ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NPF-69

DOCKET NO. 50-410

Proposed Changes to Technical Specifications
Which Relate to Generic Letter 87-09

Replace existing pages 3/4 2-8, 4-2, 4-17, 6-21 and 11-5 with the attached revised pages. These pages have marginal markings to indicate the change to the text.

Proposed Editorial Changes to Technical Specifications

Replace existing pages 3/4 3-51, 3-78, 3-80, 6-33, 7-15, 8-26, 9-3, 11-2, 11-11 and page 6-13 with the attached revised pages. These pages have marginal markings to indicate the change to the text.

LIMITING CONDITIONS FOR OPERATION

3.2.3 (Continued)

ACTION:

a. With the end-of-cycle recirculation pump trip system inoperable per Specification 3.3.4.2, operation may continue provided that, within 1 hour, MCPR is determined to be equal to or greater than the MCPR limit shown in Figure 3.2.3-1 EOC-RPT inoperable curve times the K_f shown in Figure 3.2.3-2.

b. With the main turbine bypass system inoperable per Specification 3.7.7, operation may continue provided that, within 1 hour, MCPR is determined to be equal to or greater than the MCPR limit shown in Figure 3.2.3-1 main turbine bypass inoperable curve times the K_f shown in Figure 3.2.3-2.

c. With MCPR less than the applicable MCPR limit determined from Figures 3.2.3-1 and 3.2.3-2, as applicable, initiate corrective action within 15 minutes to restore MCPR within the required limit. Restore MCPR to within the required limit within 4 hours, if necessary, by reducing THERMAL POWER to the level required.

SURVEILLANCE REQUIREMENTS

4.2.3 MCPR shall be determined to be equal to or greater than the applicable MCPR limit determined from Figures 3.2.3-1 and 3.2.3-2 with:

a. τ = 1.0 prior to performance of the initial scram time measurements for the cycle in accordance with Specification 4.1.3.2,

   1. At least once per 24 hours,

   2. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and

   3. Initially and at least once per 12 hours when the reactor is operating with a LIMITING CONTROL ROD PATTERN for MCPR, or

b. τ as defined in Specification 3.2.3 used to determine the limit within 72 hours of the conclusion of each scram time surveillance test required by Specification 4.1.3.2

   1. At least once per 24 hours,

   2. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and

   3. Initially and at least once per 12 hours when the reactor is operating with a LIMITING CONTROL ROD PATTERN for MCPR.

c. The provisions of Specification 4.0.4 are not applicable.

LIMITING CONDITIONS FOR OPERATION (Continued)

g) Perform Surveillance Requirement 4.4.1.1.2 if THERMAL POWER is $\leq$ 30%* of RATED THERMAL POWER or the recirculation loop flow in the operating loop is $\leq$ 50%* of rated loop flow.

2. Otherwise be in at least HOT SHUTDOWN within the next 12 hours.

b. With no reactor coolant system recirculation loops in operation, immediately initiate action to reduce THERMAL POWER such that it is not within the restricted zone of Figure 3.4.1.1-1 within two hours, and initiate measures to place the unit in at least STARTUP within six hours and in HOT SHUTDOWN within the next six hours.

c. With one or two reactor coolant system recirculation loops in operation and total core flow less than 45% but greater than 39%** of rated core flow and THERMAL POWER within the restricted zone of Figure 3.4.1.1-1:

1. Determine the APRM and LPRM*** noise levels per Specification 4.4.1.1.1:

a) At least once per eight hours, and

b) Within 30 minutes after the completion of a THERMAL POWER increase of at least 5% of RATED THERMAL POWER.

2. With the APRM or LPRM*** neutron flux noise levels greater than three times their established baseline noise levels, within 15 minutes initiate corrective action to restore the noise levels within the required limits within two hours by increasing core flow or by reducing THERMAL POWER.

d. With one or two reactor coolant system recirculation loops in operation and total core flow $\leq$ 39%** and THERMAL POWER within the restricted zone of Figure 3.4.1.1-1, within 15 minutes initiate corrective action to reduce THERMAL POWER to within the unrestricted zone of Figure 3.4.1.1-1 or increase core flow to > 39%** within 4 hours.

