman, or a designated alternate.

QUORUM

6.5.1.5 The quorum of the SORC necessary for the performance of the SORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman, or a Vice-Chairman and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The SORC shall be responsible for:

- a. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President and General Manager - Nuclear and to the Safety Review and Audit Board;

ADMINISTRATIVE CONTROLS

6.5 REVIEW AND AUDIT

6.5.1 STATION OPERATIONS REVIEW COMMITTEE

6.5.1.6 (Continued)

- b. Review of all REPORTABLE EVENTS;
- c. Review of unit operations to detect potential hazards to nuclear safety;
- d. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Safety Review and Audit Board;
- e. Safety evaluations and analyses resulting from technical review and control activities 6.5.2.1, 6.5.2.2, 6.5.2.3, and 6.5.2.5.

DUTIES

6.5.1.7 The SORC shall:

- a. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6.a through e constitutes an unreviewed safety question.
- b. Provide written notification within 24 hours to the Vice President and General Manager - Nuclear and the Safety Review and Audit Board of disagreement between the SORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The SORC shall maintain written minutes of each SORC meeting that at a minimum, document the result of all SORC activities performed under the responsibilities and authority provisions of these Technical Specifications. Copies shall be provided to the Vice President and General Manager - Nuclear and the Safety Review and Audit Board.

6.5.2 TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.1 Each procedure and program required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be prepared by a qualified individual/organization. Each such procedure, and changes thereto, shall be reviewed by an individual/group other than the individual/group that prepared the procedure, or changes thereto, but who may be from the same organization as the individual/group that prepared the procedure, or changes thereto. Approval of procedures and programs and changes thereto and their safety evaluations, shall be controlled by administrative procedures.

6.5.2.2 Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be reviewed by an individual/group other than the individual/group that prepared the proposed change, but who may be from the same organization as the individual/group that prepared the proposed change.

ADMINISTRATIVE CONTROLS

REVIEW AND AUDIT

TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.2 (Continued)

Proposed changes to the Technical Specifications shall be approved by the Plant Manager.

6.5.2.3 Proposed modifications to unit structures, systems, and components that affect nuclear safety shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group that designed the modification, but who may be from the same organization as the individual/group that designed the modification. Proposed modifications to structures, systems, and components and the safety evaluations shall be approved before implementation by the Plant Manager, or the Manager Technical Support, as previously designated by the Plant Manager.

6.5.2.4 Individuals responsible for reviews performed in accordance with Specifications 6.5.2.1, 6.5.2.2, and 6.5.2.3 shall be members of the station supervisory staff, previously designated by the Plant Manager to perform such reviews. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary such review shall be performed by the appropriate designated station review personnel.

6.5.2.5 Proposed tests and experiments that affect station nuclear safety and are not addressed in the FSAR or Technical Specifications and their safety evaluations shall be reviewed by the Plant Manager, or the Manager Technical Support, as previously designated by the Plant Manager.

6.5.2.6 The Plant Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President and General Manager - Nuclear.

6.5.2.7 The facility security program and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the Plant Manager and transmitted to the Vice President and General Manager - Nuclear, and to the Chairman of the Safety Review and Audit Board.

6.5.2.8 The facility emergency plan and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the Plant Manager and transmitted to the Vice President and General Manager - Nuclear and to the Chairman of the Safety Review and Audit Board.

ADMINISTRATIVE CONTROLS

REVIEW AND AUDIT

TECHNICAL REVIEW AND CONTROL ACTIVITIES

6.5.2.9 The Plant Manager shall assure the performance of a review by a qualified individual/organization of changes to the Radiological Waste Treatment systems.

6.5.2.10 Review of any accidental, unplanned, or uncontrolled radioactive release, including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President and General Manager - Nuclear and to the Safety Review and Audit Board.

6.5.2.11 Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL. Approval of any changes shall be made by the Plant Manager or a designee before implementation of such changes.

6.5.2.12 Reports documenting each of the activities performed under Specifications 6.5.2.1 through 6.5.2.9 shall be maintained. Copies shall be provided to the Vice President and General Manager - Nuclear and the Safety Review and Audit Board.

