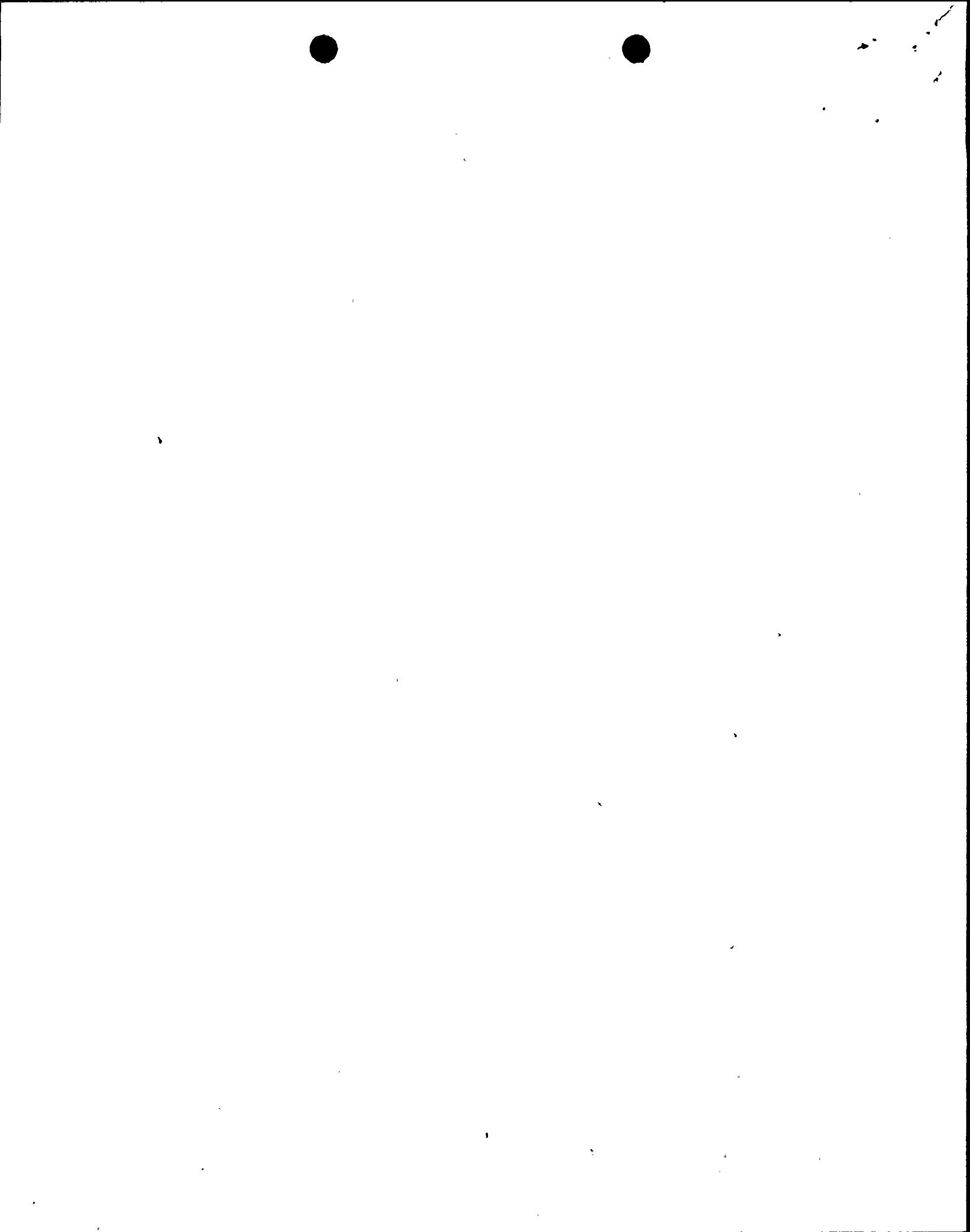


ATTACHMENT A  
NIAGARA MOHAWK POWER CORPORATION  
LICENSE DPR-63  
DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A)

Existing pages 178a and 178b will be replaced with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

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LIMITING CONDITION FOR OPERATION

Specification:

- c. The results of laboratory carbon sample analysis shall show  $\geq 90\%$  radioactive methyl iodine removal when tested in accordance with ANSI N.510-1980 at 80°C and 95% R.H.
- d. Fans shall be shown to operate within  $\pm 10\%$  design flow.
- e. From and after the date that the control room air treatment system is made or found to be inoperable for any reason, reactor operation or refueling operations is permissible only during the succeeding seven days unless the system is sooner made operable.
- f. If these conditions cannot be met, reactor shutdown shall be initiated and the reactor shall be in cold shutdown within 36 hours for reactor operations and refueling operations shall be terminated within 2 hours.

