ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A)

Existing page 158 will be replaced with the attached revised page. This page has been retyped in its entirety with marginal markings to indicate changes to the text.

3.3.7 CONTAINMENT SPRAY SYSTEM

Applicability:

Applies to the operating status of the containment spray system.

Objective:

To assure the capability of the containment spray system to limit containment pressure and temperature in the event of a loss-of-coolant accident.

Specification:

a. During all reactor operating conditions whenever reactor coolant temperature is greater than 215 F and fuel is in the reactor vessel; each of the two containment spray systems and the associated raw water cooling systems shall be operable except as specified in 3.3.7.b. During the spring 1986 refueling outage, both containment spray systems may be inoperable when the reactor coolant temperature is greater than 215°F to perform the reactor coolant system hydrostatic test.

b. If a redundant component of a containment spray system becomes inoperable, Specification 3.3.7.a shall be considered fulfilled, provided that the component is returned to an operable condition within 15 days and that the additional surveillance required is performed.

4.3.7 CONTAINMENT SPRAY SYSTEM

Applicability:

Applies to the testing of the containment spray system.

Objective:

To verify the operability of the containment spray system.

Specification:

The containment spray system surveillance shall be performed as indicated below:

a. Containment Spray Pumps

(1) At least once per operating cycle, automatic startup of the containment spray pump shall be demonstrated.

(2) At least once per quarter, pump operability shall be checked.

b. Nozzles

At least once per operating cycle, an air test shall be performed on the spray headers and nozzles.

ATTACHMENT B

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Supporting Information

The Containment Spray System would normally be operable during the reactor coolant system hydrostatic test. However, during the spring 1986 refueling outage, the containment spray heat exchangers are being replaced. Due to the extensive amount of work required to install these heat exchangers, they may not be in place at the time the reactor vessel hydrostatic test is scheduled to be performed. The reactor vessel hydrostatic test is planned to be conducted with the reactor not critical at a pressure of approximately 1133 psig. Due to recent revisions to the pressure/temperature limits for pressurization, this corresponds to a reactor coolant temperature of approximately 218°F. Since this temperature is above the reactor coolant temperature of 215°F at which the containment spray system is required to be operable, a change is required to the Containment Spray System Technical Specification, Section 3.3.7. This change will allow both of the containment spray systems to be inoperable with the reactor coolant temperature greater than 215°F to perform the reactor vessel hydrostatic test during the spring 1986 refueling outage.

Two separate and independent containment spray systems are provided to remove heat, reduce pressure and restore the pressure suppression chamber temperature following a loss-of-coolant accident. Each system consists of two redundant loops, each of which is capable of removing decay heat, and the energy from any credible metal-water reaction at a rate which will prevent containment pressures and temperature from exceeding their design valves.

In the unlikely event of a break in the reactor coolant pressure boundary during the reactor vessel hydrostatic test, the amount of energy released to the drywell and suppression pool would be considerably less than for a design basis accident. This is based on the following considerations: 1) decay heat will be less as fuel will have cooled for approximately 60-75 days in the spent fuel pool since the outage began, 2) approximately 1/3 of the bundles will be new and will have no decay heat associated with them, 3) the amount of energy contained in the system will be less due to the lower temperature of the system and 4) the operation of the core spray system prevents any significant metal water reaction which could result in containment overpressurization due to hydrogen generation. In addition, the Bases for 3.3.7 and 4.3.7 Containment Spray System indicates that for temperatures up to 312°F, the pressure as a result of a loss of coolant accident without containment spray operation would not exceed the containment design pressure of 35 psig.

10CFR50.91 requires that 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 10FR50.91 and 10CFR50.92, the following analysis has been performed:

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

The function of the containment spray systems is to mitigate the consequences of a loss of coolant accident. Therefore, the inoperability of the containment spray system during the spring 1986 reactor vessel hydrostatic test will not increase the probability of an accident previously evaluated. In addition, the consequences of an accident previously evaluated (i.e., loss of coolant accidents) will not be increased since at the hydrostatic test temperature of approximately 218°F, the pressure as a result of a loss of coolant accident without containment spray operation would not exceed the containment design pressure of 35 psig.

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

By allowing the containment spray systems to be inoperable to perform the reactor vessel hydrostatic test during the spring 1986 refueling outage, the only accident which needs to be considered is a loss of coolant accident without containment spray. However, the Bases for 3.3.7 and 4.3.7 Containment Spray Systems indicates that for reactor coolant temperatures up to 312°F, the pressure as a result of a loss of coolant accident without containment spray would not exceed the containment design pressure of 35 psig. This accident has been previously analyzed and found to be within the design bases of the plant. Therefore, allowing the containment spray system to be inoperable during the reactor vessel hydrostatic test will not create the possibility of a new or different kind of accident from an accident previously evaluated.

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

The reactor coolant temperature during the hydrostatic test will only be slightly above the required operating temperature of the containment spray system of 215°F. In addition, for temperatures up to 312°F, the pressure as a result of a loss of coolant accident without containment spray operation would not exceed the containment design pressure of 35 psig. No other tests will be conducted during the spring 1986 refueling outage which will require the reactor coolant system temperature to be greater than 215°F, except for the reactor vessel hydrostatic test. Therefore, the proposed amendment will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standard for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards consideration. Example (vi) relates to a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method.

In this case, the proposed change described above is similar to Example (vi) in that a margin of safety is somewhat reduced. However, the change is within the design bases of the plant.

Therefore, based on the above considerations it has determined that the proposed amendment does not involve a significant hazards consideration.