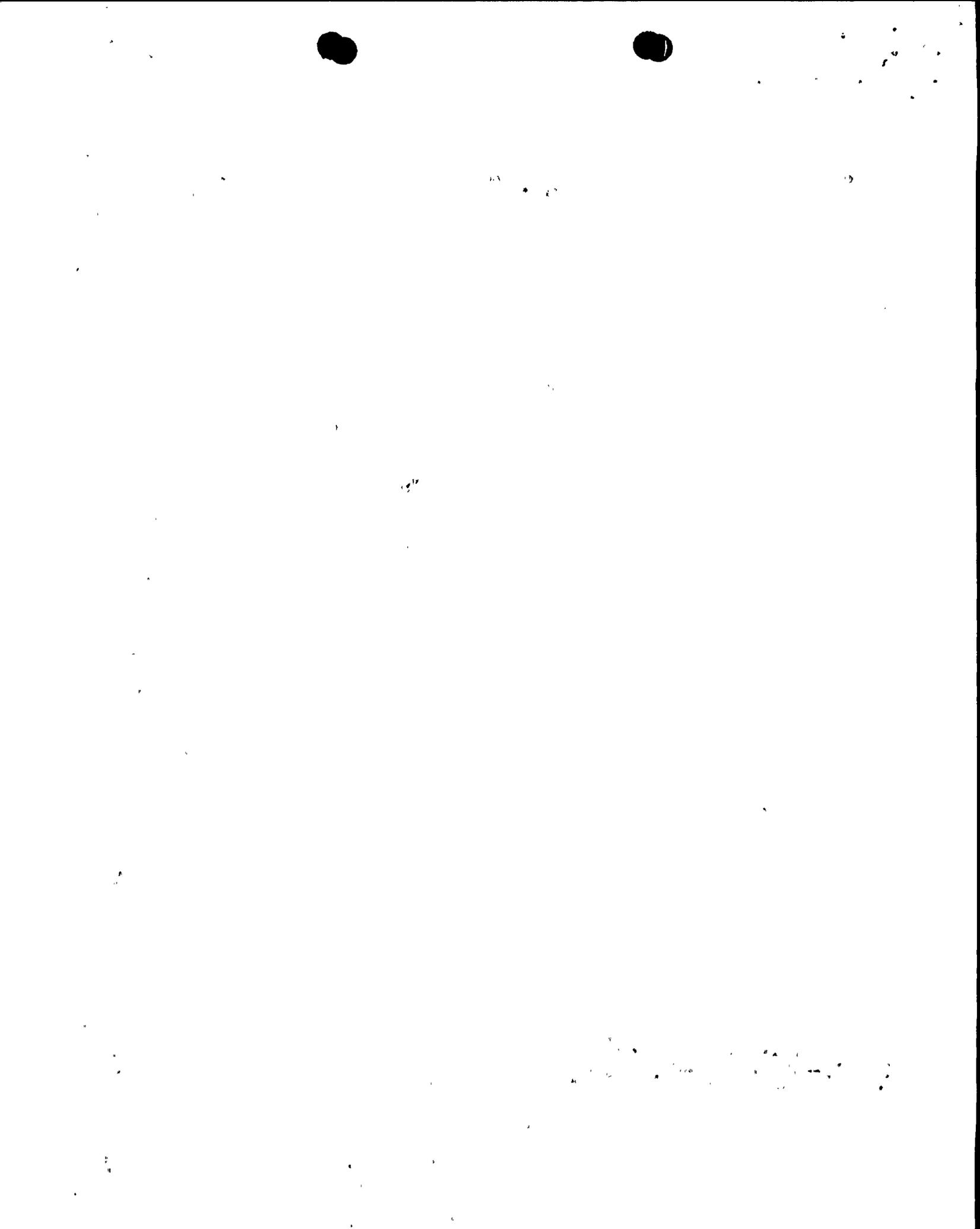


ATTACHMENT A
Proposed Changes To The Technical Specifications

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ELECTRICAL POWER SYSTEMS

DC SOURCES

DC SOURCES - OPERATING

SURVEILLANCE REQUIREMENTS

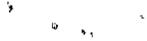
4.8.2.1 (Continued)

- b. At least once per 92 days and within 7 days after a battery discharge with battery terminal voltage below 107 volts, or battery overcharge with battery terminal voltage above 142 volts, by verifying that:
 - 1. The parameters in Table 4.8.2.1-1 meet the Category B limits,
 - 2. There is no visible corrosion at either terminals or connectors, or the resistance of the associated cell-to-cell and terminal connection is less than or equal to 120% of the resistance readings taken during initial installation, and
 - 3. The average electrolyte temperature of one out of five connected cells is above 60°F.

