



**Constellation
Nuclear**

**Nine Mile Point
Nuclear Station**

*A Member of the
Constellation Energy Group*

December 26, 2001
NMP2L 2043

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

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69
TAC No. MB3545

Subject: Application for Amendment to Technical Specification 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)"

Gentlemen:

Nine Mile Point Nuclear Station, LLC, (NMPNS) hereby transmits an Application for Amendment to the Nine Mile Point Unit 2 (NMP2) Technical Specifications (TSs) as set forth in Appendix A of Operating License NPF-69. Enclosed as Attachment A is the proposed change to the NMP2 TSs. The supporting information and analyses pursuant to 10 CFR 50.92 which demonstrate that the proposed change does not involve a significant hazards consideration are included as Attachment B. To assist the NRC Staff with their review, a hand "marked-up" copy of the affected TS page is provided as Attachment C. The basis for concluding that this application meets the criteria of 10 CFR 51.22 for categorical exclusion from performing an environmental assessment is included as Attachment D.

The proposed change to the TSs contained herein revises Section 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," to remove the "AO" (i.e., air-operated) designator from the valve numbers for feedwater check valves 2FWS*AOV23A and B, as listed in TS Table 3.6.1.3-1, "Secondary Containment Bypass Leakage Paths Leakage Rate Limits." This change will have no impact on the applicable TS surveillance requirements as defined in Surveillance Requirement (SR) 3.6.1.3.11. The leakage rate for these valves will continue to be verified to be within the secondary containment bypass leakage rate limits of Table 3.6.1.3-1 when pressurized to ≥ 40 psig at a frequency in accordance with the 10 CFR 50 Appendix J Testing Program Plan.

The proposed nomenclature change will allow implementation of a design change to convert feedwater check valves 2FWS*AOV23A and B from air-operated testable check valves to simple check valves. Based on NMP2 plant-specific root cause analyses and

A001

Rec'd
01/23/02

industry experience, the remote testing and position indication design features provided on testable check valves have a history of reliability problems which have resulted in multiple occurrences of the valves failing to completely close. The design change will remove the nonsafety-related remote air-operated testing capability and local and remote disc position indication, which is expected to improve the reliability and overall performance of the valves by simplifying their operation and eliminating identified failure modes. Removal of the remote position indication will eliminate the need to perform the associated position indication channel checks every 31 days and channel calibrations every 24 months pursuant to TS Section 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," SRs 3.3.3.1.1 and 3.3.3.1.3, respectively.

NRC approval of the proposed change to TS Table 3.6.1.3-1 is necessary to facilitate the redesign of feedwater check valves 2FWS*AOV23A and B. Due to equipment reliability concerns with these valves, NMPNS plans to implement the design change to convert the valves to simple check valves during the Spring 2002 refueling outage (RF08). Therefore, NMPNS requests that this TS amendment application be approved and the amendment issued no later than March 15, 2002, with the implementation date specified as prior to startup from RFO8.

Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this amendment application and the associated analyses regarding no significant hazard considerations to the appropriate state representative.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 26, 2001.

Very truly yours,



John T. Conway
Site Vice President

JTC/CDM/cld
Attachments

cc: 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

ATTACHMENT A

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. NPF-69

DOCKET NO. 50-410

Proposed Changes to the Current Technical Specifications (TSs)

Replace existing TS page 3.6.1.3-14 with the attached corresponding revised page. The revised replacement page has been retyped in its entirety, incorporating the change, and includes a marginal marking (revision bar) to indicate the change.

Table 3.6.1.3-1 (page 1 of 2)
Secondary Containment Bypass Leakage Paths Leakage Rate Limits

VALVE NUMBER	PER VALVE LEAK RATE (SCFH)
2MSS*MOV111 2MSS*MOV112	1.875
2MSS*MOV208	0.625
2CMS*SOV74A, B 2CMS*SOV75A, B 2CMS*SOV76A, B 2CMS*SOV77A, B	0.2344
2DER*MOV119 2DER*RV344	(a)
2DER*MOV120	1.25
2DER*MOV130 2DER*MOV131	0.625
2DFR*MOV120	1.875
2DFR*MOV121 2DFR*RV228	(b)
2DFR*MOV139 2DFR*MOV140	0.9375
2WCS*MOV102 2WCS*MOV112	2.5
2FWS*V23A, B 2FWS*V12A, B	12.0
2CPS*AOV104 2CPS*AOV106	4.38

(continued)

(a) The combined leakage rate for these two valves shall be ≤ 1.25 SCFH.

