



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 27 TO FACILITY OPERATING LICENSE NO. NPF-69
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT NO. 2
DOCKET NO. 50-410

1.0 INTRODUCTION

By letter dated June 14, 1988, as supplemented September 29, 1988, and as superseded November 20, 1990, Niagara Mohawk Power Corporation, the licensee, requested an amendment to Facility Operating License No. NPF-69 for Nine Mile Point Nuclear Station, Unit No. 2. The proposed amendment would change the plant Technical Specifications (TSs) based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the Surveillance Requirements of TS 4.0. Specifically, the licensee has requested the following revisions to TSs 4.0.3 and 4.0.4 as follows:

Specification 4.0.3 would be revised to incorporate a 24-hour delay in implementing ACTION requirements due to a missed surveillance when the ACTION requirements provide a restoration time that is less than 24 hours.

Specification 4.0.4 would be revised to clarify that, "This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements."

Additionally, this amendment would update the Bases for TS Sections 3.0 and 4.0 in accordance with the guidance provided in GL 87-09 and make several editorial changes.

2.0 EVALUATION

The changes proposed by the licensee have been reviewed considering the limitations set forth in GL 87-09 for TSs 4.0.3 and 4.0.4 as follows.

Specification 4.0.3

In GL 87-09 the staff stated that it is overly conservative to assume that systems or components are inoperable when a Surveillance Requirement has not been performed, because the vast majority of surveillances demonstrate that systems or components are in fact operable. Because the allowable outage time limits of some ACTION requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

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This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the ACTION requirements are less than this time limit or when shutdown ACTION requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with ACTION requirements before the surveillance can be completed.

This limit does not waive compliance with Specification 4.0.3. Under Specification 4.0.3, the failure to perform a Surveillance Requirement will continue to constitute noncompliance with the OPERABILITY requirements of an LCO and to bring into play the applicable ACTION requirements.

Based on the above, the following change to Specification 4.0.3 is acceptable:

Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours.

Specification 4.0.4

TS 4.0.4 prohibits entry into an OPERATIONAL CONDITION or other specified condition until all required surveillances have been performed. This could cause an interpretation problem when OPERATIONAL CONDITION changes are required in order to comply with ACTION requirements. Specifically, two possible conflicts between TSs 4.0.3 and 4.0.4 could exist. The first conflict arises because TS 4.0.4 prohibits entry into an operational mode or other specified condition when Surveillance Requirements have not been performed within the specified surveillance interval. The proposed modification to resolve this conflict involves the revision to TS 4.0.3 to permit a delay of up to 24 hours in the application of the ACTION requirements, as explained above, and a clarification of TS 4.0.4 to allow passage through or to operational modes as required to comply with ACTION requirements. The second potential conflict between TSs 4.0.3 and 4.0.4 arises because an exception to the requirements of 4.0.4 is allowed when Surveillance Requirements can only be completed after entry into a mode or condition. However, after entry into



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this mode or condition, the requirements of TS 4.0.3 may not be met because the Surveillance Requirements may not have been performed within the allowable surveillance interval.

The licensee proposes to resolve these conflicts by providing the following clarifying statement to TS 4.0.4:

"This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements."

The NRC staff has provided in GL 87-09 a clarification that: (a) it is not the intent of TS 4.0.3 that the ACTION requirements preclude the performance of surveillances allowed under any exception to TS 4.0.4; and (b) that the delay of up to 24 hours in TS 4.0.3 for the applicability of ACTION requirements provides an appropriate time limit for the completion of Surveillance Requirements that become applicable as a consequence of any exception to TS 4.0.4.

Consequently, the NRC staff finds the proposed changes to TS 4.0.4 acceptable.

Bases For Sections 3.0 and 4.0

GL 87-09 provides guidance regarding the Bases applicable to Sections 3.0 and 4.0. The licensee proposed to update the Bases applicable to Sections 3.0 and 4.0 in accordance with this guidance. The staff finds the proposed changes to the Bases for Sections 3.0 and 4.0 acceptable.

Editorial Changes

The following editorial changes have been proposed by the licensee.

Specification 4.3.4.2.1 would reference Table 4.3.4.2-1 instead of Table 4.3.4.2.1-1 to correct an error.

In Table 3.3.7.4-1, Remote Shutdown Monitoring Instrumentation, the word "outlet" would be deleted from 8. and 11. in the instrument column. The remote shutdown panel monitors the service water flow to the RHR heat exchangers, not the outlet flow.

In Table 4.3.7.4-1, Remote Shutdown Monitoring Instrumentation Surveillance Requirements, the word "outlet" would be deleted from 11. in the instrument column. The remote shutdown panel monitors the service water flow to the RHR heat exchangers, not the outlet flow.

In Table 3.6.3-1, Primary Containment Isolation Valves, the valve functions for Isolation Valves 2IAS*EFV203 and 2IAS*EFV205 would be reversed to correct an error.

In Specification 4.7.4. title the spelling of "Isolation" would be corrected.



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In Table 3.8.4.1-1, the listings of equipment powered in Sections 7B, 7E, and 7F were revised to correct errors and to reflect a valve replacement.

