

ATTACHMENT A

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

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

Existing pages 4 and 25 will be replaced with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate the changes. A new page, 25a, will be created due to space limitations on page 25.

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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

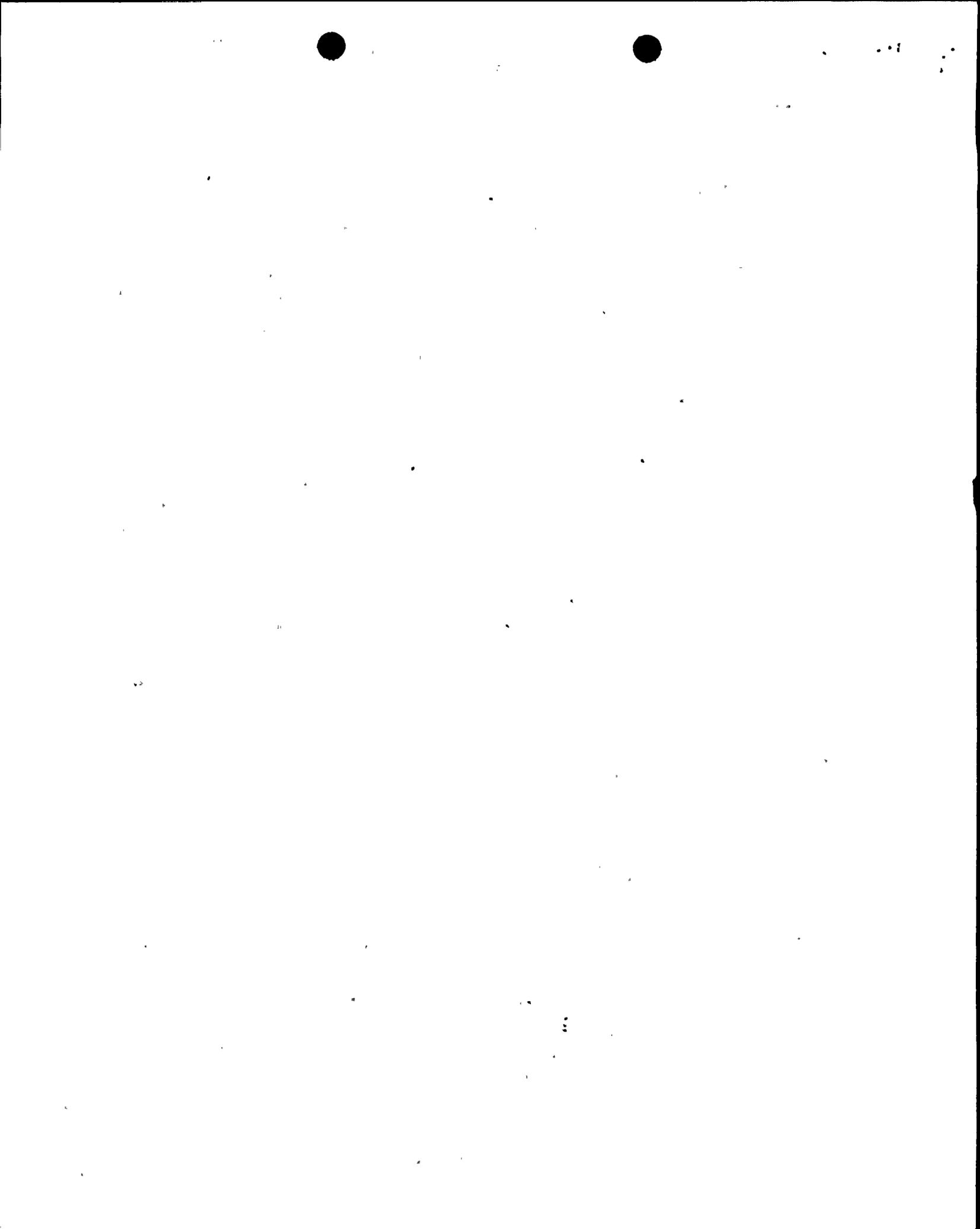
A core alteration is the addition, removal, relocation, or other manual movement of fuel or controls in the reactor core. Control rod movement with the control rod drive hydraulic system is not considered to be a core alteration.

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.



### 3.0 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

#### 3.0.1 OPERABILITY REQUIREMENTS

When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are operable, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in a condition stated in the individual specification.

In the event a Limiting Condition for Operation and/or associated surveillance requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in a condition consistent with the individual specification unless corrective measures are completed that permit operation under the permissible surveillance requirements for the specified time interval as measured from initial discovery or until the reactor is placed in an operational condition in which the specification is not applicable.