(b) The combined leakage rate for these two valves shall be ≤ 1.875 SCFH.

ATTACHMENT B

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. NPF-69

DOCKET NO. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

Background

During normal plant operation, the feedwater system provides feedwater flow to the reactor through two 24-inch feedwater lines connected to the reactor pressure vessel. The feedwater lines are part of the reactor coolant pressure boundary since they penetrate the containment drywell prior to connecting to the reactor vessel. The two feedwater lines are provided with safety-related motor-operated containment isolation valves 2FWS*MOV21A and B and containment isolation testable check valves 2FWS*AOV23A and B located outside containment and containment isolation simple check valves 2FWS*V12A and B and manual isolation valves 2FWS*HCV54A and B located inside containment. These valves are normally open during plant operation to supply makeup water to the reactor vessel to maintain the required reactor vessel water level. The feedwater lines and provided containment isolation valves meet 10 CFR 50, Appendix A, General Design Criterion (GDC) 55, for "other defined basis" as discussed in NUREG-1047, "Safety Evaluation Report related to the operation of Nine Mile Point Nuclear Station, Unit No. 2," Supplement 3. The feedwater system is described in Updated Safety Analysis Report (USAR) Sections 5.4.9, 10.4.7, and Figures 10.1-6a and b.

In the event of a feedwater line break outside containment, feedwater check valves 2FWS*AOV23A and B and 2FWS*V12A and B are credited to close to restore the reactor coolant pressure boundary and prevent a significant loss of reactor coolant inventory. Furthermore, since the reactor water cleanup (RWCU) system return lines connect to the feedwater lines outside containment, isolation of an RWCU return line break from the reactor vessel is also provided by closure of the feedwater check valves.

For a loss of coolant accident (LOCA), the feedwater check valves are credited to close on reverse flow to isolate containment to preserve the primary containment boundary. The motor-operated containment isolation valves (2FWS*MOV21A and B) do not automatically isolate on a LOCA since it is desirable to maintain reactor coolant makeup capability from all sources of supply during a LOCA. The motor-operated valves can be remotely closed from the control room to provide long-term leakage protection upon operator judgment that feedwater makeup is unavailable or unnecessary.

The feedwater check valves are also credited to close during a LOCA to assure the secondary containment bypass leakage rate is maintained within the value assumed in the radiological analyses. Technical Specification (TS) Table 3.6.1.3-1, "Secondary Containment Bypass Leakage Paths Leakage Rate Limits," specifies a bypass leakage limit of 12.0 scfh per valve for check valves 2FWS*AOV23A and B and 2FWS*V12A and B. Table 3.6.1.3-1 is included in the TSs because the Nine Mile Point Unit 2 (NMP2) radiological analyses assume a secondary containment bypass leakage rate through each individual leakage path rather than a total combined leakage rate.

Feedwater check valves 2FWS*AOV23A and B are 24-inch testable check valves designed to be normally open during normal plant operation, with the capability for remote (air-operated) test closing. The remote testing capability is provided by externally mounted air-actuators and open and close position indication limit switches. Test switches and open and close position indication lights are provided at control room panel 603. The valves will close on a loss or reversal of feedwater flow, and will close on reverse flow even with the test switches selected to the open position. The valves will open when feedwater pump discharge pressure exceeds reactor pressure even with the test switches selected to the closed position. On a loss of electrical power to the solenoids or a loss of air pressure to the air-actuators, the air-actuator closing spring and gravity acting on the valve disc will close the valves (with no forward flow). The remote testing function and associated design features, including position indication, are not safety-related.

Feedwater testable check valves 2FWS*AOV23A and B are full-stroke exercise tested in the reverse flow direction at a test frequency of cold shutdown in accordance with the NMP2 inservice testing (IST) program. TS Section 5.5.6, "Inservice Testing Program," establishes the regulatory requirements for programmatic controls pertaining to inservice testing of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 pumps and valves. The feedwater testable check valves are IST Category AC valves since they are credited with an active close safety function which limits seat leakage to a specific maximum amount (specified in TS Table 3.6.1.3-1).

The remote valve position indication channels for feedwater testable check valves 2FWS*AOV23A and B are currently channel checked every 31 days in accordance with TS Section 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," Surveillance Requirement (SR) 3.3.3.1.1 and calibrated every 24 months in accordance SR 3.3.3.1.3.

