

ATTACHMENT A
NIAGARA MOHAWK POWER CORPORATION
LICENSE No. DPR-63
DOCKET No. 50-220

Proposed Changes to Technical Specifications

Existing pages 2, 42, 47, 48, 52, 61, 72, 159, 175, and 177 will be replaced with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate the changes. Page 2a has been added to accommodate the verbage added to Page 2.

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1.2 Operable

A system, subsystem, train, component or device shall be operable when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, except as noted in 3.0, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

A verification of operability is an administrative check, by examination of appropriate plant records (logs, surveillance test records) to determine that a system, subsystem, train, component or device is not inoperable. Such verification does not preclude the demonstration (testing) of a given system, subsystem, train, component or device to determine operability.

1.3 Operating

Operating means that a system or component is performing its required functions in its required manner.

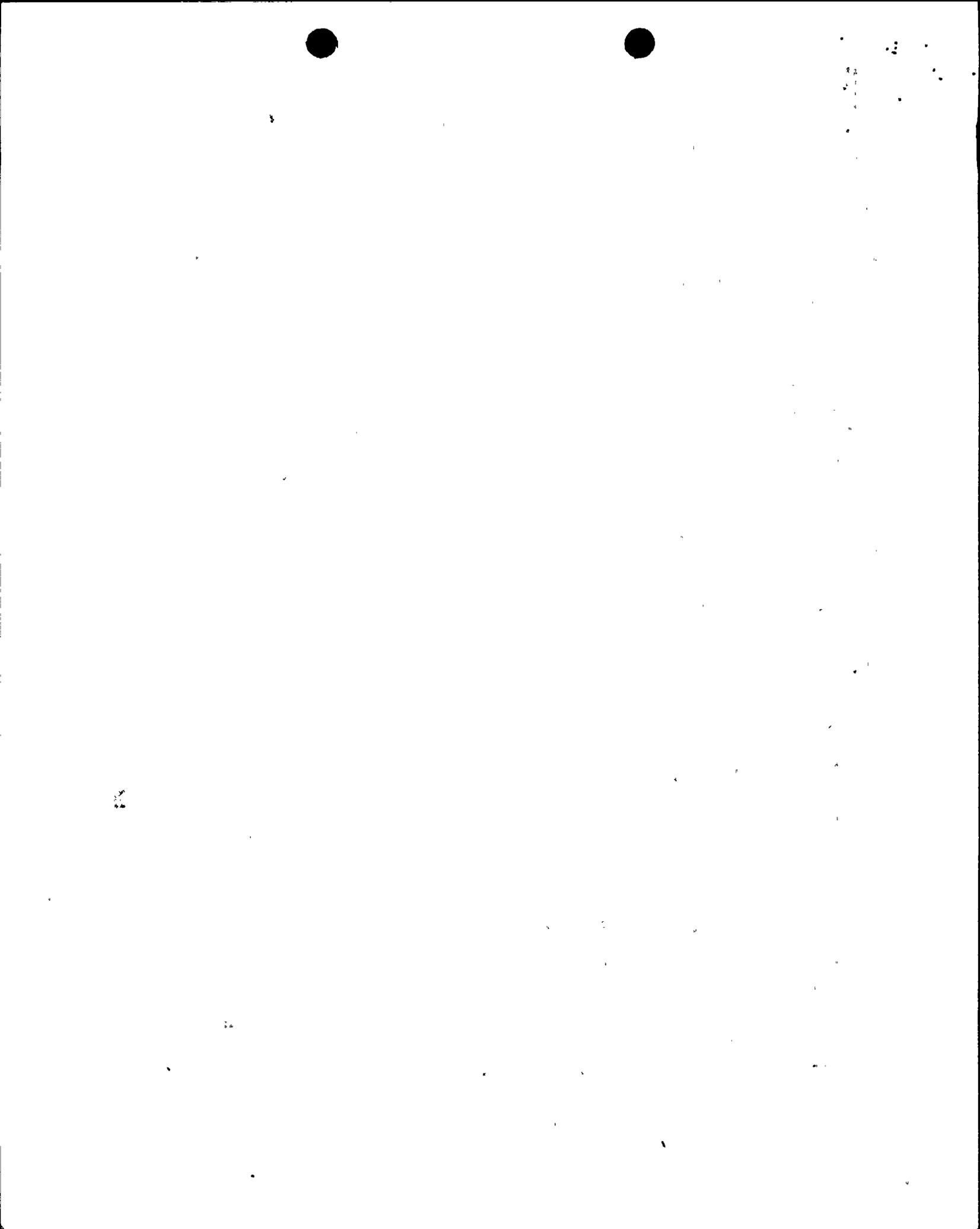
1.4 Protective Instrumentation Logic Definitions