SURVEILLANCE REQUIREMENT

Specification:

- c. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.
- d. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal absorber bank or after any structural maintenance on the system housing.
- e. The system shall be operated at least 10 hours every month.
- f. At least once per operating cycle, not to exceed 24 months, automatic initiation of the control room air treatment system shall be demonstrated.
- g. At least once per operating cycle, not to exceed 24 months, the control room air treatment system shall be shown to maintain a positive pressure within the control room of greater than one sixteenth of an inch (water) relative to areas adjacent to the control room.



## BASES FOR 3.4.5 AND 4.4.5 CONTROL ROOM AIR TREATMENT SYSTEM

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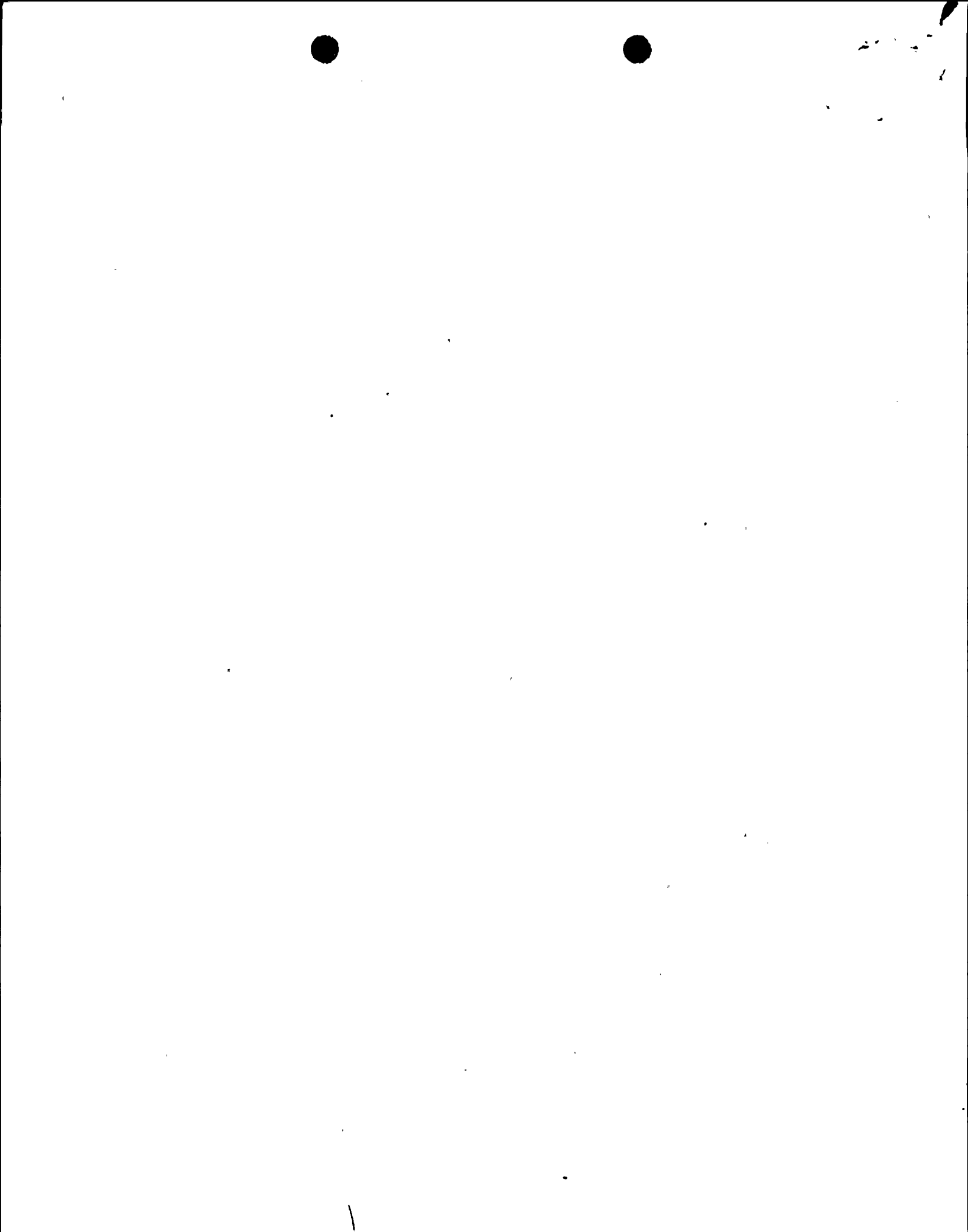
The control room air treatment system is designed to filter the control room atmosphere for intake air. A roughing filter is used for recirculation flow during normal control room air treatment operation. The control room air treatment system is designed to automatically start upon receipt of a high radiation signal from one of the two radiation monitors located on the ventilation intake and to maintain the control room pressure to the design positive pressure (one-sixteenth inch water) so that all leakage should be out leakage.