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* Initial values. Final values to be determined during Startup Testing based upon the threshold THERMAL POWER and recirculation loop flow which will sweep the cold water from the vessel bottom head preventing stratification.

** Value to be established during startup test program which is equivalent to minimum core flow for 2 recirculation pumps at high speed with minimum flow control valve position.

*** Detector levels A and C of one LPRM string per core octant plus detectors A and C of one LPRM string in the center of the core should be monitored.

3/4.4.4 CHEMISTRY

LIMITING CONDITIONS FOR OPERATION

3.4.4 The chemistry of the reactor coolant system (RCS) shall be maintained within the limits specified in Table 3.4.4-1.

APPLICABILITY: At all times.

ACTION:

a. In OPERATIONAL CONDITION 1:

1. With the conductivity, chloride concentration, or pH exceeding the limit specified in Table 3.4.4-1 for less than 72 hours during one continuous time interval and, for conductivity and chloride concentration for less than 336 hours per year, but with the conductivity less than 10 μmho/cm at 25°C and with the chloride concentration less than 0.5 ppm, this need not be reported to the Commission.

2. With the conductivity, chloride concentration, or pH exceeding the limit specified in Table 3.4.4-1 for more than 72 hours during one continuous time interval or with the conductivity and chloride concentration exceeding the limit specified in Table 3.4.4-1 for more than 336 hours per year, be in at least STARTUP within the next 6 hours.

3. With the conductivity exceeding 10 μmho/cm at 25°C or chloride concentration exceeding 0.5 ppm, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

b. In OPERATIONAL CONDITIONS 2 and 3 with the conductivity, chloride concentration, or pH exceeding the limit specified in Table 3.4.4-1 for more than 48 hours during one continuous time interval, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

c. At all other times:

1. With the:

a) Conductivity or pH exceeding the limit specified in Table 3.4.4-1, restore the conductivity and pH to within the limit within 72 hours, or

b) Chloride concentration exceeding the limit specified in Table 3.4.4-1, restore the chloride concentration to within the limit within 24 hours, or

3/4.6.3 PRIMARY CONTAINMENT ISOLATION VALVES

LIMITING CONDITIONS FOR OPERATION

3.6.3 The primary containment isolation valves and the reactor instrumentation line excess flow check valves shown in Table 3.6.3-1 shall be OPERABLE with isolation times less than or equal to those shown in Table 3.6.3-1.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3

ACTION:

a. With one or more of the primary containment isolation valves shown in Table 3.6.3-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within 4 hours either:

   1. Restore the inoperable valve(s) to OPERABLE status, or

   2. Isolate each affected penetration by use of at least one deactivated automatic valve secured in the isolated position,* or

   3. Isolate each affected penetration by use of at least one closed manual valve or blind flange,* and

   4. For penetrations isolated in accordance with ACTION a.2 or a.3 above, declare the associated system inoperable, if applicable, and perform the appropriate ACTION statements for that system.

   Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With one or more of the reactor instrumentation line excess flow check valves shown in Table 3.6.3-1 inoperable, operation may continue and the provisions of Specification 3.0.3 are not applicable provided that within 4 hours either;

   1. The inoperable valve is returned to OPERABLE status, or
   2. The instrument line is isolated and the associated instrument is declared inoperable.

   Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

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* Isolation valves closed to satisfy these requirements may be reopened on an intermittent basis under administrative control.