#### 3.0.2 SURVEILLANCE REQUIREMENTS

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.

##### BASES

Specification 3.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with a 24 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 3.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.



### 3.1.0 FUEL CLADDING

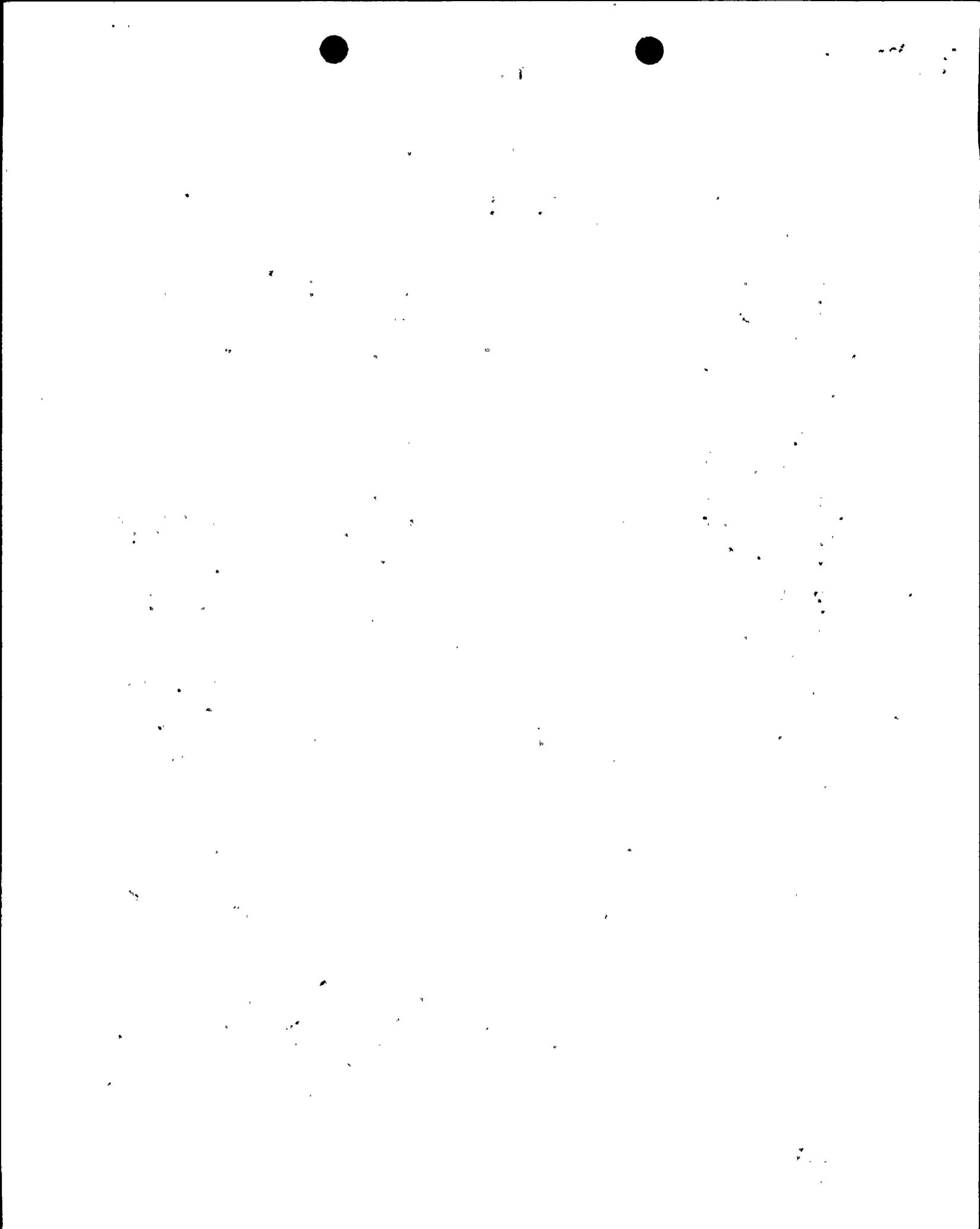
#### A) GENERAL APPLICABILITY

Applies to the power level regulation, control rod system, liquid poison system, emergency cooling system, and core spray system. LCO's for the minimum allowable circuits corresponding to the LS<sub>3</sub> settings are included in the Reactor Protection System LCO (3.6.2).

#### B) GENERAL OBJECTIVE

LIMITING CONDITIONS FOR OPERATION - To define the lowest functional capability or performance level of the systems and associated components which will assure the integrity of the fuel cladding as a barrier against the release of radioactivity.

SURVEILLANCE REQUIREMENTS - To define the tests or inspections required to assure the functional capability or performance level of the required systems or components.



