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 AUTH. NAME AUTHOR AFFILIATION
 MANGAN, C. V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Application for amend to License NPF-54, revising Tech Specs
 re scram discharge vol operability.

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December 9, 1986
(NMP2L 0948)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

Re: Nine Mile Point Unit 2
Docket No. 50-410

The purpose of this letter is to request a change to the Nine Mile Point Unit 2 Technical Specifications under surveillance 4.1.3.1.4.a. The requested change as well as justification is attached. Niagara Mohawk is requesting that the attached change be incorporated into the full power license when it is issued. This Technical Specification change is an operational enhancement.

Very truly yours,

C. V. Mangan

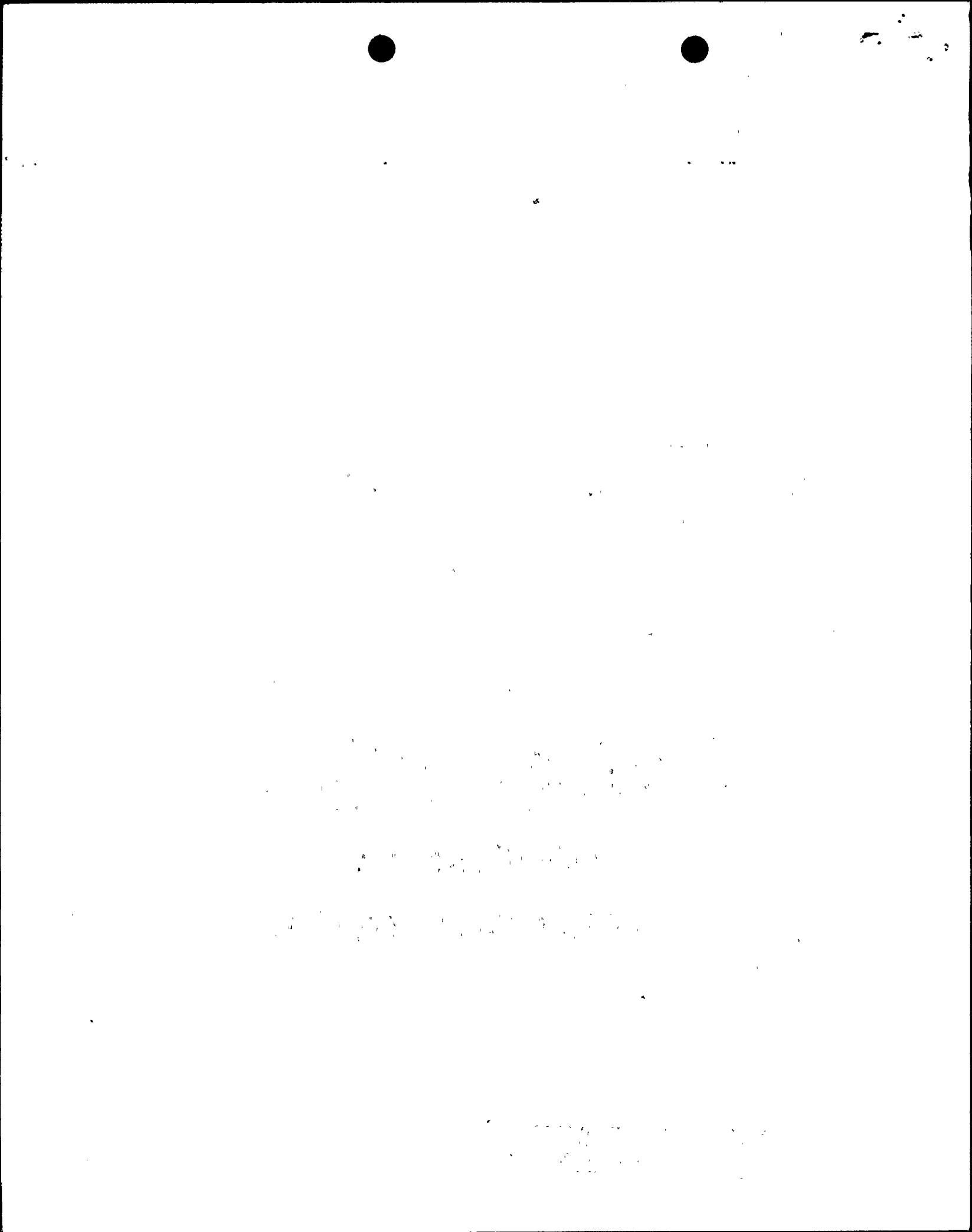
C. V. Mangan
Senior Vice President

TS/pns
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Attachments

xc: W. A. Cook, NRC Resident Inspector
Project File (2)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Niagara Mohawk Power Corporation)
(Nine Mile Point Unit 2))

Docket No. 50-410

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C. V. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 8th day of December, 1986.

Beth A. Menikheim
Notary Public in and for
Onondaga County, New York

My Commission expires:

BETH A. MENIKHEIM
Notary Public in the State of New York
Qualified in Onondaga County No. 4804074
My Commission Expires August 31, 1987

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MAY 10 1961
U.S. DEPARTMENT OF
COMMERCE
WASHINGTON, D.C.

Subject: Justification for change to surveillance 4.1.3.1.4.a of Nine Mile Point Unit 2 Technical Specifications, page 3/4 1-5

Niagara Mohawk is requesting a change to the surveillance requirements of Specification 4.1.3.1.4.a regarding the scram discharge volume operability. Specifically, the proposed change eliminates the requirement that the scram discharge volume vent and drain valves be demonstrated operable "when the control rods are scram tested from a normal control rod configuration of less than or equal to 50 percent rod density." The requested change also eliminates the footnote associated with the 50 percent rod density requirement.

The intent of the 50 percent rod density requirement is to provide greater assurance that there are no flow blockages in the scram discharge system. However, other specification requirements provide adequate assurance that the scram discharge volume vent and drain valves are operable and that no blockages exist. Every 18 months (i.e., during the refueling outage), the specifications require the reactor mode switch to be tested which results in a full scram (Table 4.3.1.1-1, item 11, page 3/4 3-8). This test allows the vent and drain valves to be tested to satisfy the requirement that the vent and drain valves close within 30 seconds after receipt of the scram signal and open when the signal is reset. In addition, each control rod is required to be individually scram-timed which will demonstrate that the three-quarter inch line from the hydraulic control unit to the scram discharge volume is free of any obstructions and provides reasonable assurance that the 8-inch diameter scram discharge header is unplugged (Surveillance 4.1.3.2, page 3/4 1-6). Given the diameter of the scram discharge volume header (8 inches) and the diameter of the volume itself (12 inches), coupled with the required tests, Niagara Mohawk believes there is reasonable assurance that the scram discharge volume system will be operable. A similar change was granted to Fermi 2 in SSER 6, pages S-3 and S-4.

During the scram evolution, significant stress and shock is placed on the control rod drive mechanism components, specifically the drive seals and stub tubes. By reducing the number of scrams, the useful life of the mechanism components can be extended and thus reduce the necessary maintenance and, therefore, the personnel radiation exposure required. Drive stub tube fatigue is also reduced by a reduction in scrams and this, in turn, reduces exposure and repair times.

The requested change to Technical Specification 4.1.3.1.4.a, page 3/4 1-5, is attached.



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