ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A)

Replace pages 57, 58, 59 and 123 with the attached revised pages. Pages 57, 58, 59 and 123 have been entirely retyped with marginal markings indicating the changes. Page 123a has been added as a new page.

LIMITING CONDITION FOR OPERATION

3.1.5 SOLENOID-ACTUATED PRESSURE RELIEF VALVES (AUTOMATIC DEPRESSURIZATION SYSTEM)

Applicability:

Applies to the operational status of the solenoid-actuated relief valves.

Objective:

To assure the capability of the solenoid-actuated pressure relief valves to provide a means of depressurizing the reactor in the event of a small line break to allow full flow of the core spray system.

Specification:

a. During power operating condition whenever the reactor coolant pressure is greater than 110 psig and the reactor coolant temperature is greater than saturation temperature, all six solenoid-actuated pressure relief valves shall be operable.

b. If specification 3.1.5a above is not met, the reactor coolant pressure and the reactor coolant temperature shall be reduced to 110 psig or less and saturation temperature or less, respectively, within ten hours.

SURVEILLANCE REQUIREMENT

4.1.5 SOLENOID-ACTUATED PRESSURE RELIEF VALVES (AUTOMATIC DEPRESSURIZATION SYSTEM)

Applicability:

Applies to the periodic testing requirements for the solenoid-actuated pressure relief valves.

Objective:

To assure the operability of the solenoid-actuated pressure relief valves to perform their intended functions.

Specification:

The solenoid-actuated pressure relief valve surveillance shall be performed as indicated below.

a. At least once during each operating cycle with the reactor at pressure, each valve shall be manually opened until acoustic monitors or thermocouples downstream of the valve indicate that the valve has opened and steam is flowing from the valve.

b. At least once during each operating cycle, automatic initiation shall be demonstrated.

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Pressure Blowdown

In the event of a small line break, substantial coolant loss could occur from the reactor vessel while it was still at relatively high pressures. A pressure blowdown system is provided which in conjunction with the core spray system will prevent significant fuel damage for all sized line breaks (Appendix E-11.2.0*).

Operation of three solenoid-actuated pressure relief valves is sufficient to depressurize the primary system to 110 psig which will permit full flow of the core spray system within required time limits (Appendix E-11.2*). Requiring all six of the relief valves to be operable, therefore, provides twice the minimum number required. Prior to or following refueling at low reactor pressure, each valve will be manually opened to verify valve operability. The malfunction analysis (Section II.XV, "Technical Supplement to Petition to Increase Power Level," dated April 1970) demonstrates that no serious consequences result if one valve fails to close since the resulting blowdown is well within design limits.

In the event of small line break, considerable time is available for the operator to permit core spray operation by manually depressurizing the vessel using the solenoid-actuated valves. However, to ensure that the depressurization will be accomplished, automatic features are provided. The relief valves shall be capable of automatic initiation from simultaneous low-low-low water level (7 feet, 11 inches below minimum normal water level at Elevation 302' 9", -30 inches indicator scale) and high containment pressure (3.5 psig). The system response to small breaks requiring depressurization is discussed in Section VII-A.3.3* and the time available to take operator action is summarized in Table VII-1*. Additional information is included in the answers to Questions III-1 and III-5 of the First Supplement.

Steam from the reactor vessel is discharged to the suppression chamber during valve testing. Conducting the tests with the reactor at pressure such as just prior to or just after refueling minimizes the stress on the reactor coolant system.

The test interval of once per operating cycle results in a system failure probability of 7.0×10^{-7} (Fifth Supplement, p. 115)* and is consistent with practical consideration.

* FSAR

LIMITING CONDITION FOR OPERATION

3.2.9 PRESSURE RELIEF SYSTEMS - SOLENOID-ACTUATED PRESSURE RELIEF VALVES (OVERPRESSURIZATION)

Applicability:

Applies to the operational status of the solenoid-actuated pressure relief valves.

Objective:

To assure the capability of the solenoid-actuated pressure relief valves to limit reactor overpressure below the lowest safety valve setpoint in the event of rapid reactor isolation.

Specification:

a. During the power operating condition and whenever the reactor coolant pressure is greater than 110 psig and temperature greater than saturation, five of the six solenoid-actuated pressure relief valves shall be operable.

b. If Specification 3.2.9a is not met, the reactor coolant pressure and temperature shall be reduced to 110 psig or less and saturation temperature or less, respectively, within ten hours.

