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SUBJECT: Forwards application to amend License DPR-63.

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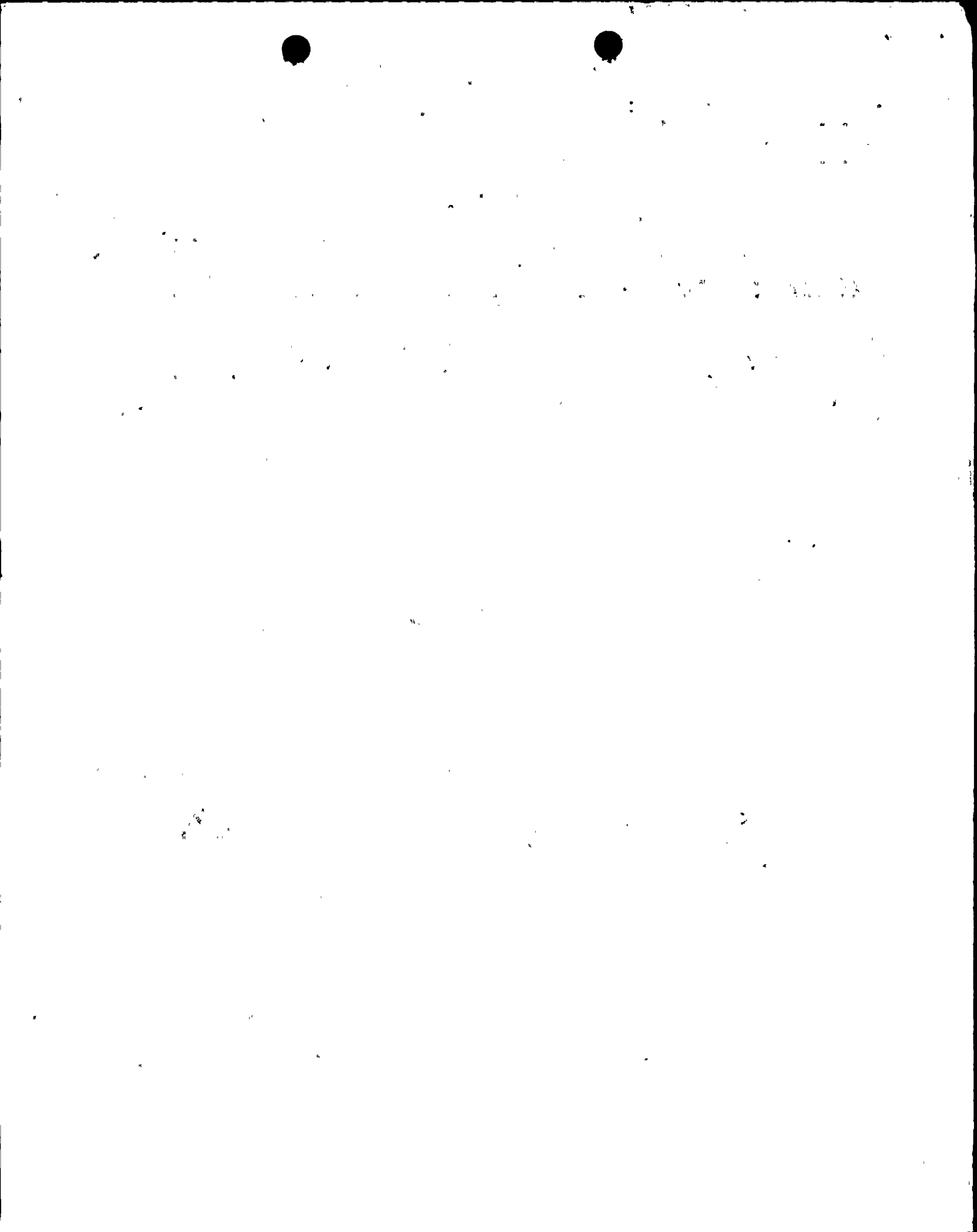
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- † ADMITTED TO THE DISTRICT OF COLUMBIA BAR

June 28, 1979

Mr. Harold R. Denton
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. Denton:

As counsel for Niagara Mohawk Power Corporation,
I enclose the following:

(1) Three (3) originals and nineteen (19) copies
of an Application for Amendment to Operating License to
amend Sections 2.1.2 and 3.1.7 and Bases of the Technical
Specifications to utilize an extended power/flow line which
will allow rated power operation at reduced core flow; and

(2) Forty (40) copies each of three (3) documents
designated Attachments A, B, and C which set forth the re-
quested changes in the Technical Specifications along with
its technical basis, and supporting information, which
demonstrates that the proposed changes do not involve a

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FOR THE BOARD OF DIRECTORS
OF THE [illegible]

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Mr. Harold R. Denton
June 28, 1979
Page Two

significant hazards consideration, nor would authorize any change in the types or any increase in the amount of effluents or any change in the authorized power level of the facility.