TS Section 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," SR 3.6.1.3.11 specifies that the secondary containment bypass leakage paths be verified to be within the limits of Table 3.6.1.3-1 when pressurized to ≥ 40 psig at a frequency in accordance with the 10 CFR 50 Appendix J Testing Program Plan. As discussed in USAR Section 6.2.3.2.3, the feedwater lines to the reactor pressure vessel (penetrations Z-4A and Z-4B) are considered secondary containment bypass leakage paths. As such, feedwater containment isolation check valves 2FWS*AOV23A and B and 2FWS*V12A and B are included in TS Table 3.6.1.3-1 and Type C leakage tested at a pressure of ≥ 40 psig at a frequency of at least once per 30 months in accordance with the NMP2 10 CFR 50

Appendix J Testing Program Plan and Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program."

Description of Change

The proposed change revises TS Section 3.6.1.3 to remove the "AO" (i.e., air-operated) designator from valve numbers 2FWS*AOV23A and B, as listed in Table 3.6.1.3-1. This change will have no impact on the applicable TS requirements of SR 3.6.1.3.11. The leakage rate for these valves (to be re-numbered to 2FWS*V23A and B) will continue to be verified to be within the secondary containment bypass leakage rate limits of Table 3.6.1.3-1 when pressurized to ≥ 40 psig at a frequency in accordance with the 10 CFR 50 Appendix J Testing Program Plan.

The proposed change will allow implementation of a design change to convert feedwater check valves 2FWS*AOV23A and B from air-operated testable check valves to simple check valves by removing the nonsafety-related remote air-operated testing capability and local and remote disc position indication. Removal of the remote position indication will eliminate the need to perform the associated position indication channel checks every 31 days and channel calibrations every 24 months pursuant to TS SRs 3.3.3.1.1 and 3.3.3.1.3, respectively.

Reason for Change

NMP2 uses Anchor Darling testable check valves in various systems as containment isolation and high-pressure/low-pressure interface valves. This type of check valve is unique in that it is remotely testable and has disc position indication. Based on the results of NMP2 plant-specific root cause analyses and industry experience, the remote testing and position indication design features provided on testable check valves have a history of reliability problems which have resulted in multiple occurrences of the valves failing to completely close.

In an effort to improve the reliability and overall performance of feedwater testable check valves 2FWS*AOV23A and B, NMP2 evaluated several design change options. Based on the evaluation, it was determined that the most appropriate design change for the feedwater check valves would be to change the valves to simple check valves by removing the nonsafety-related remote testing capability and local and remote disc position indication. This change will reduce the torsional loads that resist valve closure and is expected to improve feedwater check valve reliability and overall performance. Nine Mile Point Nuclear Station, LLC, (NMPNS) plans to implement the above described design change during the Spring 2002 refueling outage. Similar design changes have been implemented at Vermont Yankee, Duane Arnold, and Susquehanna.

As previously discussed, NMPNS requests a revision to TS Section 3.6.1.3 to remove the "AO" (i.e., air-operated) designator from the valve numbers for feedwater testable check valves 2FWS*AOV23A and B, as listed in Table 3.6.1.3-1. The proposed valve numbers (2FWS*V23A and B) are indicative of simple check valves and reflect implementation of

a design change which removes the remote air-operated testing and position indication design features. NRC approval of the proposed TS change is necessary pursuant to 10 CFR 50.90 to facilitate the redesign of the feedwater check valves. Revision of the feedwater check valve nomenclature represents a change to components that satisfy Criterion 3 of 10 CFR 50.36 for inclusion in the TSs.

Evaluation

The proposed TS change reflects the implementation of a design change to convert feedwater check valves 2FWS*AOV23A and B from air-operated testable check valves to simple check valves by removing the remote air-operated testing capability and local and remote disc position indication. The remote testing and position indication design features were originally provided to accommodate partial test closing of the valves on-line with only a minor effect on feedwater flow. The remote testing function and associated design features, including position indication, are not safety-related. The feedwater check valves are credited to close on reverse flow in the event of a LOCA to isolate containment to preserve the primary containment boundary and maintain the secondary containment bypass leakage rate within the value assumed in the radiological analyses. The feedwater check valves are also credited to close to restore the reactor coolant pressure boundary and prevent a significant loss of reactor coolant inventory in the event of a feedwater or RWCU return line break outside containment. The feedwater check valves have an active open function to open during normal plant operation to supply makeup water (i.e., feedwater) to the reactor vessel to maintain the required reactor vessel water level. The active open reactor coolant makeup function is not safety-related, but is considered important to safety. The active close containment isolation and line break isolation functions for the feedwater check valves are safety-related.