High efficiency particulate absolute (HEPA) filters are installed before the charcoal adsorbers to prevent clogging of the iodine adsorber. The charcoal adsorbers are installed to reduce the potential intake of radioiodine to the control room. The in-place test results should indicate a system leak tightness of less than 1 percent bypass leakage for the charcoal adsorbers and a HEPA efficiency of at least 99 percent removal of DOP particulates. The laboratory carbon sample test results should indicate a radioactive methyl iodide removal efficiency of at least 90 percent for expected accident conditions. If the efficiencies of the HEPA filter and charcoal adsorbers are as specified, adequate radiation protection will be provided such that resulting doses will be less than the allowable levels stated in Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10CFR Part 50. Operation of the fans significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers.

If the system is found to be operable, there is no immediate threat to the control room and reactor operation or refueling operation may continue for a limited period of time while repairs are being made. If the makeup system cannot be repaired within seven days, the reactor is shutdown and brought to cold shutdown within 36 hours or refueling operations are terminated.

Pressure drop across the combined HEPA filters and charcoal adsorbers of less than six inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Pressure drop should be determined at least once per operating cycle to show system performance capability. In addition, air intake radiation monitors will be calibrated and functionally tested each operating cycle, not to exceed 24 months, to verify system performance.

The frequency of tests and sample analysis are necessary to show the HEPA filters and charcoal adsorbers can perform as evaluated. The charcoal adsorber efficiency test procedures should allow for the removal of one adsorber tray, emptying of one bed from the tray, mixing the adsorbent thoroughly and obtaining at least two samples. Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. If test results are unacceptable, all adsorbent in the system shall be replaced with an adsorbent qualified according to Table 5-1 of ANSI 509-1980. The replacement charcoal for the adsorber tray removed for the test should



ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

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Supporting Information and No Significant Hazards Considerations Analysis

The proposed Technical Specifications change adds surveillance requirements to the Nine Mile Point Unit 1 Technical Specifications as requested by the NRC staff in the Safety Evaluation Report transmitted with Technical Specification Amendment 73. Currently, the Technical Specifications do not require a test to verify that the control room air treatment system can provide a positive pressure in the control room. The control room air treatment system is designed to provide a positive pressure in the control room during accident conditions. By maintaining the control room pressure positive compared to adjacent areas so that all leakage is out leakage, control room habitability during accident conditions is assured.

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 10CFR50.91 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 addition of this surveillance test to the technical specification will verify the capability of the control room air treatment system to meet its intended design of providing a positive pressure in the control room under accident conditions. Therefore, adding this test to the technical specifications will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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.

The operation of Nine Mile Point Unit 1 in accordance with this proposed amendment will essentially remain the same. Additional testing of the control room air treatment system will not create the possibility of a new or different kind of accident from any accident previously evaluated. The test consists of simply reading pressure gauges at the control room boundary and will not interfere with operations or the function of safety systems.



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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.

This additional testing will not decrease the margin of safety at Nine Mile Point Unit 1. Since similar testing was not previously required by our Technical Specification, this addition to the surveillance requirements of our Technical Specifications will increase our ability to assess the functional operation of our control room air treatment system. According to our current Technical Specification Bases, the Control Room Ventilation System can maintain a "positive pressure" in the Control Room. This proposal changes the bases to indicate that the Control Room Ventilation System can maintain "one-sixteenth of an inch positive pressure" within the control room. Therefore, the margin of safety will not decrease.

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

