ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Tecnnical Specifications (Appendix A)

Replace existing pages 47, 48, 50, 24lee, 24lff, 24lgg, 24lhh, and 24lii with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text. Additionally, delete page 47a.

LIMITING CONDITION FOR OPERATION

3.1.3 EMERGENCY COOLING SYSTEM

Applicability:

Applies to the operating status of the emergency cooling system.

Objective:

To assure the capability of the emergency cooling system to cool the reactor coolant in the event the normal reactor heat sink is not available.

Specification:

a. During power operating conditions and whenever the reactor coolant temperature is greater than 212F, both emergency cooling systems shall be operable except as specifed in 3.1.3.b and c.

b. If one emergency cooling system becomes inoperable, Specification 3.1.3.a shall be considered fulfilled, provided that the inoperable system is returned to an operable condition within 7 days and the additional surveillance required is performed.

SURVEILLANCE REQUIREMENT

4.1.3 EMERGENCY COOLING SYSTEM

Applicability:

Applies to periodic testing requirements for the emergency cooling system.

Objective:

To assure the capability of the emergency cooling system for cooling of the reactor coolant.

Specification:

The emergency cooling system surveillance shall be performed as indicated below:

a. At least once every five years -

The system heat removal capability shall be determined.

b. At least once daily -

The shell side water level and makeup tank water level shall be checked.

c. At least once per month -

The makeup tank level control valve shall be manually opened and closed.

LIMITING CONDITION FOR OPERATION

c. Make up water shall be available from the two gravity feed makeup water tanks.

d. During Power Operating Conditions, each emergency cooling system high point vent to torus shall be operable.

1. With a vent path for one emergency cooling system inoperable, restore the vent path to an operable condition within 30 days.

2. With vent paths for both emergency cooling systems inoperable, restore one vent path to an operable condition within 14 days and both vent paths within 30 days.

e. If Specification 3.1.3.a, b, c or d are not met, a normal orderly shutdown shall be initiated within one hour and the reactor shall be in the cold shutdown condition within ten hours.

SURVEILLANCE REQUIREMENT

d. At least once each shift -

The area temperature shall be checked.

e. During each major refueling outage -

Automatic actuation and functional system testing shall be performed during each major refueling outage and whenever major repairs are completed on the system.

Each emergency cooling vent path shall be demonstrated operable by cycling each power-operated valve (05-01R,05-11, 05-12, 05-04R, 05-05 and 05-07) in the vent path through one complete cycle of full travel and verifying that all manual valves are in the open position.

f. Surveillance with an Inoperable System

When one of the emergency cooling systems is inoperable, the level control valve and the motor-operated isolation valve in the operable system shall be demonstrated to be operable immediately and daily thereafter.

Nearly all maintenance can be completed within a few days. Infrequently, however, major maintenance might be required. Replacement of principal system components could necessitate outages of more than 7 days. In spite of the best efforts of the operator to return equipment to service, some maintenance could require up to 6 months.

The system heat removal capability shall be determined at five-year intervals. This is based primarily on the low corrosion characteristics of the stainless steel tubing. During normal plant operation the water level will be observed at least once daily on emergency condensers and makeup water tanks. High and low water level alarms are also provided on the above pieces of equipment. The test frequency selected for level checks and valve operation is to assure the reliability of the system to operate when required.

The emergency cooling system is provided with high point vents to exhaust noncondensible gases that could inhibit natural circulation cooling. Valve redundancy in the vent path serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, power supply or control system does not prevent isolation of the vent path. The function, capabilities and testing requirements of the emergency cooling vent paths are consistent with the requirements of item II.B.1 of NUREG 0737, "Clarification of TMI Action Plan Requirement," November 1980.

LIMITING CONDITION FOR OPERATION

3.6.11 ACCIDENT MONITORING INSTRUMENTATION

Applicability:

Applies to the operability of the plant instrumentation that performs an accident monitoring function.

Objective:

To assure high reliability of the accident monitoring instrumentation.

Specification:

a. During the power operating condition, the accident monitoring instrumentation channels shown in Table 3.6.11-1 shall be operable except as specified in Table 3.6.11-2.

SURVEILLANCE REQUIRMENT

4.6.11 ACCIDENT MONITORING INSTRUMENTATION

Applicability:

Applies to the surveillance of the instrumentation that performs an accident monitoring function.

Objective:

To verify the operability of accident monitoring instrumentation.

Specification:

Instrument channels shall be tested and calibrated at least as frequently as listed in Table 4.6.11.

