

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

The existing pages 93 and 94 will be replaced with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

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LIMITING CONDITION FOR OPERATION

b. Inservice Testing

1. To be considered operable, Quality Group A, B and C pumps and valves, shall satisfy the requirements contained in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for continued service of ASME Code Class 1, 2 and 3 components, respectively, except where relief has been granted by the Commission pursuant to 10CFR50, Section 50.55a(g)(6)(i).

c. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.

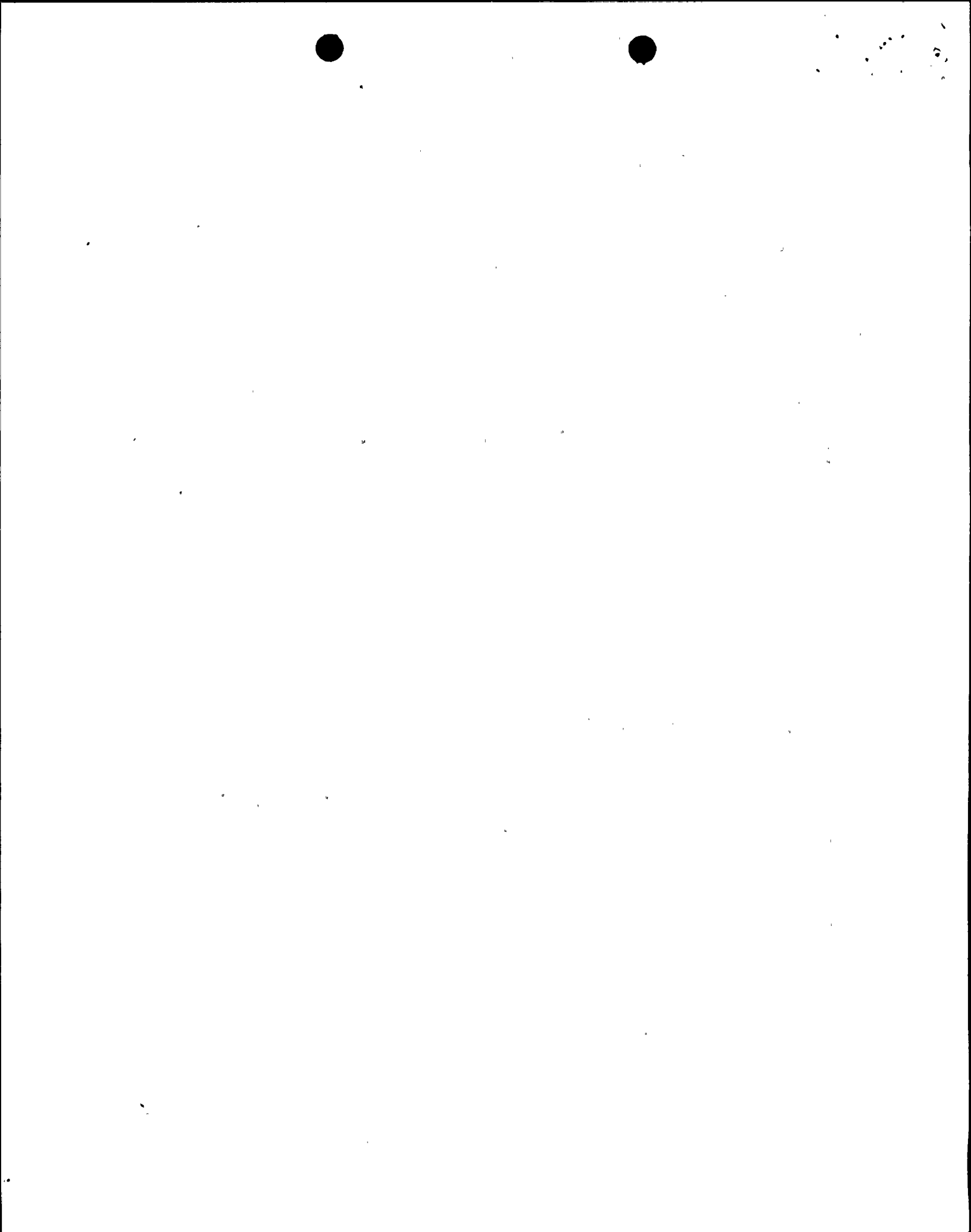
d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

SURVEILLANCE REQUIREMENT

2. The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall be performed in accordance with the staff positions on schedule, methods, personnel and sample expansion included in this generic letter.

b. Inservice Testing

1. Inservice testing of Quality Group A, B and C pumps and valves shall be performed in accordance with the requirements for ASME Code Class 1, 2 and 3 components contained in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a(g), except where relief has been granted by the Commission pursuant to 10CFR Part 50, Section 50.55a(g)(6)(i).



