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Ltr on behalf of Niagara Mohawk.... notarized 1-20-75..... trans the following:

NOTE FOR DIST OF ENCL 1_5 #4
SEE NC# 663-A

PLANT NAME: Nine Mile Point #1

ENCLOSURES:
1) Tech Specs Change...re Bases for the Containment Spray Specifications....2)Tech Specs...re Administrative controls section (Fig 6.2-2, Section 6.0) 3) Tech Specs Change....re reactor vessel water leveliinstrumentation.....4) Tech Specs Change (Enviro).....re Administrative Controls (Fig 5.2, Sec 5.0).....

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FOR ACTION/INFORMATION 1-23-75 ehf

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January 21, 1975

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U.S. ATOMIC ENERGY COMMISSION
Regulatory Mail Section

Mr. Edson G. Case
Acting Director
Office of Nuclear Reactor
Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555

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

Dear Mr. Case:

Pursuant to 10 C.F.R. § 50.90 of the Commission's regulations, transmitted herewith are four proposed changes to the technical specifications for Niagara Mohawk Power Corporation's Nine Mile Point Nuclear Station Unit 1. Two of the proposed modifications reflect changes in plant organization and affect Table 6.1-2 of Appendix A to the operating license for that facility and Figure 5.2 of Appendix B to that license. In addition, proposed changes are submitted to the set points for reactor water levels, as set forth in Sections 2.1.2 and 2.1.1 of Appendix A, and to the containment spray system, as described in Sections 3.3.7 and 4.3.7 of Appendix A.

Copies of these documents were also served upon those persons listed in the enclosed Certificate of Service.

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Very truly yours,

LeBoeuf, Lamb, Leiby & MacRae

LeBeouf, Lamb, Leiby & MacRae
Attorneys for Applicant

663

BEFORE THE UNITED STATES

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-220
(Nine Mile Point Unit 1)	)	

APPLICATION FOR AMENDMENT

TO

OPERATING LICENSE

Niagara Mohawk Power Corporation, Licensee in the above-captioned docket, hereby files an Application for Amendment to its Operating License DPR-63.

This Amendment constitutes a change to the Bases for the Containment Spray Specifications in Sections 3.3.7 and 4.3.7.

With this Application for Amendment, Licensee hereby transmits a document entitled "Proposed Change to the Technical Specifications" describing the change and reasons therefore. The proposed change has been reviewed and approved by the Safety Review and Audit Board and the Site Operations Review Committee.

WHEREFORE, Licensee prays as in its original Application for Licenses.

Respectfully submitted,

NIAGARA MOHAWK POWER CORPORATION

By Philip D. Raymond

Philip D. Raymond
Vice President-Engineering

Subscribed and sworn to before me this 20th day of January, 1975.

Hazel J. Carrick

Notary Public

HAZEL J. CARRICK
Notary Public in the State of New York
Qualified in Onon. Co. No. 4624460
My Commission Expires March 30, 1976

Proposed Change To The Technical Specifications

As previously described in an unusual event report dated October 30, 1974,[1] a variance in the performance requirements of the containment spray raw water pumps was observed.

Based on the Safety Analysis of the FSAR[2] the pumps are required to meet a 3000 gpm flow and a pressure of 160 psig on the raw water side of the containment spray heat exchangers. The 160 psig will assure that any leakage is into the containment spray system and will prevent releases of radioactivity into the raw water discharge. The head is only required to circulate 3000 gpm and to maintain the differential pressure across the boundary. Therefore, the technical specification requiring the pumps to meet 3000 gpm at a total developed head of 540 feet is not necessary as long as the flow and heat exchanger pressure are met. During a recent surveillance test, one of the pumps was opened and inspected. It was found to have no apparent wear. This is substantiated by the fact that total operating time since installation is less than 25 hours. Therefore, it was concluded to be a miscalibration of the flow orifice. This will be corrected to read 3000 gpm when the Total Developed Head is 540 feet.

(1) Letter from R. R. Schneider to D. J. Skovholt, dated October 30, 1974

(2) FSAR, Volume I, page VII-22

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET 50-220

PROPOSED CHANGE TO THE TECHNICAL SPECIFICATIONS

Item	Location	Change
Bases for Specification 3.3.7 and 4.3.7	Pg. 73	Change 4th paragraph of the bases to read as follows: "The corresponding raw water cooling system is designed to maintain containment spray water temperature no greater than 140F under the most limiting operating conditions. The containment spray raw water cooling system is considered operable when the flow rate is not less than 3000 gpm and the pressure on the raw water side of the containment spray heat exchangers is not less than 160 psig. The higher pressure on the raw water side will assure that any leakage is into the containment spray system."

