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ACCESSION NBR: 8708110466 DOC. DATE: 87/08/06 NOTARIZED: NO DOCKET # FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410 AUTH. NAME AUTHOR AFFILIATION MANGAN, C. V. Niagara Mohawk Power Corp. RECIP. NAME RECIPIENT AFFILIATION Document Control Branch (Document Control Desk)

SUBJECT: Supplemental application for amend to License NPF-69, supplementing 870803 ltr, correcting ref on second page to read "10CFR50.91(a)(6)" & clarifying Attachment B through substitution of encl Attachment A.

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NIAGARA MOHAWK POWER CORPORATION/301 PLAINFIELD ROAD, SYRACUSE, N.Y. 13212/TELEPHONE (315) 474-1511

August 6, 1987 (NMP2L 1068)

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555

GARA Hawk

> Re: Nine Mile Point Unit 2 Docket No. 50-410 NPF-69

Gentlemen:

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KWK/pns 3545G

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Based upon conversations with members of the NRC staff, we are providing additional information to supplement our request for amendment to Operating License NPF-69 for Nine Mile Point Unit 2. The information provided herein supplements our letter sent to you on August 3, 1987 (NMP2L 1066).

The second page, second paragraph from the top, last sentence of the previously referenced letter contains a reference to "10 CFR 50.90(a)(6)." The correct reference is "10 CFR 50.91(a)(6)."

The last two paragraphs of Attachment B of the original submittal are being clarified and supplemented by the substitution of the text of Attachment A of this letter.

Although we do not concur with the staff's position that this request should not be presently reviewed on an emergency basis, we nevertheless request that it be treated as an exigent change under the provisions of 10 CFR 50.91(a)(6). Should service water temperatures show indications of approaching and exceeding $77^{\circ}F$, we reserve our right to renew the request on an emergency basis.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan Senior Vice President

Attachments xc: Regional Administrator, Region I Mr. R. A. Capra, Director Mr. J. D. Neighbors, Project Manager Mr. W. A. Cook, Resident Inspector

Mr. Jay Dunkleberger Division of Policy Analysis and Planning New York State Energy Office Agency Building 2 Empire State Plaza Albany, NY 12223



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ATTACHMENT A

The proposed change will not affect other existing Technical Specification operational limits. The change is within the system performance criteria established in the design documents for Nine Mile Point Unit 2. Numerous conservatisms remain in the applicable analyses and system capabilities used to establish the revised design basis for the service water system. Some of these conservatisms are:

- 1) design allowances for heat exchanger fouling,
- 2) design allowances for heat exchanger tube plugging,
- chiller'design capacity exceeding calculated duty requirements by approximately 20%,
- 4) plant equipment where the design normal maximum temperature has increased remains qualified to higher temperatures than they would experience due to a service water supply temperature of 82°F. Margin still exists between the revised design normal maximum temperature and temperatures to which the equipment is qualified to in the affected zones.
- 5) conservative estimation of heat gains in the post-accident containment response analyses, and
- 6) a 1°F margin between the Technical Specification limit and the analyzed/evaluated temperature limit.

The previously listed margins are not significantly affected by the proposed Technical Specification change.

Therefore, the proposed change to the Technical Specifications does not involve a significant reduction in the margin of the ability of plant equipment to perform their safety-related function. The change in the margin of safety as a result of the proposed Technical Specification change is insignificant compared to the remaining margin in the previously identified items.

Based on historical information, the service water temperature can be expected to peak in mid-August. With the exception of 1987, the average daily service water temperature has exceeded 76°F only twice since 1978. Due to the unusually long heat wave this year, water temperatures have exceeded 77°F and are again expected to exceed 77°F. The likelihood of service water temperature exceeding 77°F during the designed plant lifetime is very low. The instances when elevated service water temperatures would occur concurrently with a design basis event is extremely low. Therefore, the margin of safety is reduced insignificantly on a very infrequent basis.



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