

ATTACHMENT A

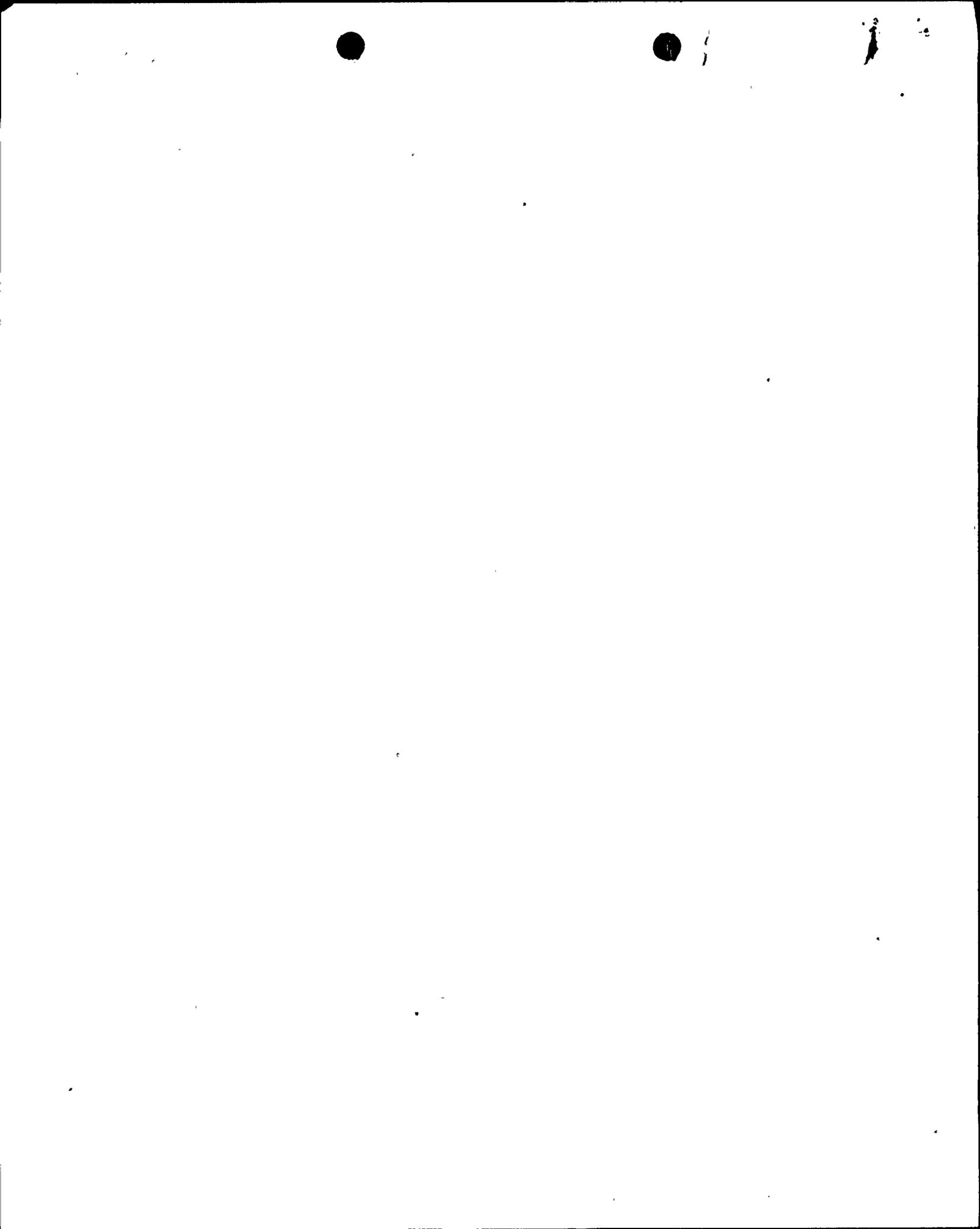
Niagara Mohawk Power Corporation

License No. DPR-63

Docket No. 50-220

Proposed Changes to Technical Specifications (Appendix B)

Replace pages 166 and 168 with the attached revised pages. These pages were completely retyped with changes as marked.