a. Instrument Channel

An instrument channel means an arrangement of a sensor and auxiliary equipment required to generate and transmit to a trip system a single trip signal related to the plant parameter monitored by that instrument channel.

b. Trip System

A trip system means an arrangement of instrument channel trip signals and auxiliary equipment required to initiate action to accomplish a protective trip function. A trip system may require one or more instrument channel trip signals related to one or more plant parameters in order to initiate trip system action. Initiation of protective action may require the tripping of a single trip system or the coincident tripping of two trip systems.

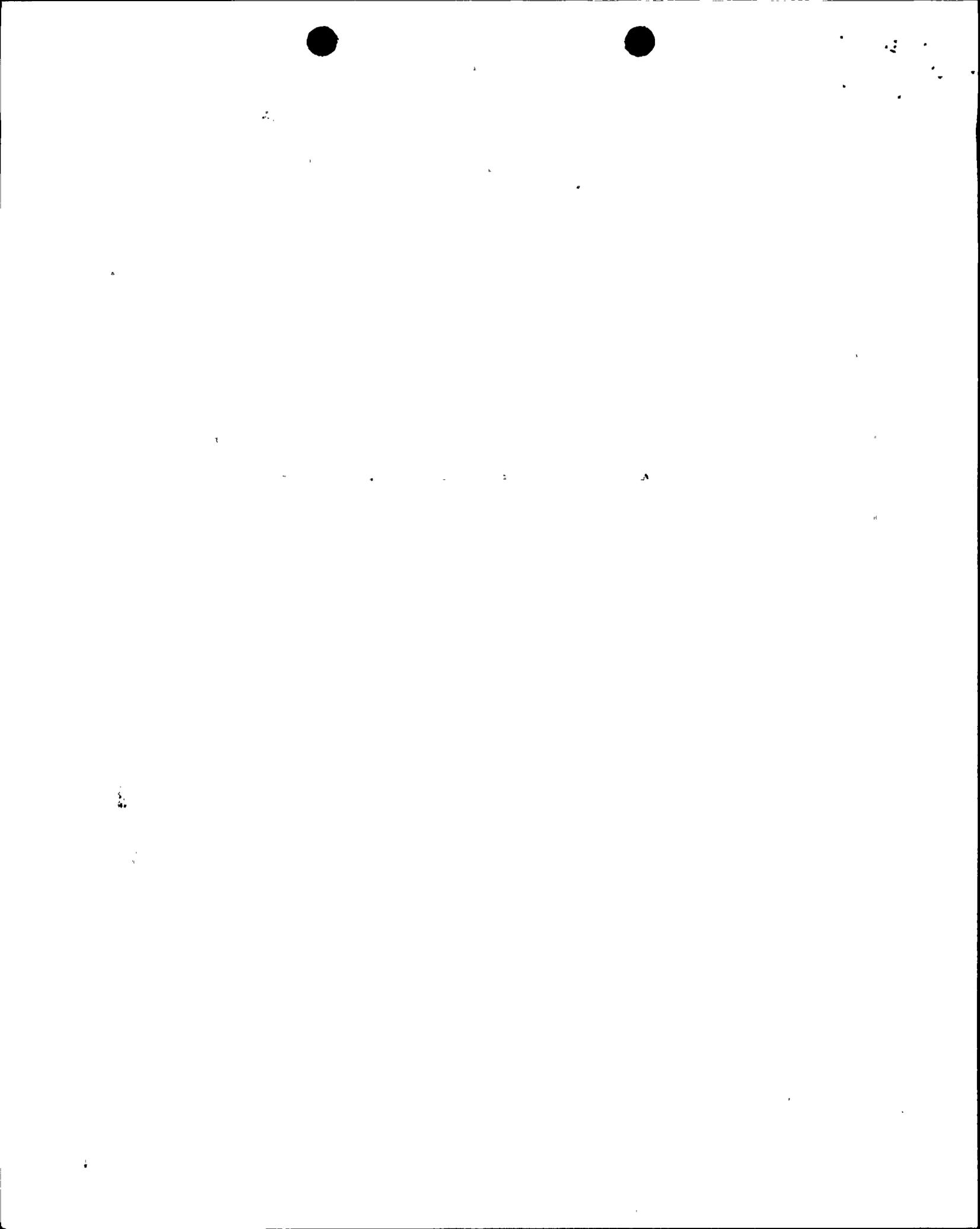


1.5 Sensor Check

A sensor check is a qualitative determination of acceptable operability by observation of sensor behavior during operation. This determination shall include, where possible, comparison of the sensor with other independent sensors measuring the same variable.

1.6 Instrument Channel Test

Instrument channel test means injection of a simulated signal into the channel to verify its proper response including, where applicable, alarm and/or trip initiating action.



LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

- (3) At least once per day -

The solution temperature shall be checked.

- (4) At least once per operating cycle

Verify enrichment by analysis.

- c. Surveillance with Inoperable Components

When a component becomes inoperable its redundant component shall be verified to be operable immediately and daily thereafter.



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3.1.3 EMERGENCY COOLING SYSTEM

Applicability:

Applies to the operating status of the emergency cooling system.

Objective:

To assure the capability of the emergency cooling system to cool the reactor coolant in the event the normal reactor heat sink is not available.

Specification:

- a. During power operating conditions and whenever the reactor coolant temperature is greater than 212°F except for hydrostatic testing with the reactor not critical, both emergency cooling systems shall be operable except as specified in 3.1.3.b.
- b. If one emergency cooling system becomes inoperable, Specification 3.1.3.a shall be considered fulfilled, provided that the inoperable system is returned to an operable condition within 7 days and the additional surveillance required in 4.1.3.f is performed.

4.1.3 EMERGENCY COOLING SYSTEM

Applicability:

Applies to periodic testing requirements for the emergency cooling system.