6.5.3 SAFETY REVIEW AND AUDIT BOARD

FUNCTION

6.5.3.1 The Safety Review and Audit Board (SRAB) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Quality assurance practices and
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant.

The SRAB shall report to and advise the Chief Nuclear Officer on those areas of responsibility in Specifications 6.5.3.7 and 6.5.3.8.

COMPOSITION

6.5.3.2 The SRAB shall be composed of the:

Chairman:	Vice President, Manager or Staff Engineer
Member:	Plant Manager or Designee
Member:	Staff Engineer - Nuclear
Member:	Staff Engineer - Mechanical or Electrical
Member:	Consultant (Specification 6.5.3.4)

ADMINISTRATIVE CONTROLS

REVIEW AND AUDIT

SAFETY REVIEW AND AUDIT BOARD

AUDITS

6.5.3.8 (Continued)

- j. Any other area of unit operation considered appropriate by the SRAB or the Vice President and General Manager - Nuclear.
- k. The Fire Protection Program and implementing procedures at least once per 24 months.
- l. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- m. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

AUTHORITY

6.5.3.9 The SRAB shall report to and advise the Chief Nuclear Officer on those areas of responsibility specified in Sections 6.5.3.7 and 6.5.3.8.

RECORDS

6.5.3.10 Records of SRAB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each SRAB meeting shall be prepared, approved, and forwarded to the Chief Nuclear Officer within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.3.7b, e, g, h shall be prepared, approved, and forwarded to the Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.3.8 shall be forwarded to the Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.72 and 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the SRAB and the Vice President and General Manager - Nuclear.

6.7 SAFETY LIMIT VIOLATION

The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President and General Manager - Nuclear and the SRAB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared in accordance with 10 CFR 50.73. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission within 30 days of the violation, and to the SRAB, and the Vice President and General Manager - Nuclear within 14 days.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

PROCEDURES

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory guide 1.33, Revision 2, February 1978
- b. The applicable procedures required to implement the requirements of NUREG-0737
- c. Refueling operations

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

DOCKET NO. 50-410

Supporting Information and no Significant Hazards Consideration Analysis

INTRODUCTION

The proposed Technical Specification changes to Sections 6.1, 6.2, 6.5, 6.6, and 6.7 reflect the restructuring of the Niagara Mohawk Power Corporation (NMPC) corporate management organization. The proposed NMPC upper management Generation Business Group is reflected on Attachment C. The proposed NMPC Nuclear Division management structure is reflected on Attachment D.

NMPC is restructuring the corporate level management of its electric power generation facilities. The restructuring provides for the establishment of the Generation Business Group composed of nuclear and non-nuclear electric power generation facilities. The current Executive Vice President - Nuclear has been chosen to head the Generation Business Group as the Executive Vice President - Generation Business Group/Chief Nuclear Officer. Accordingly, the Executive Vice President - Nuclear Generation Business Group/Chief Nuclear Officer will have a combination of nuclear and non-nuclear corporate level management responsibilities. The proposed amendment reassigns corporate management responsibilities within the Nuclear Division to provide the necessary attention to nuclear safety matters.

The general features of the organizational restructuring include the establishment of the Executive Vice President - Generation Business Group/Chief Nuclear Officer position; the establishment of the Vice President and General Manager - Nuclear position; reassignment of responsibilities assigned to the Executive Vice President - Nuclear to either the Chief Nuclear Officer or the Vice President and General Manager - Nuclear; reassignment of responsibilities assigned to the Vice President - Nuclear Generation to the Vice President and General Manager - Nuclear; and the associated elimination of the Executive Vice President - Nuclear and Vice President - Nuclear Generation positions.

Specifically, the position of Executive Vice President - Generation Business Group/Chief Nuclear Officer has been established to provide corporate management oversight of NMPC's nuclear and non-nuclear power generation facilities. The Executive Vice President - Generation Business Group/Chief Nuclear Officer, hereinafter referred to as the Chief Nuclear Officer in describing the nuclear organization, will have overall responsibility for oversight of the Nuclear Division, including: Communications and Public Affairs; Nuclear Generation; Nuclear Engineering; Nuclear Safety Assessment and Support; Business Management; and Human Resource Development. Upon implementation of the approved amendment, the current Executive Vice President - Nuclear will assume the "Chief Nuclear Officer" position.

