ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

The existing page 1 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.

1.0 DEFINITIONS

1.1 Reactor Operating Conditions

The various reactor operating conditions are defined below. Individual technical specifications amplify these definitions when appropriate.

a. Shutdown Condition - Cold

(1) The reactor mode switch is in the shutdown position or refuel position.
(2) No core alterations leading to an addition of reactivity are being performed.
(3) Reactor coolant temperature is less than or equal to 212°F.

b. Shutdown Condition - Hot

(1) The reactor mode switch is in the shutdown position or refuel position.
(2) No core alterations leading to an addition of reactivity are being performed.
(3) Reactor coolant temperature is greater than 212°F.

c. Refueling Condition

(1) The reactor mode switch is in the refuel position.
(2) The reactor coolant temperature is less than 212°F.
(3) Fuel may be loaded or unloaded.
(4) No more than one operable control rod may be withdrawn.

d. Power Operating Condition

(1) Reactor mode switch is in startup or run position.
(2) Reactor is critical or criticality is possible due to control rod withdrawal.

e. Major Maintenance Condition

(1) No fuel is in the reactor.

ATTACHMENT B

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Supporting Information and No Significant Hazards Consideration Analysis

The proposed Technical Specification submittal requests a change in the definition of reactor operating condition related to the hot shutdown condition. The hot shutdown condition definition currently does not allow the reactor mode switch to be in the refuel position. The reactor pressure vessel hydrotest following a refueling outage requires compliance with Technical Specification Figure 3.2.2.c. This figure establishes the minimum temperature for reactor vessel pressurization during hydrostatic testing. Currently Niagara Mohawk performs control rod scram testing following the reactor vessel hydrostatic test. The pressure is reduced to approximately 800 psig to perform the control rod scram time testing. This practice reduces the outage time since the scram time testing would have to be performed during startup if it could not be performed during the reactor vessel hydrostatic test. Recent proposed changes to Figure 3.2.2.c to account for thirteen effective full power years of core operation have increased the minimum temperature to approximately 216°F at 1000 psig. In order to perform scram time testing, the reactor mode switch must be in the refuel position to allow one control rod to be withdrawn at a time to perform the testing. However, the reactor coolant temperature will remain above 212°F.

The present technical specification definitions for reactor operating conditions allow the reactor mode switch to be in the refuel position if the reactor coolant temperature is less than 212°F. Since the reactor vessel hydrotest must be performed at a temperature greater than 212°F, the reactor mode switch cannot be in the refuel position to perform scram time testing. To eliminate the restriction, a change to the definition of shutdown condition-hot is proposed to cover the case of hydrostatic testing and control rod scram time testing.

The proposed change is being requested to allow scram time testing to be performed in conjunction with reactor vessel hydrostatic testing. Since the minimum temperature for reactor vessel pressurization during hydrotesting requires temperatures greater than 212°F, scram time testing could not be performed in the cold shutdown condition with the reactor mode switch in the refuel position (i.e., reactor coolant temperature less than 212°F).

With the reactor mode switch in the refuel position during hot shutdown, one control rod at a time will be withdrawn to perform scram time testing. The reactor vessel head will be in place and no refueling activities will be permitted. Therefore, there is no potential for a refueling accident. In addition, since only one control rod can be withdrawn at a time, the consequences of a control rod drop accident will not be increased.

Since the reactor vessel hydrostatic test will be conducted at temperatures greater than 212°F, a break in the reactor coolant pressure boundary would result in water flashing to steam. However, all systems required to be operable by Technical Specifications for the operating conditions, such as core spray and containment spray will be operable to mitigate the consequences of a loss of coolant accident. The core spray and containment spray systems are designed to mitigate the consequences of a loss of coolant accident at higher pressures and temperatures than would be obtained during the hydrostatic test and control rod scram time testing. In addition, primary and secondary containment integrity will be maintained during the hydrotest and control rod scram time testing.

Scram time testing at temperatures greater than 212°F does not put the plant in an unanalyzed condition as the reactor coolant temperature is greater than 212°F with one or more rods withdrawn when the mode switch is in the startup or the run position. The scram time testing could be performed in the startup condition. However, Niagara Mohawk administratively does not allow the mode switch to be placed in the startup mode until actions such as final primary containment inspections and control rod scram time testing have been performed.

Although more than one accident is being considered here (i.e., a refueling accident or a loss of coolant accident), these accidents are not dependent on each other and there is no increase in the probability of these accidents occurring due to this Technical Specification change.

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 about the issue of no significant hazards consideration. Therefore, in accordance with 10 CFR 50.91, the following analysis has been performed:

<u>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.</u>

The proposed amendment is requested to allow scram time testing of control rods immediately following hydrostatic testing. While a break in the reactor coolant pressure boundary may occur due to hydrostatic testing, the change to allow scram time testing has no effect on the probability or the consequences of a loss of coolant accident occurring. In addition, since refueling activities will not be occurring and only one control rod can be withdrawn at a time in the refuel condition, the probability and consequences of a refueling or control rod drop accident are not changed.

<u>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.</u>

Since the proposed change to allow scram time testing immediately following hydrostatic testing at temperatures greater than 212°F does not put the plant in an unanalyzed condition, and since the refueling control rod drop accident and loss of coolant accident are not interrelated, there is no possibility of a new or different kind of accident than any accident previously evaluated.

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.

The proposed amendment will permit control rod scram time testing immediately following the reactor vessel hydrostatic test at reactor coolant temperatures greater than 212°F. All other applicable Technical Specification requirements will remain in effect. Therefore, the change will not affect any margin of safety.