

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. DPR-63
DOCKET NO. 50-220

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

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1.12 Reactor Building Integrity

Reactor Building Integrity means that the Reactor Building is closed and the following conditions are met:

- a. At least one door at each access opening is closed.
- b. The standby gas treatment system is operable.
- c. All Reactor Building ventilation system automatic isolation valves are operable or are secured in the closed position.

1.13 Core Alteration

A core alteration is the addition, removal, relocation, or other manual movement of fuel or controls in the reactor core. Control rod movement with the control rod drive hydraulic system is not considered to be a core alteration.

1.14 Rated Flux

Rated flux is the neutron flux that corresponds to a steady-state power level of 1850 thermal megawatts. The use of the term 100 percent also refers to the 1850 thermal megawatt power level.

1.15 Surveillance

Surveillance means that process whereby systems and components which are essential to plant nuclear safety during all modes of operation or which are necessary to prevent or mitigate the consequences of incidents are checked, tested, calibrated and/or inspected, as warranted, to verify performance and availability at optimum intervals. Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.



Attachment 8

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SUPPORTING INFORMATION AND NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

Discussion

Definition 1.15, "Surveillance", of the Nine Mile Point Unit 1 Technical Specifications permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. Definition 1.15 also limits extending surveillance so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

Experience has shown that the refueling surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. Also, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the Commission concluded that removal of the 3.25 limit will have an overall positive impact on safety.



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Definition 1.15, "Surveillance", of the Nine Mile Point Unit 1 (NMP1) Technical Specifications also permits surveillance intervals to be adjusted minus 25 percent of the specified interval. Reference to the "minus 25 percent adjustment" will be deleted. This is an administrative change which will revise NMP1's definition of "Surveillance" to meet the guidelines provided in Generic Letter 89-14.

Proposed Technical Specification Changes

Niagara Mohawk proposes to change Technical Specification Definition 1.15 "Surveillance". The proposed change will 1) delete reference to the 3.25 limit on extending surveillance intervals, 2) delete reference to the "minus 25 percent adjustment" and 3) add the statement from Generic Letter 89-14 concerning surveillance requirements.

Nine Mile Point Unit 1 can be safely operated with the incorporation of the changes in the proposed amendment. 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 1, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes do not involve a significant increase in the probability or consequence of an accident previously evaluated. The removal of the 3.25 limit on extending surveillance intervals does not impact plant design or the operation of plant systems. It is not intended that this provision be routinely used to extend surveillance intervals beyond that specified in Technical Specifications. The provision is intended for use when plant conditions are not suitable for the conduct of surveillances due to safety systems being out-of-service for maintenance or due to other ongoing surveillance activities. In such cases, the safety benefit of extending a surveillance interval up to 25 percent would exceed the risk reduction derived by conforming to the 3.25 limitation. The removal of the "minus 25 percent adjustment" to surveillance intervals does not impact plant design or the operation of plant systems. This is an administrative change which will revise NMP1's definition of "Surveillance" to the guidelines provided in Generic Letter 89-14.

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.

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes introduce no new mode of plant operation nor do they require physical modification to the plant.



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.

Surveillance testing performed in accordance with Definition 1.15 and the maximum 25 percent interval extension criteria will continue to ensure adequate system reliability. Therefore, the proposed amendment will not involve a significant reduction in a margin of safety.

