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VASSALLO,D.B. Operating Reactors Branch 2

SUBJECT: Application to amend License DPR-63,consisting of revised pages to Tech Specs re triple low reactor water level setpoint change.Changes involve replacing 147.1 inch indicator scale w/-10 inch indicator scale.

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NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

April 2, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Dear Mr. Vassallo:

Our May 22, 1980 letter provided an application for an amendment to Operating License DPR-63 that incorporated a recommendation of General Electric Service Information Letter (SIL) 299 "High Drywell Temperature Effect on Reactor Vessel Water Level Instrumentation." That application involved adjusting the triple low reactor water level setpoint 20 inches to conservatively account for possible differences in actual to indicated water level. Raising the setpoint 20 inches resulted from Niagara Mohawk's evaluation of the recommendations contained in the General Electric SIL 299. The adjusted setpoint was established at 6 feet, 3 inches below minimum normal water level 302 feet, 9 inches (147.1 inches indicator scale).

Subsequent to the May 22, 1980 application, by letter dated August 5, 1980, Niagara Mohawk submitted another application for an amendment to the Technical Specifications. This latter submittal affected the same pages as the May 22, 1980 submittal. That application involved revising the indicator scale readings to provide a common reference level for vessel instrumentation as outlined in NUREG 0737 Item II.K.3.27. The triple low reactor water level indicator scale value was changed from 147.1 inches to -10 inches.

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Amendment 45 was subsequently issued in response to the August 5, 1980 submittal. However, the triple low reactor water level setpoint was stated as being 7 feet, 11 inches (-30 inches indicator scale). Our May 22, 1980 application correctly states the triple low setpoint at 6 feet, 3 inches but includes the old indicator scale values. Therefore, Niagara Mohawk intends to supplement and clarify our outstanding May 22, 1980 submittal with the attached revised Technical Specification pages. As noted below, the changes involve replacing the 147.1 inches indicator scale with the -10 inches indicator scale. The following pages should be replaced in their entirety with the attached revised pages. Revisions have been indicated with marginal revision bars.

1. Replace pages 6, 13, 53a, 59, 159 and 213 of our May 22, 1980 submittal with the attached revised pages 6, 13, 53a, 59, 159 and 213. The revision involves changing the 147.1 inches indicator scale value to -10 inches. In addition, the second paragraph on page 13 was revised to include an explanation of why the triple low setpointed was changed.
2. Replace page 52 of our current Technical Specifications with the attached revised page 52. The revision involves changing the 7 feet, 11 inches and -30 inches indicator scale to 6 feet, 3 inches and -10 inches indicator scale, respectively. This page was inadvertently omitted from the May 22, 1980 application.
3. Replace page 20 in our May 22, 1980 submittal with the attached revised page 20. The reference number for General Electric SIL 299 should now be 14 because of a previous amendment that contained a number 13 reference.

The current Technical Specifications list the triple low setpoint to be 7 feet, 11 inches (-30 inches indicator scale). The actual instrumentation is set at 6 feet, 3 inches (-10 inches indicator scale). The higher triple low trip setting is more restrictive, and therefore, in the conservative direction.

This proposed revision to the May 22, 1980 Technical Specification change regarding the triple low reactor water level setpoint change involves no significant hazard considerations. Therefore, the operation of 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 revision is being submitted to achieve consistency with the actual instrumentation scales at Nine Mile Point Unit 1. This change in indicator scale was previously approved by your staff in Amendment 45 dated June 1, 1981. 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 change to achieve consistency, correction of an error or a change in nomenclature.

The information contained in this submittal has been reviewed and approved by the Site Operations Review Committee and the Safety Review and Audit Board.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

CVM/MTG:djm
Attachments