P.O. Box 63
Lycoming, New York 13093

Constellation
Nuclear

Nine Mile Point
Nuclear Station

A Member of the
Constellation Energy Group

November 26, 2001
NMP1L 1628

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

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Subject: ***Inservice Inspection and Inservice Testing Requirements in Technical Specifications (TAC No. MB3208)***

Gentlemen:

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits an Application for Amendment to Nine Mile Point Unit 1 (NMP1) Operating License DPR-63. Enclosed are proposed changes to the Technical Specifications (TS) set forth in Appendix A of the Operating License. Attachment A provides retyped TS pages with marginal bars to show areas of proposed changes. Attachment B consists of supporting information and analysis demonstrating that the proposed changes involve no significant hazards considerations pursuant to 10CFR50.92. Attachment C is a "marked-up" copy of revised TS pages and associated Bases pages. The Bases pages are provided for information only and do not require issuance by the NRC. NMPNS's determination that the proposed changes meet the criteria for categorical exclusion from performing an environmental assessment is based on the evaluation included as Attachment D.

The proposed changes delete TS 3/4.2.6, "Inservice Inspection and Testing," and the associated Bases, revise TS 4.2.7, "Reactor Coolant System Isolation Valves," and the associated Bases, create a new TS 6.17, "Inservice Testing Program," and delete several reporting requirements in TS 6.9.3, "Special Reports." These changes will improve the NMP1 TS, consistent with current NRC guidance and the improved Standard Technical Specifications for General Electric (GE) BWR/4 and BWR/6 plants (NUREG-1433 and NUREG-1434, respectively). Most of these changes are similar to those already reflected in the Nine Mile Point Unit 2 (NMP2) Improved Technical Specifications (ITS), which are based on NUREG-1433 and NUREG-1434. The adoption of these changes by NMP1 will assure greater uniformity in processes and practices between NMP1 and NMP2, reduce duplicative

A047.

and burdensome requirements, and enhance plant operations. Accordingly, NMPNS requests that the NRC approve these proposed changes expeditiously with an implementation date 30 days following approval.

Pursuant to 10CFR50.91(b)(1), NMPNS has provided a copy of this amendment request and the associated analysis regarding no significant hazards considerations to the appropriate state representative.

Very truly yours,

RLWenderlich

Raymond L. Wenderlich
Senior Constellation Nuclear Officer
Responsible for Nine Mile Point

RLW/IAA/cld
Attachments

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)
Mr. John P. Spath
NYSERDA
286 Washington Avenue Ext.
Albany, NY 12203-6399
Records Management

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Nine Mile Point Nuclear Station, LLC	)	**Docket No. 50-220**
	)	
Nine Mile Point Unit 1	)	

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission, Nine Mile Point Nuclear Station, LLC, holder of Facility Operating License No. DPR-63, hereby requests an amendment to the Technical Specifications (TS) set forth in Appendix A to the License. The proposed changes set forth in Attachment A to this application delete TS 3/4.2.6, "Inservice Inspection and Testing," and the associated Bases, revise TS 4.2.7, "Reactor Coolant System Isolation Valves," and the associated Bases, create a new TS 6.17, "Inservice Testing Program," and delete several reporting requirements in TS 6.9.3, "Special Reports."

The proposed changes will not authorize any change in the types of effluents or in the authorized power level of the facility. Supporting information and analyses which demonstrate that the proposed changes involve no significant hazards considerations pursuant to 10CFR50.92 are included as Attachment B.

WHEREFORE, Applicant respectfully requests that Appendix A to Facility Operating License No. DPR-63 be amended in the form attached hereto as Attachment A.

NINE MILE POINT NUCLEAR STATION, LLC

By RWenderlich

Raymond L. Wenderlich
Senior Constellation Nuclear Officer
Responsible for Nine Mile Point

Subscribed and Sworn to before me
on this 26th day of November 2001.

