



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 109 TO FACILITY OPERATING LICENSE NO. DPR-63  
NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT NUCLEAR STATION, UNIT NO. 1  
DOCKET NO. 50-220

1.0 INTRODUCTION

By letter dated April 25, 1989, as amended by letter dated June 16, 1989, the Niagara Mohawk Power Corporation (the licensee) proposed changes to the Technical Specifications (TS) for Nine Mile Point Unit 1 (NMP1). The proposed changes would modify specifications having cycle-specific parameter limits by replacing the values of those limits with a reference to the Core Operating Limits Report (COLR) for the values of those limits. The proposed changes also include the addition of the COLR to the Definitions section and to the reporting requirements of the Administrative Controls section of TS. Guidance on the proposed changes was developed by NRC on the basis of the review of a lead-plant proposal submitted on the Oconee plant docket by Duke Power Company. This guidance was provided to all power licensees and applicants by Generic Letter 88-16, dated October 4, 1988. The licensee's June 16, 1989 submittal amended the April 25, 1989 submittal. However, the changes did not change the intent of the original submittal and were more conservative. Specifically revisions to page 11 and 64 were deleted because changes to the Linear Heat Generation Rate (LHGR) parameters were not included in Generic Letter 88-16. Therefore, the current Specification remains in place. In addition, the submittal made editorial changes to include the words "latest approved revision" for referenced documents. This clarifies that only NRC approved documents are used. Section 6.9.1.f was also reformatted. In addition, the words "its supplements and revisions" were deleted from the definition of the Core Operating Limits Report. Because the June 16, 1989 changes did not change the intent of the original submittal, and were made only to clarify the intent, and did not alter the staff's initial determination, the action was not noticed in the Federal Register.

2.0 EVALUATION

The licensee's proposed changes to the TS are in accordance with the guidance provided by Generic Letter 88-16 and are addressed below.

- (1) The Definition section of the TS was modified to include a definition of the Core Operating Limits Report that requires cycle/reload-specific parameter limits to be established on a unit-specific basis in accordance with an NRC approved methodology that maintains the limits of the safety analysis. The definition notes that plant operation within these limits is addressed by individual specifications.

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- (2) The following specifications were revised to replace the values of cycle-specific parameter limits with a reference to the COLR that provides these limits.
- (a) Specification 3.1.7.a - Average Planar Linear Heat Generation Rate (APLHGR)  
  
The average planar linear heat generation rate limits are provided in the COLR for the different fuel types.
  - (b) Specification 3.1.7.c - Minimum Critical Power Ratio (MCPR)  
  
The  $K_f$  factors and MCPRs are provided in the COLR.
  - (c) Specification 3.1.7.e - Partial Loop Operation  
  
Average planar linear heat generation rates for partial loop operation are provided in the COLR.  
  
The MCPR for three loop operation is adjusted as discussed in the COLR.
- (3) Specification 6.9.1.f was added to the reporting requirements of the Administrative Controls section of the TS. This specification requires that the COLR be submitted, upon issuance, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector. The report provides the values of cycle-specific parameter limits that are applicable for the current fuel cycle. Furthermore, these specifications require that the values of these limits be established using NRC approved methodology and be consistent with all applicable limits of the safety analysis. The approved methodologies are the following:
- (a) NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel" (latest approved version).
  - (b) NEDE-30966-P-A, Volumes I and II, "SAFER Model for Evaluation of Loss-of-Coolant Accidents for Jet Pump and Non-Jet Pump plants" (latest approved version).
  - (c) NEDO-20556-P-A, "General Electric Company Analytical Model for Loss-of-Coolant Accident Analysis in Accordance with 10 CFR 50 Appendix K" (latest approved version).

Finally, the specification requires that all changes in cycle-specific parameter limits be documented in the COLR before each reload cycle or remaining part of a reload cycle and submitted upon issuance to NRC, prior to operation with the new parameter limits.



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On the basis of the review of the above items, the NRC staff concludes that the licensee provided an acceptable response to those items as addressed in the NRC guidance in Generic Letter 88-16 on modifying cycle-specific parameter limits in TS. Because plant operation continues to be limited in accordance with the values of cycle-specific parameter limits that are established using an NRC approved methodology, the NRC staff concludes that this change is administrative in nature and there is no impact on plant safety as a consequence. Accordingly, the staff finds that the proposed changes are acceptable.

### 3.0 SUMMARY

We have reviewed the request by the Niagra Mohawk Power Company to modify the Technical Specifications of the Nine Mile Point Unit 1 plant that would remove the specific values of some cycle-dependent parameters from the specifications and place the values in a Core Operating Limits Report that would be referenced by the Specification. Based on this review, we conclude that these Technical Specification modifications are acceptable.

### ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of the facility components located within the restricted areas as defined in 10 CFR 20. The staff has determined that this amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Sec 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: August 21, 1989

PRINCIPAL CONTRIBUTOR: D. Fieno



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