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 3.1.4 and 3.3.7 of the Technical Specifications set forth in Appendix A to that License be amended. These proposed changes have been reviewed by the Site Operations Review Committee and the Safety Review and Audit Board.

The proposed Technical Specifications change is set forth in Attachment A to this application. Sections 3.1.4 and 3.3.7 have been proposed for amendment in order to clarify the conditions necessary for instrument penetration maintenance work. The proposed change would not authorize any change in the types of effluents or in the authorized power level of the facility in conjunction with this Application for License Amendment. Supporting information and analysis which demonstrate that the proposed changes involve no significant hazards considerations pursuant to 10CFR50.92, are included as Attachment B.

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WHEREFORE, Applicant respectfully 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 Vice President Senior

Subscribed and sworn to before me on this $7^{\frac{th}{t}}$ day of January 1986

CHRISTINE AUSTIN Notary Public in the State of New York Qualified in Onondaga Co. No. 4787687 My Commission Expires March 30, 1987

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ATTACHMENT A NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

The existing pages 53, 55, 56, 160, 161, 163 and 164 will be replaced with the attached revised pages. These pages have been retyped in their entirety with marginal markings indicating changes to the text.

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ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE DPR-63

DOCKET NO. 50-220

Supporting Information and No Significant Hazards Considerations Analysis

The proposed Technical Specification changes described in Attachment A will restrict the replacement of dry tubes associated with the intermediate range monitor (IRM) and source range monitor (SRM) instrumentation. The same basis specified for LPRM associated dry tubes now in the Technical Specifications would be applicable. The proposed amendment would replace the term "LPRM" with the word "instrument" in order to include the assorted monitoring devices.

Currently, our Technical Specifications do not directly consider instrument penetrations except for LPRM, in determining the operability of the core spray or containment spray systems. This change will assure that these systems are considered operable only when no more than one control rod drive housing or instrument penetration is opened at one time. Additionally, this change will assure that SRM and IRM associated dry tubes are replaced only when correct conditions exist. The current Bases for 3.3.7 and 4.3.7 state that the intent of the specifications is to allow control rod drive maintenance and LPRM replacement at the time that the suppression chamber is unwatered. This condition should also be met for other instrumentation and is therefore proposed as such. The Bases further state that procedural controls, available make-up water and limited time involved in the performance of the task exist so that replacement of a dry tube can be performed with adequate protection against drainage of the vessel while the suppression chamber is drained. The same Bases are also true for the proposed additional penetrations and therefore provide supporting analysis for the inclusion of the remaining instrument penetrations.

As required by 10CFR50.91, at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in Section 50.92 about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed:

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to allow for the replacement of dry tubes associated with SRM and IRM instrumentation will not increase the probability of any accident previously evaluated. The requirement that no more than one penetration be allowed opened at the same time will be applicable to more penetrations and will therefore be more restrictive than the current Technical Specifications. Additionally, controls and available preventative measures now utilized in the opening of LPRM penetrations, will apply for other instrument penetrations.

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ATTACHMENT B (cont'd)

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The proposed amendment; in accordance with operation of Nine-Mile Point Unit 1, will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment will allow for the performance of a maintenance task under conditions already approved for similar equipment. Additionally, the approval of this change will not initiate a new or different procedure. This section could currently be interpreted as addressing the other instruments, but it is Niagara Mohawk's intent to clarify this section of the Technical Specifications in order to improve the overall clarity of Nine Mile Point Unit 1 Technical Specifications.

The proposed amendment; in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant reduction in a margin of safety.

Although the Technical Specifications currently address only LPRM penetrations, the supporting information above demonstrates that by changing "LPRM" to instrument, no new situation or hazard will be created. Therefore, the change does not represent a significant reduction in a margin of safety.

Based on the above analysis, the proposed amendment involves no significant hazards consideration.

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