SURVEILLANCE REQUIREMENT

4.2.9 PRESSURE RELIEF SYSTEMS - SOLENOID-ACTUATED PRESSURE RELIEF VALVES (OVERPRESSURIZATION)

Applicability:

Applies to the periodic testing requirements for the solenoid-actuated pressure relief valves.

Objective:

To assure the operability of the solenoid-actuated pressure relief valves to limit reactor overpressure in the event of rapid reactor isolation.

Specification:

The solenoid-actuated pressure relief valve surveillance shall be performed as indicated below.

a. The setpoints of the six relief valves shall be as follows:

No. of Valves	Setpoint
2	≤ 1090 psig
2	≤ 1095 psig
2	≤ 1100 psig

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
	4.2.9 PRESSURE RELIEF SYSTEMS - SOLENOID-ACTUATED PRESSURE RELIEF VALVES (OVERPRESSURIZATION) Specification: (Continued) b. At least once during each operating cycle with the reactor at pressure, each valve shall be manually opened until acoustic monitors or thermocouples downstream of the valve indicate that the valve has opened and steam is flowing from the valve. c. At least once during each operating cycle, relief valve setpoints shall be verified.

ATTACHMENT B

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Supporting Information

The changes to Section 3.1.5, 4.1.5, 3.2.9 and 4.2.9 were made 1) at the request of the Nuclear Regulatory Commission and 2) to reorganize these specifications for the purposes of specifically separating the Automatic Depressurization System function and the overpressurization function of the relief valves.

The following specific changes were made.

page 57

The titles of 3.1.5 and 4.1.5 were expanded to include the Automatic Depressurization System. This was done to clearly state the applicability of these specifications.

Under the Objective Section of 3.1.5, the statement referencing overpressurization was deleted. That statement applies to Section 3.2.9.

Under the specification section of 3.1.5, the words Pressure Blowdown were deleted and both "a" and "b" were added to page 57. The wording of "a" and "b" was not revised.

Under the specification section of 4.1.5, the word "low" in both "a" and "b" as it referenced reactor pressure was deleted. The word "low" was deleted in "a" because this requirement is performed at operating pressure. The word "low" was deleted in "b" because this requirement is performed at atmospheric pressure. In addition, in "a", the acoustic monitors were added as a means of determining if the valve was opened. Paragraphs "a" and "b" were also moved entirely to page 57.

page 58

This page becomes intentionally blank since the specifications are on page 57.

page 59

The fourth paragraph in the bases was revised because the valves are not tested at low reactor pressure. The valves are tested at operating pressure.

page 123

The titles of 3.2.9 and 4.2.9 were expanded to include overpressurization. This was done to clearly state the applicability of these specifications.

Under the specification section 4.2.9, the following changes were made.

1. Existing paragraph "a" was changed to "b" and added on page 123a.

2. Existing paragraph "b" was changed to "c" and reworded to accurately state the necessary surveillance requirement and added on page 123a.

3. A new paragraph "a" was added that provides the relief valve setpoints. This paragraph was added at the request of the Commission staff.

page 123a

Paragraph "b" states the specific requirement instead of referencing 4.1.5.a. No technical change was made.

ATTACHMENT C

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Amendment Classification

This proposed amendment to the Operating License has been evaluated and determined to fall within the definition of Class II of 10CFR170.22 requiring a fee of $1,200. A check for this amount is enclosed.

ATTACHMENT D

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No Significant Hazards Considerations Analysis

The proposed Technical Specification changes regarding the solenoid actuated pressure relief valves involves no significant hazard considerations. Therefore, the operation of the Nine Mile Point Unit 1 in accordance with the proposed amendment will not 1) involve a significant increase in the probability or consequences of an accident previously evaluated, 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. This determination is based on the following analysis.

The proposed change regarding incorporation of the relief valve setpoints into the surveillance requirements was requested by the Commission staff. The relief valve setpoints are currently in the basis of the technical specifications. The setpoints were added into the surveillance requirement section of the Technical Specifications. No technical changes were made.

The remaining changes were made to achieve consistency and clarity in the two separate specifications regarding overpressurization and Automatic Depressurization System function. This included adding the acoustic monitors as the primary means of determining if a valve had opened and removing the word "low" as it referenced reactor pressure for the valve surveillance tests. The word "low" was removed because the valves are normally tested when the reactor is at atmospheric pressure to fulfill one surveillance requirement and at operating pressure to fulfill another requirement. This proposed determination is supported by the fact that the requested action corresponds with example (i) of the Sholly Rule published in the Federal Register on April 6, 1983, which involves a purely administrative change, for example to achieve consistency, correct a typographical error or a change in nomenclature.