BEFORE THE UNITED STATES

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-220
(Nine Mile Point Unit 1)	)	

APPLICATION FOR AMENDMENT

TO

OPERATING LICENSE

Niagara Mohawk Power Corporation, Licensee in the above-captioned docket, hereby files an Application for Amendment to its Operating License DPR-63.

This Amendment constitutes changes to Figure 6.2-2 in Section 6.0 for Administrative Controls for the Station.

With this Application for Amendment, Licensee hereby transmits a document entitled "Proposed Changes to the Technical Specifications" describing the changes and reasons therefore. The proposed changes have been reviewed and approved by the Safety Review and Audit Board and the Site Operations Review Committee.

WHEREFORE, Licensee prays as in its original Application for Licenses.

Respectfully submitted,

NIAGARA MOHAWK POWER CORPORATION

By Philip D. Raymond

Philip D. Raymond
Vice President-Engineering

Subscribed and sworn to before me this 17th day of January, 1975.

Hazel J. Carrick

Notary Public

HAZEL J. CARRICK
Notary Public in the State of New York
Qualified in Onon. Co. No. 4[illegible]450
My Commission Expires March 30, 1976

PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS

Proposed changes to the Technical Specifications would provide functional titles comparable to those recommended in ANSI N18.1-1971 for "Selection and Training of Nuclear Power Plant Personnel," and reflect the additional work load in operating both plants.

The first change will provide continuity in functional titles for both nuclear and non-nuclear positions at Niagara Mohawk's generation facilities. The "Operations Supervisor" will assume all the responsibilities of the position previously titled, "Assistant to the Superintendent for Operation," including reporting directly to the "Station Superintendent" (Nine Mile Point Unit 1) or "Plant Superintendent" (James A. FitzPatrick) respectively. The second change involves the addition of an "Assistant Maintenance Supervisor" who reports directly to the "Maintenance Supervisor." The position was added to reflect the additional work load of operating both Nine Mile Point Unit #1 and the James A. FitzPatrick Plant.

The attached revised figure reflects the changes made.