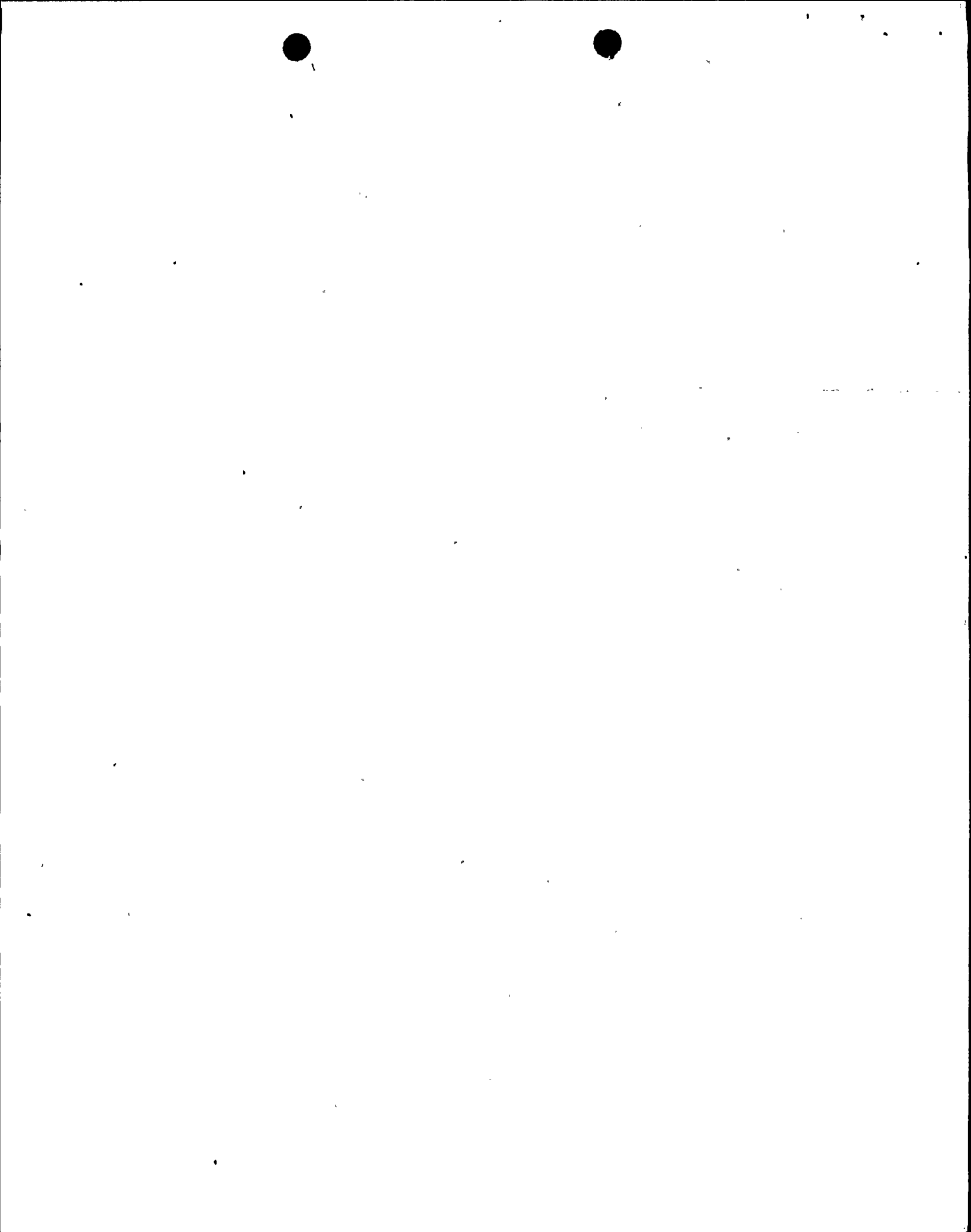
The proposed amendment to the Operating License has been evaluated and determined to fall within the definition of Class III of 10 C.F.R. § 170.22; therefore, a check in the amount of \$4,000.00 is enclosed to cover the appropriate fee.

Very truly yours,

LeBOEUF, LAMB, LEIBY & MacRAE

by *Eugene B. Thomas, Jr.*
Eugene B. Thomas, Jr.