ATTACHMENT B

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SUPPORTING INFORMATION AND NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

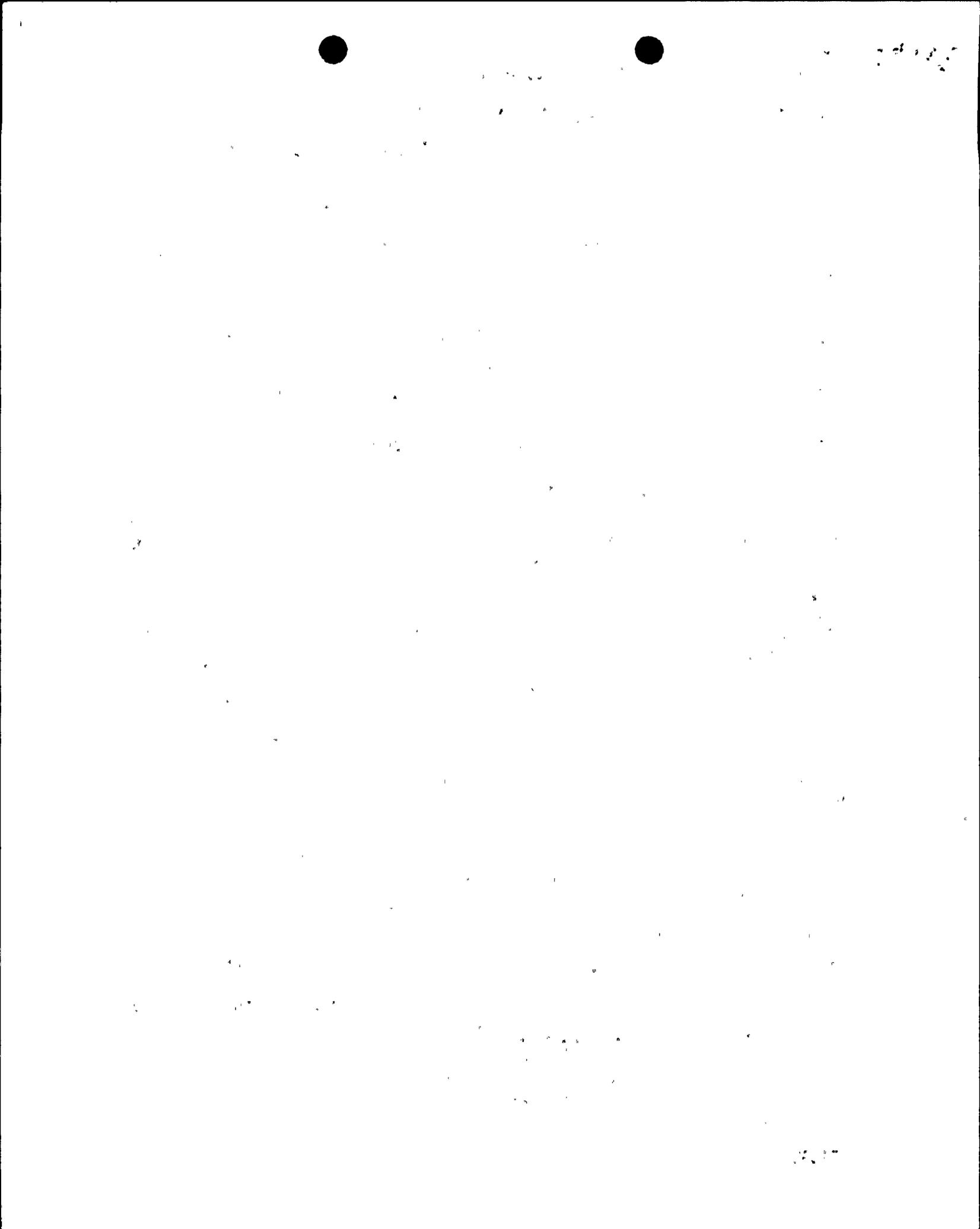
Discussion

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.

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 from the second sentence in Definition 1.15. 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

This Technical Specification Amendment Application proposes to 1) Revise and relocate the second sentence of Definition 1.15 "Surveillance" to a newly created Technical Specification (TS) Section 3.0.2. TS 3.0.2 will delineate the maximum allowable extension to surveillance intervals per the guidelines given in Generic Letter 89-14. This will result in the removal of the "minus 25 percent adjustment" to surveillance intervals. 2) Delete the third sentence of Definition 1.15; 3) add a "BASES" section based on the guidance provided in Generic Letter 89-14 to Section 3.0.2. In addition the section entitled operability requirements on Page 25 has been assigned the number 3.0.1.

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 normal and refuel outage (24 month) 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.

