ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A)

Replace the existing pages with the attached revised pages as shown below. These pages have been retyped in their entirety and the marginal markings indicate changes to the text.

Existing Page	Revised Page
118	118
205	205
206	206
235	235

NOTE: Please be advised that we recently submitted (November 1, 1983) another application to amend page 118 of our Technical Specifications.

LIMITING CONDITIONS FOR OPERATION
Table 3.2.7

REACTOR COOLANT SYSTEM ISOLATION VALVES

Line or System	No. of Valves (Each Line)	Location Relative to Primary Containment	Normal Position	Motive Power	Maximum Oper. Time (Sec)	Action on Initiating Signal	Initiating Signal (All Valves Have Remote Manual Backup)
Main Steam	1	Inside	Open	A.I.P.O.*	10	Close	Reactor water level low-low, or main steam line high radiation, or main steam line high flow, or low condenser vacuum, or high temperature in the pipe tunnel
(Two Lines)	1	Outside	Open	A.I.P.O.*	10	Close	
Main Steam Warm-up (Two Lines)	1	Outside	Closed	A.I.P.O.	8	Close	
Main Steam-Emergency Cooling Vents (Two Lines)	2	Outside	Open	A.I.P.O.	5	Close	-
Feedwater	1	Outside	Open	R.M.P.O.*	60	-	-
(Two Lines)	1	Outside	-	Self Act. Ck.	--	-	-
Emergency Cooling							
Steam Leaving Reactor	1	Outside	Open	A.I.P.O.	38	Close	High system flow
(Two Lines)	1	Outside	Open	A.I.P.O.	38	Close	
Condenser Return to Reactor	1	Inside	-	Self Act. Ck.	--	-	
(Two Lines)	1	Outside	Closed	A.I.P.O.	60	Close	
Reactor Cleanup							
Water Leaving Reactor	1	Inside	Open	A.I.P.O.	18	Close	Reactor water level low-low, or high area temperature, liquid poison initiation or high system pressure, or low system flow, or high system temperature
(One Line)	1	Outside	Open	A.I.P.O.	18	Close	
Water Return to Reactor	1	Inside	Open	A.I.P.O.	18	Close	
(One Line)	1	Outside	-	Self Act. Ck.	--	-	
Shutdown Cooling							
Water Leaving Reactor	1	Inside	Closed	A.I.P.O.	40	Close	Reactor water level low-low, or high area temperature
(One Line)	1	Outside	Closed	A.I.P.O.	40	Close	
Water Return to Reactor	1	Inside	Closed	A.I.P.O.	40	Close	
(One Line)	1	Outside	-	Self Act. Ck.	--	-	

Table 3.6.2c

INSTRUMENTATION THAT INITIATES OR ISOLATES EMERGENCY COOLING

Limiting Condition for Operation

Parameter	Minimum No. of Tripped or Operable Trip Systems	Minimum No. of Operable Instrument Channels per Operable Trip Sytem	Set-Point	Reactor Mode Switch Position in Which Function Must Be Operable			
				Shutdown	Refuel	Startup	Run
EMERGENCY COOLING INITIATION							
(1) High-Reactor Pressure	2	2	≤1080 psig	(b)		x	x
(2) Low-Low Reactor Water Level	2	2	≥5 inches (Indicator Scale)	(b)		x	x
EMERGENCY COOLING ISOLATION (for each of two systems)							
(3) High Steam Flow Emergency Cooling System	2	2(a)	19 psid			x	x

Table 4.6.2c

INSTRUMENTATION THAT INITIATES OR ISOLATES EMERGENCY COOLING

Parameter	Surveillance Requirement		
	Sensor Check	Instrument Channel Test	Instrument Channel Calibration
EMERGENCY COOLING INITIATION			
(1) High Reactor Pressure	None	Once per month(c)	Once per 3 months(c)
(2) Low-Low Reactor Water Level	Once/day	Once per month(c)	Once per 3 months(c)
EMERGENCY COOLING ISOLATION (for each of two systems)			
(3) High Steam Flow Emergency Cooling System	None	Once per 3 months(c)	Once per 3 months(c)

a. The set points included in the tables are those used in the transient analysis and the accident analysis. The high flow set point for the main steam line is 105 psi differential. This represents a flow of approximately 4.4×10^6 lb/hr. The high flow set point for the emergency cooling system supply line is 19 psi differential. This represents a flow of approximately 8.7×10^5 at rated conditions.

Normal background for the main steam line radiation monitors is defined as the radiation level which exists in the vicinity of main steam lines after 1 hour or more of sustained full rated power. The dose rate at the monitor due to activity from the control rod drop accident of Appendix E or from gross failure of one rod with complete fission product release from the rod would exceed the normal background at the monitor. The automatic initiation signals for the emergency cooling systems have to be sustained for more than 10 seconds to cause opening of the return valves. If the signals last for less than 10 seconds, the emergency cooling system operating will not be automatically initiated.

