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TO: Mr. B. C. Rusche	ORIG 1 signed	CC	OTHER	SENT NRC PDR XX SENT LOCAL PDR XX		
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DESCRIPTION: Ltr submitted on behalf of Niagara Mohawk Power Corp. & trans the following:

ACKNOWLEDGED
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PLANT NAME: Nine Mile Pt. Unit 1

ENCLOSURES: Application for Amendment to OL/DPR-63/Tech Specs in re to hydraulic snubbers with attachments A & B & C..... (3 Orig & 37 CC rec'd)

CERTIFICATE OF SERVICE dated 9-17-75 showings svc of Appl for Amdt to OL upon Mr, Robert P. Jones, Town of Scriba, Oswego, N.Y....et. al.

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September 17, 1975

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:

Transmitted herewith are three (3) signed originals and nineteen (19) copies of a document entitled "Application for Amendment to Operating License." This Application seeks to add Sections 3.6.4 and 4.6.4 to Appendix A to Facility Operating License No. DPR-63 in compliance with a letter from George E. Lear, Chief, Operating Reactors Branch #3, dated August 25, 1975 respecting hydraulic snubbers. Forty (40) copies of the proposed change and safety evaluation are also enclosed.

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

9913

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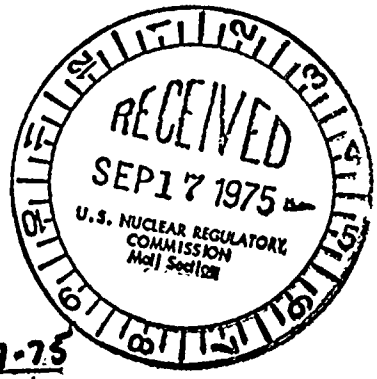

BEFORE THE UNITED STATES

NUCLEAR REGULATORY COMMISSION

Received w/Ltr Dated 9-17-75

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 17th day of September, 1975.

Mr. Robert P. Jones
Supervisor
Town of Scriba
R. D. #4
Oswego, New York 13126

Miss Juanita Kersey
Librarian
Oswego City Library
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Hope M. Babcock

Hope M. Babcock

LeBoeuf, Lamb, Leiby & MacRae
Attorneys for Applicant

9913

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)	)	

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 the addition of Sections 3.6.4 and 4.6.4 to the Technical Specifications set forth in Appendix A to that License. This proposed change is in response to the July 25, 1975 letter of request from Mr. G. Lear, received on July 30, 1975. The proposed change has been approved by the Site Operations Review Committee and Safety Review and Audit Board.

The proposed Technical Specifications change is set forth in Attachment A to this application. A safety evaluation, which demonstrates that the proposed change does not involve a significant hazards consideration, is set forth in Attachment B. Attachment C provides a separate listing of non-safety related snubbers, as requested. It is not intended for incorporation into the Technical Specifications. The proposed change would not authorize any change in the type 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 R. R. Schneider

R. R. Schneider
Vice President-Electric Operations

Subscribed and sworn to
before me on this 15th day
of September, 1975.

Patricia A. Connor (Patricia C. Nott)

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

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 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

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 to verify their operability in accordance with the following schedule:

Number of Accessible 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%

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT

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.

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 accessible hydraulic snubbers whose seal materials have not been demonstrated to be compatible with the normal operating environment (≤150F) shall be visually inspected for operability every 6 months.

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. All inaccessible hydraulic snubbers have been demonstrated to be compatible with the normal operating environment (≤150F) and shall be visually inspected for operability every refueling outage.

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.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
d. If a hydraulic snubber is determined to be inoperable while the reactor is in the shutdown or refuel mode, the snubber shall be made operable prior to reactor startup.	d. Once each refueling cycle at least two representative snubbers from a relatively severe environment shall be completely disassembled and examined for damage and abnormal seal degradation.

TABLE 3.6.4

Inside Containment

Identification No.	System	Elevation
01-HS-1	Main Steam	264'-0½"
01-HS-2	Main Steam	264'-0½"
01-HS-3	Main Steam	264'-0½"
01-HS-4	Main Steam	264'-0½"
01-HS-5	Main Steam	264'-0½"
01-HS-6	Main Steam	264'-0½"
01-HS-7	Main Steam	264'-0½"
01-HS-8	Main Steam	264'-0½"
31-HS-1	Feedwater	263'-6½"
31-HS-2	Feedwater	263'-6½"
32-HS-1	Reactor Recirculation	230'-2 5/8"
32-HS-2	Reactor Recirculation	230'-2 5/8"
32-HS-3	Reactor Recirculation	245'-5 3/8"
32-HS-4	Reactor Recirculation	245'-5 3/8"
32-HS-5	Reactor Recirculation	225'-6"
32-HS-6	Reactor Recirculation	230'-2 5/8"
32-HS-7	Reactor Recirculation	230'-2 5/8"
32-HS-8	Reactor Recirculation	245'-5 3/8"
32-HS-9	Reactor Recirculation	245'-5 3/8"
32-HS-10	Reactor Recirculation	225'-6"
32-HS-11	Reactor Recirculation	230'-2 5/8"
32-HS-12	Reactor Recirculation	230'-2 5/8"
32-HS-13	Reactor Recirculation	245'-5 3/8"
32-HS-14	Reactor Recirculation	245'-5 3/8"
32-HS-15	Reactor Recirculation	225'-6"
32-HS-16	Reactor Recirculation	230'-2 5/8"
32-HS-17	Reactor Recirculation	230'-2 5/8"
32-HS-18	Reactor Recirculation	245'-5 3/8"
32-HS-19	Reactor Recirculation	245'-5 3/8"
32-HS-20	Reactor Recirculation	225'-6"

