

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET 50-220

Proposed Changes to Technical Specifications (Appendix A)

Attached are new pages 24lee, 24lff, 24lgg, 24lhh and 24lii. Revised pages iii, v, 248, 249 and 264 are also attached.

0009180 348



SECTION

DESCRIPTION

PAGE

3.6.5	Radioactive Material Sources	4.6.5	Radioactive Material Sources	24lk
3.6.6	Fire Detection	4.6.6	Fire Detection	24lm
3.6.7	Fire Suppression	4.6.7	Fire Suppression	24lq
3.6.8	Carbon Dioxide Suppression System	4.6.8	Carbon Dioxide Suppression System	24lu
3.6.9	Fire Hose Stations	4.6.9	Fire Hose Stations	24ly
3.6.10	Fire Barrier Penetration Fire Seals	4.6.10	Fire Barrier Penetration Fire Seals	24lcc
3.6.11	Accident Monitoring Instrumentation	4.6.11	Accident Monitoring Instrumentation	24lee



SECTION

DESCRIPTION

PAGE

6.11	Radiation Protection Program	260
6.12	Respiratory Protection Program	260
6.13	High Radiation Area	263
6.14	Fire Protection Inspection	268
6.15	Systems Integrity	268
6.16	Iodine Monitoring	268



LIMITING CONDITION FOR OPERATION

3.6.11 ACCIDENT MONITORING INSTRUMENTATION

Applicability:

Applies to the operability of the plant instrumentation that performs an accident monitoring function.

Objective:

To assure high reliability of the accident monitoring instrumentation.

Specification:

- a. During the power operating condition, the accident monitoring instrumentation sensors shown in Table 3.6.11 shall be operable except as specified in 3.6.11 b or c.
- b. Safety and Relief Valves
 - (1) With the number of operable accident monitoring instrumentation sensors (for parameters 1 and 2) less than the number shown in Table 3.6.11 restore the inoperable sensor to an operable status at the earliest time of accessibility.
 - (2) The total number of sensors shown in Table 3.6.11 will be operable prior to the beginning of each cycle.

SURVEILLANCE REQUIREMENT

4.6.11 ACCIDENT MONITORING INSTRUMENTATION

Applicability:

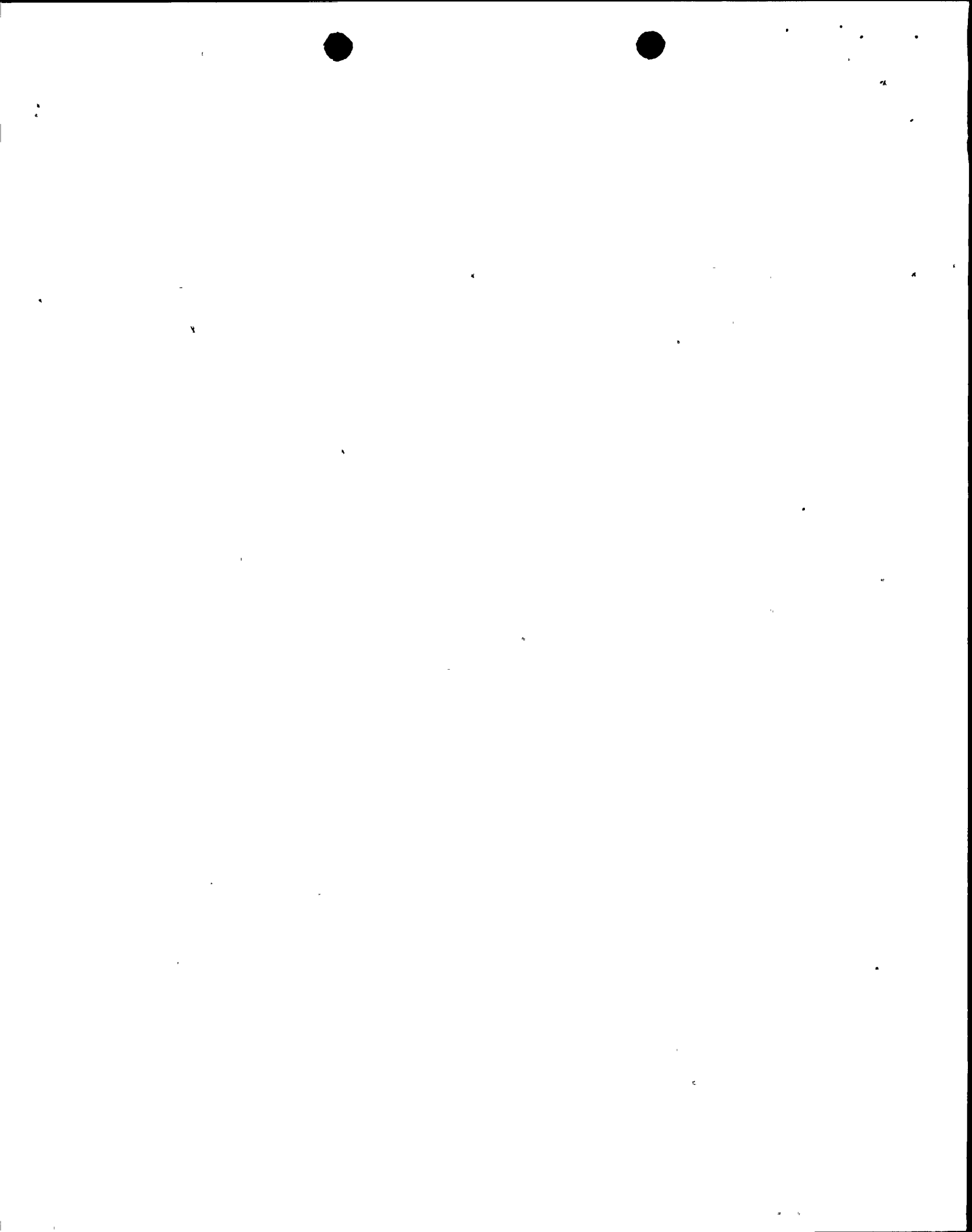
Applies to the surveillance of the instrumentation that performs an accident monitoring function.

Objective:

To verify the operability of accident monitoring instrumentation.

Specification:

Instrument channels shall be tested and calibrated at least as frequently as listed in Table 4.6.11.



LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

3.6.11 ACCIDENT MONITORING INSTRUMENTATION (continued)

Specification: (continued)

c. Reactor Vessel Water Level

- (1) With the number of operable accident monitoring instrumentatin sensors less than the total number of sensors (for parameter 3) shown in Table 3.6.11, either restore the inoperable sensor(s) to operable status within 15 days, or be in at least hot shutdown within the next 12 hours.
- (2) With the number of operable accident monitoring instrumentation sensors (for parameter 3) less than the minimum number of operable sensors of Table 3.6.11, either restore the inoperable sensor(s) to operable status within 48 hours or be in at least hot shutdown within the next 12 hours.