3.4.1 LEAKAGE RATEApplicability:

Applies to the leakage rate of the secondary containment.

Objective:

To specify the requirements necessary to limit exfiltration of fission products released to the secondary containment as a result of an accident.

Specification:

Whenever the reactor is in the refueling or power operating condition, the reactor building leakage rate as determined by Specification 4.4.1 shall not exceed 2000 cfm. If this cannot be met after a routine surveillance check, then the actions listed below shall be taken:

- a. Suspend immediately irradiated fuel handling, fuel pool and reactor cavity activities, and irradiated fuel cask handling operations in the reactor building.
- b. Restore the reactor building leakage rates to within specified limits within 4 hours or initiate normal orderly shutdown and be in a cold shutdown condition within 10 hours.

4.4.1 LEAKAGE RATEApplicability:

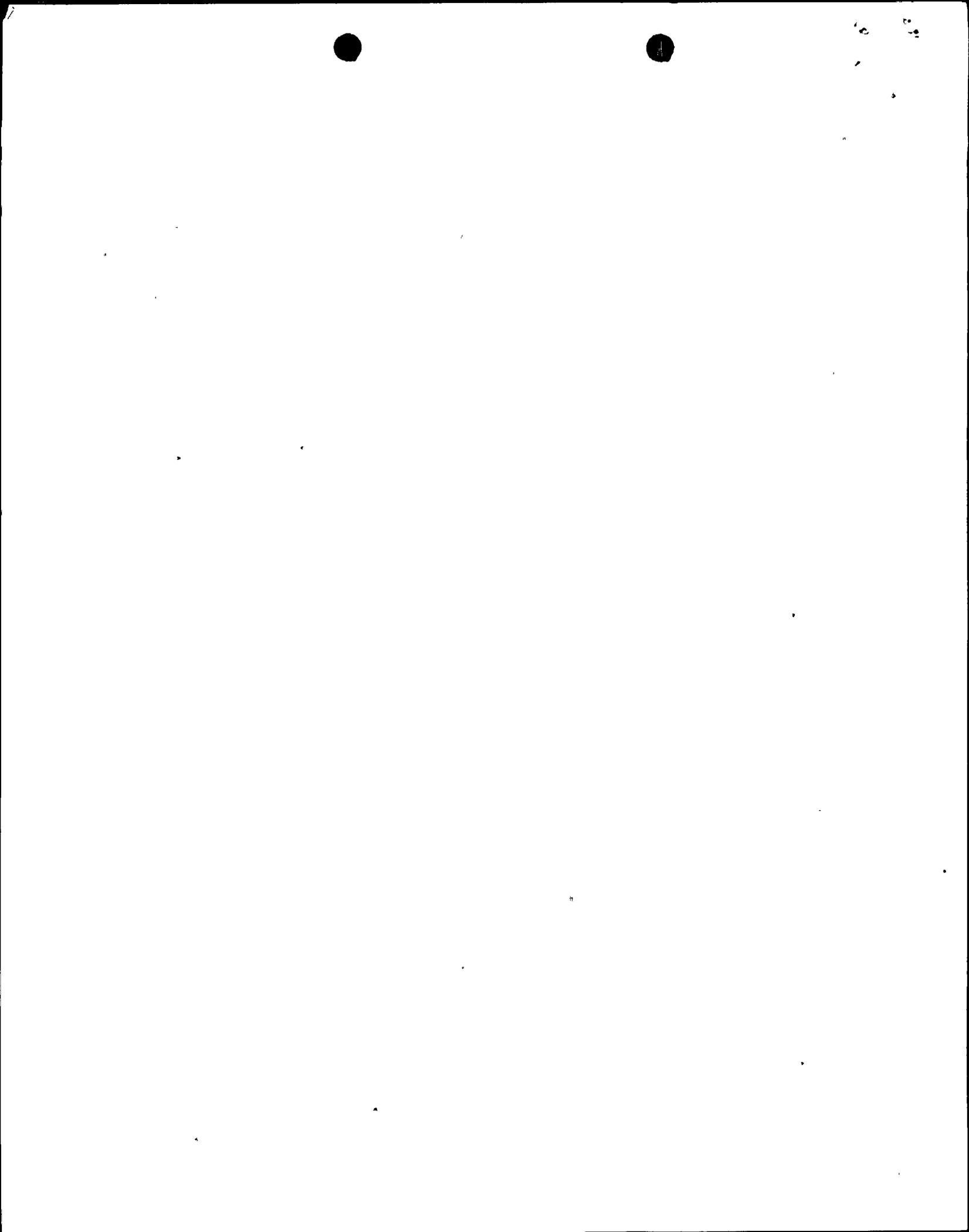
Applies to the periodic testing requirements of the secondary containment leakage rate.