BASES FOR 3.2.6 AND 4.2.6 INSERVICE INSPECTION AND TESTING

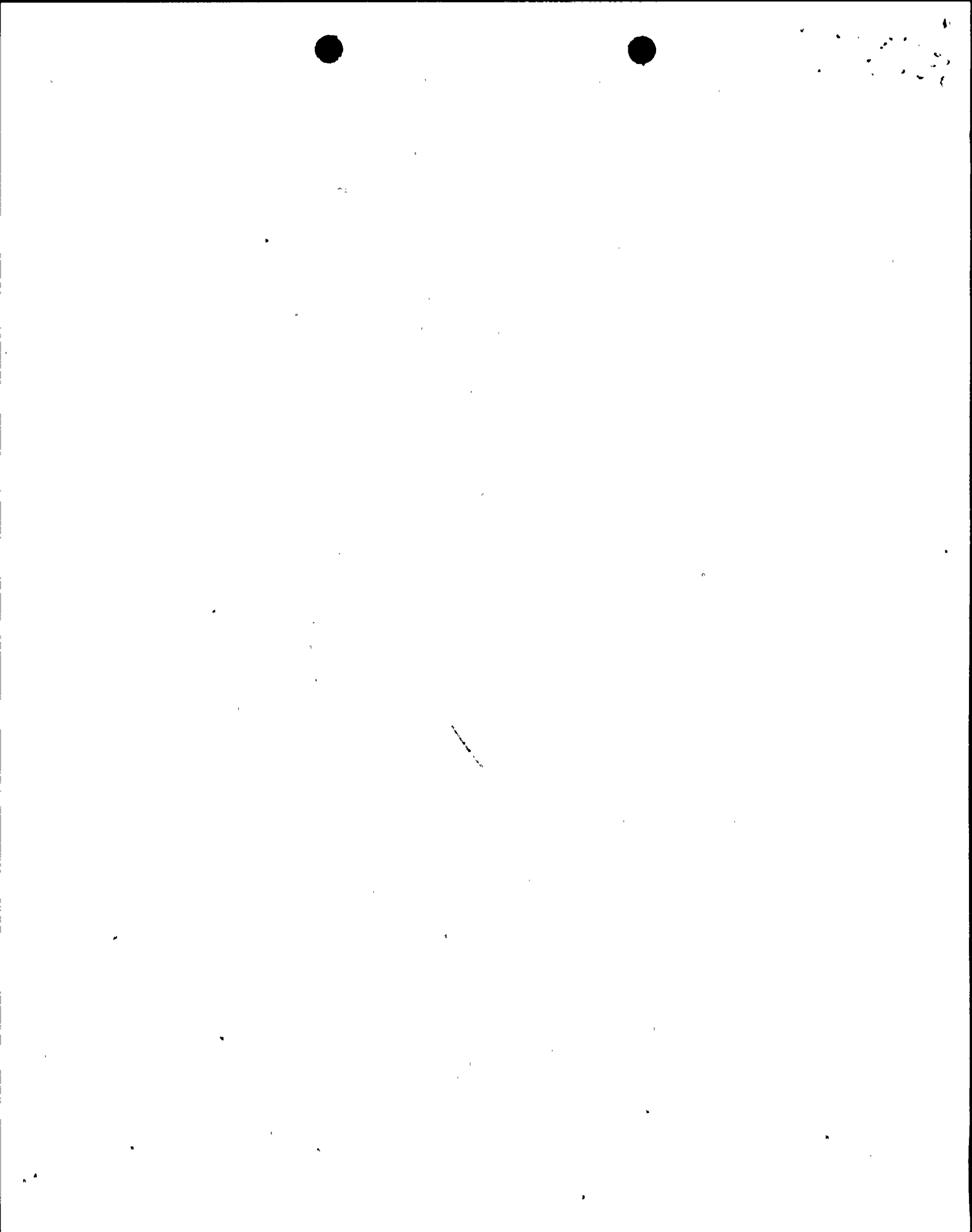
The inservice inspection and testing programs⁽¹⁾⁽²⁾ for the Nine Mile Point Unit 1 plant conform to the requirements of 10CFR50, Section 50.55a(g). Where practical, the inspection of components, pumps and valves classified into NRC Quality Groups A, B and C conforms to the requirements of ASME Code Class 1, 2 and 3 components, pumps and valves, respectively, contained in Section XI of the ASME Boiler and Pressure Vessel Code. If a Code required inspection is impractical for the Nine Mile Point Unit 1 facility, a request for relief from that requirement is submitted to the Commission in accordance with 10CFR50, Section 50.55a(g)(6)(i).

Request for relief from the requirements of Section XI of the ASME Code and applicable Addenda will be submitted to the Commission prior to the beginning of each 10-year inspection interval if they are known to be required at the time. Requests for relief which are identified during the course of inspection will be submitted quarterly throughout the inspection interval.

The inservice inspection program for piping conforms to the staff positions on schedules, methods, personnel and sample expansion contained in Generic Letter 88-01.⁽³⁾ It is performed in order to detect and survey intergranular stress corrosion cracking of BWR austenitic stainless steel piping that is four inches or larger in nominal diameter and contains reactor coolant at a temperature of 200°F during power operation. Inspections shall be performed by individuals qualified to: (A) the ASME Boiler and Pressure Vessel Code, Section XI, and (B) Ultrasonic Testing Operator Training for the Detection of Intergranular Stress Corrosion Cracking developed by the EPRI Non-Destructive Examination Center. As an alternate, Niagara Mohawk may use other qualification programs approved by the NRC.

References

- (1) Letter from the Nuclear Regulatory Commission (D. B. Vassallo) to Niagara Mohawk Power Corporation (G. K. Rhode), dated September 19, 1983.
- (2) Letter from Niagara Mohawk Power Corporation (D. P. Dise) to the Nuclear Regulatory Commission (T. A. Ippolito), dated August 7, 1981.
- (3) Generic Letter 88-01 endorses NUREG 0313 Revision 2, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," dated January 1988.



ATTACHMENT B

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Supporting Information and No Significant Hazards Considerations Analysis

The proposed Technical Specification submittal revises Technical Specifications 3.2.6 and 4.2.6, Inservice Inspection and Testing, to incorporate the requirements of Generic Letter 88-01. To the extent practical, the wording of the Standard Technical Specifications promulgated with the generic letter has been used in this Technical Specification change request. However, the format of the Unit 1 Technical Specifications is different than the format of the standard Technical Specifications. Consequently, incorporation of the exact wording of the standard is not possible.

The limits on reactor coolant system leakage required by Generic Letter 88-01 were previously added to Section 3.2.5 of the Technical Specifications in response to Generic Letter 84-11 (Amendment 70, dated February 27, 1988).

At the time a licensee requests an amendment, 10CFR50.91 requires the licensee to 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.

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 proposed amendment incorporates the recommendations of NUREG 0313 Revision 2, "Technical Report on Material Selection and Process Guidelines for BWR Coolant Pressure Boundary Piping," as promulgated by Generic Letter 88-01. Niagara Mohawk has been complying with the requirements of NUREG 0313 Revision 1 since 1979. Since these inspection programs are not a factor in calculating accident probabilities or consequences, incorporating this later revision of NUREG 0313 has no affect on the probability or consequences of an accident previously evaluated.

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 examinations required by the Inservice Inspection Program are normally performed during refueling and maintenance outages. These examinations are designed to detect service generated defects. Since these examinations do not affect the operation of plant equipment, no increase in the probability or consequences of an accident will result from the proposed changes.



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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 proposed changes incorporate the requirements of NUREG 0313 Revision 2 as promulgated by Generic Letter 88-01 for the inspection of austenitic BWR stainless steel piping. The new requirements imposed by Generic Letter 88-01 provide an increase in the level of safety by requiring augmented inspections of all austenitic materials. However, no credit is assumed in the calculation of the safety margin for inservice inspection. Therefore, there will be no reduction in the margin of safety.

As determined by the analysis above, this proposed amendment involves no significant hazards considerations.