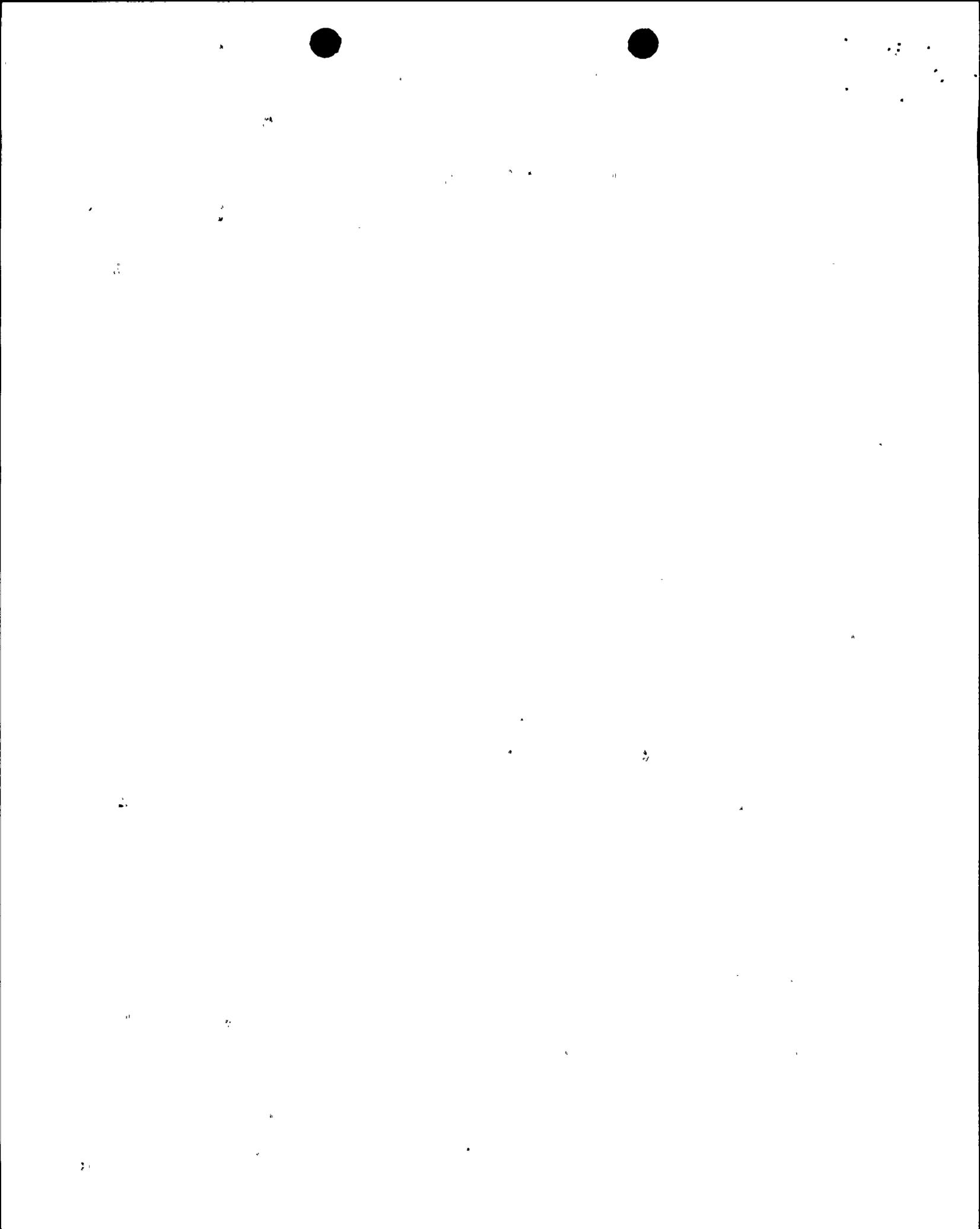
Objective:

To assure the capability of the emergency cooling system for cooling of the reactor coolant.

Specification:

The emergency cooling system surveillance shall be performed as indicated below:

- a. At least once every five years -
The system heat removal capability shall be determined.
- b. At least once daily -
The shell side water level and makeup tank water level shall be checked.
- c. At least once per month -
The makeup tank level control valve shall be manually opened and closed.