Objective:

To assure the capability of the secondary containment to maintain leakage within allowable limits.

Specification:

Once during each operating cycle - isolate the reactor building and start emergency ventilation system fan to demonstrate negative pressure in the building relative to external static pressure. The fan flow rate shall be varied so that the building internal differential pressure is at least as negative as that on Figure 3.4.1 for the wind speed at which the test is conducted. The fan flow rate represents the reactor building leakage referenced to zero mph with building internal pressure at least 0.25 inch of water less than atmospheric pressure. The test shall be done at wind speeds less than 20 miles per hour.



BASES FOR 3.4.1 AND 4.4.1 LEAKAGE RATE

In the answers to Questions II-3 and IV-5 of the Second Supplement and also in the Fifth Supplement,* the relationships among wind speed direction, pressure distribution outside the building, building internal pressure, and reactor building leakage are discussed. The curve of pressure in Figure 3.4.1 represents the wind direction which results in the least building leakage. It is assumed that when the test is performed, the wind direction is that which gives the least leakage.

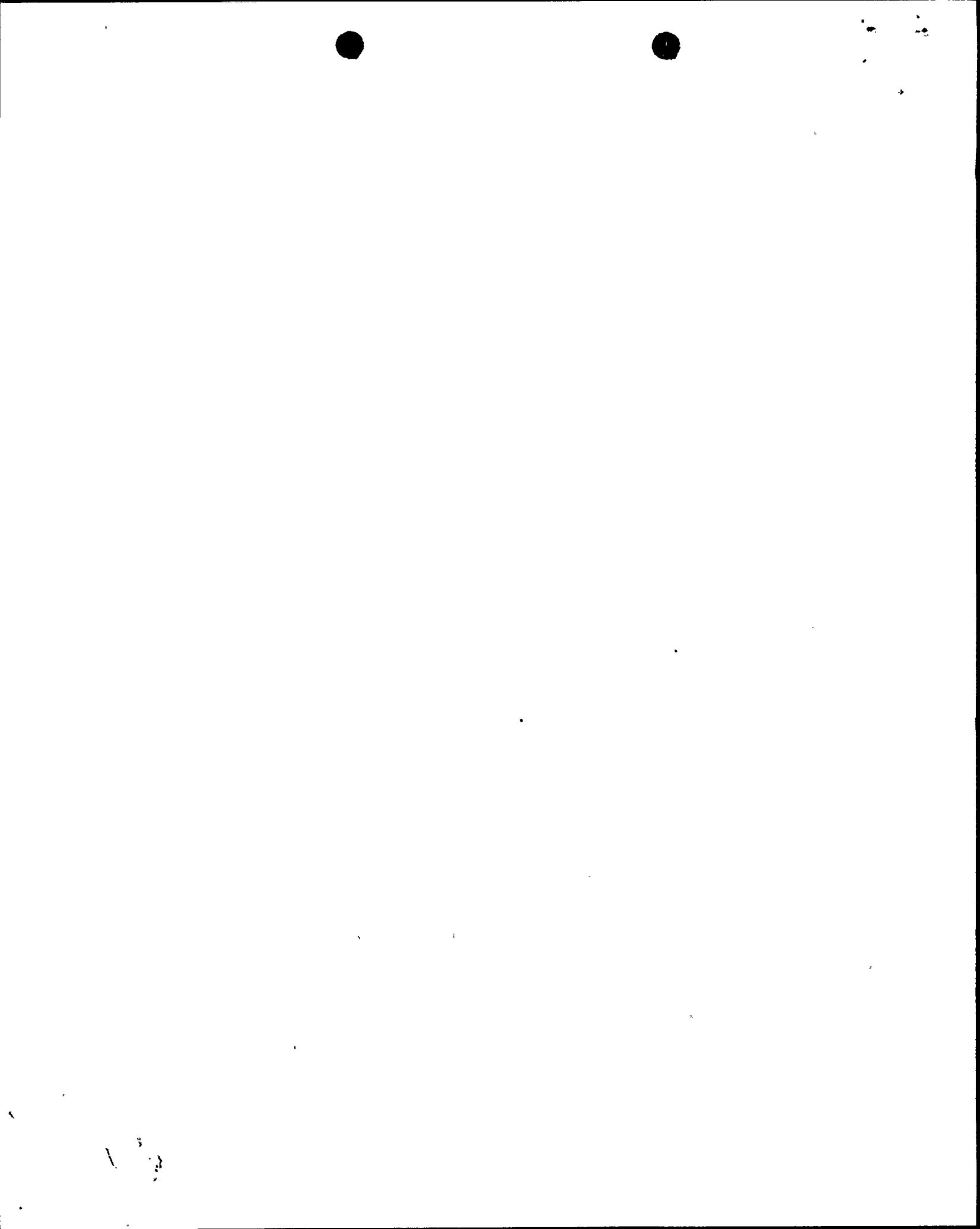
If the wind direction was not from the direction which gave the least reactor building leakage, building internal pressure would not be as negative as Figure 3.4.1 indicates. Therefore, to reduce pressure, the fan flow rate would have to be increased. This erroneously indicates that reactor building leakage is greater than if wind direction were accounted for. If wind direction were accounted for, another pressure curve could be used which was less negative. This would mean that less fan flow (or measured leakage) would be required to establish building pressure. However, for simplicity it is assumed that the test is conducted during conditions leading to the least leakage while the accident is assumed to occur during conditions leading to the greatest reactor building leakage.

