

**AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)**

CONTROL NO: 2366

FILE

FROM: Niagara Mohawk Power Corp. Syracuse, N. Y. 13202 R. R. Schneider		DATE OF DOC: 4-4-73	DATE REC'D 4-10-73	LTR X	MEMO	RPT	OTHER
TO: Mr. Skovholt	ORIG 1	CC	OTHER	SENT AEC PDR X SENT LOCAL PDR X			
CLASS: U/PROP INFO	INPUT X	NO CYS REC'D 1		DOCKET NO: 50-220			
DESCRIPTION: Ltr requesting change to Tech Specs, regarding the removal of all baffling from within the torus & begin installation of "Rams Heads"....				ENCLOSURES:			
PLANT NAMES: Nine Mile Point # 1				Do Not Remove ACKNOWLEDGED			

FOR ACTION/INFORMATION 4-11-73 AB

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NIAGARA MOHAWK POWER CORPORATION

NIAGARA MOHAWK

300 ERIE BOULEVARD WEST
SYRACUSE, N.Y. 13202

April 4, 1973



Mr. Donald J. Skovholt
Assistant Director for Reactor Operations
Division of Reactor Licensing
United States Atomic Energy Commission
Washington, D. C. 20545

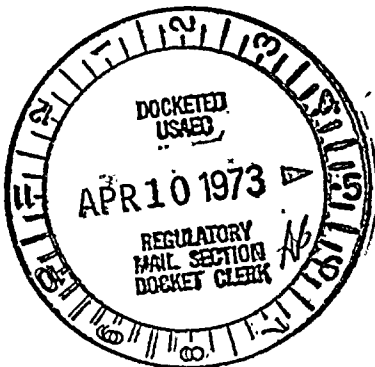
Dear Mr. Skovholt:

Re: Provisional Operating License: DPR-17
Docket No.: 50-220

During the upcoming 1973 Spring refueling outage, Nine Mile Point Nuclear Station, Unit #1 proposes to remove all baffling from within the torus and begin installation of "Rams Heads" on the existing electromatic relief valve discharge piping. Inasmuch as these maintenance items must be done with an unwatered suppression chamber, concurrent with normal refueling activities, relief is requested from the following Technical Specifications:

1. Page 32, Section 3.1.4 (e):

"If Specification a,b,c and d are not met, a normal orderly shutdown shall be initiated within one hour and the reactor shall be in the cold shutdown condition within ten hours.



If both core spray systems become inoperable the reactor shall be in the cold shutdown condition within ten hours and no work 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."

2. Page 73, Section 3.3.7 (e):

"If Specification a or b are not met, shutdown shall begin within one hour and the reactor coolant shall be below 215F within ten hours.

If both containment spray systems become inoperable the reactor shall be in the cold shutdown condition within ten hours and no work 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").



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We desire to perform control rod drive maintenance and LPRM replacements during the time the torus water would be at a level below net minimum positive suction head, therefore, the core spray and containment spray systems would not perform as its intended design function. However, in the unlikely event that some malfunction occurred during the time a control rod drive or an LPRM is being removed and it could be possible for reactor water to drain through the opening, coverage of the fuel would be obtained in the following ways:

1. The Control Rod Drive would not be completely removed until water flow had stopped. Should flow continue, it would be jacked back onto the flange and rebolted.
2. A large inventory of water in the refueling cavity and equipment storage pit are available (400,000 gals.) above the seven foot - eleven inch specification. This would provide more than two hours time by most conservative calculation in which to plug the opening.
3. Core spray pumps may pump condensate from condensate storage tanks to the reactor vessel in the same manner as from the suction in the torus.
4. Condensate from the condenser hot-well may be pumped to the reactor through the normal feed water chain.
5. One or the other of 3 or 4 would always be available.
6. Enough condensate would always be in storage to bring the level in the torus to specifications. At this point, a self contained system is again established and the core spray pumps are again able to perform their intended function.
7. The LPRM would not be completely removed until it was assured that the spring reel is securely in place and blocking any flow of water from the reactor vessel.
8. Written procedures will be established to implement this temporary condition including:
 - a. No more than one control rod drive housing or LPRM penetration will be opened at any time.
 - b. A blind flange will be installed on the control rod drive housing whenever a control rod drive has been removed for maintenance.
 - c. Work will not be performed in the reactor vessel while a control rod drive housing is open.
 - d. A control rod drive will not be removed if the backseat seal does not function.
 - e. A minimum condensate storage volume of 300,000 gallons and a minimum hot well storage volume of 40,000 gallons will be maintained during the period that the torus water level is below that corresponding to minimum NPSH requirement.
 - f. The Control Rod Drive removal and LPRM replacement will not be concurrent items.

The intent of this request is to perform control rod drive maintenance and LPRM replacement at the time that the torus is unwatered and to perform normal fuel movement activities in the refuel mode with an unwatered torus in series with the above mentioned maintenance and replacement activities.



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April 4, 1973

In view of small probability of the problem arising and the high degree of protection afforded by the above, we request temporary relief from Technical Specifications 3.1.4 (e) and 3.3.7 (e) during the time the torus might be unwatered. This plan has been reviewed by both the on-site and off-site safety committees who find no safety implications provided the plan is carried forth as described.

Very truly yours,


R. R. Schneider
Vice-President Operations

RRS:cm

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