Sandra A. Oswald
NOTARY PUBLIC

SANDRA A. OSWALD
Notary Public, State of New York
No. 01OS6032276
Qualified in Oswego County
Commission Expires 10/25/05

ATTACHMENT A

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to the Current Technical Specifications

Replace the existing Technical Specifications pages listed below with the attached revised pages. The revised pages have been retyped in their entirety with marginal markings to indicate changes to the text.

Remove	Insert
ii	ii
vi	vi
105	105
106	106
108	108
368	368
374	374

(Deleted)

(Deleted)

LIMITING CONDITION FOR OPERATION

3.2.7 REACTOR COOLANT SYSTEM ISOLATION VALVES

Applicability:

Applies to the operating status of the system of isolation valves on lines connected to the reactor coolant system.

Objective:

To assure the capability of the reactor coolant system isolation valves to minimize reactor coolant loss in the event of a rupture of a line connected to the nuclear steam supply system.

Specification:

a. During power operating conditions whenever the reactor head is on, all reactor coolant system isolation valves on lines connected to the reactor coolant system shall be operable except as specified in "b" below.

b. In the event any isolation valve becomes inoperable the system shall be considered operable provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition, except as noted in Specification 3.1.1.e.

SURVEILLANCE REQUIREMENT

4.2.7 REACTOR COOLANT SYSTEM ISOLATION VALVES

Applicability:

Applies to the periodic testing requirement for the reactor coolant system isolation valves.

Objective:

To assure the capability of the reactor coolant system isolation valves to minimize reactor coolant loss in the event of a rupture of a line connected to the nuclear steam supply system.

Specification:

The reactor coolant system isolation valves surveillance shall be performed as indicated below.

a. At least once per operating cycle the operable automatically initiated power-operated isolation valves shall be tested for automatic initiation and closure times.

b. Additional surveillances shall be performed as required by Specification 6.17.

6.9.3 Special Reports

Special reports shall be submitted in accordance with 10 CFR 50.4 Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

a. Reactor Vessel Material Surveillance Specimen Examination, Specification 4.2.2(b) (12 months).

b. (Deleted)

c. (Deleted)

d. (Deleted)

e. (Deleted)

f. (Deleted)

g. Sealed Source Leakage In Excess Of Limits, Specification 3.6.5.2 (Three months).

h. Calculate Dose from Liquid Effluent in Excess of Limits, Specification 3.6.15.a(2)(b) (30 days from the end of the affected calendar quarter).

i. Calculate Air Dose from Noble Gases Effluent in Excess of Limits, Specification 3.6.15.b(2)(b) (30 days from the end of the affected calendar quarter).

j. Calculate Dose from I-131, H-3 and Radioactive Particulates with half lives greater than eight days in Excess of Limits, Specification 3.6.15.b(3)(b) (30 days from the end of the affected calendar quarter).

k. Calculated Doses from Uranium Fuel Cycle Source in Excess of Limits, Specification 3.6.15.d (30 days from the end of the affected calendar year).

l. Inoperable Gaseous Radwaste Treatment System, Specification 3.6.16.b (30 days from the event).

m. Environmental Radiological Reports. With the level of radioactivity (as the result of plant effluents) in an environmental sampling medium exceeding the reporting level of Table 6.9.3-1, when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within thirty (30) days from the end of the calendar quarter a special report identifying the cause(s) for exceeding the limits, and define the corrective action to be taken.

4. The combined Local Leak Rate Test (Type B & C Tests including airlocks) acceptance criteria is less than 0.6 L_a, calculated on a minimum pathway basis, at all times when containment integrity is required.

   The provisions of Specification 4.0.1 do not apply to the test frequencies specified in the 10 CFR 50 Appendix J Testing Program Plan.

6.17 Inservice Testing Program

This program provides controls for inservice testing of Quality Group A, B, and C pumps and valves to ASME Code Class 1, 2, and 3 requirements, respectively. The program shall include the following:

a. The provisions of Specification 4.0.1 are applicable to the normal and accelerated testing frequencies for performing inservice testing activities;

b. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

ATTACHMENT B

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

Supporting Information and No Significant Hazards Consideration Analysis

INTRODUCTION

The Nine Mile Point Unit 1 (NMP1) Technical Specifications (TS) are specific to NMP1. They are written in a format and use definitions, terminology, Limiting Conditions for Operation (LCOs) and Surveillance Requirements (SRs) that are different from those used at other nuclear power plants.

