ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

Proposed Changes to Technical Specifications (Appendix A)

Replace pages 117, 194 and 196a with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

2537G 7

LIMITING CONDITION FOR OPERATION

c. If Specifications 3.2.7a and b above are not met, initiate normal orderly shutdown within one hour and have reactor in the cold shutdown condition within ten hours.

SURVEILLANCE REQUIREMENT

c. At least once per quarter the feedwater and main-steam line power-operated isolation valves shall be exercised by partial closure and subsequent reopening.

d. At least once per plant cold shutdown the feedwater and main steam line power-operated isolation valves shall be fully closed and reopened, unless this test has been performed within the previous 92 days.

e. At least once per quarter the scram discharge system air operated vent and drain valves shall be fully closed and reopened.

TABLE 4.6.2a

INSTRUMENTATION THAT INITIATES SCRAM

Surveillance Requirement

Parameter	Sensor Check	Instrument Channel Test	Instrument Channel Calibration
(1) Manual Scram	None	Once per 3 months	None
(2) High Reactor Pressure	None	Once per month(1)	Once per 3 months(1)
(3) High Drywell Pressure	None	Once per month(1)	Once per 3 months(1)
(4) Low Reactor Water Level	Once/day	Once per month(1)	Once per 3 months(1)
(5) High Water Level Scram Discharge Volume	None	Once per month	Once per 3 months
(6) Main-Steam Line Isolation Valve Position	None	Once per cold shutdown(o)	Once per operating cycle
(7) High Radiation Main-Steam Line	Once/shift	Once per week	Once per 3 months

(n) Within 24 hours prior to the planned start of the hydrogen injection test with the reactor power at greater than 20% rated power, the normal full-power radiation background level and associated trip and alarm setpoints may be changed based on a calculated value of the radiation level expected during the test. The background radiation level and associated trip and alarm setpoints may be adjusted during the test program based on either calculations or measurements of actual radiation levels resulting from hydrogen injection. The background radiation level shall be determined and associated trip and alarm setpoints shall be reset within 24 hours of re-establishing normal radiation levels after completion of the hydrogen injection or within 12 hours of establishing reactor power levels below 20% rated power, while these functions are required to be operable. At reactor power levels below 20% rated power, hydrogen injection shall be terminated and the injection system secured.

(o) This test is not required if it has been performed within the previous 92 days.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE DPR-63

DOCKET NO. 50-220

Supporting Information and No Significant Hazards Considerations Analysis

Article IWV 3000 of Section XI of the ASME Boiler and Pressure Vessel Code, 1983 Edition with Summer 1983 Addendum requires that Category A and B valves shall be exercised at least once every three months. Paragraph IWV 3412 further indicates that valves shall be exercised to the position required to fulfill their function unless such operation is not practical during plant operation. If only limited operation is practical during operation, the valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdown. Full-stroke exercising during cold shutdowns for all valves not full-stroke exercised during plant operation is not required if the valve has been full-stroke tested within the last three months. A reduction in frequency is also recommended to prevent accelerated wear of the main steam isolation valves. An evaluation performed by the main steam isolation valve manufacturer determined that the present test frequency is excessive and may prove to be counter-productive as it will accelerate upper rib and poppet pad wear which is detrimental to seat tightness.

Therefore, Surveillance Requirement 4.2.7.c is being proposed for revision to change the frequency of feedwater and main steam line power-operated isolation valves testing from at least twice per week to at least once per quarter. The proposed once per quarter test frequency is in accordance with ASME Boiler and Pressure Vessel Code, Section XI, 1983 Edition, with Summer 1983 Addendum which is the edition of the ASME Code endorsed by 10 CFR 50.55a(g).

In addition, it is proposed to add Surveillance Requirement 4.2.7.d to incorporate the full closure test for the feedwater and main steam line isolation valves consistent with the requirements of ASME Boiler and Pressure Vessel Code Section XI, 1983 Edition, with Summer 1983 Addendum. This test shall be performed during each plant cold shutdown unless it has been performed in the previous three months (92 days).

The existing Surveillance Requirement 4.2.7.d has been renumbered to be 4.2.7.e. This revision is purely administrative.

The revision to Table 4.6.2a changes the frequency of the main steam line isolation valve position instrument channel test from once per 3 months to once per cold shutdown. This change is in accordance with recommendations provided by the Office of Nuclear Reactor Regulation. In their evaluation of Nine Mile Point Unit 1's Technical Specification requirements for main steam line isolation valve limit switch testing, dated May 8, 1984, the Office of Nuclear Reactor Regulation recommended that the instrument channel test for these valves be conducted "prior to startup following plant shutdowns by actual closure of the main steam isolation valve(s), unless the test has been performed within the previous 92 days." The revision to Table 4.6.2a (page 194) and the addition of note (o) (page 196a) incorporates this recommendation.

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 Section 50.92 about the issue of no significant hazards consideration. Therefore, in accordance with 10 CFR 50.91 and 10 CFR 50.92, the following analysis has been performed.

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The revision to the test frequency of the feedwater valves and the main steam line isolation valves meets appropriate industry standards. The test frequencies are in accordance with ASME Boiler and Pressure Vessel Code Section XI, 1983 Edition with Summer 1983 Addendum. This edition has been approved by the Nuclear Regulatory Commission as indicated in 10CFR 50.55a. Furthermore, the change in test frequency is consistent with our proposed Inservice Testing Program. The change in test frequency continues to provide the necessary number of tests to provide an indication of reliability while preventing unnecessary wear to the affected equipment. Therefore, no significant increase in the probability or consequences of an accident previously evaluated will occur.

The change in frequency for performing the main steam isolation valve limit switch testing is consistent with evaluations performed by the Office of Nuclear Reactor Regulation. This evaluation indicates that the probability of the protection system failing to initiate the actuation of the equipment is and can be maintained acceptably low without testing the equipment during reactor operation. This change is requested to require performing the instrument channel test in the cold shutdown condition only. This test should be performed during plant shutdown in order to prevent an inadvertent reactor scram. As indicated in the Office of Nuclear Reactor Regulation's May 8, 1984 Safety Evaluation, the function of the main steam isolation valve limit switches is to initiate a scram to terminate a main steam isolation valve closure transient. However, if the limit switches should fail, two other independent and diverse scram functions (reactor high pressure and high neutron flux) are available to terminate the transient (see Nine Mile Point Unit 1 FSAR Section XV.3.5, Main Steam Isolation Valve Closure with Scram). Therefore, the proposed change to the main steam line isolation valve limit switch testing will not significantly increase the probability or consequences of a main steam line accident.

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

The proposed change regarding the exercising of the main steam and feedwater isolation valves maintains the same type of testing practiced in the past, only the frequency has changed. The change affecting the testing of the main steam isolation valve limit switches is to require testing to be performed only during cold shutdown. Since there is no change in plant configuration to perform the tests, the possibility of a new or different kind of accident from any accident previously evaluated will not be introduced.

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant reduction in a margin of safety.

The change in test frequency continues to provide an accurate indication of reliability while preventing unnecessary wear on equipment. Therefore, a significant reduction in a margin of safety will not occur.