Table 3.6.11

Accident Monitoring Instrumentation

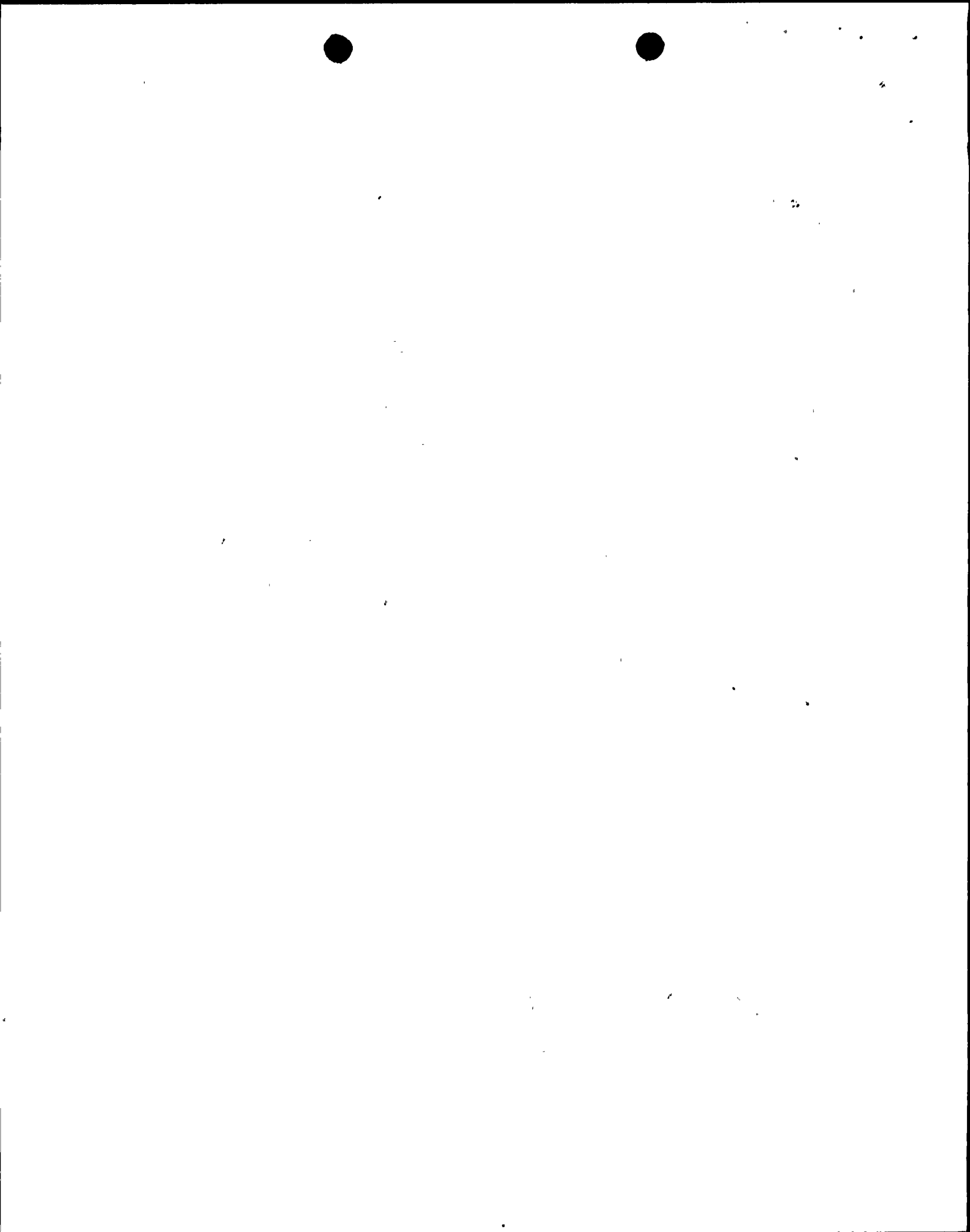
<u>Parameter</u>	<u>Total Number of Sensors</u>	<u>Minimum Number of Operable Sensors</u>
(1) Relief valve position indicator (Primary - Acoustic)	1/valve	N.A.
Relief valve position indicator (Backup - Thermocouple)	1/valve	N.A.
(2) Safety valve position indicator (Primary - Acoustic)	1/valve	N.A.
Safety valve position indicator (Backup - Thermocouple)	1/valve	N.A.
(3) Reactor vessel water level	2	1



Table 4.6.11

Accident Monitoring InstrumentationSurveillance Requirement

<u>Parameter</u>	<u>Instrument Channel Test</u>	<u>Instrument Channel Calibration</u>
(1) Relief valve position indicator (Primary - Acoustic)	Once per month	Once during each major refueling outage
Relief valve position indicator (Backup - Thermocouple))	Once per month	Once during each major refueling outage
(2) Safety valve position indicator (Primary - Acoustic)	Once per month	Once during each major refueling outage
Safety valve position indicator (Backup - Thermocouple)	Once per month	Once during each major refueling outage
(3) Reactor vessel water level	Once per month	Once during each major refueling outage



Bases 3.6.11 and 4.6.11 Accident Monitoring Instrumentation

Accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables during and following an accident. This capability is consistent with the recommendations of NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."



Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION (1)

License	Normal Operation	Shutdown Condition	Operation (3) W/O Process Computer	Reactor (4) Startups
Senior Operator	1	1	1	1
Operator	2	1	2	3
Unlicensed (2)	2	1	3	2
Shift Technical Advisor	1	1 (5)	1	1

Notes:

- (1) At any one time more licensed or unlicensed operating people could be present for maintenance, repairs, fuel outages, etc.
- (2) Those operating personnel not holding an "Operating" or "Senior Operator" License.
- (3) For operation longer than eight hours without process computer.
- (4) For reactor startups, except a scram recovery where the reason for scram is both clearly understood and corrected.
- (5) Hot shutdown condition only



6.3 Facility Staff Qualifications

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 Training

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 except for Fire Brigade Training sessions which shall be held at least quarterly.

6.5 Review and Audit

6.5.1 Site Operations Review Committee (SORC)

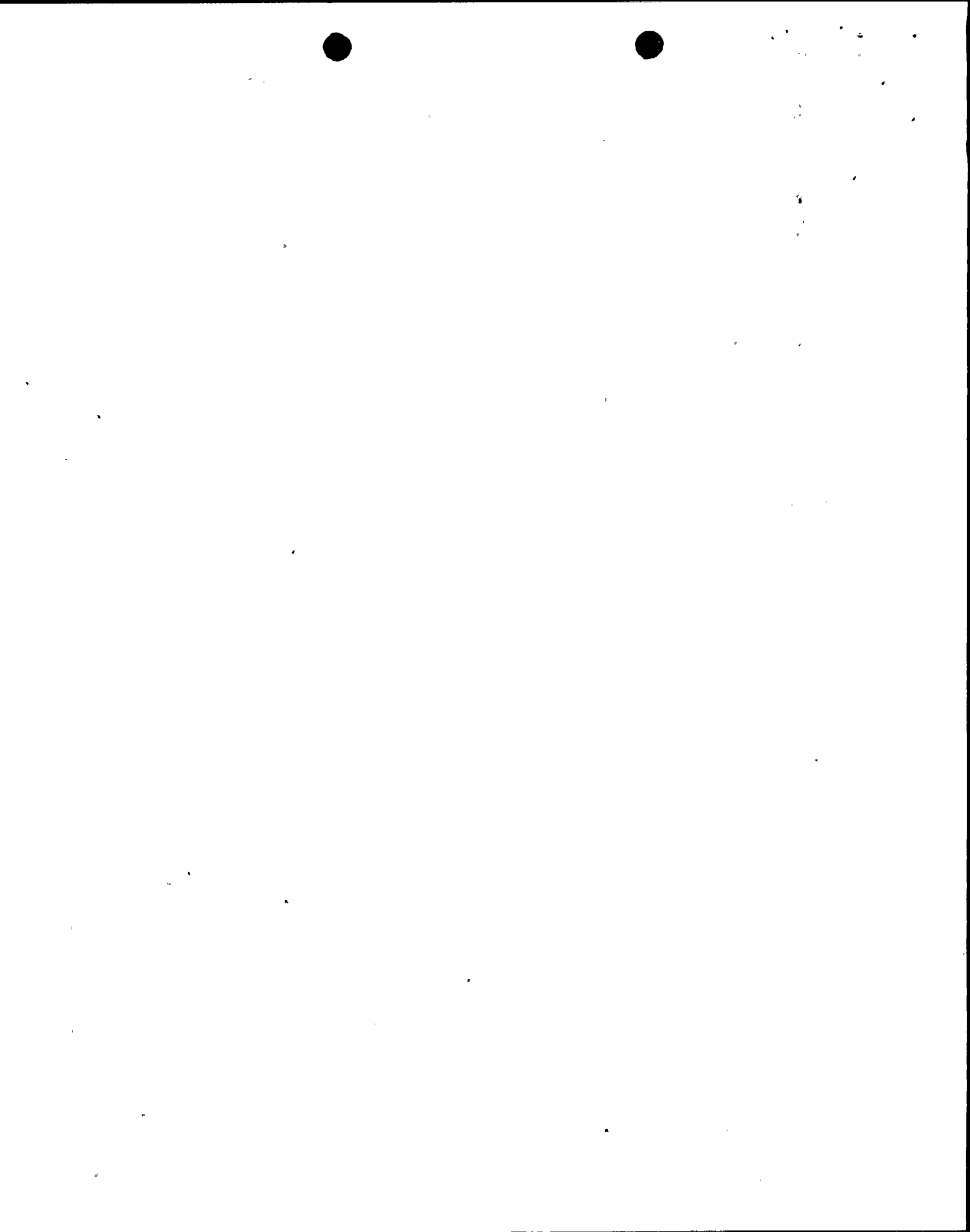
Function

6.5.1.1 The Site Operations Review Committee shall function to advise the General Superintendent Nuclear Generation on all matters related to nuclear safety.

Composition

6.5.1.2 The Site Operations Review Committee shall be composed of the:

Chairman:	General Superintendent - Nuclear Generation
Member:	Station Superintendent - Nuclear Generation
Member:	Superintendent Results - Nuclear
Member:	Supervisor Reactor Analysis
Member:	Superintendent Maintenance - Nuclear
Member:	Supervisor Instrument & Control - Nuclear
Member:	Supervisor Radiochemical & Radiation Protection



6.14 Fire Protection Inspection

6.14.1 An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site license personnel or an outside fire protection firm.

6.14.2 An inspection and audit by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.

6.15 Systems Integrity

Procedure shall be established, implemented and maintained to meet or exceed the requirements and recommendations of section 2.1.6.a of NUREG 0578.

6.16 Iodine Monitoring

Procedures shall be established, implemented and maintained to meet or exceed the requirements and recommendations of section 2.1.8.c of NUREG 0578.



ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

License No. DPR-63

Docket No. 50-220

Supporting Information

A July 2, 1980 letter from the Nuclear Regulatory Commission Staff requested that Niagara Mohawk propose amendments to the Technical Specifications and Operating License for Nine Mile Point Unit 1.

The areas in which Technical Specification changes were requested are as follows:

- (1) Emergency Power Supply/Inadequate Core Cooling
- (2) Valve Position Indication
- (3) Containment Isolation
- (4) Shift Technical Advisor

