ATTACHMENT A NIAGARA MOHAWK POWER CORPORATION LICENSE NO. DPR-63 DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A)

Replace existing page 168 with the attached revised page. This page has been retyped in its entirety with marginal markings to indicate changes to the text. Delete existing page 168a in its entirety.

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BASES FOR 3.4.1 AND 4.4.1 LEAKAGE RATE

In the answers to Questions II-3 and IV-5 of the Second Supplement and also in the Fifth Supplement,* the relationships among wind speed direction, pressure distribution outside the building, building internal pressure, and reactor building leakage are discussed. The curve of pressure in Figure 3.4.1 represents the wind direction which results in the least building leakage. It is assumed that when the test is performed, the wind direction is that which gives the least leakage.

If the wind direction was not from the direction which gave the least reactor building leakage, building internal pressure would not be as negative as Figure 3.4.1 indicates. Therefore, to reduce pressure, the fan flow rate would have to be increased. This erroneously indicates that reactor building leakage is greater than if wind direction were accounted for, another pressure curve could be used which was less negative. This would mean that less fan flow (or measured leakage) would be required to establish building pressure. However, for simplicity it is assumed that the test is conducted during conditions leading to the least leakage while the accident is assumed to occur during conditions leading to the greatest reactor building leakage.

As discussed in the Second Supplement and Fifth Supplement, the pressure for Figure 3.4.1 is independent of the reactor building leakage rate referenced to zero mph wind speed at a negative differential pressure of 0.25 inch of water. Regardless of the leakage rate at these design conditions, the pressure versus wind speed relationship remains unchanged for any given wind direction.

By requiring the reactor building pressure to remain within the limits presented in Figure 3.4.1 and a reactor building leakage rate of less than 2000 cfm, exfiltration would be prevented. This would assure that the leakage from the primary containment is directed through the filter system and discharged from the 350-foot stack.

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ATTACHMENT B

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Supporting Information

Page 168 provides the Bases for Sections 3.4.1 and 4.4.1, Reactor Building Leakage Rate. Two items have been deleted. The first is the deletion of statements in the fourth paragraph which justified one Reactor Building penetration to be open for up to four hours during normal reactor operation. This relief was required to allow for installation of TMI-related modifications. Amendment 38, dated December 12, 1980, provided this relief for a time period extending to March 31, 1981. However, when Amendment 38 was issued, it inadvertently granted the four hour relief permanently. Niagara Mohawk noticed this error and has administratively prevented a Reactor Building penetration from being opened for up to four hours since March 31, 1981. Therefore, to avoid an area of potential confusion, the statements allowing this relief have been deleted.

The second item deleted from page 168 involves statements regarding preoperational testing. The fifth paragraph described the preoperational Reactor Building capability tests that were conducted. These statements are written in the future tense and are no longer applicable. Therefore, deleting this paragraph in its entirety is purely administrative.

Page 168a also provided the Bases for Sections 3.4.1 and 4.4.1 but was effective up to March 31, 1981. This page also contained the four hour relief for a Reactor Building penetration. However, since the effective date has past and the relief is no longer necessary, the entire page is being deleted. This change is also purely administrative.

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્યું આ ગામ કે દુવિસ સંભારતીય એક છે. 19 સાથે કે વિદ્યાર્થ કે વ્યુક્ત પ્રવાર્થ છે. છે પ્રાપ્ય વર્ત પ્રદુર્શ પ્રાપ્ય કે પ્ આજે આ ભાગવામાં કે આ કે ગામ 19 ગામ કે પ્રાપ્ય તે આ પ્રાપ્ય પ્રાપ્ય કે બાળવામાં છે. આ ગામ ગામ દુવા પ્રદુર્શ તે પ્ આજે છે. આ કે ગીચાઈ હે છે, આ ગીધી પ્રાપ્ય કે દુવાર કે પ્રાપ્ય કે પ્રાપ્ય કે બાળવામાં છે. આ ગામ ગામ કે પ્રાપ્ય કે આજે છે. આ આજે આ ગીધી કે પ્રાપ્ય કે આજે તે આ ગીપ પ્રાપ્ય કે પ્રાપ્ય કે પ્રાપ્ય કે બાળવામાં છે. આ ગીપ પ્રાપ્ય કે પ હે ગીધી આ આજે આ ગીધી કે પ્રાપ્ય છે. તે આજે તે આજે કે પ્રાપ્ય કે પ્રાપ્ય કે બાળવામાં છે. આ ગીપ પ્રાપ્ય કે બાળવામાં આ ગીપ પ્રાપ્ય કે પ્રાપ્ય કે બાળવામાં કે પ્રાપ્ય કે બાળવામાં પ્રાપ્ય કે બાળવામાં પ્રાપ્ય કે બાળવામાં પ્રાપ્ય કે પ્રાય કે પ્રાપ્ય કે પ્રા વ્યુ પ્

ી આવે છે. તે પશ્ચિમ સમજાવીય અને પોલ વિદ્યુ કે પ્રાપ્ત દિશ્વ કે મળતા છે. તે ગણવા આવ્ય આવ્ય છે. તે પ્રાપ્ત પ્રાપ્ આ પણેવી પણ થયા છે. સ્વાયંત્ર 23 નુ વિદ્યુવિત કે ગયા કે સાથય બાદ વિદ્યુ કે પ્રાપ્ત છે. તે ગણવા હરાયું સ્વાય કે પ આ પણવાડી કે મિત્ર પ્રાપ્તિ વિદ્યુ કે પ્રાપ્ત વિદ્યુ લાખવા વધા પ્રાપ્ત વ્યક્તિ વ્યક્તિ વિદ્યુ કે વિદ્યુ સ્વાય કે આ પણવાડી કે મિત્ર પ્રાપ્તિ વિદ્યુ કે પ્રાપ્ત વ્યવસ્થી પ્રાપ્ત વ્યક્તિ વ્યક્તિ વ્યક્તિ વિદ્યુ કે વિદ્યુ સ્વાય કે આ પણવાડી કે મિત્ર પ્રાપ્તિ અપ્રાય કે પ્રાપ્ત વ્યવસ્થી સાથ પ્રાપ્ત વ્યક્તિ વ્યક્તિ વ્યક્તિ કે વિદ્યુ સ્વાય કે પ્

ATTACHMENT C

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Amendment Classification

The proposed Technical Specification changes involve no significant hazards 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 proposed changes to the Reactor Building Leakage Rate involves the deletion of relief which is no longer required, reference to preoperational testing and a page which is no longer applicable. The first of these reinstates a more restrictive requirement. This change does not involve a significant hazards consideration in that it corresponds to example (ii) of the Sholly Rule published in the Federal Register on April 6, 1983. The remaining two deletions are purely administrative and correspond to example (i) of the Sholly Rule. Therefore, they also do not involve a significant hazards consideration.

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