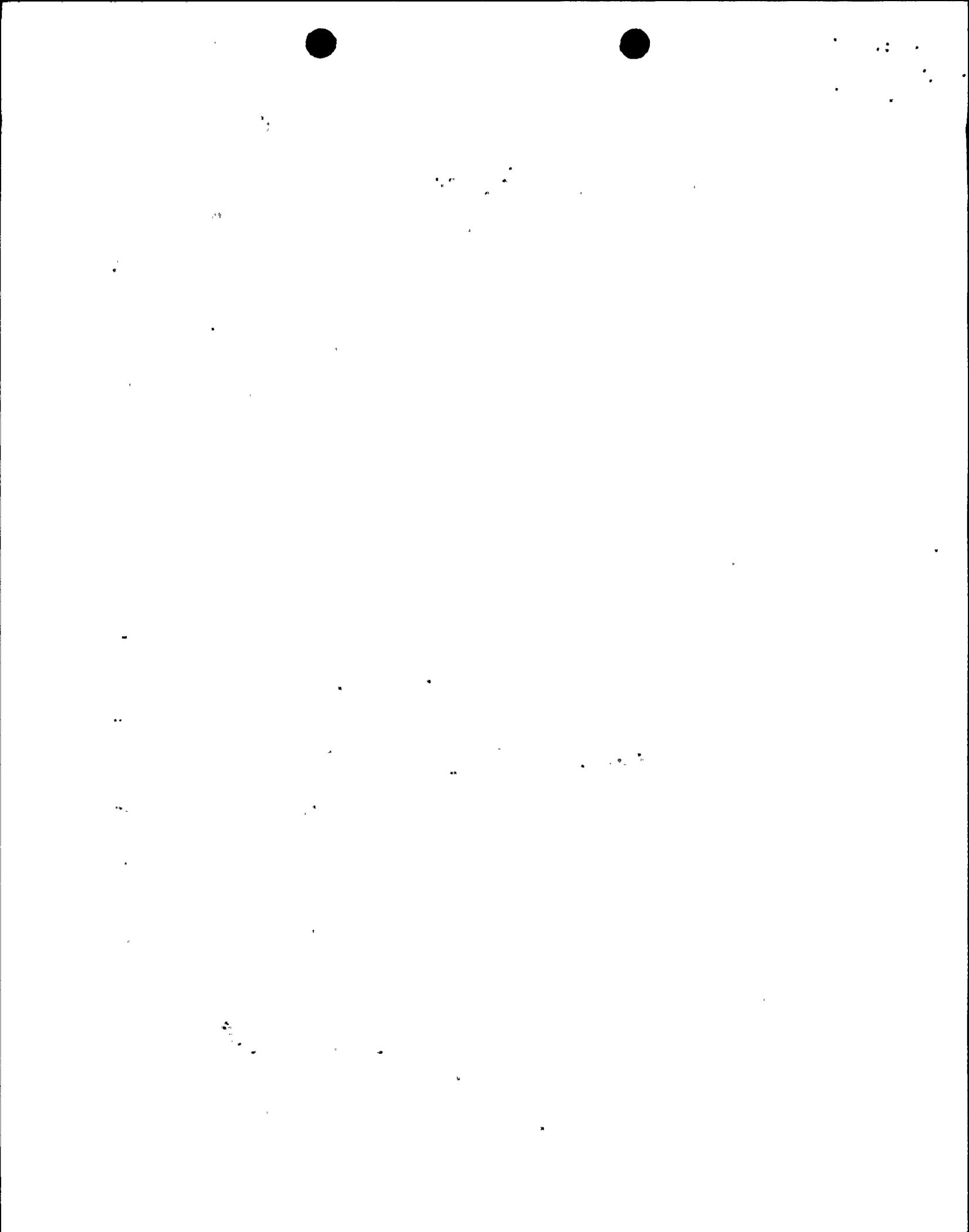
LIMITING CONDITION FOR OPERATION

- | c. Make up water shall be available from the two gravity feed makeup Water tanks.
- | d. During Power Operating Conditions, each emergency cooling system high point vent to torus shall be operable.
 - 1. With a vent path for one emergency cooling system inoperable, restore the vent path to an operable condition within 30 days.
 - 2. With vent paths for both emergency cooling systems inoperable, restore one vent path to an operable condition with 14 days and both vent paths within 30 days.
- | e. If Specification 3.1.3.a, b, c, or d are not met, a normal orderly shutdown shall be initiated with one hour, and the reactor shall be in the cold shutdown conditions within ten hours.

SURVEILLANCE REQUIREMENT

- d. At least once each shift -
The area temperature shall be checked.
- e. During each major refueling outage -
Automatic actuation and functional system testing shall be performed during each major refueling outage and whenever major repairs are completed on the system.

Each emergency cooling vent path shall be demonstrated operable by cycling each power-operated valve (05-01R, 05-11, 05-12, 05-04R, 05-05 and 05-07) in the vent path through one complete cycle of full travel and verifying that all manual valves are in the oper position.
- f. Surveillance with an Inoperable System -
When one of the emergency cooling systems is inoperable, the level control valve and the motor-operated isolation valve in the operable system shall be verified to be operable immediately and daily thereafter.



LIMITING CONDITION FOR OPERATION

- d. If Specifications a, b and c are not met, a normal orderly shutdown shall be initiated within one hour and the reactor shall be in the cold shutdown condition within ten hours.
- e. During reactor operation, except during core spray system surveillance testing, core spray isolation valves 40-02 and 40-12 shall be in the open position and the associated valve motor starter circuit breakers for these valves shall be locked in the off position. In addition, redundant valve position indication shall be available in the control room.
- f. Whenever irradiated fuel is in the reactor vessel and the reactor coolant temperature is less than or equal to 212°F, two core spray subsystems shall be operable except as specified in g and h below.
- g. If one of the above required subsystems becomes inoperable, restore at least two subsystems to an operable status within 4 hours or suspend all operations that have a potential for draining the reactor vessel.