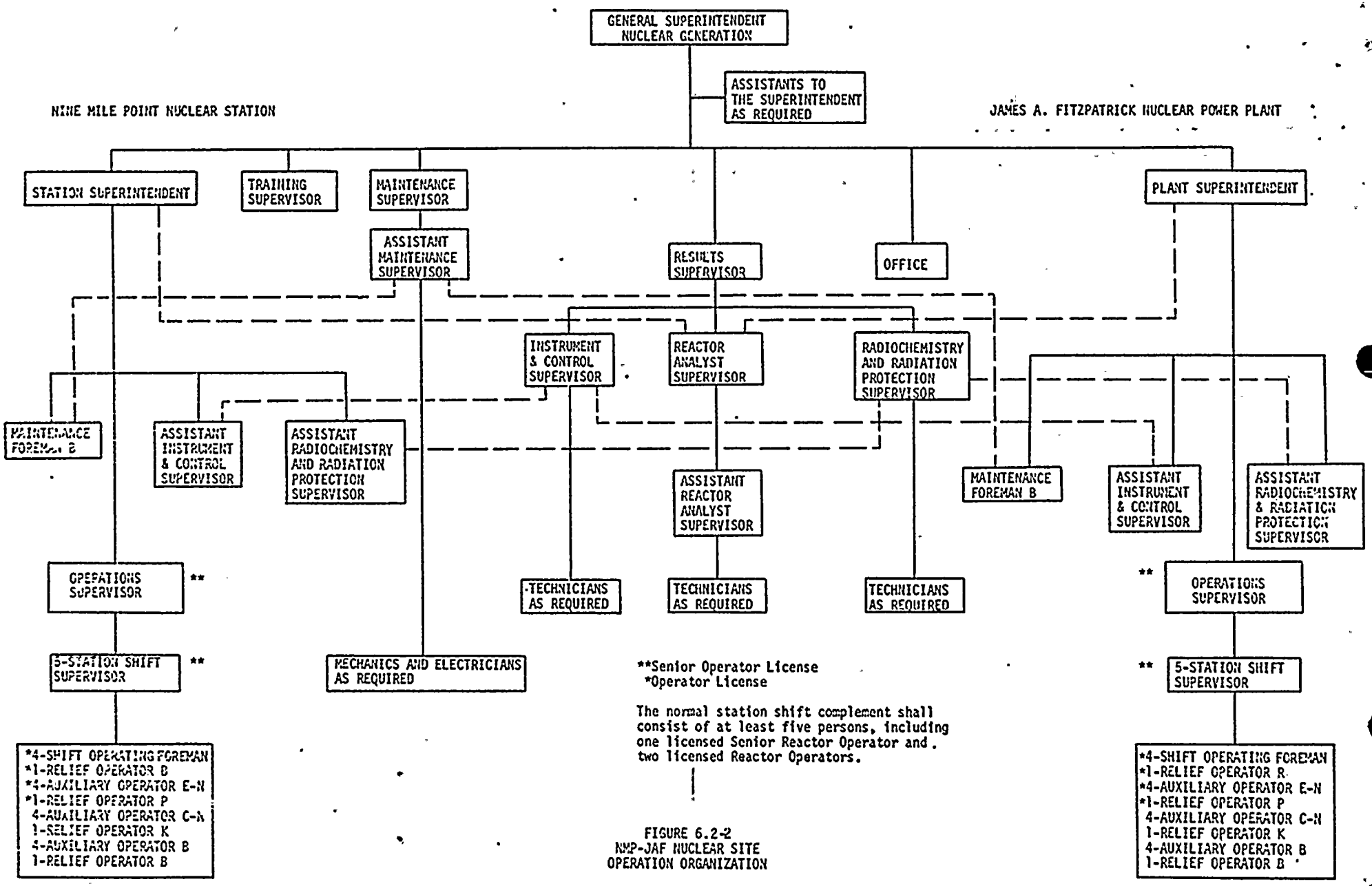
NIAGARA MOHAWK POWER CORPORATION

License No. DPR-63

Docket 50-220

PROPOSED CHANGE TO THE TECHNICAL SPECIFICATIONS

ITEM	LOCATION	CHANGE
Figure 6.2-2	Section 6.0 "Administrative Controls," Page 247	Change Titles "Assistant to the Superintendent for Operation" to read as follows: "Operations Supervisor" Add: "Assistant Maintenance Supervisor"



**Senior Operator License
*Operator License

The normal station shift complement shall consist of at least five persons, including one licensed Senior Reactor Operator and two licensed Reactor Operators.

FIGURE 6.2-2
NMP-JAF NUCLEAR SITE
OPERATION ORGANIZATION

BEFORE THE UNITED STATES

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-220
(Nine Mile Point Unit 1)	)	

APPLICATION FOR AMENDMENT

TO

OPERATING LICENSE

Niagara Mohawk Power Corporation, Licensee in the above-captioned docket, hereby files an Application for Amendment to its Operating License DPR-63.

This Amendment constitutes changes to the Technical Specifications and Bases pertaining to reactor vessel water level instrumentation.

With this Application for Amendment, Licensee hereby transmits a document entitled "Proposed Changes to the Technical Specifications" describing the changes and reasons therefore. The proposed changes have been reviewed and approved by the Safety Review and Audit Board and the Site Operations Review Committee.

WHEREFORE, Licensee prays as in its original Application for Licenses.

Respectfully submitted,

NIAGARA MOHAWK POWER CORPORATION

By Philip D. Raymond

Philip D. Raymond
Vice President-Engineering

Subscribed and sworn to before me
this 20th day of January, 1975.

Hazel J. Carrick

Notary Public

HAZEL J. CARRICK
Notary Public in the State of New York
Qualified in Onon. Co. No. 4524460
My Commission Expires March 30, 1976

Proposed Changes to the Technical Specifications

The attachment describes proposed changes to the reactor water level instrumentation set points.

The various set points for reactor level as presently in the Technical Specifications all make reference to normal water level at Elevation 302'9". The proposed change will involve using indicator settings which can be read directly rather than using elevation as a reference. This change will eliminate the confusion in interpreting between instrument readings and the elevation datum.

The actual water levels are the same. The change involves a change in reference datum only. A comparison of the reference datums is shown below.

ITEM	ELEVATION	INDICATOR SETTING
Low level	12 inches below elevation 302'9"	53"
Low-low-level	5 feet below elevation 302'9"	5"
Low-low-low-level	7'11" below elevation 302'9"	127.1"

It must also be noted that two differenct instruments are used: one for measuring low level and low-low level and another for the low-low-low level setting.

In addition to the above change, a change to the actual setting of the low-low-low level set point is proposed. An error was made in the original setting. The initial set point was 7'11" below elevation 302'9". This is equivalent to 128 inches on the indicator. The actual setpoint should have been 127.1 inches on the indicator. This latter setting is incorporated in the attached change. This difference has no effect on the transient analysis since an allowable deviation of $\pm$ 2.6 inches in set point error is assumed in the calculations.

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET 50-220

PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS

Item	Location	Change
Limiting Safety System Setting 2.1.2	Pg. 6	Change items d and e to read as follows: "d. The reactor water low-level scram trip setting shall be no lower than -12 inches (53 inches indicator setting) relative to the lowest normal operating level (Elevation 302'9") e. The reactor water low-low level setting for core spray initiation shall be no less than -5 feet (5 inches indicator setting) relative to the lowest normal operating level (Elevation 302'9")."
Bases for Safety Limit 2.1.1	Pg. 13	Change the second sentence of the last paragraph to read as follows: "This is the low-low-low water level trip point which is seven feet eleven inches (127.1 inches indicator setting) below minimum normal water level Elevation 302'9"."
Bases for Safety Limit 2.1.2	Pg. 16	Change the first sentence in item d to read as follows: "A reactor water low level scram trip setting -12 inches (53 inches indicator setting) relative to the lowest normal operating level (Elevation 302'9") will assure that power production will be terminated with adequate coolant remaining in the core."

Item	Location	Change
Bases for Safety Limit 2.1.2	Pg. 17	Change the first sentences in both paragraphs of item c to read as follows: "A reactor water low-low level signal - 5 feet (5 inches indicator setting) relative to the lowest normal operating level (Elevation 302'9") will assure that core cooling will continue even if level is dropping." "The operator will set the low-low level core spray initiation point at no less than -5 feet (5 inches indicator scale) relative to the lowest normal operating level (Elevation 302'9")."
Bases for Specification 3.1.3 and 4.1.3	Pg. 49	Change the fifth sentence in the third paragraph to read as follows: "To assist in depressurization for small line breaks the system is initiated on low-low reactor water level five feet (5 inches indicator setting) below the minimum normal water level (Elevation 302'9")."
Limiting Condition for Operation 3.1.4e	Pg. 52	Change the last paragraph to read as follows: "If both core spray systems become inoperable the reactor shall be in the cold shutdown condition within ten hours and no work (except as specified in "f" below) shall be performed on the reactor or its connected systems which could result in lowering the reactor water level to more than seven feet eleven inches below minimum normal level (127.1 inches indicator scale)."
Bases for Specification 3.1.5 and 4.1.5	Pg. 59	Change the third sentence in the third paragraph to read as follows: "The relief valves shall be capable of automatic initiation from simultaneous low-low-low water level (7'11" below lowest normal Elevation 302' 9", 127.1 inches indicator setting) and high containment pressure (3.5 psig)."

Item	Location	Change
Limiting Condition for Operation 3.3.7.e	Pg. 159	Change the last paragraph to read as follows: "If both containment spray systems become inoperable the reactor shall be in the cold shutdown condition within ten hours and no work (except as specified in "f" below) shall be performed on the reactor which could result in lowering the reactor water level to more than seven feet eleven inches below normal level. (Elevation 302'-9" and 127.1 inches indicator scale)."
Table 3.6.2a, Item (4)	Pg. 191	Change set point to be $\geq$ 53 inches. (Indicator scale)
Table 3.6.2b, Item (1)	Pg. 197	Change set point to be $\geq$ 5 inches. (Indicator scale)
Table 3.6.2b, Item (10)	Pg. 199	Change set point to be $\geq$ 5 inches. (Indicator scale)
Table 3.6.2c, Item (2)	Pg. 205	Change set point to be $\geq$ 5 inches. (Indicator scale)
Table 3.6.2d, Item (2)	Pg. 208	Change set point to be $\geq$ 5 inches. (Indicator scale)
Table 3.6.2e, Item (1) b	Pg. 211	Change set point to be $\geq$ 5 inches. (Indicator scale)
Table 3.6.2f, Item (1) a	Pg. 213	Change set point to be $\geq$ 127.1 inches. (Indicator scale)
Table 3.6.2k, Item (1)	Pg. 231	Change set point to be $\geq$ 53 inches. (Indicator scale)