In addition, the position title of "Vice President - Nuclear Generation" is being changed to "Vice President and General Manager - Nuclear" to reflect the assignment of additional responsibilities beyond those previously associated with the "Vice President - Nuclear Generation" position. The Vice President and General Manager - Nuclear will be responsible for nuclear operations, maintenance, and engineering. The Vice President and General Manager - Nuclear will have corporate responsibility for overall plant nuclear safety and will have the authority to take such measures as may be needed to ensure acceptable performance of staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. Upon implementation of the approved amendment, the Vice President - Nuclear Generation will assume the "Vice President and General Manager - Nuclear" position.

The reassignment of responsibilities includes the reporting of the Vice President - Nuclear Engineering to the Vice President and General Manager - Nuclear. In association with this change, the Unit 2 Independent Safety Engineering Group (ISEG) will report to the Vice President - Nuclear Safety Assessment and Support, rather than the Vice President - Nuclear Engineering. The Vice President - Nuclear Safety Assessment and Support will report directly to the Chief Nuclear Officer, therefore, the functions of ISEG will remain independent from plant activities, including maintenance, modifications, and operational concerns.

DESCRIPTION OF CURRENT AND PROPOSED TECHNICAL SPECIFICATIONS

NMPC proposed changes to Technical Specification Sections 6.1, "Responsibilities"; Section 6.2, "Organization"; 6.5, "Review and Audit"; 6.6, "Reportable Event Action"; and 6.7, "Safety Limit Violation." The current version and the proposed changes are as follows:

Section 6.1, Subsection 6.1.2 (Page 6-1)

Current:

6.1.2 The Station Shift Supervisor - Nuclear (or during the Supervisor's absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Executive Vice President - Nuclear shall be reissued to all station personnel annually.

Proposed:

6.1.2 The Station Shift Supervisor - Nuclear (or during the Supervisor's absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the *Vice President and General Manager - Nuclear* shall be reissued to all station personnel annually.

Section 6.2, Subsection 6.2.1.b (Page 6-1)

Current:

- b. The Executive Vice President - Nuclear shall have corporate responsibility for overall plant nuclear safety. The Executive Vice President - Nuclear shall take any

measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.

Proposed:

- b. The *Vice President and General Manager - Nuclear* shall have corporate responsibility for overall plant nuclear safety. The *Vice President and General Manager - Nuclear* shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured. *In addition, the Chief Nuclear Officer provides oversight of the Nuclear Division through the direct reporting structure of the Vice President and General Manager - Nuclear and the independent direct reporting structure of the Nuclear Safety Assessment and Support organization.*

Section 6.2, Subsection 6.2.2.i (Partial Wording Page 6-3)

Current:

Any deviation from the above guidelines shall be authorized by the Plant Manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures so that individual overtime shall be reviewed monthly by the Vice President - Nuclear Generation or a designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

Proposed:

Any deviation from the above guidelines shall be authorized by the Plant Manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures so that individual overtime shall be reviewed monthly by the *Vice President and General Manager - Nuclear* or a designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

Section 6.2, Subsection 6.2.3.1 (Page 6-3)

Current:

6.2.3.1 The Independent Safety Engineering Group (ISEG) shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Vice President - Nuclear Engineering.

Proposed:

6.2.3.1 The Independent Safety Engineering Group (ISEG) shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the *Vice President - Nuclear Safety Assessment and Support*.

Section 6.2, Subsection 6.2.3.3 (Page 6-3)

Current:

6.2.3.3 The principal function of the ISEG is to examine plant operating characteristics and the various NRC and industry licensing and service advisories, and to recommend areas for improving plant operation or safety. The ISEG will perform independent review of plant activities, including maintenance, modifications, operational concerns, and analysis and make recommendations to the Vice President - Nuclear Engineering.