This proposed change consists of several TS changes designed to improve the NMP1 TS, consistent with current NRC guidance and the improved Standard Technical Specifications for General Electric (GE) BWR/4 and BWR/6 plants (NUREG-1433 and NUREG-1434, respectively). Most of these changes are similar to those already reflected in the Nine Mile Point Unit 2 (NMP2) Improved Technical Specifications (ITS), which are based on NUREG-1433 and NUREG-1434. The adoption of these changes by NMP1 will ensure greater uniformity in processes and practices between NMP1 and NMP2, reduce duplicative and burdensome requirements, and enhance plant operations. Each proposed change is described and evaluated below.

DESCRIPTION AND EVALUATION OF CHANGES

A. Inservice Inspection and Inservice Testing Requirements

TS 3.2.6 and TS 4.2.6 require that Quality Group A, B, and C components satisfy the inservice inspection (ISI) and inservice testing (IST) requirements for ASME Code Class 1, 2, and 3 components, respectively, as stated in Section XI of the ASME Boiler & Pressure Vessel Code and applicable Addenda. The components in question include safety-related component supports, pressure vessels, piping, pumps, and valves. TS 3.2.6 also states that its requirements are in addition to other specified SRs and that nothing in the ASME Code shall be construed to supersede the requirements of any TS. TS 4.2.6 requires that the inservice inspection program for piping identified in NRC Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," be performed in accordance with the NRC staff positions on schedule, methods, personnel, and sample expansion included in the GL.

TS 3.2.6 and TS 4.2.6 allow deviations from the ASME Code Section XI requirements where relief has been granted by the NRC pursuant to 10CFR50.55a(g)(6)(i) and 10CFR50.55a(f)(6)(i).

The Bases for 3.2.6 and 4.2.6 present the background and clarification for the TS 3.2.6 and 4.2.6 requirements.

Consistent with NUREG-1433 and NUREG-1434, it is proposed to remove the ISI program requirements from TS 3.2.6 and 4.2.6 as these requirements are already included in the plant controlled ISI program. The NMP1 operating license requires compliance with 10CFR50.55a, which requires the plant ISI program to conform to the ASME Code Section XI requirements, except as allowed by the specific provisions of 10CFR50.55a. Therefore, the retention of ISI requirements in the NMP1 TS is a duplication and an unnecessary burden. Additionally, these requirements do not meet the criteria specified in 10CFR50.36 for inclusion in the TS.

NMP1 commitments to GL 88-01 are documented in the NRC's Safety Evaluation Reports (SERs) dated May 15, 1990, and June 24, 1991, and in correspondence referenced in these SERs. These commitments are also incorporated in Section 6.1.3, "Generic Letter 88-01, Augmented IGSCC Examinations," of the third ten-year ISI interval Inservice Inspection Program, which was submitted to the NRC by a letter dated October 30, 1999. Therefore, these commitments need not be repeated in the TS.

Consistent with NUREG-1433 and NUREG-1434, it is also proposed to remove details of the IST program from TS 3.2.6 and 4.2.6 as these requirements are already included in the plant controlled IST program. The NMP1 operating license requires compliance with 10CFR50.55a, which requires the plant IST program to conform to the ASME Code Section XI requirements, except as allowed by the specific provisions of 10CFR50.55a. Therefore, the retention of IST requirements in the NMP1 TS is duplicative and an unnecessary burden. Additionally, these requirements do not meet the criteria specified in 10CFR50.36 for inclusion in the TS.

In summary, the regulations and NMP1 commitments to the NRC contain the necessary programmatic requirements for ISI and IST without the need to repeat them in the TS. The details proposed to be removed from the TS need not remain in the TS to provide adequate protection of the public health and safety. Changes to the plant controlled ISI and IST programs are controlled by the provisions of 10CFR50.55a.