Table 3.6.11-1

Accident Monitoring Instrumentation

Parameters	Total Number of Channels	Minimum Number of Operable Channels	Action (see Table 3.6.11-2)
(1) Relief valve position indicator	2/valve	1/valve	1
(2) Safety valve position indicator	2/valve	1/valve	1
(3) Reactor vessel water level	2	1	2
(4) Drywell Pressure Monitor	2	1	3
(5) Suppression Chamber Water Level Monitor	2	1	3
(6) Containment Hydrogen Monitor	2	1	3
(7) Containment High Range Radition Monitor	2	1	3

Table 3.6.11-2

ACCIDENT MONITORING INSTRUMENTATION
ACTION STATEMENTS

ACTION - 1

a. With the number of OPERABLE accident monitoring instrumentation channels 1 less than the total number shown in Table 3.6.11-1, restore to an OPERABLE status during the next cold shutdown when there is access to the drywell.

b. With the number of OPERABLE accident monitoring instrumentation channels less than the minimum number shown in Table 3.6.11-1, restore the inoperable channel to an OPERABLE status within 30 days or be in at least a HOT SHUTDOWN within the next 12 hours.

c. The total number of channels shown in Table 3.6.11-1 will be OPERABLE prior to the beginning of each cycle.

ACTION - 2

a. With the number of OPERABLE accident monitoring instrumentation channels less than the total Number of Channels shown in Table 3.6.11-1, restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.

b. With the number of OPERABLE accident monitoring instrumentation channels less than the minimum Channels OPERABLE requirements of Table 3.6.11-1, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

ACTION - 3

With the number of OPERABLE channels less than required by the minimum channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours, and:

1) either restore the inoperable channel(s) to OPERABLE status witnin 7 days of the event, or

2) prepare and submit a Special Report to the Commission within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

Table 4.6.11

Accident Monitoring Instrumentation

Surveillance Requirement

	Parameter	Instrument Channel Test	Instrument Channel Calibration
(1)	Relief valve position indicator (Primary - Acoustic)	Once per month	Once during each major refueling outage
	Relief valve position indicator (Backup - Thermocouple)	Once per month	Once during each major refueling outage
(2)	Safety valve position indicator (Primary - Acoustic)	Once per month	Once during each major refueling outage
	Safety valve position indicator (Backup - Thermocouple)	Once per month	Once during each major refueling outage
(3)	Reactor vessel water level	Once per month	Once during each major refueling outage
(4)	Drywell Pressure Monitor	Once per month	Once during each major refueling outage
(5)	Suppression Chamber Water Level Monitor	Once per month	Once during each major refueling outage
(6)	Containment Hydrogen Monitor	Once per month	Once per quarter
(7)	Containment High Range Radiation Monitor	Once per month	Once during each major refueling outage

BASES 3.6.11 AND 4.6.11 ACCIDENT MONITORING INSTRUMENTATION

Accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables during and following an accident. This capability is consistent with the recommendations of NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations" and/or NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE DPR-63

DOCKET NO. 50-220

Supporting Information

The proposed changes to the technical specifications are in response to Generic Letter 83-36 "NUREG 0737 Technical Specifications" which was issued by the Nuclear Regulatory Commission on November 1, 1983. The proposed changes are consistent with the intent of the model technical specifications included as an attachment to Generic Letter 83-36. Differences between the model technical specifications and these proposed amendments are discussed below. In addition to the substantive changes, the proposed technical specifications also revise the format of Section 3.6.11 "Accident Monitoring Instrumentation" and eliminates paragraph 3.1.3b which was intended to be a temporary amendment that is no longer effective.

The model technical specifications would require a plant shutdown if one of the containment hydrogen monitors were inoperable for more than 30 days or if both were lost for more than 7 days. The proposed technical specifications are less restrictive in that both monitors may be inoperable provided an alternate method for monitoring hydrogen concentration in the containment has been established. For example, the Post Accident Sampling System can be used to determine containment hydrogen concentration. Therefore, the intent of the model technical specifications to ensure hydrogen monitoring capability will be satisfied.

The model technical specifications would require a plant shutdown if one of the drywell pressure monitors or suppression chamber water level monitors were inoperable for more than seven days or if both monitors were inoperable for more than forty-eight hours. The proposed technical specifications differ from the model technical specifications in that both monitors may be inoperable provided an alternate method for monitoring drywell pressure or suppression chamber water level has been established. For example, existing plant instrumentation can be used to monitor drywell pressure or suppression chamber water level. Therefore, the intent of the model technical specifications to ensure drywell pressure and suppression chamber water level monitoring capability will be satisfied.

The model technical specifications would require both vent paths be restored to an operable condition within 14 days when the vent paths for both emergency cooling systems become inoperable. The proposed technical specifications which require one vent path be restored to an operable condition within 14 days and both vent paths be restored within 30 days represents our interpretation of the requirement. Therefore, the intent of the model technical specifications will be satisfied.

ATTACHMENT C

NIAGARA MOHAWK POWER CORPORATION

LICENSE DPR-63

DOCKET NO. 50-220

No Significant Hazards 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.

The Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48FR14870) of amendments considered not likely to involve significant hazards consideration. One of the examples relates to a change which constitutes an additional limitation, restriction or control not presently in the Technical Specifications. The proposed Technical Specification change is similar to this in that it imposes more stringent limiting conditions for operation and surveillance requirements.