As discussed in the Second Supplement and Fifth Supplement, the pressure for Figure 3.4.1 is independent of the reactor building leakage rate referenced to zero mph wind speed at a negative differential pressure of 0.25 inch of water. Regardless of the leakage rate at these design conditions, the pressure versus wind speed relationship remains unchanged for any given wind direction.

By requiring the reactor building pressure to remain within the limits presented in Figure 3.4.1 and a reactor building leakage rate of less than 2000 cfm, exfiltration would be prevented. This would assure that the leakage from the primary containment is directed through the filter system and discharged from the 350-foot stack. Secondary Containment may be broken at one penetration for up to four hours to allow work to proceed on modifications which will enhance the overall safety of the plant. While the secondary containment is open, administrative controls will be in place to assure integrity can be restored immediately, if necessary. Typically, existing penetrations will be opened in the Reactor Building walls to allow for cable installation for various plant modifications.

Preoperational reactor building capability tests shall be conducted after isolating the reactor building and placing either branch of the emergency ventilation system in operation. The tests shall be performed under a number of different environmental wind conditions, i.e. wind speed and direction.

*FSAR



ATTACHMENT B

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Supporting Information

Changes to Section 3.4.1 and Bases of the Technical Specifications relating to reactor building leakage rates are herein proposed. The amendment would authorize operation of the Nine Mile Point Unit 1 Nuclear Facility with limiting conditions of operation for the secondary containment revised to permit operation for up to 4 hours with the leakage rate in excess of 2000 cfm. The 4 hour interval is sufficiently short that the likelihood of an accident occurring during that interval is minimal. Also, activities which have the potential to result in significant releases directly to the reactor building will be suspended during this time.

The change is necessary to allow work necessary to upgrade several safety related systems (i.e. cable routing which requires secondary containment penetration) to proceed. Therefore, the amendment to the Technical Specifications will allow for modifications to be completed which will increase the margin of safety at the Nine Mile Point Nuclear Facility.

The proposed changes are consistent with current standard Technical Specifications for Boiling Water Reactors.



12-1-78

ATTACHMENT C

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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).



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