Proposed:

6.2.3.3 The principal function of the ISEG is to examine plant operating characteristics and the various NRC and industry licensing and service advisories, and to recommend areas for improving plant operation or safety. The ISEG will perform independent review of plant activities, including maintenance, modifications, operational concerns, and analysis and make recommendations to the *Vice President - Nuclear Safety Assessment and Support*.

Section 6.5, Subsection 6.5.1.6.a (Page 6-8)

Current:

- a. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President - Nuclear Generation and to the Safety Review and Audit Board;

Proposed:

- a. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the *Vice President and General Manager - Nuclear* and to the Safety Review and Audit Board;

Section 6.5, Subsection 6.5.1.7.b (Page 6-9)

Current:

- b. Provide written notification within 24 hours to the Vice President - Nuclear Generation and the Safety Review and Audit Board of disagreement between the SORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

Proposed:

- b. Provide written notification within 24 hours to the *Vice President and General Manager - Nuclear* and the Safety Review and Audit Board of disagreement between the SORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

Section 6.5, Subsection 6.5.1.8 (Page 6-9)

Current:

6.5.1.8 The SORC shall maintain written minutes of each SORC meeting that at a minimum, document the result of all SORC activities performed under the responsibilities and authority provisions of these Technical Specifications. Copies shall be provided to the Vice President - Nuclear Generation and the Safety Review and Audit Board.

Proposed:

6.5.1.8 The SORC shall maintain written minutes of each SORC meeting that at a minimum, document the result of all SORC activities performed under the responsibilities and authority provisions of these Technical Specifications. Copies shall be provided to the *Vice President and General Manager - Nuclear* and the Safety Review and Audit Board.

Section 6.5, Subsection 6.5.2.6 (Page 6-10)

Current:

6.5.2.6 The Plant Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President - Nuclear Generation.

Proposed:

6.5.2.6 The Plant Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the *Vice President and General Manager - Nuclear*.

Section 6.5, Subsection 6.5.2.7 (Page 6-10)

Current:

6.5.2.7 The facility security program and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the Plant Manager and transmitted to the Vice President - Nuclear Generation, and to the Chairman of the Safety Review and Audit Board.

Proposed:

6.5.2.7 The facility security program and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the Plant Manager and transmitted to the *Vice President and General Manager - Nuclear*, and to the Chairman of the Safety Review and Audit Board.

Section 6.5, Subsection 6.5.2.8 (Page 6-10)

Current:

6.5.2.8 The facility emergency plan and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the Plant Manager and transmitted to the Vice President - Nuclear Generation and to the Chairman of the Safety Review and Audit Board.

Proposed:

6.5.2.8 The facility emergency plan and implementing procedures shall be reviewed at least every 12 months. Recommended changes shall be approved by the Plant Manager and transmitted to the *Vice President and General Manager - Nuclear* and to the Chairman of the Safety Review and Audit Board.

Section 6.5, Subsection 6.5.2.10 (Page 6-11)

Current:

6.5.2.10 Review of any accidental, unplanned, or uncontrolled radioactive release, including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Nuclear Generation and to the Safety Review and Audit Board.

Proposed:

6.5.2.10 Review of any accidental, unplanned, or uncontrolled radioactive release, including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the *Vice President and General Manager - Nuclear* and to the Safety Review and Audit Board.

Section 6.5, Subsection 6.5.2.12 (Page 6-11)

Current:

6.5.2.12 Reports documenting each of the activities performed under Specifications 6.5.2.1 through 6.5.2.9 shall be maintained. Copies shall be provided to the Vice President - Nuclear Generation and the Safety Review and Audit Board.

Proposed:

6.5.2.12 Reports documenting each of the activities performed under Specifications 6.5.2.1 through 6.5.2.9 shall be maintained. Copies shall be provided to the *Vice President and General Manager - Nuclear* and the Safety Review and Audit Board.

Section 6.5, Subsection 6.5.3.1 (Page 6-11)

Current:

6.5.3.1 The Safety Review and Audit Board (SRAB) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Quality assurance practices and
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant.

The SRAB shall report to and advise the Executive Vice President - Nuclear on those areas of responsibility in Specifications 6.5.3.7 and 6.5.3.8.