Enclosures



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 that Sections 2.1.2, 3.1.7, and Bases of the Technical Specifications set forth in Appendix A to that License be amended. This proposed change has been reviewed by the Site Operations Review Committee and the Safety Review and Audit Board.

The proposed Technical Specifications 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. Justification for classification of the



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amendment pursuant to 10 C.F.R. Section 170.22 is included as Attachment C. A check for the appropriate fee accompanies this application.

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 Donald P. Dise

Donald P. Dise
Vice President - Engineering

Subscribed and sworn to before
me on this 27th day of June, 1979.

Phyllis D. Voytko

NOTARY PUBLIC

PHYLLIS D. VOYTKO
Notary Public in the State of New York
Qualified in Onondaga Co. No. 84-948653
My Commission Expires March 30, 1980



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ATTACHMENT A

Niagara Mohawk Power Corporation .

License No. DPR-63

Docket No. 50-220

Proposed Changes To The Technical Specifications (Appendix A)

Replace Pages 15, 20, 64c, 70a and 70c with the attached revised pages.

Pages 15 and 70a have been retyped in their entirety. Figure 3.1.7aa on Page 64c has been redrawn with changes shown.



BASES FOR 2.1.2 FUEL CLADDING - LS³

chambers provide the basic input signals, the APRM system responds directly to average neutron flux. During transients, the instantaneous rate of heat transfer from the fuel (reactor thermal power) is less than the instantaneous neutron flux due to the time constant of the fuel. Therefore, during abnormal operational transients, the thermal power of the fuel will be less than that indicated by the neutron flux at the scram setting. Analyses (5,6,8,9,10,11,13) demonstrate that with a 120% scram trip setting, none of the abnormal operational transients analyzed violate the fuel safety limit and there is a substantial margin from fuel damage.

However, in response to expressed beliefs (7) that variation of APRM flux scram with recirculation flow is a prudent measure to assure safe plant operation during the design confirmation phase of plant operation, the scram setting will be varied with recirculation flow.

An increase in the APRM scram trip setting would decrease the margin present before the fuel cladding integrity safety limit is reached. The APRM scram trip setting was determined by an analysis of margins required to provide a reasonable range for maneuvering during operation. Reducing this operating margin would increase the frequency of spurious scrams which have an adverse effect on reactor safety because of the resulting thermal stresses. Thus, the APRM scram trip setting was selected because it provides adequate margin for the fuel cladding integrity safety limit yet allows operating margin that reduces the possibility of unnecessary scrams.

The scram trip setting must be adjusted to ensure that the LHGR transient peak is not increased for any combination of MTPF and reactor core thermal power. The scram setting is adjusted in accordance with the formula in Figure 2.1.1 when the maximum total peaking factor is greater than the limiting total peaking factor.

- b. Normal operation of the automatic recirculation pump control will be in excess of 30% rated flow; therefore, little operation below 30% flow is anticipated. For operation in the start-up mode while the reactor is at low pressure, the IRM scram setting is 12% of rated neutron flux. Although the operator will set the IRM scram trip at 12% of rated neutron flux or less, the actual scram setting can be as much as 2.5% of rated neutron flux greater. This includes the margins discussed above. This provides adequate margin between the setpoint and the safety limit at 25% of rated power. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. There are a few possible sources of rapid reactivity input to the system in the low power flow condition. Effects of increasing pressure at zero or low



