ATTACHMENT A

Niagara Mohawk Power Corporation

License No. DPR-63

Docket No. 50-220

Proposed Changes to Technical Specifications (Appendix B)

Replace Page 39 with the attached revised page and add pages 32a and 39a. These pages were completely retyped with changes as marked.

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
g. 1. The scram discharge volume drain and vent valves will be open during normal operation. If either of these valves are closed for more than 3 consecutive hours, the reactor shall be placed in a hot shutdown within 10 hours. These valves may be closed intermittently under administrative controls.	g. 1. The scram discharge volume drain and vent valves shall be verified open at least once per month.
2. If the scram discharge volume vent and drain valves become inoperable, the reactor may remain in operation for a period not to exceed 7 days. If the valves are not restored to an operable condition, initiate normal orderly shutdown within 1 hour.	2. The scram discharge volume drain and vent valves shall be demonstrated operable at least once per cycle by verifying that the vent and drain valves: a. Close within 6.0 seconds after receipt of a signal for control rods to scram, and b. Open when the scram signal is reset or the scram discharge volume trip is bypassed.

f. Reactivity Anomalies

During each fuel cycle, excess operating reactivity varies as fuel depletes and as any burnable poison in supplementary controls is burned. The magnitude of this excess reactivity is indicated by the integrated worth of control rods inserted into the core, referred to as the control rod inventory in the core. As fuel burnup progresses, anomalous behavior in the excess reactivity may be detected by comparison of actual rod inventory at any base equilibrium core state to predicted rod inventory at that state. Equilibrium xenon, samarium and power distribution are considered in establishing the steady-state base condition to minimize any source of error. During an initial period, (on the order of 1000 MWD/T core average exposure following core reloading or modification) rod inventory predictions can be normalized to actual rod patterns to eliminate calculational uncertainties. Experience with other operating BWR's indicates that the control rod inventory should be predictable to the equivalent of one percent in reactivity. Deviations beyond this magnitude would not be expected and would require thorough evaluation. One percent reactivity limit is considered safe since an insertion of this reactivity into the core would not lead to transients exceeding design conditions of the reactor system.

g. The scram discharge volume vent and drain valves are normally held open by instrument air pressure, providing a continuous vent and drain path for related piping. A small amount of leakage past the scram valves into the scram discharge piping may occur during normal operation. If either the vent or drain valve were closed, a condition would exist whereby water could accumulate in the piping serviced by these valves. If this condition were allowed to persist, enough water could accumulate to impair the ability of the scram system. The limiting conditions for operation imposed on these valves ensures that sufficient volume will be present in the scram discharge piping to accommodate a scram. In actuality, the reactor will have automatically scrammed before conditions set forth in the limiting conditions for operation have occurred (i.e. high level in the scram discharge volume will trigger an RPS signal @ 37 gal). Hence, LCO 3.1.1.g.1 serves mainly as a backup to the RPS, ensuring scram capability.

The status (open or closed) of these valves is indicated in the control room by an annunciator and computer printout. In addition to control room indications, surveillance requirements provide further assurance that these valves are operable.

Bases

(1) Paone, C.J., Stirn, R.C., and Wooley, J.A., "Rod Drop Accident Analysis for Large Boiling Water Reactors," NEDO-10527, March 1972.

(2) Stirn, R.C., Paone, C.J., and Young, R.M., "Rod Drop Accident Analysis for Large BWR's," Supplement 1 - NEDO-10527, July 1972.

(3) Stirn, R.C., Paone, C.J., and Haun, J.M., "Rod Drop Accident Analysis for Large Boiling Water Reactors Addendum No. 2 Exposed Cores," Supplement 2 - NEDO-10527, January 1973.

(4) Report entitled "Technical Basis for Changes to Allowable Rod Worth Specified in Technical Specification 3.3.B.3," transmitted by letter from L.O. Mayer (NSP) to J.F. O'Leary (USAEC) dated October 4, 1973.

(5) Letter, R.R. Schneider, Niagara Mohawk Power Corporation to A. Giambusso, USAEC, dated November 15, 1973.

(6) To include the power spike effect caused by gaps between fuel pellets.

ATTACHMENT B

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Supporting Information

Changes to Sections 3.1.1, 4.1.1, and Bases of the Technical Specifications relating to operation of the scram discharge volume vent and drain valves and control rod withdrawal block instrumentation are herein proposed by Niagara Mohawk Power Corporation. These changes were requested by the Nuclear Regulatory Commission in a letter dated July 7, 1980, and are in conformance with Sections 4.1.3.1.1 and 4.1.3.1.4 of the model Technical Specifications which were included with the letter. The present design of the Reactor Protection System at Nine Mile Point precludes implementing the requirements of Section 4.3.6.1 of the model Technical Specifications. In order to perform an Instrument Channel Test on the Scram Dump Volume Water Level Scram Bypass, the reactor mode switch must be in either the shutdown or refuel position. A monthly test of this parameter, as outlined in the model Technical Specifications, would interfere with the normal operation of the plant. Therefore, the current requirement of testing the Scram Dump Volume Water Level Scram Bypass once per refueling outage will remain in effect. All other requirements, as outlined in the Model Specifications, are covered by the present Technical Specifications. In addition to changes requested by the Nuclear Regulatory Commission, Limiting Conditions for Operation have been proposed on the scram discharge volume vent and drain valves.

The proposed changes will strengthen the provisions for assuring operability of the scram system during reactor operation.

ATTACHMENT C

Niagara Mohawk Power Corporation

License DPR-63

Docket 50-220

Amendment Classification

The proposed amendment to the Operating License has been evaluated and determined to fall within the definition of Class III of 10CFR 170.22, thereby requiring a fee of four thousand dollars ($4,000).