TABLE 3.6.4

(Continued)

Inside Containment

Identification No.	System	Elevation
32-HS-21	Reactor Recirculation	230'-2 5/8"
32-HS-22	Reactor Recirculation	230'-2 5/8"
32-HS-23	Reactor Recirculation	245'-5 3/8"
32-HS-24	Reactor Recirculation	245'-5 3/8"
32-HS-25	Reactor Recirculation	225'-6"
33-HS-1	Cleanup	263'-6½"
33-HS-2	Cleanup	263'-6½"
33-HS-3	Cleanup	263'-6½"
33-HS-4	Cleanup	263'-6½"
37-HS-1	Reactor Vent and Drain	263'-6"
38-HS-1	Shutdown Cooling	260'-10 5/8"
38-HS-2	Shutdown Cooling	260'-10 5/8"
38-HS-3	Shutdown Cooling	269'-3"
39-HS-9	Emergency Cooling	269'-3"
39-HS-10	Emergency Cooling	269'-3"
39-HS-11	Emergency Cooling	269'-3"
39-HS-12	Emergency Cooling	269'-3"
40-HS-1	Core Spray	240'-0"
40-HS-2	Core Spray	240'-0"
40-HS-3	Core Spray	240'-0"
40-HS-4	Core Spray	261'-6"
40-HS-5	Core Spray	261'-6"
40-HS-6	Core Spray	261'-6"
66-HS-1	Main Steam	265'-3"
66-HS-2	Main Steam	260'-1"
66-HS-3	Main Steam	260'-1"
66-HS-4	Main Steam	232'-10"

TABLE 3.6.4

(Continued)

Inside Containment

Identification No.	System	Elevation
66-HS-5	Main Steam	232'-10"
66-HS-6	Main Steam	232'-6"
66-HS-7	Main Steam	232'-6"
66-HS-8	Main Steam	232'-6"
66-HS-9	Main Steam	232'-6"
66-HS-10	Main Steam	232'-6"
66-HS-11	Main Steam	232'-6"
66-HS-12	Main Steam	232'-6"
66-HS-13	Main Steam	232'-6"
66-HS-14	Main Steam	232'-6"
66-HS-15	Main Steam	232'-6"
66-HS-16	Main Steam	232'-6"
66-HS-17	Main Steam	253'-1"

TABLE 3.6.4

Outside Containment

Identification No.	System	Elevation
02-HS-1	Main Steam	243'-6"
02-HS-2	Main Steam	243'-6"
02-HS-3	Main Steam	243'-6"
02-HS-4	Main Steam	243'-6"
02-HS-5	Main Steam	252'-8"
02-HS-6	Main Steam	252'-8"
02-HS-7	Main Steam	252'-8"
02-HS-8	Main Steam	252'-8"
02-HS-9	Main Steam	287'-3"
02-HS-10	Main Steam	287'-3"
02-HS-11	Main Steam	287'-3"
29-HS-1	Feedwater	279'-0"
29-HS-2	Feedwater	301'-0"
29-HS-3	Feedwater	301'-0"
29-HS-4	Feedwater	301'-0"
29-HS-5	Feedwater	301'-0"
29-HS-6	Feedwater	301'-0"
29-HS-7	Feedwater	301'-0"
29-HS-8	Feedwater	305'-6"
29-HS-9	Feedwater	305'-6"
29-HS-10	Feedwater	305'-6"
29-HS-11	Feedwater	301'-0"
29-HS-12	Feedwater	291'-6"
29-HS-13	Feedwater	291'-6"
29-HS-14	Feedwater	291'-6"
29-HS-15	Feedwater	291'-6"
29-HS-16	Feedwater	303'-9"
29-HS-17	Feedwater	303'-9"

TABLE 3.6.4

(Continued)