The above described changes will result in the deletion of TS 3.2.6 and TS 4.2.6 and their Bases. However, certain provisions and clarifications relating to IST of pumps and valves are proposed to be incorporated into TS 6.0, "Administrative Controls," in a new Section 6.17, titled "Inservice Testing Program." These provisions and clarifications are:

1. Quality Group A, B, and C pumps and valves are tested to ASME Code Class 1, 2, and 3 requirements, respectively. (This provision restates the principal requirement of the current NMP1 TS 4.2.6.b.1.)

2. The provisions of TS 4.0.1, including the 25 percent surveillance interval extension, apply to the normal and accelerated testing frequencies for performing IST. (This is a clarification.)

3. Nothing in the ASME Code supersedes the requirements of any TS. (This provision is a restatement of the current NMP1 TS 3.2.6.d.)

The above provisions and clarifications are similar to those in Section 5.5.7, "Inservice Testing Program," of NUREG-1433 and NUREG-1434 with one exception, which relates to item 2 above and is explained below.

Section 5.5.7 of NUREG-1433 and NUREG-1434 provides a table defining ASME Code frequencies applicable to IST activities (weekly, monthly, quarterly, annually etc) in terms of equivalent number of days. Thus, "monthly" means at least once per 31 days, "quarterly" means at least once per 92 days, "annually" means at least once per 366 days. It is proposed to omit this frequency table from the proposed Section 6.17 of the NMP1 TS. The justification for this omission is that the definition of frequencies in equivalent number of days is a clarification which does not have to be included in the TS per 10CFR50.36 criteria, and it is not currently included in the NMP1 TS.

As the result of omitting the frequency table, the words "The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities," as used in NUREG-1433 and NUREG-1434 regarding application of the 25 percent surveillance extension to the frequencies given in the frequency table, will be replaced in the NMP1 TS by the words "The provisions of Specification 4.0.1 are applicable to the normal and accelerated testing frequencies for performing inservice testing activities."

B. <u>Testing of Reactor Coolant System Isolation Valves</u>

TS 4.2.7, "Reactor Coolant System Isolation Valves," contains periodic testing requirements for the reactor coolant system isolation valves to assure their capability to isolate and minimize reactor coolant loss in the event of a line rupture. TS 4.2.7.b requires that at least once per quarter, all normally open power-operated isolation valves (except the feedwater and main steam line power operated valves) be fully closed and reopened. The feedwater and main steam line valves must remain open and, therefore, are not tested during normal plant operation. It is proposed to revise the quarterly testing required by TS 4.2.7.b in accordance with the periodic testing required by proposed TS 6.17.

The IST program for pumps and valves, as mandated and controlled by 10CFR50.55a, proposed TS 6.17, and ASME Code Section XI/OM Part 10 requirements, includes the necessary periodic testing and test frequencies for all reactor coolant system isolation valves to assure their continued operability and capability to isolate. ASME Code Section XI/OM Part 10 allow valves to be tested quarterly, or during cold shutdown or refueling outages if it is not practicable to perform testing during power operation. Therefore, it is overly restrictive and burdensome to retain the quarterly testing requirement in TS 4.2.7.b. Additionally, this requirement does not meet the criteria stated in 10CFR50.36 for inclusion in the TS and it is not included in NUREG-1433 and NUREG-1434. Based on this, TS 4.2.7.b and the associated Bases are proposed to be revised to reflect IST program requirements.

C. <u>Safety Class 1, 2, and 3 Reports</u>

TS 6.9.3, "Special Reports," items b, c, and d require that Safety Class 1, 2, and 3 ISI reports for Quality Group A, B, and C components that are inspected pursuant to TS 4.2.6 (and the ASME Code, Section XI) be submitted within "three months." These reporting requirements were not part of the TS associated with the NMP1 Provisional Operating License No. DPR-17 (dated August 22, 1969). They were added to the TS by the Full Term Operating License (FTOL) No. DPR-63, dated December 26, 1974, as supplemented by FTOL Amendment No. 6, dated January 15, 1976. The FTOL TS provided tables (Tables 4.2.6.a, b, and c) listing the specific components to be examined and the applicable examination requirements. The current NMP1 TS do not provide these details as the scope, method, and other specifics of the ISI examinations are currently controlled, pursuant to 10 CFR 50.55a, by Section XI of the ASME Code.

