## ATTACHMENT A

## NIAGARA MOHAWK POWER CORPORATION

# LICENSE NO. DPR-63

# DOCKET NO. 50-220

## Proposed Changes to Technical Specifications (Appendix A)

Existing page 118 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. New page 118a has been added to accommodate information originally contained on page 118.



. . . . ·

. (r .

•

### LIMITING CONDITIONS FOR OPERATION Table 3.2.7

# REACTOR COOLANT SYSTEM ISOLATION VALVES

Line or System	No. of Valves (Each Line)	Location Relative to Primary <u>Containment</u>	Normal Position	<u>Motive Power</u>	Oper. Time (Sec)	Action on Initiating 	Initiating Signal (All Valves Have <u>Remote Manual Backup)</u>	
<u>Main Steam</u> (Two Lines)	]	Inside Outside	Open Open	AC Motor Pn/DC Solenoid(l)	10 10	Close Close	Reactor water level low-low, or main steam line high radia- tion, or main steam line high	
<u>Main Steam Warm-up</u> (Two Lines)	1	Outside	Closed	Pn/DC Solenoid	10	Close	flow, or low condenser vacuum or high temperature in the pipe tunnel	
Emergency Cooling Steam Line Drain to Main Steam (Two Lines)	2	Outside	Open	Pn/DC Solenoid	10	Close	· ·	
Emergency Cooling High Point Vent to Main Steam (One Line)	2	Outside	Open	Pn/DC Solenoid	10	Close	-	
<u>Feedwater</u> (Two Lines)	1	Outside Outside	Open -	AC Motor Self Act. Ck.	60 	-	-	
Emergency Cooling							,	
<u>Steam Leaving Reactor</u> (Two Lines)	1	Outside Outside	Open Open	AC Motor DC Motor	38 38	Close Close	High system flow	
<u>Condenser Return to Reactor</u> (Two Lines)	3 1	Inside Outside	_ Closed	Self Act. Ck. Pn/DC Solenoid	· 60	Close		

1.1

NOTES:

(1) Pn - Pneumatically operated.

118

. • · · . •

ç

#### LIMITING CONDITIONS FOR OPERATION Table 3.2.7 (Continued)

## REACTOR COOLANT\_SYSTEM ISOLATION VALVES

Line or System	No. of Valves (Each Line)	Location Relative to Primary <u>Containment</u>	Normal Position	Motive_Power	Oper. Time (Sec)	Action on Initiating Signal	Initiating Signal (All Valves Have <u>Remote Manual Backup)</u>
Reactor_Cleanup					-		· ·
<u>Water Leaving Reactor</u> (One Line) ,	1	Inside Outside	Open Open	AC Motor DC Motor	18 18	Close Close	Reactor water level low-low, or high area temperature, liquid poison initiation or high system pressure, or low system flow, or high system temperature
<u>Water Return to Reactor</u> (One Line)	1 1	Inside Outside	Open -	AC Motor Self Act. Ck.	<u>18</u>	Close	
Shutdown Cooling		,				```	
<u>Water Leaving Reactor</u> (One Line)	1	Inside Outside	Closed Closed	AC Motor DC Motor	40 40	Close Close	Reactor water level low-low, or high area temperature
<u>Hater Return to Reactor</u> (One Line)	1	Inside Outside	Closed	AC Motor Self Act. Ck.	40	Close -	

118a

. .

• •

.

м. М Бу. 1. Политични — П

v

#### ATTACHMENT B

, ... ™)≹ aõ k €

## NIAGARA MOHAWK POWER CORPORATION

### LICENSE NO. DPR-63

#### DOCKET NO. 50-220

#### Supporting Information and No Significant Hazards Considerations Analysis

The proposed amendment increases the maximum operating (closure) time for the isolation valves in the emergency cooling high point vent lines from five (5) to ten (10) seconds, and increases the closure time for the main steam warmup valves from eight (8) to ten (10) seconds. In addition, the emergency cooling drain line vent isolation valves are being added to Table 3.2.7. These valves are DC solenoid operated valves located outside containment. A closure time of ten (10) seconds is specified to be consistent with the closure time of the valves identified above.

The purpose of the valve closure time is to provide assurance that reactor coolant inventory loss is minimized in the event of a main steam line During this event, inventory loss is primarily through the 24" rupture. diameter main steam lines. The analysis of the main steam line break outside the drywell (Appendix E to the Final Safety Analysis Report) assumes an eleven (11) second closure time (includes circuit delays and maximum closing time). Using the longest time for the main steam line valves following a main steam line break provides a conservative estimate of inventory loss. The total mass of coolant that passes through these valves is assumed to be released. The analysis assumes that all fission products are released in a puff within the eleven-second valve closure. The resulting accident doses are within the limits of 10 CFR 100. Increasing the closure time for the main steam warmup valves and the emergency condenser vent and drain valves does not affect the conclusions of the original main steam line break analysis. The conservatism in the analysis bounds the slight increase in inventory loss attributable to the increase in closure time for these small valves (2 inch, 1-1/2 inch and 1 inch nominal diameter).

In addition, the motive power of the isolation valves has been more accurately designated in Table 3.2.7. The type of valve operators have not been changed; they are the same as the originally installed equipment.

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:

<u>Operation of Nine Mile Point Unit 1 in accordance with the proposed amendment</u> will not involve a significant increase in the probability or consequence of an accident previously evaluated.

. . 

~\_\_\_\_\_ ≠ \_\_\_\_\_ • •/~

ž 

The only previously evaluated accident associated with the closing time of the values is the main steam line rupture event. Changing the closure time will have no effect on the probability of a main steam line rupture, as there is no credible relationship between these two actions. As discussed above, the Final Safety Analysis Report accident analysis includes sufficient conservatism so that the increase in value closure time has no effect on the consequences of a main steam line break.

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

As there is no mechanical or dynamic effect resulting from increasing the closure time, there is no increase in the possibility of creating a new kind of accident.

## <u>Operation of the Nine Mile Point Unit 1 in accordance with the proposed</u> <u>amendment will not involve a significant reduction in a margin of safety</u>.

The allowable Technical Specification closure times of the emergency cooling steam line drain, emergency cooling high point vent and main steam warmup valves have been increased to be consistent with the closure time assumed in the analysis of a main steam line rupture. As discussed above, the Final Safety Analysis Report accident analysis includes sufficient conservatism so that the increase in valve closure time has no effect on the consequences of a main steam line break.

82 & A I- 92 (6)

USNRC-DS 1987 SEP -1 A 9:38

. .

ĩ

t

,