Outside Containment

Identification No.	System	Elevation
30-HS-1	Feedwater	325'-6"
30-HS-2	Feedwater	325'-6"
30-HS-3	Feedwater	325'-6"
30-HS-4	Feedwater	325'-6"
30-HS-5	Feedwater	325'-6"
38-HS-4	Shutdown Cooling	268'-1"
38-HS-5	Shutdown Cooling	268'-1"
38-HS-6	Shutdown Cooling	268'-1"
38-HS-7	Shutdown Cooling	271'-4"
38-HS-8	Shutdown Cooling	270'-10"
39-HS-1	Emergency Cooling	333'-0"
39-HS-2	Emergency Cooling	333'-0"
39-HS-3	Emergency Cooling	318'-0"
39-HS-4	Emergency Cooling	318'-0"
39-HS-5	Emergency Cooling	318'-0"
39-HS-6	Emergency Cooling	318'-0"
39-HS-7	Emergency Cooling	305'-9"
39-HS-8	Emergency Cooling	305'-9"
39-HS-13	Emergency Cooling	308'-2 3/4"
39-HS-14	Emergency Cooling	315'-0"
39-HS-15	Emergency Cooling	315'-0"
39-HS-16	Emergency Cooling	325'-10½"
39-HS-17	Emergency Cooling	334'-6"
39-HS-18	Emergency Cooling	334'-6"
39-HS-19	Emergency Cooling	334'-6"

TABLE 3.6.4

(Continued)

Outside Containment

Identification No.	System	Elevation
39-HS-20	Emergency Cooling	341'-3"
39-HS-21	Emergency Cooling	341'-3"
39-HS-22	Emergency Cooling	341'-3"
39-HS-23	Emergency Cooling	341'-3"
39-HS-24	Emergency Cooling	308'-4 3/4"
39-HS-25	Emergency Cooling	315'-0"
39-HS-26	Emergency Cooling	315'-0"
39-HS-27	Emergency Cooling	325'-10½"
39-HS-28	Emergency Cooling	334'-6"
39-HS-29	Emergency Cooling	334'-6"
39-HS-30	Emergency Cooling	334'-6"
39-HS-31	Emergency Cooling	341'-3"
39-HS-32	Emergency Cooling	341'-3"
39-HS-33	Emergency Cooling	341'-3"
39-HS-34	Emergency Cooling	341'-3"
51-HS-1	Feedwater	301'-0"
51-HS-2	Feedwater	313'-6"
51-HS-3	Feedwater	313'-6"
51-HS-4	Feedwater	313'-6"
51-HS-5	Feedwater	291'-0"
51-HS-6	Feedwater	291'-0"
51-HS-7	Feedwater	291'-0"
51-HS-8	Feedwater	291'-0"
51-HS-9	Feedwater	296'-1"
51-HS-10	Feedwater	291'-6"
51-HS-11	Feedwater	291'-6"
51-HS-12	Feedwater	291'-6"

BASES FOR 3.6.4 and 4.6.4 HYDRAULIC SHOCK SUPPRESSORS

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 required 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 lengthen 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.

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. Snubbers in high radiation areas or those especially difficult to remove need not be selected for functional tests provided operability was previously verified. All snubbers inside the primary containment are not accessible for surveillance testing during normal reactor operating and are defined as "inaccessible". Only those snubbers in low radiation areas outside of the primary containment are considered "accessible" during normal reactor operation. To complement the visual external inspections, disassembly and internal examination for component damage and abnormal seal degradation shall be performed. The examination of two units, each refueling cycle, selected from relatively severe environments should adequately serve this purpose. Any observed wear, breakdown or deterioration will provide a basis for additional inspections.

ATTACHMENT B

The proposed specifications described in Attachment A are intended to conform to the "model" Technical Specifications suggested by the Commission. Appropriate corrections have been made for clarity and operating data or laboratory test results that are presently available. These differences are noted below.

1) The model suggests that snubbers should be categorized as "accessible" and "inaccessible", inspected independently, and defined as such. Specifications 4.6.4 a, b and c have been changed to clearly differentiate between these two types of snubbers.

2) Laboratory testing is available to show that snubbers installed at Nine Mile Point are compatible with normal operating environments. Therefore, the specifications have been changed appropriately in Sections 4.6.4 a, b and c.

3) The surveillance test frequency for Section 4.6.4 b has been changed from 31 days to 6 months. Nine Mile Point Unit 1 has not experienced any inoperable snubbers to date: six years operating experience. Therefore, a six month surveillance period reasonably assures the operability of the snubbers.

4) 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. At present a snubber inspection is planned for the refueling outage currently in progress. This inspection will be in accordance with the above specifications, and meet with the intent of the Commission; to inspect the snubbers on a timely basis. Therefore, no plant shutdown would be required within six months after issuance.

5) 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". The bleed operation occurs only during large thermal transients associated with pipeline heatup and cooldown and would not occur during seismic events. In particular, bleed would only occur due to a misapplication of 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 and cause overstressing of the pipeline.

After evaluating each system it has been determined that bleed is not expected to occur. Therefore, bleed rate testing does not assure the operability of a snubber.

6) The bases referencing seal material compatibility have been changed as a result of our operating experience and miscellaneous laboratory test results.

ATTACHMENT C

Non-Safety Related Snubbers

Ident. No.	Location	Elevation
08-HS-1	Main Steam Line, between the Turbine Stop Valve and Second Stage Reheater	292' 3"
08-HS-2	" "	294' 3"
03-HS-1	Main Steam Bypass to Condenser	258' 3"
03-HS-2	" "	257' 6"
03-HS-3	" "	257' 6"
03-HS-4	" "	289' 2 1/2"
03-HS-5	" "	289' 2 1/2"
03-HS-6	" "	289' 2 1/2"