ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

DOCKET NO. 50-410

Proposed Changes to the License

Replace existing Page 5 of the license with the attached page. This page has been provided with a marginal marking to indicate the change.

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(6) Initial Startup Test Program (Section 14, SER, SSERs 4 and 5)

Any changes to the Initial Test Program described in Section 14 of the Final Safety Analysis Report made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

(7) Operation with Reduced Feedwater Temperature (Section 15.1, SSER 4)

Niagara Mohawk Power Corporation shall not operate the facility with reduced feedwater temperature for the purpose of extending the normal fuel cycle. The facility shall not be operated with a feedwater heating capacity less than that required to produce a feedwater temperature of 400°F at rated steady-state conditions unless analyses supporting such operations are submitted by Niagara Mohawk Power Corporation and approved by the staff.

(8) Safety Parameter Display System (SPDS) (Section 18.2, SSERs 3 and 5)

Prior to startup following the first refueling outage, Niagara Mohawk Power Corporation shall have operational an SPDS that includes the revisions described in their letter of November 19, 1985. Before declaring the SPDS operational, the licensee shall complete testing adequate to ensure that no safety concerns exist regarding the operation of the Nine Mile Point Nuclear Station, Unit No. 2 SPDS.

D. The facility requires exemptions from certain requirements of 10 CFR Part 50 and 10 CFR Part 70.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

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Supporting Information and No Significant Hazards Consideration Analysis

Item I.D.1, "Control Room Design Reviews," of Task I.D., "Control Room Design," of the NRC Action Plan (NUREG-0660) developed as a result of the accident at Three Mile Island, Unit 2, states that licensees and applicants for operating licenses will be required to perform a Detailed Control Room Design Review (DCRDR) to identify and correct design deficiencies. The objective, as stated in NUREG-0660, is to improve the ability of nuclear power plant control room operators to prevent or cope with accidents if they occur by improving the information provided to them. Supplement 1 to NUREG-0737 confirmed and clarified the DCRDR requirement in NUREG-0660. As a result of Supplement 1 to NUREG-0737, each applicant of a license is required to conduct a DCRDR on a schedule negotiated with the NRC staff.

As a result of the previously identified requirements, various submittals were made to NRR to support a DCRDR consistent with the requirements stipulated in Item I.D.1 of NUREG-0660. As a result of NMPC submittals and corresponding NRC SER's, the NMP2 license was conditioned to read as follows (license condition 2.C(9)):

(9) Detailed Control Room Design Review (Section 18.1, SSERs 5 and 6)

(a) Niagara Mohawk Power Corporation shall implement the activities remaining to complete the Detailed Control Room Design Review and correct all human engineering discrepancies (HED's) in accordance with the schedule and commitments in letters from C. V. Mangan (NMPC) to E. G. Adensam (NRC) dated April 14 and June 9, 1986.

(b) Prior to startup following the first refueling outage, Niagara Mohawk Power Corporation shall provide the results of the reevaluation of normally lit and nuisance alarms for NRC review in accordance with its August 21, 1986 letter.

(c) Prior to startup following the first refueling outage, Niagara Mohawk Power Corporation shall complete permanent zone banding of meters in accordance with its August 4, 1986 letter.

License condition 2.C(9) references four letters. These letters identify to the NRC HED's (Human Engineering Discrepancies). Each HED submittal to the NRC is uniquely identified by a number, a description of the discrepancy, an

explanation of the fix, and a schedule of implementation. Any change to the attributes of an HED referenced in these letters would require a license amendment in accordance with 10 CFR 50.90, 50.91 and 50.92. This letter to the NRC proposes a license amendment whereby license condition 2.C(9) is deleted. After deletion of the license condition, changes to these HED's would be addressed in accordance with 10 CFR 50.59 as stipulated by Niagara Mohawk Engineering procedures NEL-415, "10 CFR 50.59 Safety Evaluations - Preparation and Control", and NEL-810, "NMP2 Human Factors Review Program".

Any changes to HED's subsequent to the deletion of the license condition will receive a review in accordance with 10 CFR 50.59.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed license amendment transfers the method of processing HED changes from 10 CFR 50.90, 91 and 92 to 10 CFR 50.59. A safety evaluation written in accordance with 10 CFR 50.59 addresses the same issues as required under 10 CFR 50.90, 91 and 92; therefore, an HED change cannot be made that would result in a significant increase in the probability or consequences of an accident previously evaluated. If a 10CFR50.59 evaluation were to determine that an unreviewed safety question exists, then NRC review and approval would be required.

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

Since a 10CFR50.59 evaluation addresses the same issues as required by 10CFR50.90, 91, and 92, an HED change cannot be made that would create the possibility of a new or different kind of accident from any accident previously evaluated. If a 10CFR50.59 evaluation were to determine that an unreviewed safety question exists, then NRC review and approval would be required.

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

An HED change must be assessed regarding the impact on the margin of safety in accordance with the requirements of 10CFR50.59. If a 10CFR50.59 evaluation were to determine that an unreviewed safety question exists, then NRC review and approval would be required.