The high level in the scram discharge volume is provided to assure that there is still sufficient free volume in the discharge system to receive the control rod drives discharge. Following a scram, bypassing is permitted to allow draining of the discharge volume and resetting of the reactor protection system relays. Since all control rods are completely inserted following a scram and since the bypass of this particular scram initiates a control rod block, it is permissible to bypass this scram function. The scram trip associated with the shutdown position of the mode switch can be reset after 10 seconds.

The condenser low vacuum, low-low vacuum and the main steam line isolation valve position signals are bypassed in the startup and refuel positions of the reactor mode switch when the reactor pressure is less than 600 psig. These are bypassed to allow warmup of the main steam lines and a heat sink during startup.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

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Supporting Information

Changes to Table 3.2.7, "Limiting Conditions For Operation - Reactor Coolant System Isolation Valves"; Table 3.6.2c, "Limiting Conditions for Operation - Instrumentation that Initiates or Isolates Emergency Cooling"; and Table 4.6.2c, "Surveillance Requirement - Instrumentation that Initiates or Isolates Emergency Cooling"; are proposed to reflect a modification to the emergency condenser isolation logic. Currently, emergency condenser isolation is initiated automatically on high radiation signals from detectors located near the emergency condenser vents, or on high steam flow signals. The proposed change removes the automatic isolation function on high radiation signals.

Of the seven operating BWR units that were addressed in the Safety Evaluation Report; Application of NUREG-0737 Item II.K.3.14 - "Isolation of Isolation Condensers" to Operating BWRS, Nine Mile Point Unit 1 is the only unit whose system design incorporates automatic isolation on high radiation signals. The other units require manual isolation of the emergency condenser if considered necessary by the operator. Implementation of this proposal will make Nine Mile Point Unit 1 consistent with the other operating boiling water reactor units. It was further indicated in the safety evaluation report and Niagara Mohawk concurs that "The staff also agrees with the position of one licensee that manual isolation allows the operator a greater amount of flexibility and system availability to cope with all anticipated and unanticipated operation transients". The report concluded that "the licensees' present positions, as stated in their respective submittals, are acceptable".

The detectors on one emergency condenser train are near the detectors on the second emergency condenser train. Therefore, with the present design high radiation that will initiate isolation of one train may initiate isolation of the other. It is proposed that the high radiation signal will not automatically initiate isolation of the emergency condenser train, but isolation will require operator action.

This change will prevent undesirable simultaneous isolation of both condenser loops. Without the emergency condensers, following isolation of the main steam isolation valves, a primary heat sink is lost. The proposed change increases the one out-of-two availability of the condenser system by eliminating potential spurious isolation of both condenser loops initiated by erroneous high radiation signals.

Upon receipt of a high radiation signal from one train, the operator would consider isolating that emergency condenser train. Upon receipt of another high radiation signal from the other emergency condenser train, the operator would have time to evaluate the validity of the second signal while simultaneously establishing other possible heat removal paths prior to isolating that train.

As described herein, more flexibility and availability are attained by manual isolation of the emergency condensers. The design basis of the emergency cooling system remains the same.

Therefore, this proposed change will not decrease the margin of safety at Nine Mile Point Unit 1, nor does it represent an unreviewed safety issue.

It is noted that a recent Niagara Mohawk submittal dated December 22, 1983 referenced the drafting of this Technical Specification amendment application. This submittal requested exemption from the schedular requirements of 10CFR50.48(d). Implementation of this Technical Specification amendment would eliminate the need for that exemption.

ATTACHMENT C

NIAGARA MOHAWK POWER CORPORATION

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Amendment Classification

The proposed amendment to the Operating License has been determined to fall under the Class III Amendment fee of $4,000 in accordance with 10CFR170.22.

ATTACHMENT D

NIAGARA MOHAWK POWER CORPORATION

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No Significant Hazard Considerations Analysis

The proposed Technical Specification changes submitted herein involve no significant hazard considerations. Therefore, in accordance with the proposed amendment, the operation of Nine Mile Point Unit 1 will not:

1) involve a significant increase in the probability or consequences of an accident previously evaluated; or

2) create the possibility of a new or different kind of accident from any accident previously evaluated; or

3) involve a significant reduction in a margin of safety.

As indicated above (see Attachment B, Paragraph 2) the NRC staff has previously evaluated this proposed design change. Moreover, they have determined in the Safety Evaluation Report, Application of NUREG-0737 Item II.K.3-14 - "Isolation of Isolation Condensers" to Operating BWRS, that the manual trip isolation is acceptance and "allows the operator a greater amount of flexibility and system availability to cope with all anticipated and unanticipated operation transients."

These proposed modifications will not affect the design basis of the emergency condenser system; only the logic which isolates the system. The proposed design will be in conformance to a previous Nuclear Regulatory Commission position as discussed in Attachment B.

Furthermore, this change has been determined not to be categorized as similar to the examples indicated in the April 6, 1983 Federal Register involving significant hazard considerations.

Based on the above, no significant hazards considerations are involved with this Technical Specification Amendment Application.