Proposed:

6.5.3.1 The Safety Review and Audit Board (SRAB) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Quality assurance practices and
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant.

The SRAB shall report to and advise the *Chief Nuclear Officer* on those areas of responsibility in Specifications 6.5.3.7 and 6.5.3.8.

Section 6.5, Subsection 6.5.3.8.j (Page 6-14)

Current:

- j. Any other area of unit operation considered appropriate by the SRAB or the Vice President - Nuclear Generation.

Proposed:

- j. Any other area of unit operation considered appropriate by the SRAB or the *Vice President and General Manager - Nuclear*.

Section 6.5, Subsection 6.5.3.9 (Page 6-14)

Current:

6.5.3.9 The SRAB shall report to and advise the Executive Vice President - Nuclear on those areas of responsibility specified in Sections 6.5.3.7 and 6.5.3.8.

Proposed:

6.5.3.9 The SRAB shall report to and advise the *Chief Nuclear Officer* on those areas of responsibility specified in Sections 6.5.3.7 and 6.5.3.8.

Section 6.5, Subsection 6.5.3.10 (Page 6-14)

Current:

6.5.3.10 Records of SRAB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each SRAB meeting shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.3.7b, e, g, h shall be prepared, approved, and forwarded to the Executive Vice President - Nuclear within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.3.8 shall be forwarded to the Executive Vice President - Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

Proposed:

6.5.3.10 Records of SRAB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each SRAB meeting shall be prepared, approved, and forwarded to the *Chief Nuclear Officer* within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.3.7b, e, g, h shall be prepared, approved, and forwarded to the *Chief Nuclear Officer* within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.3.8 shall be forwarded to the *Chief Nuclear Officer* and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

Section 6.6, Item b (Page 6-15)

Current:

- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the SRAB and the Vice President - Nuclear Generation.

Proposed:

- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the SRAB and the *Vice President and General Manager - Nuclear*.

Section 6.7, Item a (Page 6-15)

Current:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President - Nuclear Generation and the SRAB shall be notified within 24 hours.

Proposed:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The *Vice President and General Manager - Nuclear* and the SRAB shall be notified within 24 hours.

Section 6.7, Item c (Page 6-15)

Current:

- c. The Safety Limit Violation Report shall be submitted to the Commission within 30 days of the violation, and to the SRAB, and the Vice President - Nuclear Generation within 14 days.

Proposed:

- c. The Safety Limit Violation Report shall be submitted to the Commission within 30 days of the violation, and to the SRAB, and the *Vice President and General Manager - Nuclear* within 14 days.

EVALUATION

The proposed change to Section 6.1, "Responsibility," replaces the position title of Executive Vice President - Nuclear, in Subsection 6.1.2, with the newly established position title of Vice President and General Manager - Nuclear. This change reflects reassignment of the Executive Vice President - Nuclear responsibility, to issue and periodically reissue a management directive that emphasizes the primary management responsibilities of Shift Supervisor, to the newly established position of Vice President and General Manager - Nuclear. The reassignment of this responsibility to the Vice President and General Manager - Nuclear is consistent with the designation of the Vice President and General Manager - Nuclear with overall responsibility for nuclear safety as indicated in the proposed change for Section 6.2

The proposed change to Section 6.2, "Organization," replaces the position title of Executive Vice President - Nuclear, in Subsection 6.2.1.b, with the position title of Vice President and General Manager - Nuclear. This change reflects the change in overall responsibility for nuclear safety from the position of Executive Vice President - Nuclear to the newly established position of Vice President and General Manager - Nuclear. Subsection 6.2.1.b is also being revised to reflect the Nuclear Program oversight responsibility of the Chief Nuclear Officer. This change defines the responsibility of the Chief Nuclear Officer for Nuclear Program oversight through the direct reporting of the Vice President and General Manager - Nuclear and the direct reporting structure of the Nuclear Safety Assessment and Support organization. The proposed change to Subsection 6.2.2.i replaces the position title of Vice President - Nuclear Generation with the position of Vice President and General Manager - Nuclear to reflect the position title change. This change is administrative in nature. The proposed changes to Subsections 6.2.3.1 and 6.2.3.2 reflect the reassignment of the Independent Safety Engineering Group (ISEG) from the Vice President - Engineering to the Vice President - Nuclear Safety Assessment and Support. The Vice President - Nuclear Safety Assessment and Support will report directly to the Chief Nuclear Officer, therefore, the functions of ISEG will remain independent from plant activities, including maintenance, modifications, and operational concerns.

The proposed changes to Section 6.5, "Review and Audit," replace the position title of Vice President - Nuclear Generation, in Subsections 6.5.1.6.a, 6.5.1.7.b, 6.5.1.8, 6.5.2.6, 6.5.2.7, 6.5.2.8, 6.5.2.10, and 6.5.2.12, with the position title of Vice President and General Manager - Nuclear to reflect the position title change. In addition, the proposed changes in Subsections 6.5.3.1, 6.5.3.8.j, 6.5.3.9, 6.5.3.10.a, 6.5.3.10.b, and 6.5.3.10.c replace the position title of Executive Vice President - Nuclear with the position title of Chief Nuclear Officer. These changes are administrative in nature in that they reflect position title changes resulting from reassignment of responsibilities unrelated to Section 6.5.

The proposed change to Section 6.6, "Reportable Occurrence Action," replaces the position title of Vice President - Nuclear Generation, in Subsection 6.6.b, with the position

title of Vice President and General Manager - Nuclear. This change is administrative in nature in that it reflects a position title change resulting from the assignment of additional responsibilities unrelated to Section 6.6.

The proposed change to Section 6.7, "Safety Limit Violation," replaces the position title of Vice President - Nuclear Generation, in Subsections 6.7.1.a and 6.7.1.c, with the position title of Vice President and General Manager - Nuclear. This change is administrative in nature in that it reflects a position title change resulting from the assignment of additional responsibilities unrelated to Section 6.7.

CONCLUSIONS

The proposed amendment assigns responsibilities to assure that corporate management is involved with and informed about the safe operation of Niagara Mohawk's nuclear facilities. The reassignment of corporate level management responsibilities within the Nuclear Division will enable the Executive Vice President - Generation Business Group/ Chief Nuclear Officer to oversee both nuclear and non-nuclear portions of the Generation Business Group.

The organizational structure provides for the integrated management of activities that support the safe operation and maintenance of the nuclear facilities. Clear management control and effective lines of authority and communication will exist between the organizational units involved in the management, operation, and technical support for the operation of the facility.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the proposed amendment will not be inimical to the common defense and security or health and safety of the public.

Implementation of the proposed changes will be made through revisions to applicable procedures.

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

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 significant 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 consequence of an accident previously evaluated.

None of the accidents previously evaluated are affected by the proposed corporate management position title changes or by the reassignment of responsibilities. The revised organizational structure will not affect the design of systems, structures, or components; the operation of plant equipment or systems; nor maintenance, modification, or testing activities. The revised management reporting structure and assignment of responsibilities

does not involve accident precursors or initiators previously evaluated and does not create any new failure modes that would affect any previously evaluated accidents. Therefore, operation in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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 revised organizational structure will not affect the design of systems, structures, or components; the operation of plant equipment or systems; nor maintenance, modification or testing activities. The proposed position title changes and responsibility assignments do not create any new failure modes or conditions that would create a new or different kind of accident. Therefore, operation in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any previously evaluated.

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 defines the lines of authority, responsibility, and communication necessary to ensure operation of the facility in a safe manner. The present Executive Vice President - Nuclear will assume the responsibilities of Chief Nuclear Officer. The present Vice President - Nuclear Generation will assume the responsibilities of Vice President and General Manager - Nuclear. These assignments provide the highest level of management expertise and experience in the operation of Nine Mile Point Unit 2 and assure that adequate operational safety is maintained. Therefore, the proposed organizational restructuring will not involve a significant reduction in a margin of safety.