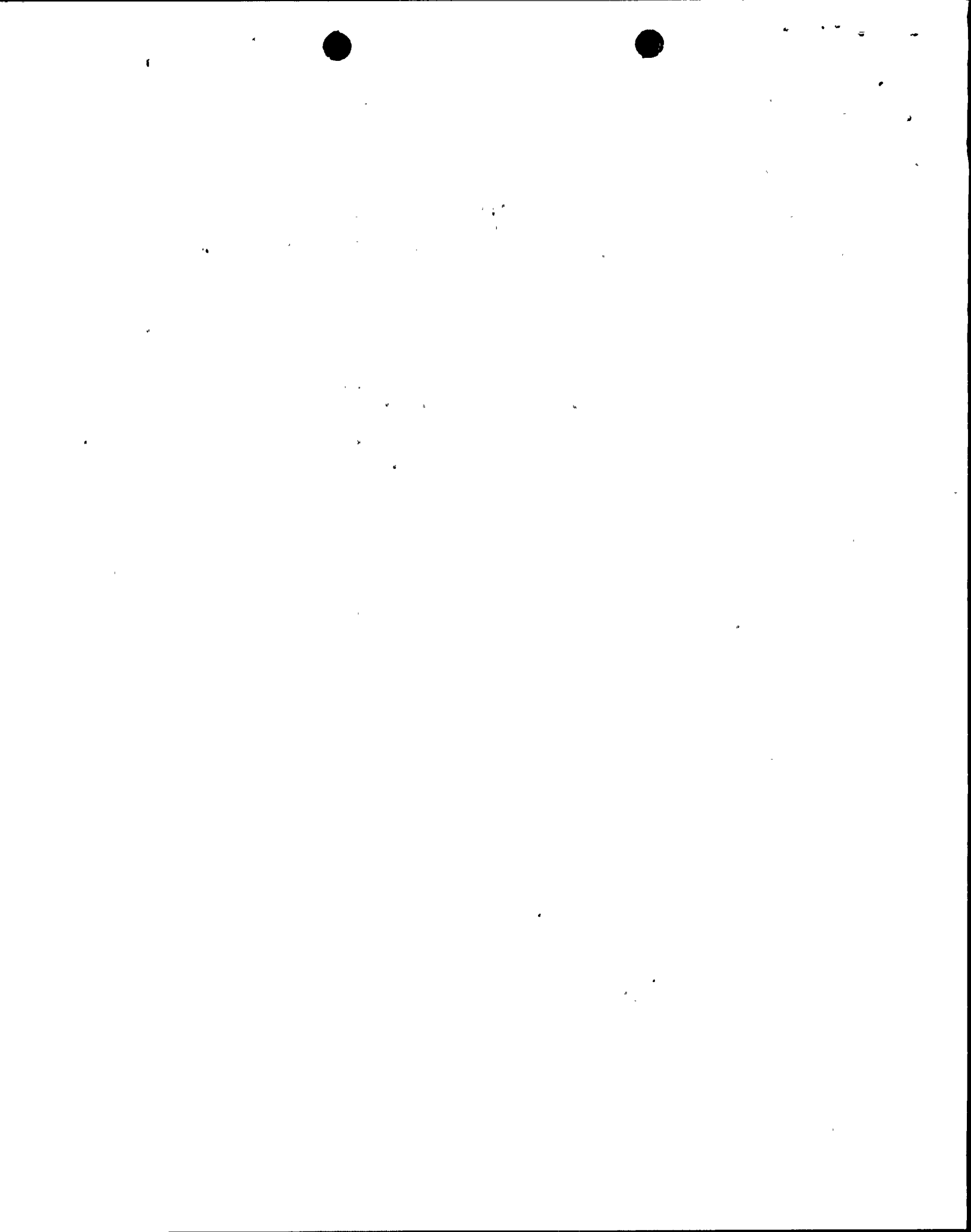
Proposed Specifications 3.6.11 and 4.6.11 and Bases of Attachment A address Items 1 and 2 of the Nuclear Regulatory Commission letter with the following exceptions.

(1) The requirement for returning instrumentation on relief and safety valves to an operable status within either 7 days or 48 hours respectively is not practical. Acoustic monitors are located inside of the drywell and not accessible during normal operation. In addition, as a backup, thermocouples monitor valve discharge. Specifically, operator action for a safety valve opening would be the same as a Loss of Coolant Accident.

(2) The requirement for returning one channel of reactor vessel level instrumentation to an operable status within 7 days is too restrictive. Fifteen days is deemed more appropriate because a redundant channel is available. In addition, this system does not activate any safety system and existing level monitoring equipment provides additional redundancy.

Item 3 is presently covered by Technical Specifications 3.2.7, 4.2.7, 3.4.2, 4.4.2 and Bases. These Specifications reflect diverse isolation signals for isolation valves for Nine Mile Point Unit 1.

Proposed changes to Table 6.2-1 and Specification 6.3.1 provide for Item 4, Shift Technical Advisor.



The areas for which proposed amendment to the operating license was requested are as follows:

- (1) Systems Integrity
- (2) Iodine Monitoring

These items are also being included in the proposed Technical Specifications rather than the operating license. Niagara Mohawk believes that these items are more appropriately part of the Technical Specifications.

(1) Systems Integrity

A program has been developed as described in our December 31, 1979 letter to Harold Denton, to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program includes (1) provisions establishing preventive maintenance and periodic visual inspection requirements, and (2) leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

(2) Iodine Monitoring

A program has been developed as described in our December 31, 1979 letter to Harold Denton, which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program includes (1) Training of personnel, (2) Procedures for monitoring, and (3) Provisions for maintenance of sampling and analysis equipment.



11-11-68