ASME Code Section XI requires preparation and submittal of inservice inspection summary reports for Class 1 and Class 2 pressure retaining components and their supports. By letter dated October 5, 2000, the NRC authorized NMP1 to use ASME Code Case N-532 as an alternative to the ASME Code Section XI for satisfying inservice inspection summary report preparation and submittal requirements. ASME Code Case N-532 requires the preparation of an Owner's Activity Report following each refueling outage and the submittal of these Owner's Activity Reports following the end of the inspection period. NUREG-1433 and NUREG-1434 do not contain submittal requirements corresponding to TS 6.9.3, items b, c, and d, and the information in these submittals is routinely available at the site for NRC inspection purposes. Therefore, items b, c, and d are unnecessary and are proposed to be deleted.

D. Primary Containment Leakage Testing Report

TS 6.9.3, item e requires that the results of primary containment leakage testing conducted pursuant to TS 3.3.3, "Leakage Rate," be reported within three months. As explained below, item e duplicates current regulatory guidance and may be deleted.

TS 4.3.3, "Leakage Rate," requires that the primary containment leakage rates be demonstrated "in conformance with the criteria specified in the 10 CFR 50 Appendix J Testing Program Plan as described in Specification 6.16." TS 6.16 requires that the Appendix J Testing Program Plan satisfy Option B of Appendix J and, with certain exceptions, be in accordance with the guidelines contained in Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995. RG 1.163, dated September 1995, endorses Revision 0 of NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50 Appendix J," dated July 26, 1995, with a few restrictions. Section 12.0, "Record Keeping," of NEI 94-01, Revision 0, requires that a post-outage inspection report be prepared and be available on-site for internal and external review. Per Section 12.0, this documentation is not required to be submitted to the NRC.

In light of the above, item e of TS 6.9.3 is unnecessary and is proposed to be deleted.

E. Secondary Containment Leakage Testing

TS 6.9.3, item f requires that the results of secondary containment leakage testing conducted pursuant to TS 3.4.1, "Leakage Rate," be reported within three months.

When the NRC issued NMP1 FTOL Amendment No. 6 on January 15, 1976, item f was added to the licensee's original TS Amendment Application as a unique requirement in accordance with Section C.3, "Unique Reporting Requirements," of RG 1.16, Revision 4, dated August 1975.

RG 1.16 identifies the basis for unique reporting requirements as "unique plant design features or other factors" and states that the need for unique reporting "will be determined on a case-by-case basis." RG 1.16 does not present any specific examples of unique reporting requirements. Nine Mile Point Nuclear Station, LLC has not identified any plant specific reasons for continuation of the reporting requirement of TS 6.9.3.f. Should secondary containment leakage testing results not meet acceptance criteria, appropriate corrective actions and evaluation of reportability per 10CFR50.72 and 10CFR50.73 requirements will be performed. Therefore, Item f is unnecessary and is proposed to be deleted.

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

10CFR50.91 requires a licensee requesting an amendment to provide its analysis concerning the issue of no significant hazards consideration using the standards in 10CFR50.92. Nine Mile Point Nuclear Station, LLC has evaluated this proposed amendment against the standards in 10CFR50.92 and determined that it involves no significant hazards considerations. The following analysis has been performed.

1. **The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed amendment deletes duplicative and unnecessary inservice inspection (ISI) and inservice testing (IST) requirements from the Technical Specifications; clarifies remaining IST requirements; revises a requirement to perform quarterly testing of the reactor coolant isolation valves to conform to the periodic testing requirements of the ASME Boiler and Pressure Vessel Code (ASME Code); and deletes unnecessary reporting requirements relating to routine ISI, primary containment leakage testing, and secondary containment leakage testing. These changes do not reduce the plant's existing ISI/IST commitments based on 10CFR50.55a, Section XI of the ASME Code, and Generic Letter 88-01. These changes also do not involve hardware changes, changes in plant setpoints, or changes in plant safety parameters.

Based on the above, the operation of Nine Mile Point Unit 1 (NMP1) in accordance with the proposed amendment, will not involve a significant increase in the probability or the consequences of an accident previously evaluated.

2. **The operation of Nine Mile Point Unit 1 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 changes do not involve any physical modifications to the plant nor alter equipment configuration, setpoints, or safety parameters. The ISI/IST related changes are consistent with current NRC guidance and industry standards and will continue to ensure acceptable equipment operability and availability.

Based on the above, the operation of NMP1 in accordance with the proposed amendment cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.**

The proposed changes do not affect any of the plant's fission product barriers or safety/operational limits. The ISI/IST related changes will continue to ensure acceptable equipment operability and availability.

Based on the above, the operation of NMP1 in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

ATTACHMENT C

NINE MILE POINT NUCLEAR STATION, LLC
LICENSE NO. DPR-63

DOCKET NO. 50-220

"Marked-Up" Copy of the Current Technical Specifications (TSs) and Associated Bases

LIMITING CONDITION FOR OPERATION

3.2.6 INSERVICE INSPECTION AND TESTING

Applicability:

Applies to components which are part of the reactor coolant pressure boundary and their supports and other safety-related pressure vessels, piping, pumps, and valves.

Objective:

To assure the integrity of the reactor coolant pressure boundary and the operational readiness of safety-related pressure vessels, piping, pumps, and valves.

Specification:

a. Inservice Inspection

1. To be considered operable, Quality Group A, B and C components shall satisfy the requirements contained in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for continued service of ASME Code Class 1, 2 and 3 components, respectively, except where relief has been granted by the Commission pursuant to 10CFR50, Section 50.55a(g)(6)(i).

(Deleted)

SURVEILLANCE REQUIREMENT

4.2.6 INSERVICE INSPECTION AND TESTING

Applicability:

Applies to periodic inspection and testing of components which are part of the reactor coolant pressure boundary and their supports and other safety-related pressure vessels, piping, pumps, and valves.

Objective:

To verify the integrity of the reactor coolant pressure boundary and the operational readiness of safety-related pressure vessels, piping, pumps, and valves.

Specification:

a. Inservice Inspection

1. Inservice inspection of Quality Group A, B and C components shall be performed in accordance with the requirements for ASME Code Class 1, 2 and 3 components, respectively, contained in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a(g), except where relief has been granted by the Commission pursuant to 10CFR Part 50, Section 50.55a (g)(6)(i).

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
	2. The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall be performed in accordance with the staff positions on schedule, methods, personnel and sample expansion included in this generic letter.
b. Inservice Testing	b. Inservice Testing
1. To be considered operable, Quality Group A, B and C pumps and valves, shall satisfy the requirements contained in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for continued service of ASME Code Class 1, 2 and 3 components, respectively, except where relief has been granted by the Commission pursuant to 10CFR50, Section 50.55a(f)(6)(i).	1. Inservice testing of Quality Group A, B and C pumps and valves shall be performed in accordance with the requirements for ASME Code Class 1, 2 and 3 components contained in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a(f), except where relief has been granted by the Commission pursuant to 10CFRPart 50, Section 50.55a(f)(6)(i).
c. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.	
d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.	

(Deleted)

The inservice inspection and testing programs[1][2] for the Nine Mile Point Unit 1 plant conform to the requirements of 10CFR50, Section 50.55a(f) and (g). Where practical, the inspection of components, pumps and valves classified into NRC Quality Groups A, B and C conforms to the requirements of ASME Code Class 1, 2 and 3 components, pumps, and valves, respectively, contained in Section XI of the ASME Boiler and Pressure Vessel Code. If a Code required inspection is impractical for the Nine Mile Point Unit 1 facility, a request for relief from that requirement is submitted to the Commission in accordance with 10CFR50, Section 50.55a(f)(6)(i) and Section 50.55a(g)(6)(i).

Request for relief from the requirements of Section XI of the ASME Code and applicable Addenda will be submitted to the Commission prior to the beginning of each 10-year inspection interval if they are known to be required at the time. Requests for relief which are identified during the course of inspection will be submitted quarterly throughout the inspection interval.

The inservice inspection program for piping conforms to the staff positions on schedules, methods, personnel and sample expansion contained in Generic Letter 88-01.[3] It is performed in order to detect and survey intergranular stress corrosion cracking of BWR austenitic stainless steel piping that is four inches or larger in nominal diameter and contains reactor coolant at a temperature above 200°F during power operation. Inspections shall be performed by individuals qualified to: (A) the ASME Boiler and Pressure Vessel Code, Section XI, and (B) Ultrasonic Testing Operator Training for the Detection of Intergranular Stress Corrosion Cracking developed by the EPRI Non-Destructive Examination Center. As an alternate, the licensee may use other qualification programs approved by the NRC.

(Deleted)

References

(1) Letter from the Nuclear Regulatory Commission (D.B. Vassallo) to Niagara Mohawk Power Corporation (G.K. Rhode), dated September 19, 1983.

(2) Letter from Niagara Mohawk Power Corporation (D.P. Dise) to the Nuclear Regulatory Commission (T.A. Ippolito), dated August 7, 1981.

(3) Generic Letter 88-01 endorses NUREG 0313 Revision 2, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," dated January 1988.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT

3.2.7 REACTOR COOLANT SYSTEM ISOLATION VALVES

Applicability:

Applies to the operating status of the system of isolation valves on lines connected to the reactor coolant system.

Objective:

To assure the capability of the reactor coolant system isolation valves to minimize reactor coolant loss in the event of a rupture of a line connected to the nuclear steam supply system.

Specification:

a. During power operating conditions whenever the reactor head is on, all reactor coolant system isolation valves on lines connected to the reactor coolant system shall be operable except as specified in "b" below.

b. In the event any isolation valve becomes inoperable the system shall be considered operable provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition, except as noted in Specification 3.1.1.e.

(1) p

4.2.7 REACTOR COOLANT SYSTEM ISOLATION VALVES

Applicability:

Applies to the periodic testing requirement for the reactor coolant system isolation valves.

Objective:

To assure the capability of the reactor coolant system isolation valves to minimize reactor coolant loss in the event of a rupture of a line connected to the nuclear steam supply system.

Specification:

The reactor coolant system isolation valves surveillance shall be performed as indicated below.

(1) p

a. At least once per operating cycle the operable automatically initiated power-operated isolation valves shall be tested for automatic initiation and closure times.

b. ~~At least once per quarter all normally open power-operated isolation valves (except the feedwater and main-steam-line power-operated isolation valves) shall be fully closed and reopened.~~ Additional surveillances shall be performed as required by Specification 6.17

BASES FOR 3.2.7 AND 4.2.7 REACTOR COOLANT SYSTEM ISOLATION VALVES

The list of reactor coolant isolation valves is contained in the procedure governing controlled lists and have been removed from the Technical Specifications per Generic Letter 91-08. Revisions will be processed in accordance with Section 6.0, "Administrative Controls."

Double isolation valves are provided in lines which connect to the reactor coolant system to assure isolation and minimize reactor coolant loss in the event of a line rupture. The specified valve requirements assure that isolation is already accomplished with one valve shut or provide redundancy in an open line with two operative valves. Except where check valves are used as one or both of a set of double isolation valves, the isolation valves shall be capable of automatic initiation. Valve closure times are selected to minimize coolant losses in the event of the specific line rupturing and are procedurally controlled. Using the longest closure time on the main-steam-line valves following a main-steam-line break (Section XV C.1.0)[1], the core is still covered by the time the valves close. Following a specific system line break, the cleanup and shutdown cooling closing times will upon initiation from a low-low level signal limit coolant loss such that the core is not uncovered. Feedwater flow would quickly restore coolant levels to prevent clad damage. Closure times are discussed in Section VI-D.1.0[1].

The valve operability test intervals are based on periods not likely to significantly affect operations, and are consistent with testing of other systems. Results obtained during closure testing are not expected to differ appreciably from closure times under accident conditions as in most cases, flow helps to seal the valve.

The test interval of once per operating cycle for automatic initiation results in a failure probability of 1.1×10^{-7} (Fifth Supplement, p. 115)[2] that a line will not isolate. ~~More frequent testing for valve operability results in a more reliable system.~~

Additional surveillances are in accordance with the Inservice Testing Program described in Specification 6.17.

(1) UFSAR
(2) FSAR

6.9.3 Special Reports

Special reports shall be submitted in accordance with 10 CFR 50.4 Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

a. Reactor Vessel Material Surveillance Specimen Examination, Specification 4.2.2(b) (12 months).

b. ~~Safety Class 1 Inservice Inspection, Specification 4.2.6 (Three months).~~ (Deleted)

c. ~~Safety Class 2 Inservice Inspections, Specification 4.2.6 (Three months).~~ (Deleted)

d. ~~Safety Class 3 Inservice Inspections, Specification 4.2.6 (Three months).~~ (Deleted)

e. ~~Primary Containment Leakage Testing, Specification 3.3.3 (Three months).~~ (Deleted)

f. ~~Secondary Containment Leakage Testing, Specification 3.4.1 (Three months).~~ (Deleted)

g. Sealed Source Leakage In Excess Of Limits, Specification 3.6.5.2 (Three months).

h. Calculate Dose from Liquid Effluent in Excess of Limits, Specification 3.6.15.a(2)(b) (30 days from the end of the affected calendar quarter).

i. Calculate Air Dose from Noble Gases Effluent in Excess of Limits, Specification 3.6.15.b(2)(b) (30 days from the end of the affected calendar quarter).

j. Calculate Dose from I-131, H-3 and Radioactive Particulates with half lives greater than eight days in Excess of Limits, Specification 3.6.15.b(3)(b) (30 days from the end of the affected calendar quarter).

k. Calculated Doses from Uranium Fuel Cycle Source in Excess of Limits, Specification 3.6.15.d (30 days from the end of the affected calendar year).

l. Inoperable Gaseous Radwaste Treatment System, Specification 3.6.16.b (30 days from the event).

m. Environmental Radiological Reports. With the level of radioactivity (as the result of plant effluents) in an environmental sampling medium exceeding the reporting level of Table 6.9.3-1, when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within thirty (30) days from the end of the calendar quarter a special report identifying the cause(s) for exceeding the limits, and define the corrective action to be taken.

4. The combined Local Leak Rate Test (Type B & C Tests including airlocks) acceptance criteria is less than 0.6 L_a, calculated on a minimum pathway basis, at all times when containment integrity is required.

   The provisions of Specification 4.0.1 do not apply to the test frequencies specified in the 10 CFR 50 Appendix J Testing Program Plan.

6.17 Inservice Testing Program

This program provides controls for inservice testing of Quality Group A, B, and C pumps and valves to ASME Code Class 1, 2, and 3 requirements, respectively. The program shall include the following:

a. The provisions of Specification 4.0.1 are applicable to the normal and accelerated testing frequencies for performing inservice testing activities;

b. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

NEW ADDITION

ATTACHMENT D

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

Eligibility for Categorical Exclusion from Performing an Environmental Assessment

10 CFR 51.22 provides criteria for, and identification of, licensing and regulatory actions eligible for exclusion from performing an environmental assessment. Nine Mile Point Nuclear Station, LLC has reviewed the proposed amendment and determined that it does not involve a significant hazard consideration, and there will be no significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, nor will there be any significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is required to be prepared in connection with this license amendment application.