- c. At least once per 18 months by verifying that:
 - 1. The cells, cell plates, and battery racks show no visual indication of physical damage or abnormal deterioration,
 - 2. The cell-to-cell and terminal connections are clean, tight, free of corrosion,
 - 3. The resistance of each cell-to-cell and terminal connection is less than or equal to 120% of the resistance readings taken during initial installation,* and
 - 4. The battery charger will supply:
 - 1. For Divisions I and II, at least 300 amperes at a minimum of 130 volts for at least 4 hours.
 - 2. For Division III, at least 40 amperes at a minimum of 130 volts for at least 4 hours.

- d. At least once per 18 months, during shutdown, by verifying that either:
 - 1. The battery capacity is adequate to supply and maintain in OPERABLE status all of the actual emergency loads for 2 hours for Divisions I and II, and 2 hours for Division III when the battery is subjected to a battery service test, or
 - 2. The battery capacity is adequate to supply a dummy load of the following profile while maintaining the battery terminal voltage greater than or equal to 105 volts for Division I and II and 112.5 volts for Division III:

* In accordance with IEEE 450-1980.



ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NPF-69

DOCKET NO. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

INTRODUCTION

The Nine Mile Point Unit 2 Technical Specifications require verification at least once per 92 days that the terminals and connectors for all IE batteries are free of corrosion. NUREG-0123, Standard Technical Specifications, permits verification of low terminal resistance in lieu of a visual inspection. The proposed license amendment will allow Niagara Mohawk this flexibility.