In Specification 3.9.2b, "Audible Annunciation" would replace "Audible Indication" to be consistent with boiling water reactor terminology for source range monitoring.

In Table 4.11.1-1, the line between 2.c. and 2.d. would be extended to the left margin to properly delineate the requirements which apply to 2.d.

In Table 4.11.2-1, the word "alert" would be deleted from "alert alarm" in (d) and (g) to reflect the current terminology used for the main stack and reactor/radwaste building radiation monitors.

Specifications 6.5.3.8e and 6.5.3f would refer to "Facility" instead of "Unit" for the emergency plan and the security plan. There is only one emergency plan and one security plan for Nine Mile Point Units 1 and 2.

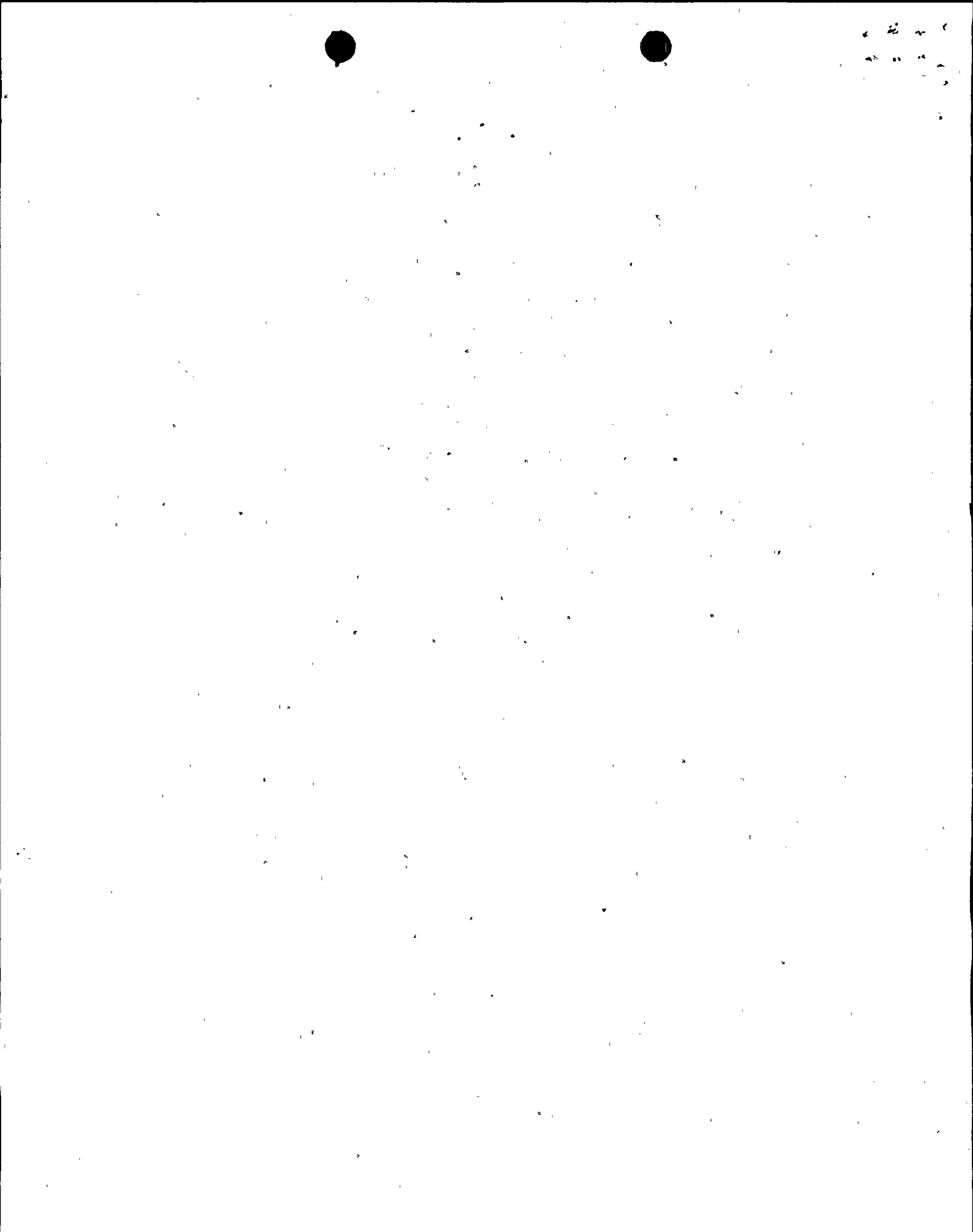
The staff has reviewed the editorial changes discussed above, and has found these changes acceptable.

3.0 SUMMARY

The staff has reviewed the proposed changes to the Technical Specifications and to the Bases and the proposed editorial changes, and finds these changes to be acceptable.

ENVIRONMENTAL CONSIDERATION

This amendment involves a change in a requirement with respect to the installation or use of the facility components located within the restricted areas as defined in 10 CFR Part 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 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 this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: March 12, 1991

PRINCIPAL CONTRIBUTOR:

T. Dunning



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