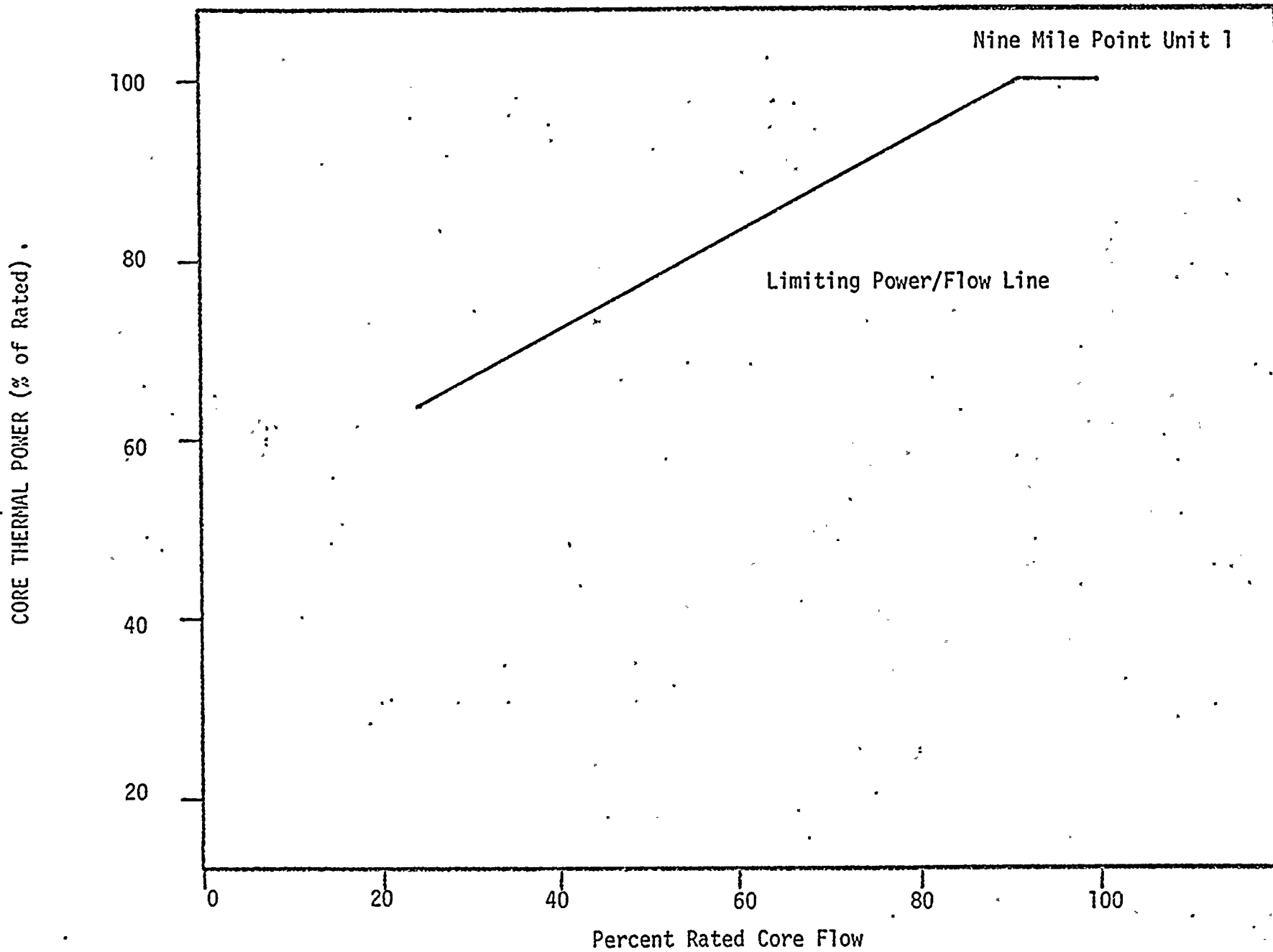


Figure 3.1.7.aa LIMITING POWER FLOW LINE



REFERENCES FOR BASES 2.1.1 AND 2.1.2 FUEL CLADDING

- (1) General Electric BWR Thermal Analysis Basis (GETAB) Data, Correlation and Design Application, NEDO-10958 and NEDE-10958.
- (2) Linford, R. B., "Analytical Methods of Plant Transient Evaluations for the General Electric Boiling Water Reactor," NEDO-10001, February 1973.
- (3) FSAR, Volume II, Appendix E.
- (4) FSAR, Second Supplement.
- (5) FSAR, Volume II, Appendix E.
- (6) FSAR, Second Supplement.
- (7) Letters, Peter A. Morris, Director of Reactor Licensing, USAEC, to John E. Logan, Vice-President, Jersey Central Power and Light Company, dated November 22, 1967 and January 9, 1968.
- (8) Technical Supplement to Petition to Increase Power Level, dated April 1970.
- (9) Letter, T. J. Brosnan, Niagara Mohawk Power Corporation, to Peter A. Morris, Division of Reactor Licensing, USAEC, dated February 28, 1972.
- (10) Letter, Philip D. Raymond, Niagara Mohawk Power Corporation, to A. Giambusso, USAEC, dated October 15, 1973.
- (11) Nine Mile Point Nuclear Power Station Unit 1 Load Line Limit Analysis, NEDO 24012, May, 1977.
- (12) Licensing Topical Report General Electric Boiling Water Reactor Generic Reload Fuel Application, NEDE-24011-P-A, August, 1978.
- (13) Nine Mile Point Nuclear Power Station Unit 1, Extended Load Line Limit Analysis, License Amendment Submittal (Cycle 6), NEDO-24185, April 1979.



