

UNITED STATES
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Niagara Mohawk Power Corporation)
(Nine Mile Point Nuclear Station)
Unit No. 1)

Docket No. 50-220

APPLICATION FOR AMENDMENT
TO
OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, Niagara Mohawk Power Corporation, holder of Facility Operating License No. DPR-63, hereby requests that Sections 3.4.4, 4.4.4, 3.4.5, 4.4.5, 3.6.2, and 4.6.2 of the Technical Specifications set forth in Appendix A to that License be amended. This proposed change has been reviewed by the Site Operations Review Committee and the Safety Review and Audit Board.

The proposed Technical Specifications changes are set forth in Attachment A to this application. Supporting information, which demonstrates that the proposed changes will have no safety or environmental significance, is set forth in Appendix B. The proposed changes would not authorize any change in the types of effluents or any change in the authorized power level of the facility. Justification for this amendment involving no significant hazards considerations pursuant to 10CFR50.92 is included as Attachment C.

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WHEREFORE, Applicant respectively requests that Appendix A to Facility Operating License No. DPR-63 be amended in the form attached hereto as Attachment A.

NIAGARA MOHAWK POWER CORPORATION

By: *C. M. M. M. M.*
Vice President
Nuclear Engineering and Licensing

Subscribed and sworn to before
me on this 1st day of October, 1984.

Christine Austin
NOTARY PUBLIC

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4787687
My Commission Expires March 30, 1985

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ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

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Proposed Changes to Technical Specifications (Appendix A)

This proposal requests that the existing pages of our Technical Specification be replaced with the attached revised pages as shown below. These pages have been retyped and the marginal markings indicate changes.

<u>Existing Page</u>	<u>Revised Page</u>
173	173
174	174
175	175
176	176
177	177
178	178
178a	178a
178b	178b
178c	178c
188	188
190	190
---	190a
---	232d
---	232e



ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

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Supporting Information

I. System Modifications

Niagara Mohawk submittal dated March 28, 1983, described modifications to the Control Room Air Treatment System which would establish an acceptable degree of compliance with General Design Criterion 19. These modifications included installation of redundant radiation monitors on the air intake which will automatically initiate the emergency train of the system.

The changes described below reflect the change from manual to automatic initiation of the Control Room Air Treatment System and add Limiting Conditions for Operation and Surveillance Requirements to further increase the system's reliability. These changes as explained in Attachment C involve no significant hazards considerations.

The addition of item (j) to page 178a requires surveillance testing of the Control Room Air Treatment System at least once every operating cycle. This addition will help to ensure the reliability of the system. Changes to page 178b correct the text to reflect changes in the design basis of the system. Changes to page 188* indicate the additions of Tables 3.6.2m and 4.6.2m which increase the Limiting Conditions for Operation and Surveillance Requirements of the Control Room Air Treatment System. The addition of item (13) to page 190 increases Limiting Conditions for Operation of Protective Instrumentation to include instrumentation which automatically initiates the emergency train of the Control Room Air Treatment System. Addition of page 232d provides the set point, minimum number of trip systems and minimum number of instrument channels that must be operable for each position of the reactor mode switch except the shutdown position. Addition of page 232e provides details of the Surveillance Requirements, including a sensor check, instrument channel test and instrument channel calibration.

*NOTE: Page 188 currently contains a typographical error which would be corrected with the approval of this submittal, namely, the first paragraphs of 3.6.2a and 4.6.2a should currently read, "...Tables 3.6.2a to 3.5.21." and "...Tables 4.6.2a to 4.6.21.", respectively.



ATTACHMENT B (Continued)

In addition, we are requesting that the Technical Specifications governing the Emergency Ventilation System and the Control Room Air Treatment System be updated to reflect the current standards for testing the adsorber filters. Currently, our specifications reference ANSI N.510-1975 for testing the adsorber filters (i.e. charcoal filters). ANSI N.510-1975 is also endorsed by Regulatory Guide 1.52 (Rev. 2), but the current Standard Review Plan endorses ANSI N.510-1980. The salient difference between the two standards is the environmental conditions for testing. We believe the newer standard more realistically reflects the environmental conditions for which the charcoal filters are designed. Therefore, the proposed technical specifications submitted herein reference the ANSI N.510-1980.

The existing Page 173 references ANSI N.510-1975 for testing of the operability of the inlet heater at rated power for the Emergency Ventilation System. The new standard, ANSI N.510-1980, requires the same testing procedure. This page is being revised to consistently reference the new standard throughout the Control Room Air Treatment and the Emergency Ventilation Technical Specifications.

The qualification requirements for the replacement charcoal (replacement is necessary when the charcoal fails its surveillance test) for the Emergency Ventilation System and the Control Room Air Treatment System are given on pages 176 and 177, and 178b and 178c, respectively. The current nuclear power air cleaning standard, ANSI 509-1980, will be referenced directly rather than Regulatory Guide 1.52, which references ANSI 509-1975. Similarly, the statements on these pages for HEPA filter design requirements are being updated.

Finally, our current Technical Specifications call for testing frequency of 18 months for both the Emergency Ventilation System and the Control Room Air Treatment System. Since we are now operating on a nominal 24 month refueling cycle, we request to have our Technical Specification reflect the current refueling cycle frequency.



ATTACHMENT C

NIAGARA MOHAWK POWER CORPORATION

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No Significant Hazards Considerations Analysis

These 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.

Moreover, the changes reflecting the Control Room Ventilation System modifications increase the margin of safety at Nine Mile Point Unit 1. First, change from manual to automatic initiation decreases the response time capability of the system which will reduce the potential consequences during the event that this system is required. Second, addition of surveillance requirements will help to ensure the operability of the system and therefore, increase its reliability.

In addition, these changes are consistent with previously stated Nuclear Regulatory Commission positions. The change from manual to automatic initiation is consistent with Standard Review Plan Section 6.4. The additional surveillance requirements to test the operability of the system is consistent with Standard Technical Specifications 4.7.2. Furthermore, increases in surveillance requirements have been determined to involve no significant hazard consideration, as indicated in item ii of the section regarding examples of amendments that are considered not likely to involve significant hazard considerations (Federal Register; April 6, 1983, p. 14870).

The proposed changes regarding testing of the charcoal filters do not involve a Significant Hazards Consideration as defined in 10CFR50.92. This change is similar to item vi of amendments that are considered not likely to involve significant hazards considerations (Federal Register; April 6, 1983, p. 14870). This change is similar in that the intent of acceptance criteria are met as specified in the Standard Review Plan Section 6.5.1 with respect to charcoal filters.