RADIOACTIVE EFFLUENTS

LIQUID EFFLUENTS

DOSE

LIMITING CONDITIONS FOR OPERATION

3.11.1.2 The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each unit, to UNRESTRICTED AREAS (see Figure 5.1.3-1) shall be limited:

a. During any calendar quarter to less than or equal to 1.5 mrem to the whole body and to less than or equal to 5 mrem to any organ, and

b. During any calendar year to less than or equal to 3 mrem to the whole body and to less than or equal to 10 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.2 Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

INSTRUMENTATION

RECIRCULATION PUMP TRIP ACTUATION INSTRUMENTATION

END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

4.3.4.2.1 Each end-of-cycle recirculation pump Trip System instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.4.2-1.

4.3.4.2.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.4.2.3 The END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM RESPONSE TIME of each Trip Function shown in Table 3.3.4.2-3 shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least the logic of one type of channel input, turbine control valve fast closure or turbine stop valve closure, so that both types of channel inputs are tested at least once per 36 months.

TABLE 3.3.7.4-1

REMOTE SHUTDOWN MONITORING INSTRUMENTATION

INSTRUMENT	READOUT LOCATION	MINIMUM INSTRUMENTS OPERABLE
1. Service Water Pump Disch Flow	2CES*PNL405	2/Division
2. Reactor Vessel Pressure	2CES*PNL405	1/Division
3. RX Vessel Water Level Wide Range	2CES*PNL405	1/Division
4. RX Vessel Water Level Narrow Range	2CES*PNL405	1/Division
5. RCIC Turbine Speed	2CES*PNL405	1
6. Suppression Pool Water Level	2CES*PNL405	1/Division
7. RHR Loop "A" Flow	2CES*PNL405	1
8. RHR Ht. Ex. Service Water "A" Flow	2CES*PNL405	1
9. Suppression Pool Temperature	2CES*PNL405	1/Division
10. RHR Loop "B" Flow	2CES*PNL405	1
11. RHR Ht. Ex. Service Water "B" Flow	2CES*PNL405	1
12. Safety/Relief Valve Position	2CES*PNL405	1/Valve
13. RCIC Flow Indicator/Controller	2CES*PNL405	1

TABLE 4.3.7.4-1

REMOTE SHUTDOWN MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CALIBRATION	READOUT LOCATION
1. Service Water Pump Discharge Flow	M	R	2CES*PNL405
2. Reactor Vessel Pressure	M	R	2CES*PNL405
3. RX Vessel Water Level Wide Range	M	R	2CES*PNL405
4. RX Vessel Water Level Narrow Range	M	R	2CES*PNL405
5. RCIC Turbine Speed	R	R	2CES*PNL405
6. Suppression Pool Water Level	M	R	2CES*PNL405
7. RHR Loop "A" Flow	M	R	2CES*PNL405
8. RHR Ht. Ex. Service Water "A" Flow	M	R	2CES*PNL405
9. Suppression Pool Temp.	M	R**	2CES*PNL405
10. RHR Loop "B" Flow	M	R	2CES*PNL405
11. RHR Ht. Ex. Service Water "B" Flow	M	R	2CES*PNL405
12. Safety/Relief Valve Position (4 Valves)	M	R*	2CES*PNL405
13. RCIC Flow Indicator/Controller	R	R	2CES*PNL405

* CHANNEL calibration is performed per Specification 4.4.2.

** CHANNEL calibration excludes sensors; sensor comparison shall be done in lieu of sensor calibration.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