The feedwater check valves are designed to close on a loss or reversal of feedwater flow and will close on reverse flow even with the control room test switches selected to the open position. The valves are designed to open when feedwater pump discharge pressure exceeds reactor pressure even with the test switches selected to the closed position. The feedwater check valves are provided for accident mitigation and have no flow control functions as feedwater flow is controlled by the flow control valves. A failure of the valves to open or close is not an assumed precursor to the loss of feedwater accident or any other analyzed accident or transient.

The proposed change will not affect the capability of the feedwater check valves to close on a loss or reversal of feedwater flow, or their capability to open when feedwater pump discharge pressure exceeds reactor pressure. Moreover, removal of the nonsafety-related remote testing and position indication design features is expected to improve the reliability and overall performance of the valves by eliminating identified failure modes and provides additional assurance that the valves are capable of performing their open and close functions. Removal of the position indication is consistent with Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Environs Conditions During and Following an Accident," which exempts primary containment isolation check valves from the requirement for remote position indication.

Therefore, the proposed change maintains acceptable compliance with Regulatory Guide 1.97 and will not adversely affect a function that is safety-related or important to safety.

GDC 55 is the governing design criterion for the feedwater lines since they are considered part of the reactor coolant pressure boundary and penetrate the primary containment. Each feedwater line is provided with a safety-related motor-operated containment isolation valve and containment isolation testable check valve (2FWS*AOV23A(B)) located outside containment and a safety-related containment isolation simple check valve and manual isolation valve located inside containment. The outside and inside containment isolation check valves are located as close to the primary containment wall as practical. The feedwater piping within the outermost (motor-operated) isolation valve, including the isolation valves, meets the quality assurance requirements of 10 CFR 50, Appendix B, and is constructed in accordance with the requirements for Seismic Category I structures and components. As evaluated in Supplement 3 of NUREG-1047, the feedwater lines satisfy the "other defined basis" provision of GDC 55 because each line is provided with three containment isolation valves. Should a break occur, the check valves prevent significant loss of reactor coolant inventory and offer prompt primary containment isolation. During a postulated LOCA, the check valves are credited to close on reverse flow to isolate containment, but would re-open if feedwater makeup is available and desired.

The proposed change does not affect the number of feedwater containment isolation valves or their location, nor does the change affect the component or structural qualification of the feedwater piping and valves. The feedwater check valves will remain capable of closing on a loss or reversal of feedwater flow in the event of a line break or LOCA, as well as remain capable of re-opening during a LOCA when reactor coolant makeup is desired and feedwater pump discharge pressure exceeds reactor pressure. The associated design change only affects the nonsafety-related remote testing and position indication design features of the valves and has been prepared and will be implemented in accordance with established procedures and accepted codes and standards. Therefore, the proposed change and associated implementing design change will not adversely affect compliance with GDC 55 and will not degrade the quality or performance of the feedwater system piping and components.

TS SR 3.6.1.3.11 specifies that the leakage rate for feedwater testable check valves 2FWS*AOV23A and B be verified to be within the secondary containment bypass leakage rate limits of Table 3.6.1.3-1 when pressurized to ≥ 40 psig at a frequency in accordance with the 10 CFR 50 Appendix J Testing Program Plan. The proposed change does not affect the bypass leakage rate assumed in the radiological analyses for NMP2 or the applicable Appendix J testing requirements. The valves will continue to be Type C leakage tested following implementation of the design change in accordance with TS SR 3.6.1.3.11 at the current frequency of at least once per 30 months. Accordingly, the proposed change will have no impact on compliance with SR 3.6.1.3.11.

The remote position indication channels for feedwater check valves 2FWS*AOV23A and B are currently channel checked every 31 days and calibrated every 24 months in

accordance with TS SRs 3.3.3.1.1 and 3.3.3.1.3, respectively. In addition, the NMP2 IST Program requires the remote position indicators for these valves to be verified by observing the valves locally at least every two years to assure valve operation is accurately indicated.

The proposed change allows implementation of a design change that includes removal of the local and remote disc position indication from the valves. Regulatory Guide 1.97 exempts the feedwater check valves (i.e., check valves used as primary containment isolation valves) from the requirement for remote position indication and verification of the remote position indication is only required if it exists. There is no regulatory requirement applicable to the feedwater check valves that requires the valves to have local position indication. Moreover, the position indication function of these valves is not safety-related. Therefore, removal of the valve position indication is acceptable. Following implementation of the design change, TS SRs 3.3.3.1.1 and 3.3.3.1.3 will no longer be applicable to the valves (and the associated testing will no longer be performed on the valves) since the remote position indication channels will have been removed.

The NMP2 IST Program requires full-stroke exercise testing of feedwater check valves 2FWS*AOV23A and B in the reverse flow direction at a frequency of cold shutdown. The cold shutdown test frequency was established based on the air-actuators for the valves not being designed to close the valves during normal plant operation (i.e., against forward flow). The cold shutdown test frequency was justified because (1) feedwater flow is not needed to maintain reactor vessel water level during cold shutdown as other sources of makeup (e.g., control rod drive system) are available and (2) the availability of valve position indication allows confirmation that the valve discs re-closed following completion of the required full-stroke exercise testing without the necessity of performing additional leakage testing.

The proposed change will not affect the IST Program requirement to perform full-stroke exercise testing in the reverse flow direction since the valves remain Category AC check valves with a credited active close safety function and specified seat leakage limit. However, disc position indication will no longer be available to assure satisfactory completion of the test. Consequently, the Appendix J Type C leakage test will be credited as the full-stroke exercise test in the reverse flow direction. Crediting the Appendix J Type C leakage test as the full-stroke exercise test in the reverse flow direction is acceptable in that the test verifies the valve disc to be fully closed following cessation of forward flow.

Conclusions

NMPNS is requesting a revision to TS Section 3.6.1.3 to remove the “AO” (i.e., air-operated) designator from the valve numbers for feedwater testable check valves 2FWS*AOV23A and B, as listed in Table 3.6.1.3-1. The proposed valve numbers (2FWS*V23A and B) are indicative of simple check valves and reflect implementation of a design change which removes the remote air-operated testing and position indication design features. NRC approval of the proposed TS change is necessary since revision of

the feedwater check valve nomenclature represents a change to components that satisfy Criterion 3 of 10 CFR 50.36.

The proposed change and associated implementing design change only affect the nonsafety-related remote testing and position indication design features of the feedwater check valves. The design change will not adversely affect compliance with GDC 55 and will not degrade the quality or performance of the feedwater piping and components. The feedwater check valves will remain capable of closing on a loss or reversal of feedwater flow in the event of a line break or LOCA, as well as remain capable of re-opening during a LOCA when reactor coolant makeup is desired and feedwater pump discharge pressure exceeds reactor pressure. Moreover, removal of the nonsafety-related remote testing and position indication design features is expected to improve the reliability and overall performance of the feedwater check valves by eliminating identified failure modes and provides additional assurance that the valves are capable of performing their open and close functions.

Removal of the position indication is consistent with Regulatory Guide 1.97 and eliminates the need to perform remote position indication testing on the valves pursuant to TS SRs 3.3.3.1.1 and 3.3.3.1.3. The feedwater check valves will continue to be Appendix J Type C leakage tested in accordance with TS SR 3.6.1.3.11 at the current frequency of at least once per 30 months. The Appendix J Type C leakage test will be credited as the full-stroke exercise test in the reverse flow direction.

Therefore, the proposed change will not adversely affect the capability of the feedwater check valves to mitigate the consequences of an accident and provides continued assurance that plant operation will be conducted in compliance with applicable NRC regulations. Accordingly, NMPNS believes that the proposed change is acceptable and operation in the proposed manner will not present undue risk to the public health and safety or be inimical to the common defense and security.

No Significant Hazards Consideration Analysis

According to 10 CFR 50.91, at the time a licensee requests an amendment to its operating license, the licensee must provide to the NRC its analysis, using the standards in 10 CFR 50.92, concerning the issue of no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

NMPNS has evaluated this proposed amendment pursuant to 10 CFR 50.91 and has determined that it involves no significant hazards considerations.

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 feedwater check valves are provided for accident mitigation and have no flow control functions. A failure of the valves to open or close is not an assumed precursor to the loss of feedwater accident or any other previously analyzed accident or transient. The proposed nomenclature change will allow implementation of a design change to convert the valves from air-operated testable check valves to simple check valves by removing the remote air-operated testing capability and local and remote disc position indication. Following implementation of the design change, the feedwater check valves will remain capable of closing on a loss or reversal of feedwater flow in the event of a line break or LOCA, as well as remain capable of re-opening during a LOCA when reactor coolant makeup is desired and feedwater pump discharge pressure exceeds reactor pressure. Moreover, removal of the remote testing and position indication design features is expected to improve the reliability and overall performance of the feedwater check valves by removing identified failure modes and provides additional assurance that the valves are capable of performing their open and close functions. The feedwater check valves will continue to be Appendix J Type C leakage tested in accordance with TS SR 3.6.1.3.11 at the current frequency. Therefore, the proposed change will not adversely affect the capability of the feedwater check valves to mitigate the consequences of an accident and provides continued assurance that plant operation will be conducted in compliance with applicable NRC regulations. Accordingly, the proposed amendment will not significantly increase 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.

Removal of the remote air-operated testing and position indication design features is expected to improve the reliability and overall performance of the feedwater check valves by eliminating identified failure modes and provides additional assurance that the valves are capable of performing their open and close functions. Therefore, the feedwater check valves will continue to perform their accident mitigation safety functions and important to safety reactor coolant makeup functions as previously evaluated. Accordingly, the proposed amendment will not create the possibility of a new or different kind of accident from any accident 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 feedwater check valves are credited to close on reverse flow in the event of a LOCA to preserve the primary containment boundary and maintain the secondary containment bypass leakage rate within the value assumed in the radiological analyses. The feedwater check valves are also credited to close to restore the reactor coolant pressure boundary and prevent a significant loss of reactor coolant inventory in the event of a feedwater or RWCU return line break outside containment. The feedwater check valves are credited to open during normal plant operation to supply makeup water to the reactor vessel to maintain the required reactor vessel water level. The active open reactor coolant makeup function is not safety-related, but is considered important to safety. The active close containment isolation and line break isolation functions are safety-related. The proposed change and associated implementing design change only affect the nonsafety-related remote testing and position indication design features of the feedwater check valves. There will be no adverse effect on compliance with GDC 55 or on the capability the valves to perform their active close safety functions and active open important to safety function. The design change has been prepared and will be implemented in accordance with established procedures and accepted codes and standards such that there will be no degradation of the feedwater system piping and components. Converting the valves to simple check valves is expected to improve their reliability and overall performance by eliminating identified failure modes and provides additional assurance that the valves are capable of performing their open and close functions. Therefore, the proposed change will not adversely affect any structure, system, component, or function that is safety-related or important to safety. Accordingly, the proposed amendment will not involve a significant reduction in a margin of safety.

ATTACHMENT C

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. NPF-69

DOCKET NO. 50-410

“Marked-Up” Copy of the Current Technical Specifications (TSs)

The current version of TS page 3.6.1.3-14 has been marked-up by hand to reflect the proposed change.

Table 3.6.1.3-1 (page 1 of 2)
Secondary Containment Bypass Leakage Paths Leakage Rate Limits

VALVE NUMBER	PER VALVE LEAK RATE (SCFH)
2MSS*MOV111 2MSS*MOV112	1.875
2MSS*MOV208	0.625
2CMS*S0V74A, B 2CMS*S0V75A, B 2CMS*S0V76A, B 2CMS*S0V77A, B	0.2344
2DER*MOV119 2DER*RV344	(a)
2DER*MOV120	1.25
2DER*MOV130 2DER*MOV131	0.625
2DFR*MOV120	1.875
2DFR*MOV121 2DFR*RV228	(b)
2DFR*MOV139 2DFR*MOV140	0.9375
2WCS*MOV102 2WCS*MOV112	2.5
2FWS* AOV V23A, B 2FWS*V12A, B	12.0
2CPS*AOV104 2CPS*AOV106	4.38

(continued)

(a) The combined leakage rate for these two valves shall be ≤ 1.25 SCFH.

(b) The combined leakage rate for these two valves shall be ≤ 1.875 SCFH.

ATTACHMENT D

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. NPF-69

DOCKET NO. 50-410

**Eligibility for Categorical Exclusion from Performing an
Environmental Assessment**

The provisions of 10 CFR 51.22 provide 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 significant hazard considerations, 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 the issuance of this license amendment.