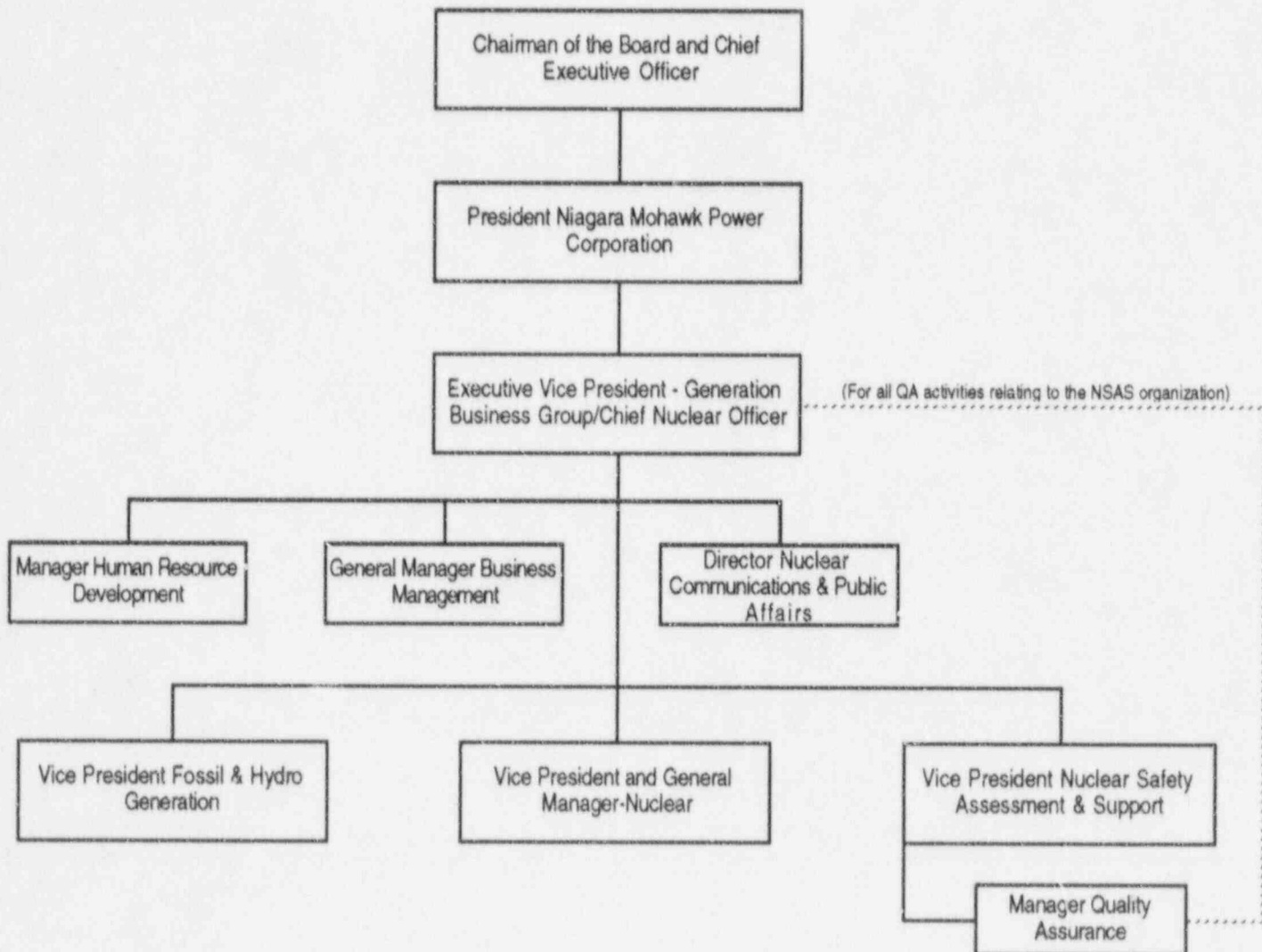
As determined by the analysis, the proposed amendment involves no significant hazards consideration.

ENVIRONMENTAL CONSIDERATION

10 CFR 51.22 provides criteria for, and identification of, licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. Niagara Mohawk has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment.