BASES FOR 3.1.7 AND 4.1.7 FUEL RODS

of the plant, a MCPR evaluation will be made at the 25% thermal power level with minimum recirculation pump speed. The MCPR margin will thus be demonstrated such that future MCPR evaluations below this power level will be shown to be unnecessary. The daily requirement for calculating MCPR above 25% rated thermal power is sufficient since power distribution shifts are very slow when there have not been significant power or control rod changes. The requirement for calculating MCPR when a limiting control rod pattern is approached ensures that MCPR will be known following a change in power or power shape (regardless of magnitude) that could place operation at a thermal limit.

Figure 3.1.7-1 is used for calculating MCPR during operation at other than rated conditions. For the case of automatic flow control, the K_f factor is determined such that any automatic increase in power (due to flow control) will always result in arriving at the nominal required MCPR at 100% power. For manual flow control, the K_f is determined such that an inadvertent increase in core flow (i.e., operator error or recirculation pump speed controller failure) would result in arriving at the 99.9% limit MCPR when core flow reaches the maximum possible core flow corresponding to a particular setting of the recirculation pump MG set scoop tube maximum speed control limiting set screws. These screws are to be calibrated and set to a particular value and whenever the plant is operating in manual flow control the K_f defined by that setting of the screws is to be used in the determination of required MCPR. This will assure that the reduction in MCPR associated with an inadvertent flow increase always satisfies the 99.9% requirement. Irrespective of the scoop tube setting, the required MCPR is never allowed to be less than the nominal MCPR (i.e., K_f is never less than unity).

Power/Flow Relationship

The power/flow curve is the locus of critical power as a function of flow from which the occurrence of abnormal operating transients will yield results within defined plant safety limits. Each transient and postulated accident applicable to operation of the plant was analyzed along the power/flow line. The analysis (7,8,9) justifies the operating envelope bounded by the power/flow curve as long as other operating limits are satisfied. Operation under the power/flow line is designed to enable the direct ascension to full power within the design basis for the plant.

Reactor power level in the one-loop-isolated mode is restricted to a power level which has been analyzed and found acceptable.



REFERENCES FOR BASES 3.1.7 AND 4.1.7 FUEL RODS

- (1) "Fuel Densification Effects on General Electric Boiling Water Reactor Fuel," Supplements 6, 7 and 8, NEDM-10735, August 1973.
- (2) Supplement 1 to Technical Report on Densifications of General Electric Reactor Fuels, December 14, 1974 (USA Regulatory Staff).
- (3) Communication: V. A. Moore to I. S. Mitchell, "Modified GE Model for Fuel Densification," Docket 50-321, March 27, 1974.
- (4) "General Electric Boiling Water Reactor Generic Reload Application for 8 x 8 Fuel," NEDO-20360, Supplement 1 to Revision 1, December 1974.
- (5) "General Electric Company Analytical Model for Loss of Coolant Analysis in Accordance with 10CFR50 Appendix K," NEDO-20566.
- (6) General Electric Refill Reflood Calculation (Supplement to SAFE Code Description) transmitted to the USAEC by letter, G. L. Gyorey to Victor Stello Jr., dated December 20, 1974.
- (7) "Nine Mile Point Nuclear Power Station Unit 1, Load Line Limit Analysis," NEDO-24012.
- (8) Licensing Topical Report General Electric Boiling Water Reactor Generic Reload Fuel Application, NEDE-24011-P-A, August, 1978.
- (9) Nine Mile Point Nuclear Power Station Unit 1, Extended Load Line Limit Analysis, License Amendment Submittal (Cycle 6), NEDO-24185, April 1979.



ATTACHMENT B

Niagara Mohawk Power Corporation

License No. DPR-63

Docket No. 50-220

Supporting Information

Attachment A describes proposed changes to the Nine Mile Point Unit 1 Technical Specifications. These changes are required to provide for more flexible operation. The bases for the proposed Technical Specification changes are provided in the enclosed report "Nine Mile Point Nuclear Power Station Unit 1 Extended Load Line Limit Analysis Licensing Amendment Submittal, NEDO-24185."

The analyses were performed utilizing an extended power/flow line. The analysis results are provided in the same sequence as the standard reload format to assure that all aspects of reactor operation which are affected are considered. Future reload submittals will incorporate the use of the extended load line in the analysis.

The analysis in the attached report shows operation near end-of-cycle requires slightly lower power levels to assure adequate pressure margins during a postulated turbine trip without bypass transient than those calculated in Reference 2. This is due to the reduced core flow assumed in the calculation. To assure adequate pressure margins near end-of-cycle, Niagara Mohawk will utilize a power/flow ratio near end-of-cycle which is conservatively bounded by the analysis in the attached report and that of Reference 2.



THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT