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Ltr on behalf of Niagara Mohawk Pwr Corp..... w/attch certificate of service....notarized 2-19-76....trans the following:

ENCLOSURE

Amdt to OL/Change to Tech Specs: Consists of revisions to tech specs with regard to sections dealing with SNUBBERS....(40 cys encl rec'd)

PLANT NAME: Nine Mile Point #1

SAFETY — FOR ACTION/INFORMATION — ENVIRO 2-20-76 ehf

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February 19, 1976

Mr. Ben C. Rusche
Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station Unit No. 1
Docket No. 50-220

Dear Mr. Rusche:

As counsel for Niagara Mohawk Power Corporation, we submit herewith three (3) signed originals and nineteen (19) copies of a document entitled "Application for Amendment to Operating License." This Application seeks to amend Sections 3.6.4 and 4.6.4 of the Technical Specifications set forth in Appendix A to Facility Operating License No. DPR-63 to modify the surveillance requirements for hydraulic snubbers. Forty (40) copies of the proposed changes and a safety evaluation are also transmitted.

A Certificate of Service showing service of these documents upon the persons listed therein is also enclosed.

Very truly yours,

LeBoeuf, Lamb, Leiby & MacRae

LeBoeuf, Lamb, Leiby & MacRae
Attorneys for Niagara Mohawk
Power Corporation

1636

UNITED STATES OF AMERICA

Received w/Ltr Dated 2-19-76

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
NIAGARA MOHAWK POWER CORPORATION	)	Docket No. 50-220
(Nine Mile Point Nuclear Station	)	
Unit No. 1)	)	

APPLICATION FOR AMENDMENT

TO

OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, Niagara Mohawk Power Corporation, holder of Facility Operating License No. DPR-63, hereby requests that Sections 3.6.4 and 4.6.4 of the Technical Specifications set forth in Appendix A to that License be amended. This proposed change has been approved by Site Operations Review Committee and Safety Review and Audit Board.

The proposed Technical Specification change is set forth in Attachment A to this application. Supporting information, which demonstrates that the proposed change does not involve a significant hazards consideration, is set forth in Attachment B. The proposed change would not authorize any change in the types or any increase in the amounts of effluents or any change in the authorized power level of the facility.

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

NIAGARA MOHAWK POWER CORPORATION

By _____
Gerald K. Rhode
Vice President-Engineering

Subscribed and sworn to before me
on this 18th day of February, 1976.

Patricia A. Connor (Patricia C. Mott)
Notary Public

PATRICIA A. CONNOR
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4608264
My Commission Expires March 30, 1977

ATTACHMENT A

Niagara Mohawk Power Corporation

License No. DPR-63

Docket No. 50-220

Proposed Changes to Technical Specifications (Appendix A)

The attached is a revision to pages 241 a-j of DPR-63.

LIMITING CONDITION FOR OPERATION

3.6.4 Hydraulic Snubbers

Applicability

Applies to the operational status of the hydraulic shock suppressors (snubbers).

Objective

To assure the capability of the snubbers to:

Prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, and

Allow normal thermal motion during startup and shutdown.

Specification

a. During all modes of operation except Cold Shutdown and Refuel, all hydraulic snubbers which are required

SURVEILLANCE REQUIREMENT

4.6.4 Hydraulic Snubbers

Applicability

Applies to the periodic testing requirement for the hydraulic shock suppressors (snubbers).

Objective

To assure the operability of the snubbers to perform their intended functions.

Specification

The following surveillance requirements apply to all hydraulic snubbers listed in Table 3.6.4.

a. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the normal operating environment (≤150F) shall be visually inspected. This inspection shall include but not necessarily be limited to inspection of the hydraulic fluid

LIMITING CONDITION FOR OPERATION

to protect the primary coolant system or any other safety related system or component shall be operable except as noted in 3.6.4.b through 3.6.4.d below. These safety related hydraulic snubbers are listed in Table 3.6.4

SURVEILLANCE REQUIREMENT

reservoir, fluid connections and linkage connections to the piping and anchor to verify snubber operability in accordance with the following schedule:

Number of Snubbers Found Inoperable During Inspection or During Inspection Interval	Next Required Inspection Interval
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
≥ 8	31 days ± 25%

The required inspection interval shall not be lengthened more than one step at a time.

Snubbers may be categorized in two groups, "accessible" or "inaccessible" based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
b. From and after the time that a hydraulic snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable.	b. All hydraulic snubbers whose seal materials are other than ethylene propylene or other material that has not been demonstrated to be compatible with the normal operating environment (≤150F) shall be visually inspected for operability every 31 days.
c. If the requirements of 3.6.4.a and 3.6.4.b cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition within 36 hours.	c. Once each refueling cycle, a representative sample of 10 snubbers or approximately 10% of the snubbers, whichever is less, shall be functionally tested for operability including verification of proper piston movement and lock up. For each unit and subsequent unit found inoperable, an additional 10% or ten snubbers shall be so tested until no more failures are found or all units have been tested.
d. If a hydraulic snubber is determined to be inoperable while the reactor is in the shutdown or refuel made, the snubber shall be made operable prior to reactor startup.	
e. Snubbers may be added to safety related systems without prior License Amendment to Table 3.6.4 provided that safety evaluations, documentation and reporting are provided in accordance with 10 CFR 50.59, and that a revision to Table 3.6.4 is included with a subsequent License Amendment request.	

TABLE 3.6.4

SAFETY RELATED SNUBBERS

Snubber No.	Location	Elevation	Snubbers In High Radiation Area	Especially Hard To Remove Snubbers	Inaccessible Snubbers	Accessible Snubbers
01-HS-1	Main Steam	264'-0 1/2"	X		X	
01-HS-2	Main Steam	264'-0 1/2"	X		X	
01-HS-3	Main Steam	264'-0 1/2"	X		X	
01-HS-4	Main Steam	264'-0 1/2"	X		X	
01-HS-4	Main Steam	264'-0 1/2"	X		X	
01-HS-5	Main Steam	264'-0 1/2"	X		X	
01-HS-6	Main Steam	264'-0 1/2"	X		X	
01-HS-7	Main Steam	264'-0 1/2"	X		X	
01-HS-8	Main Steam	264'-0 1/2"	X		X	
29-HS-1	Feedwater	279'-0"				X
29-HS-2	Feedwater	301'-0"				X
29-HS-3	Feedwater	301'-0"				X
29-HS-4	Feedwater	301'-0"				X
29-HS-5	Feedwater	301'-0"				X
29-HS-6	Feedwater	301'-0"				X
29-HS-7	Feedwater	301'-0"				X

TABLE 3.6.4

SAFETY RELATED SNUBBERS

Snubber No.	Location	Elevation	Snubbers In High Radiation Area	Especially Hard To Remove Snubbers	Inaccessible Snubbers	Accessible Snubbers
29-HS-8	Feedwater	305'-6"				X
29-HS-9	Feedwater	305'-6"				X
29-HS-10	Feedwater	305'-6"				X
29-HS-11	Feedwater	301'-0"				X
29-HS-12	Feedwater	291'-6"				X
29-HS-13	Feedwater	291'-6"				X
29-HS-14	Feedwater	291'-6"				X
29-HS-15	Feedwater	291'-6"				X
29-HS-16	Feedwater	303'-9"				X
29-HS-17	Feedwater	303'-9"				X
30-HS-1	Feedwater	325'-6"				X
30-HS-2	Feedwater	325'-6"				X
30-HS-3	Feedwater	325'-6"				X
30-HS-4	Feedwater	325'-6"				X
30-HS-5	Feedwater	325'-6"				X
31-HS-1	Feedwater	263'-6 1/2"	X		X	
31-HS-2	Feedwater	263'-6 1/2"	X		X	
32-HS-1	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-2	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-3	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-4	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-5	Reactor Recirculation	225'-6"	X		X	
32-HS-6	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-7	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-8	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-9	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-10	Reactor Recirculation	225'-6"	X		X	
32-HS-11	Reactor Recirculation	230'-2 5/8"	X		X	

TABLE 3.6.4

SAFETY RELATED SNUBBERS

Snubber No.	Location	Elevation	Snubbers In High Radiation Area	Especially Hard To Remove Snubbers	Inaccessible Snubbers	Accessible Snubbers
32-HS-12	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-13	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-14	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-15	Reactor Recirculation	225'-6"	X		X	
32-HS-16	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-17	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-18	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-19	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-20	Reactor Recirculation	225'-6"	X		X	
32-HS-21	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-22	Reactor Recirculation	230'-2 5/8"	X		X	
32-HS-23	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-24	Reactor Recirculation	245'-5 3/8"	X		X	
32-HS-25	Reactor Recirculation	225'-6"	X		X	
33-HS-1	Cleanup	263'-6 1/2"	X		X	
33-HS-2	Cleanup	263'-6 1/2"	X		X	
33-HS-3	Cleanup	263'-6 1/2"	X		X	
33-HS-4	Cleanup	263'-6 1/2"	X		X	
36-HS-1	Seal Leak Detection	261'-0"	X		X	
37-HS-1	Reactor Vent and Drain	263'-6"	X		X	
38-HS-1	Shutdown Cooling	260'-10 5/8"	X		X	
38-HS-2	Shutdown Cooling	260'-10 5/8"	X		X	
38-HS-3	Shutdown Cooling	269'-3"	X		X	
38-HS-4	Shutdown Cooling	268'-1"				X
38-HS-5	Shutdown Cooling	268'-1"				X
38-HS-6	Shutdown Cooling	268'-1"				X
38-HS-7	Shutdown Cooling	271'-4"				X
38-HS-8	Shutdown Cooling	270'-10"				X

TABLE 3.6.4

SAFETY RELATED SNUBBERS

Snubber No.	Location	Elevation	Snubbers In High Radiation Area	Especially Hard To Remove Snubbers	Inaccessible Snubbers	Accessible Snubbers
39-HS-1	Emergency Cooling	333'-0"				X
39-HS-2	Emergency Cooling	333'-0"				X
39-HS-3	Emergency Cooling	318'-0"				X
39-HS-4	Emergency Cooling	318'-0"				X
39-HS-5	Emergency Cooling	318'-0"				X
39-HS-6	Emergency Cooling	318'-0"				X
39-HS-7	Emergency Cooling	305'-9"				X
39-HS-8	Emergency Cooling	305'-9"				X
39-HS-9	Emergency Cooling	269'-3"	X		X	
39-HS-10	Emergency Cooling	269'-3"	X		X	
39-HS-11	Emergency Cooling	269'-3"	X		X	
39-HS-12	Emergency Cooling	269'-3"	X		X	
39-HS-13	Emergency Cooling	308'-2 3/4"				X
39-HS-14	Emergency Cooling	315'-0"				X
39-HS-15	Emergency Cooling	315'-0"				X
39-HS-16	Emergency Cooling	325'-10 1/2"				X
39-HS-17	Emergency Cooling	334'-6"				X
39-HS-18	Emergency Cooling	334'-6"				X
39-HS-19	Emergency Cooling	334'-6"				X
39-HS-20	Emergency Cooling	341'-3"				X
39-HS-21	Emergency Cooling	341'-3"				X
39-HS-22	Emergency Cooling	341'-3"				X
39-HS-23	Emergency Cooling	341'-3"				X
39-HS-24	Emergency Cooling	308'-4 3/4"				X
39-HS-25	Emergency Cooling	315'-0"				X
39-HS-26	Emergency Cooling	315'-0"				X
39-HS-27	Emergency Cooling	325'-10 1/2"				X
39-HS-28	Emergency Cooling	334'-6"				X
39-HS-29	Emergency Cooling	334'-6"				X
39-HS-30	Emergency Cooling	334'-6"				X
39-HS-31	Emergency Cooling	341'-3"				X

TABLE 3.6.4

SAFETY RELATED SNUBBERS

Snubber No.	Location	Elevation	Snubbers In High Radiation Area	Especially Hard To Remove Snubbers	Inaccessible Snubbers	Accessible Snubbers
39-HS-32	Emergency Cooling	341'-3"				X
39-HS-33	Emergency Cooling	341'-3"				X
39-HS-34	Emergency Cooling	341'-3"				X
40-HS-1	Core Spray	240'-0"	X		X	
40-HS-2	Core Spray	240'-0"	X		X	
40-HS-3	Core Spray	263'-10"	X		X	
40-HS-4	Core Spray	261'-6"	X		X	
40-HS-5	Core Spray	261'-6"	X		X	
40-HS-6	Core Spray	261'-6"	X		X	
40-HS-7	Core Spray	248'-0"	X		X	
40-HS-8	Core Spray	248'-0"	X		X	
40-HS-9	Core Spray	248'-0"	X		X	
40-HS-10	Core Spray	272'-5"	X		X	
40-HS-11	Core Spray	261'-6"	X		X	
51-HS-1	Feedwater	301'-0"				X
51-HS-2	Feedwater	313'-6"				X
51-HS-3	Feedwater	313'-6"				X
51-HS-4	Feedwater	313'-6"				X
51-HS-5	Feedwater	291'-0"				X
51-HS-6	Feedwater	291'-0"				X
51-HS-7	Feedwater	291'-0"				X
51-HS-8	Feedwater	291'-0"				X
51-HS-10	Feedwater	291'-6"				X
51-HS-11	Feedwater	291'-6"				X
51-HS-12	Feedwater	291'-6"				X

TABLE 3.6.4

SAFETY RELATED SNUBBERS

Snubber No.	Location	Elevation	Snubbers In High Radiation Area	Especially Hard To Remove Snubbers	Inaccessible Snubbers	Accessible Snubbers
66-HS-1	Main Steam	232'-6"	X		X	
66-HS-2	Main Steam	232'-3"	X		X	
66-HS-3	Main Steam	231'-9"	X		X	
66-HS-4	Main Steam	232'-6"	X		X	
66-HS-5	Main Steam	232'-3"	X		X	
66-HS-6	Main Steam	261'-9"	X		X	
66-HS-7	Main Steam	232'-6"	X		X	
66-HS-8	Main Steam	232'-3"	X		X	
66-HS-9	Main Steam	231'-9"	X		X	
66-HS-10	Main Steam	232'-6"	X		X	
66-HS-11	Main Steam	232'-3"	X		X	
66-HS-12	Main Steam	231'-9"	X		X	
66-HS-13	Main Steam	232'-6"	X		X	
66-HS-14	Main Steam	232'-3"	X		X	
66-HS-15	Main Steam	231'-9"	X		X	
66-HS-16	Main Steam	232'-6"	X		X	
66-HS-17	Main Steam	232'-3"	X		X	
66-HS-18	Main Steam	231'-9"	X		X	
66-HS-19	Main Steam	253'-0"	X		X	
66-HS-20	Main Steam	253'-0"	X		X	
66-HS-21	Main Steam	265'-3"	X		X	

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic or other event initiating dynamic loads. It is therefore required that all hydraulic snubbers required to protect the primary coolant system or any other safety system or component be operable during reactor operation.

Because the snubber protection is requied only during relatively low probability events, a period of 72 hours is allowed for repairs or replacements. In case a shutdown is required, the allowance of 36 hours to reach a cold shutdown condition will permit an orderly shutdown consistent with standard operating procedures. Since plant startup should not commence with knowingly defective safety related equipment, Specification 3.6.4.d prohibits startup with inoperable snubbers.

All safety related hydraulic snubbers are visually inspected for overall integrity and operability. The inspection shall include verification of proper orientation, adequate hydraulic fluid level and proper attachment of snubber to piping and structures.

The inspection frequency is based upon maintaining a constant level of snubber protection. Thus the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required inspection. Inspections performed before that interval has elapsed shall be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) shall not be used to lenghten the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

Experience at our operating facility has shown that the required surveillance program should assure an acceptable level of snubber performance because the seal materials have demonstrated their compatibility with the normal operating environment. To date, six years operating experience, has resulted in no seal failures. Also, laboratory test data are available on seal material for all snubbers installed as of September 1975. These data show their compatibility with the normal operating environment.

To increase the assurance of snubber reliability, functional tests shall be performed once each refueling cycle. These tests will include stroking of the snubbers to verify proper piston movement and lock-up. Ten percent or ten snubbers, whichever is less, represents an adequate sample for such tests. Observed failures on these samples should require testing of additional units. Those snubbers designated in Table 3.6.4 as being in high radiation areas or those especially difficult to remove need not be selected for functional tests provided operability was previously verified.

Attachment B

Nine Mile Point Unit 1

Docket No. 50-220

License DPR-63

Supporting Information

Attachment A describes revised specification that are intended to conform with a recent Commission "model" Technical Specification transmitted by letter dated December 24, 1975. Appropriate modifications have been made to the revised specifications to account for differences in plant system design and the snubber inspection performed during the Fall, 1975 outage. These differences are noted below:

1. Laboratory testing is available to show that all snubbers installed at Nine Mile Point are compatible with normal operating environments. In addition, the specifications have been changed in Sections 4.6.4 a and b to reflect that the snubbers are compatible to normal operating environments ($\leq$150F).

2. Section 4.6.4.3 of the model has been removed. This specification calls for a plant shutdown within 6 months after issuance of the snubber technical specifications. A snubber inspection was performed during the Fall, 1975 refueling outage. During the inspection the hydraulic reservoir, fluid connections and linkage connections to the piping and anchor were verified for operability. Also, ten percent of the snubbers were tested for lock-up. All snubbers tested were verified to be operable. No bleed rate testing was performed for reasons given in Item 3 below.

3. Those specifications requiring surveillance for "bleed" have been removed. Bleed is the rate of flow through the snubber orifice or bypass after snubber "lock-up." Bleed would not occur during seismic events. Bleed would only occur due to a misapplication of a snubber installation (i.e. long lengths of pipe greater than 100 ft.) which could expand in excess of the lock-up rate of the snubber during large thermal transients and cause overstressing of the pipeline. An evaluation of each system has been made and assures that there are no misapplications of snubber installations. Therefore, bleed rate testing is not applicable to Nine Mile Point Unit 1.

The December 24, 1975 Commission letter requested definitions for "inaccessible" and "especially difficult to remove" snubbers be provided. We have defined these below:

"Inaccessible snubbers" are those snubbers within the primary containment that cannot be inspected during reactor operation, due to the inerted containment and high radiation levels.

No snubbers are classified as "especially difficult to remove." Therefore, this is not applicable to Nine Mile Point Unit 1.

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
NIAGARA MOHAWK POWER CORPORATION	)	Docket No. 50-220
(Nine Mile Point Nuclear Station	)	
Unit No. 1)	)	

CERTIFICATE OF SERVICE

I hereby certify that I have served a document entitled "Application for Amendment to Operating License" by mailing a copy thereof first class, postage prepaid, to the following persons this 19th day of February, 1976.

Mr. Robert P. Jones
Supervisor
Town of Scriba
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Oswego, New York 13126

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Librarian
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