ISOLATION VALVE NO.	VALVE FUNCTION	VALVE ISOLATION GROUP SIGNAL(a)	MAXIMUM CLOSING TIME (SECONDS)
2ICS*EFV3	To 2ICS*PDT168		
2ICS*EFV4	To 2ICS*PDT168		
2IAS*EFV200	To 2IAS*PT230 off ADS Accum.		
2IAS*EFV201	To 2IAS*PT231 off ADS Accum.		
2IAS*EFV202	To 2IAS*PT232 off ADS Accum.		
2IAS*EFV203	To 2IAS*PT235 off ADS Accum.		
2IAS*EFV204	To 2IAS*PT234 off ADS Accum.		
2IAS*EFV205	To 2IAS*PT233 off ADS Accum.		
2IAS*EFV206	To 2IAS*PT236 off ADS Accum.		
2RHS*EFV 5, 6	To 2RHS*PDT18B		
2RHS*EFV7	To 2RHS*PDT18A		
2MSS*EFV 1A,B,C,D	To Flow elements A,B,C,D steamlines		
2MSS*EFV 2A,B,C,D	To Flow elements A,B,C,D steamlines		
2MSS*EFV 3A,B,C,D	To Flow elements A,B,C,D steamlines		
2MSS*EFV 4A,B,C,D	To Flow elements A,B,C,D steamlines		
2RCS*EFV44 A,B	To 2RCS*PT 84 A/B		
2RCS*EFV45 A,B	To 2RCS*FT 7 A/B, FT 9 A/B		
2RCS*EFV46 A,B	To 2RCS*FT 7 A/B, FT 9 A/B		
2RCS*EFV47 A,B	To 2RCS*FT 6 A/B, FT 8 A/B		
2RCS*EFV48 A,B	To 2RCS*FT 6 A/B, FT 8 A/B		
2RCS*EFV52 A,B	To 2RCS*PDT 15 A/B		
2RCS*EFV53 A,B	To 2RCS*PDT 15 A/B		
2RCS*EFV62 A,B	To 2RCS*PT44 A/B		
2RCS*EFV63 A,B	To 2RCS*PT42 A/B		

4.7.4 (Continued)

c. At least once per 18 months by:

1. Performing a system functional test which includes simulated automatic actuation and restart and verifying that each automatic valve in the flow path actuates to its correct position. Actual injection of coolant into the reactor vessel may be excluded.

2. Verifying that the system will develop a flow of 600 gpm or more in the test flow path when steam is supplied to the turbine at a pressure of 150 + 15, -0 psig.*

3. Verifying that the suction for the RCIC system is automatically transferred from the condensate storage tank to the suppression pool on a condensate storage tank water level-low signal.

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* The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the tests.

TABLE 3.8.4.1-1 (Continued)

PRIMARY CONTAINMENT AC CIRCUITS DEENERGIZED

CIRCUIT NO.	POWER SOURCE	SECT.	EQUIPMENT POWERED
2DERA03	2NHS-MCC012	7B	2DER*MOV128 - Reactor Drain Isol Valve
NA	2NHS-MCC005	7B	2MHR-CRN3 - Recirc Mtr Hndlg Crane - AMHR PNL101
NA	2NHS-MCC005	7C	2MHR-CRN4 - Recirc Mtr Hndlg Crane - 2MHR PNL102
NA	2NHS-MCC005	7D	2MHR-CRN65 - Monorail 2 Ton for 2MSS*PSV
NA	2NHS-MCC005	7E	2MHR-CRN67 - Monorail 2 Ton for 2MSS*HVY Valves
NA	2NHS-MCC005	7F	2MHR-CRN66 - Monorail 2 Ton for RDS Cart

3/4.9.2 INSTRUMENTATION

LIMITING CONDITIONS FOR OPERATION

3.9.2 At least 2 source range monitor* (SRM) channels shall be OPERABLE and inserted to the normal operating level with:

a. Continuous visual indication in the control room,

b. Audible annunciation in the control room,

c. One of the required SRM detectors located in the quadrant where CORE ALTERATIONS are being performed and the other required SRM detector located in an adjacent quadrant, and

d. Unless adequate shutdown margin has been demonstrated per Specification 3.1.1 and the "one rod out" interlock is OPERABLE per Specification 3.9.1, the shorting links shall be removed from the RPS circuitry prior to and any time one control rod is withdrawn.**

APPLICABILITY: OPERATIONAL CONDITION 5.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS and insert all insertable control rods.

SURVEILLANCE REQUIREMENTS

4.9.2 Each of the above required SRM channels shall be demonstrated OPERABLE by:

a. At least once per 12 hours:

   1. Performing a CHANNEL CHECK,

   2. Verifying the detectors are inserted to the normal operating level, and

   3. During CORE ALTERATIONS, verifying that the detector of an OPERABLE SRM channel is located in the core quadrant where CORE ALTERATIONS are being performed and another is located in an adjacent quadrant.

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* The use of special movable detectors during CORE ALTERATIONS in place of the normal SRM nuclear detectors is permissible as long as these special detectors are connected to the normal SRM circuits.

** Not required for control rods removed per Specification 3.9.10.1 and 3.9.10.2.

TABLE 4.11.1-1

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD)(a) (μCi/ml)
1. Batch Waste Release Tanks (b)	P Each Batch	P Each Batch	Principal Gamma Emitters(c)	5×10^{-7}
a. 2LWS-TK4A b. 2LWS-TK4B c. 2LWS-TK5A d. 2LWS-TK5B			I-131	1×10^{-6}
	P One Batch/M	One Batch/M	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
	P Each Batch	M Composite(d)	H-3	1×10^{-5}
			Gross Alpha	1×10^{-7}
	P Each Batch	Q Composite(d)	Sr-89, Sr-90	5×10^{-8}
			Fe-55	1×10^{-6}
2. Continuous Releases	Grab Sample M(e)	Grab Sample M(e)	Principal Gamma Emitters(c)	5×10^{-7}
			I-131	1×10^{-6}
a. Service Water Effluent A			Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
b. Service Water Effluent B			H-3	1×10^{-5}
			Gross Alpha	1×10^{-7}
c. Cooling Tower Blowdown	Grab Sample Q(e)	Grab Sample Q(e)	Sr-89, Sr-90	5×10^{-8}
			Fe-55	1×10^{-6}
d. Auxiliary Boiler Pump Seal and Sample Cooling Discharge (Service Water)	Grab Sample M(f)	Grab Sample M(f)	Principal Gamma Emitters(c)	5×10^{-7}
	Grab Sample Q(f)	Grab Sample Q(f)	H-3	1×10^{-5}

TABLE 4.11.2-1 (Continued)

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

TABLE NOTATIONS

(b) Sample and analysis before PURGE is used to determine permissible PURGE rates. Sample and analysis during actual PURGE is used for offsite dose calculations.

(c) The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141, and Ce-144 in iodine and particulate releases. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.8 in the format outlined in RG 1.21, Appendix B, Revision 1, June 1974.

(d) If the main stack or reactor/radwaste building isotopic monitor is not OPERABLE, sampling and analysis shall also be performed following shutdown, startup, or when there is an alarm on the offgas pretreatment monitor.

(e) Tritium grab samples shall be taken weekly from the reactor/radwaste ventilation system when fuel is offloaded until stable tritium release levels can be demonstrated.

(f) The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.11.2.1.b and 3.11.2.3.

(g) When the release rate of the main stack or reactor/radwaste building vent exceeds its alarm setpoint, the iodine and particulate device shall be removed and analyzed to determine the changes in iodine and particulate release rates. The analysis shall be done daily until the release no longer exceeds the alarm setpoint. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10.

REVIEW AND AUDIT

SAFETY REVIEW AND AUDIT BOARD

REVIEW

6.5.3.7 (Continued)

g. All REPORTABLE EVENTS;

h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and

i. Reports and meeting minutes of the SORC.

AUDITS

6.5.3.8 Audits of unit activities shall be performed under the cognizance of the SRAB. These audits shall encompass:

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once every 12 months;

b. The performance, training, and qualifications of the entire unit staff at least once every 12 months;

c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once every 6 months;

d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50, at least once every 24 months;

e. The facility Emergency Plan and implementing procedures at least once every 12 months.

f. The facility Security Plan and implementing procedures at least once every 12 months.

g. The Radiological Environmental Monitoring Program and the results thereof at least once every 12 months;

h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once every 24 months;

i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once every 24 months;

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NPF-69

DOCKET NO. 50-410

SUPPORTING INFORMATION AND SIGNIFICANT HAZARDS

Introduction

Generic Letter 87-09 was issued by the Nuclear Regulatory Commission on June 4, 1987. This letter discusses three recommended changes to Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the applicability of Limiting Conditions for Operation and Surveillance Requirements. The first problem discussed involves unnecessary restrictions on mode changes by Specification 3.0.4 and inconsistent application of exceptions to it. The second problem involves unnecessary shutdowns caused by Specification 4.0.3 when surveillance intervals are inadvertently exceeded. The third problem involves two possible conflicts between Specifications 4.0.3 and 4.0.4. The first conflict arises when Shutdown Action Requirements require entry into an operational mode or other specified condition and Surveillance Requirements that become applicable have not been performed within the specified surveillance interval as required by Specification 4.0.4. A second conflict could arise when Surveillance Requirements can only be completed after entry into a mode or specified condition for which the Surveillance Requirements apply. In this situation, an exception to the requirements of Specification 4.0.4 is allowed. However, upon entry into this mode or condition, the requirements of Specification 4.0.3 may not be met because the Surveillance Requirements may not have been performed within the allowed surveillance interval. The recommended changes resolve all three of these problems.

Discussion

The proposed amendment involves changes to Specifications 3.0.4, 4.0.3 and 4.0.4 in response to Nuclear Regulatory Commission recommendations covered in Generic Letter 87-09. Specification 3.0.4 impacts the operation of the facility in two ways. First, it delays startup under conditions in which conformance to the Action Requirements establishes an acceptable level of safety for unlimited continued operation of the facility. Second, it delays a return to power operation when the Limiting Condition for Operation must be met without reliance on the Action Requirements. Specification 3.0.4 unduly restricts facility operation when conformance to the Action Requirements provides an acceptable level of safety for continued operation. For a Limiting Condition for Operation that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode of other specified condition should be permitted in accordance with those Action Requirements. This is consistent with the Nuclear Regulatory Commission's regulatory requirements for a Limiting Condition for Operation. The restriction on a change in operational modes should apply only where the Action Requirements establish a specified time interval in which conditions of the Limiting Condition for Operation must be met or a shutdown of the facility

would be required. The proposed changes permit entry into an operational mode while meeting the Action Requirements of a Limiting Condition for Operation when the Action Requirements permit continued operation for an unlimited period of time. As a consequence of the modification to Specification 3.0.4, individual specifications with Action Requirements permitting continued operation no longer indicate that Specification 3.0.4 does not apply. Exceptions to Specification 3.0.4 were not deleted for individual specifications if a mode change would be precluded by Specification 3.0.4 as revised.

Specification 4.0.3 states that the failure to perform a surveillance within the specified time interval shall constitute a failure to meet the Limiting Condition for Operation's Operability Requirements. Therefore, if a Surveillance Requirement is not met as a result of the failure to schedule the performance of the surveillance, the Limiting Condition for Operation would not be met. Generally, the Action Requirements include a specified time interval (i.e., allowable outage time limit) that permits corrective action to be taken to satisfy the Limiting Condition for Operation. However, some Action Requirements have allowable outage time limits of only one or two hours and do not establish a practical time limit for the completion of a missed Surveillance Requirement. Inability to complete these missed surveillances within the allowable outage time limits often requires a plant shutdown to comply with Technical Specification Action Requirements. A plant shutdown would also be required if the missed surveillance applies to more than the minimum number of systems or components required to be operable under the allowable outage time limits of the Action Requirements.

If a plant shutdown is required due to a missed surveillance, it is likely that the surveillance would be conducted while the plant is being shut down. This is undesirable since it increases the risk to the plant and public safety for two reasons. First, the plant would be in a transient state involving plant evolutions that create the potential for an upset which in turn could lead to a demand for the system or component being tested. This would occur when the component is either out of service for testing or the operability of the component is in question. Second, a shutdown could result in pressure on the plant staff to expeditiously complete the required surveillance to facilitate a return to power operation. This would intensify the potential for a plant upset when both the shutdown and surveillance activities place a demand on the plant operators.

It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. In fact, the opposite is the case; the vast majority of surveillances demonstrate that systems or components, in fact, are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance. The proposed changes to Specification 4.0.3 include a 24-hour time limit to permit performance of a missed surveillance when the allowable outage times of the Action Requirements are less than 24 hours or when shutdown Action Requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

The proposed change to Specification 4.0.3 also resolves an existing conflict with Specification 4.0.4. Exceptions to Specification 4.0.4 are allowed when Surveillance Requirements can only be completed after entry into a specified condition for which they apply. However, upon entry into the OPERATIONAL CONDITION, Specification 4.0.3 may not be met because the Surveillance Requirements may not have been performed within the allowed surveillance interval. It is not the intent of Specification 4.0.3 to preclude the performance of surveillances when an exception to Specification 4.0.4 is allowed. The proposed change to Specification 4.0.3 creates an appropriate time limit of up to 24 hours for completion of Surveillance Requirements that become applicable when an exception to Specification 4.0.4 is allowed.

The third change involves Specification 4.0.4 and resolves a conflict which exists when a mode change is required as a consequence of Action Requirements and the Surveillance Requirements that become applicable have not been performed within the specified surveillance interval. The potential for a plant upset and challenge to safety systems is heightened if surveillances are performed during a shutdown to comply with Action Requirements. It is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with Action Requirements and it should not apply when mode changes are imposed by Action Requirements. Specification 4.0.4, as proposed, would allow passage through or to Operational Modes as required to comply with Action Requirements.

Ten editorial changes are also included in this submittal. Eight of the ten correct cross-reference, equipment identification, or spelling errors. The editorial changes are enumerated below.

Page 3/4 3-51 Table 4.3.4.2.1-1 should be referenced as Table 4.3.4.2-1.

Page 3/4 3-78 The Remote Shutdown panel monitors Service Water flow to the RHR heat exchangers, not outlet flow. Items #8 and #11 on Table 3.3.7.4-1 are revised accordingly.

Page 3/4 3-80 The Remote Shutdown panel monitors Service Water flow to the RHR heat exchangers, not outlet flow. Item #11 on Table 4.3.7.4-1 is revised accordingly.

Page 3/4 6-33 The function for Isolation Valves 2IAS*EFV203 and EFV205 are reversed.

Page 3/4 7-15 The spelling of "Isolation" is corrected.

Page 3/4 8-26 The equipment powered from 2NHS-MCC005 Section 7E and 7F are reversed.

Page 3/4 9-3 "Audible indication" is changed to "Audible annunciation" to properly reflect BWR terminology for source range monitoring.

Page 3/4 11-2 The format of Table 4.11.1-1 is revised to specifically identify those requirements which apply to Item 2.d, Auxiliary Boiler Pump Seal and Sample Cooling Discharge.

Page 3/4 11-11 The main stack and reactor/radwaste building radiation monitors do not have "alert alarms." The proper terminology is just "alarm." Notes (d) and (g) are revised to reflect this.

Page 6-13 In Section 6.5.3.8, under Administrative Controls, "Unit Emergency Plan" and "Unit Security Plan" are changed to "Facility Emergency Plan" and "Facility Security Plan" since the Nine Mile Project has one emergency plan and one security plan that cover both units.

Conclusion

Nine Mile Point Unit 2 can be safely operated with the proposed changes to Specification 3.0.4, 4.0.3 and 4.0.4. The proposed changes result in improved Technical Specifications and are consistent with the recommendations of NUREG-1024, "Technical Specifications - Enhancing the Safety Impact," and the Commission Policy Statement on Technical Specification improvements.

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 each of the proposed amendments, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

3.0.4: In each case where relief from Operational Condition change restrictions will now be available, it was either available before or it is being proposed in recognition that taking the prescribed remedial action upon entry into a given specified condition as opposed to having already been in that condition is not adverse to safety. This is a valid statement because such relief is only allowed when the prescribed action has no time limits, which signifies that unlimited operation under the action has already been determined by the Nuclear Regulatory Commission to be an acceptably safe alternative means of meeting the LCO requirements. Based on the above, the proposed change to Specification 3.0.4 does not adversely affect the probability or consequences of any previously evaluated accident.

4.0.3: Although it is conceivable under this proposal that additional time could be provided for restoration of inoperable components, this occurs only when the component affected by the missed surveillance is found to be inoperable once the test is actually performed. Therefore, the effect of this change is to only allow entry into action statements when the component is known to be inoperable or when adequate (24 hours) test performance time is provided. This has an insignificant effect on previous analyses because the potential for an untested component to be inoperable is low and because the action (which must be within 24 hours) is entered as soon as the test is failed. Furthermore, very few missed surveillances are

anticipated and, of these few cases, a smaller number will involve inoperable components. Based on the above, this change has no significant effect on the probability or consequences of previously analyzed accidents.

4.0.4: As stated in Generic Letter 87-09, "It is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with action requirements and it should not apply when mode changes are imposed by 'Action Requirements'". Therefore, this change can be interpreted as editorial clarification. Regardless, ensuring that performance of surveillance tests will not be required during shutdowns to comply with actions will reduce the probability of previously analyzed transients and accidents by minimizing activities which could challenge safety systems during a shutdown evolution.

Editorial: Those Technical Specification changes which are delineated as editorial in nature do not change the intent or meaning of the Technical Specification and, accordingly, do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

3.0.4: As stated above, the unlimited nature of the actions associated with this proposal assures a level of safety commensurate with that which is normally required. Therefore, these conditions do not create a possibility of a new or different kind of accident from any previously evaluated and will not require analysis of potentially new or different accidents.

4.0.3: The revised provisions of 4.0.3 modify existing constraints on previously analyzed conditions, as was analyzed above. They do not create the possibility for new or different accident scenarios.

4.0.4: The revision to Specification 4.0.4 reduces the probability of previously analyzed transients. This is accomplished by minimizing activities which could challenge safety systems during a shutdown evolution. The change has no features which could create the possibility of new or different scenarios.

Editorial: Editorial changes, by their nature, do not create the possibility of new or different scenarios.

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

3.0.4: The premise upon which these changes are proposed is that the difference in safety margin between taking a time-independent action upon entry into a given operational condition and taking the same action while in that condition is insignificant. Since the difference in safety margin is insignificant, the proposed amendment cannot involve a significant reduction in a margin of safety.

4.0.3: The margin of safety provided by the action statements is subjectively improved for the following reasons:

1. Based on experience, the proposed change will minimize the potential for shutdowns due to the inability to perform a missed surveillance on components that are, in all probability, operable. Therefore, unwarranted plant transients will be avoided and safety is improved.

2. The provision does not provide additional time when the situation does not warrant it. When greater than 24 hours exists, or when the component is known to be inoperable, the normal action applies.

3. The potential for misinterpretation of the new wording was reviewed, and it is believed that the improved Bases section for the proposed change (as well as the guidance in the Generic Letter, if needed) will mitigate any potential for problems in this area.

4.0.4: The margin of safety is based in part on the 'Action Requirements' as stated in the Technical Specifications. By assuring that Surveillance Requirements do not interfere with shutdowns required by Action Statements, the margin of safety is improved.

Editorial: Editorial changes improve the clarity of the Technical Specifications and, as such, do not involve a significant reduction in the margin of safety.