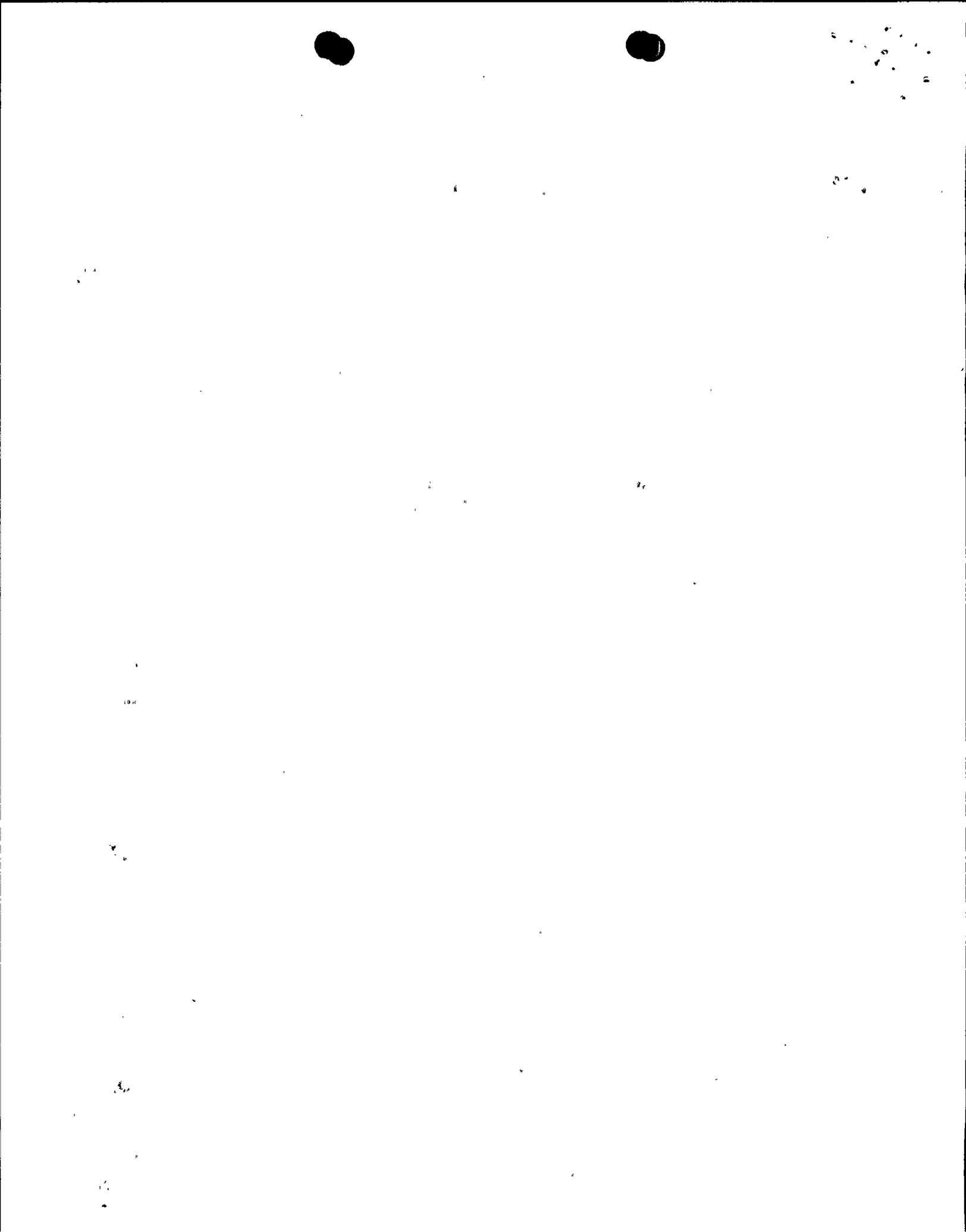
DISCUSSION

The three divisions of the emergency IE DC power system are designated Divisions I, II and III, corresponding to the three divisions of the onsite emergency AC power system. Each division of the emergency DC system has its own battery and primary and backup battery chargers, all Class IE and Category 1. Each emergency battery is sized in accordance with Reg. Guide 1.32. Each emergency battery charger is capable of supplying the largest combined demands of the steady-state loads on the battery while recharging the battery from the design minimum charge state to the fully charged state within 24 hours. The batteries are qualified per IEEE-344-1975 and IEEE-323-1974.

The existing surveillance program meets the requirements of Reg. Guides 1.32, 1.128 and 1.129 (IEEE-308-1974, 484-1975 and 450-1975, respectively). The Nine Mile Point Unit 2 Safety-Related DC Systems are described in Section 8.3.2.1.2 of the plant Final Safety Analysis Report.

Technical Specification Surveillance Requirement 4.8.2.1.b.2 currently requires that "no visible corrosion at either terminals or connectors" on IE batteries and chargers be verified at least once per 92 days. Surveillance Requirement 4.8.2.1.c requires verification at least once per 18 months that there is no visible corrosion and that the resistance of each connection "is less than or equal to 120% of the resistance readings taken during initial installation."

Allowing a resistance check every 92 days, in lieu of a visual inspection for corrosion, increases the level of assurance regarding the OPERABILITY and capability of the batteries. Verifying freedom from visual corrosion serves as a qualitative assessment of the integrity of the battery connections. The resistance check is a quantitative means to assure the OPERABILITY of the batteries. The resistance check provides a positive verification that the connections are capable of carrying their rated current with an acceptable voltage drop.



ATTACHMENT B (Continued)

The Standard Technical Specifications for BWR-5 plants, NUREG-0123, provides the option of verifying resistance in lieu of a visual inspection. Reg. Guide 1.129, Rev. 1, recognizes resistance values of 120% of the as-installed value as an indication of the acceptability of battery connections. Niagara Mohawk has reviewed the as-installed resistance values determined during preoperational testing, and has determined that a 20% increase will have no effect on the ability of the batteries to carry their rated load.

10 CFR 50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10 CFR 50.92 concerning the issue of no significant hazards consideration. Therefore, in accordance with 10 CFR 50.91, the following analysis has been performed:

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment establishes an alternative method of verifying the integrity of battery connections. The amendment does not adversely affect the function or design of the safety-related DC power systems. Further, the proposed change does not adversely affect the environmental qualification of the batteries or their associated chargers. The performance and reliability of the DC power sources will not be affected, thus assuring there will still be power available to supply the safety-related equipment required for (1) the safe shutdown of the facility and (2) the mitigation and control of accident conditions within the facility. Therefore, this amendment will not involve a significant increase in the probability of an accident previously evaluated.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not create the possibility of a new or different kind of accident from any previously evaluated.

Verification of resistance is a positive method of establishing the reliability of station batteries. This is recognized in NUREG-0123, Standard Technical Specifications. Reg. Guide 1.129, Rev. 1, recognizes resistance values of 120% of initial installation values or less as acceptable. Therefore, battery and charger performance are not adversely affected by this change. This assures that the design capabilities of the IE AC and DC systems and components are not challenged in a manner not previously assessed so as to create the possibility of a new or different kind of accident from any previously assessed.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

The Technical Specification bases recognize that verifying connection resistance values, in conjunction with the other tests and inspections required by the surveillances, assures the effectiveness of the charging system and the ability of the batteries to handle high discharge rates. The connections will still be verified to be free of corrosion every 18 months in accordance with Surveillance 4.8.2.1.c.2, pg. 3/4 8-15. Thus, the proposed change does not result in a significant reduction in a margin of safety.