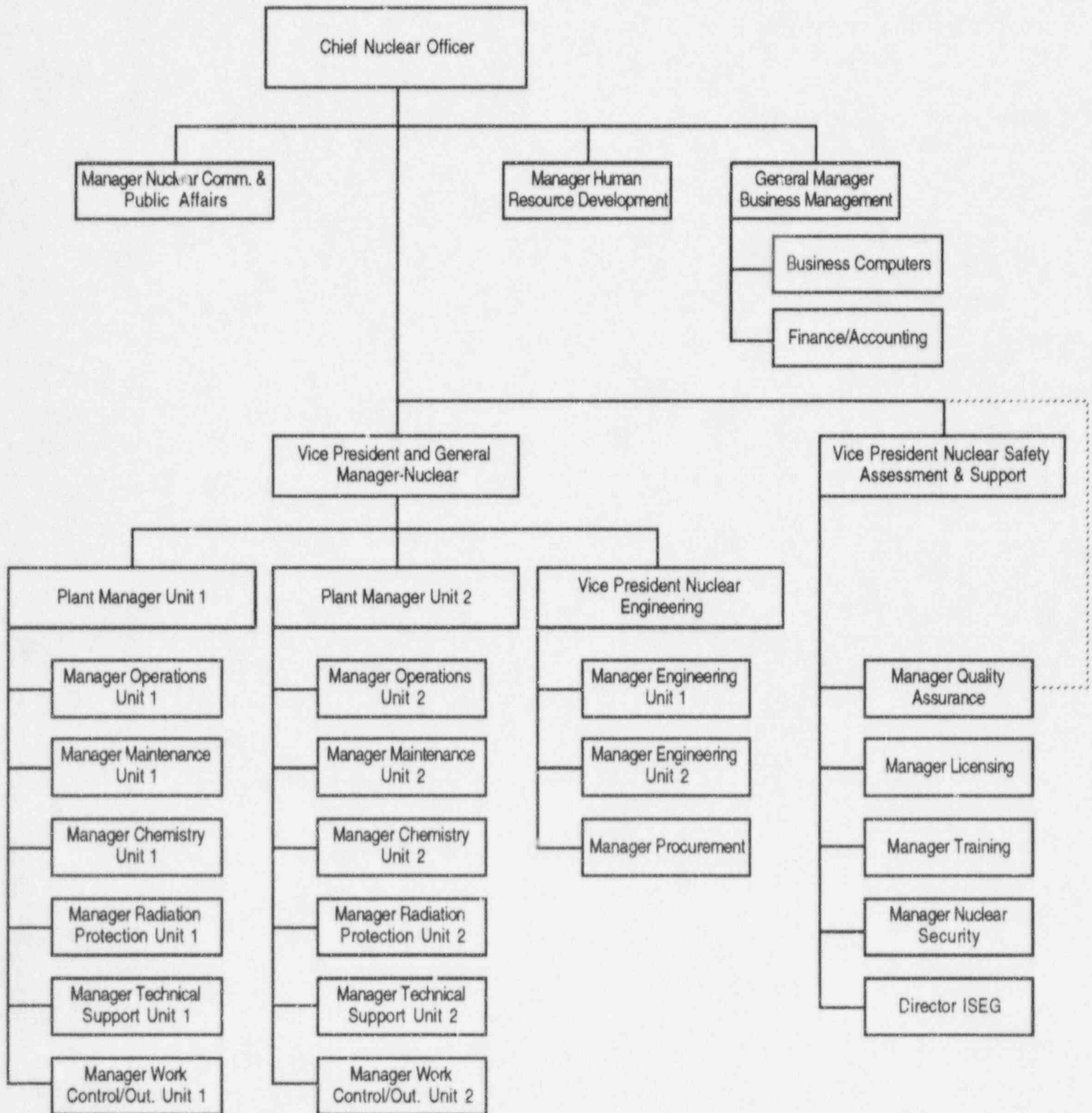
ATTACHMENT C

NMPC UPPER MANAGEMENT GENERATION BUSINESS GROUP



ATTACHMENT D

GENERATION BUSINESS GROUP PROPOSED NMPC NUCLEAR DIVISION MANAGEMENT STRUCTURE



----- For all QA activities relating to the NSAS organization