SURVEILLANCE REQUIREMENT

- d. Core spray header ΔP instrumentation
 - check Once/day
 - calibrate Once/3 months
 - test Once/3 months
- e. Surveillance with Inoperable Components

When a component becomes inoperable its redundant component or system shall be verified to be operable immediately and daily thereafter.
- f. With a core spray subsystem suction from the CST, CST level shall be checked once per day.
- g. At least once per month when the reactor coolant temperature is greater than 212°F, verify that the piping system between valves 40-03, 13 and 40-01, 09, 10, 11 is filled with water.



LIMITING CONDITION FOR OPERATION

- b. If a redundant component becomes inoperable, the control rod drive pump coolant injection system shall be considered operable provided that the component is returned to an operable condition within 7 days and the additional surveillance required is performed.
- c. If Specifications "a" or "b" above are not met, the reactor coolant temperature shall be reduced to 212°F or less within ten hours.

SURVEILLANCE REQUIREMENT

- b. At least once per quarter -

Pump flow rate shall be determined.

- c. Surveillance with Inoperable Components

When a component becomes inoperable its redundant component shall be verified to be operable immediately and daily thereafter.



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LIMITING CONDITION FOR OPERATION

- c. If Specification "a" and "b" are not met, a normal orderly shutdown shall be initiated within one hour and reactor coolant pressure and temperature shall be reduced to less than 110 psig and saturation temperature within 24 hours.

SURVEILLANCE REQUIREMENT

- c. Surveillance with Inoperable Components

When a component becomes inoperable its redundant component shall be verified to be operable immediately and daily thereafter.



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LIMITING CONDITION FOR OPERATION

- c. If a redundant component in each of the containment spray systems or their associated raw water systems become inoperable, both systems shall be considered operable provided that the component is returned to an operable condition within 7 days and that the additional surveillance required is performed.
- d. If a containment spray system or its associated raw water system becomes inoperable and all the components are operable in the other systems, the reactor may remain in operation for a period not to exceed 7 days.
- e. If Specifications "a" or "b" are not met, shutdown shall begin within one hour and the reactor coolant shall be below 215°F within ten hours.

If both containment spray systems become inoperable the reactor shall be in the cold shutdown condition within ten hours and no work shall be performed on the reactor which could result in lowering the reactor water level to more than six feet, three inches (-10 inches indicator scale) below minimum normal water level (Elevation 302'9").

SURVEILLANCE REQUIREMENT

c. Raw Water Cooling Pumps

At least once per quarter manual startup and operability of the raw water cooling pumps shall be demonstrated.

d. Surveillance with Inoperable Components

When a component or system becomes inoperable its redundant component or system shall be verified to be operable immediately and daily thereafter.



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LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

- g. At least once per operating cycle, not to exceed 24 months, automatic initiation of each branch of the emergency ventilation system shall be demonstrated.
- h. At least once per operating cycle, not to exceed 24 months, manual operability of the bypass valve for filter cooling shall be demonstrated.
- i. When one circuit of the emergency ventilation system becomes inoperable all active components in the other emergency ventilation circuit shall be verified to be operable within two hours and daily thereafter.



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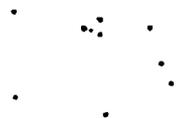
The replacement charcoal for the adsorber tray removed for the test should meet the same adsorbent quality. Any HEPA filters found defective shall be replaced with filters qualified pursuant to ANSI 509-1980.

All elements of the heater should be demonstrated to be functional and operable during the test of heater capacity. Operation of the inlet heater will prevent moisture buildup in the filters and adsorber system.

With doors closed and fan in operation, DOP aerosol shall be sprayed externally along the full linear periphery of each respective door to check the gasket seal. Any detection of DOP in the fan exhaust shall be considered an unacceptable test result and the gaskets repairs and test repeated.

If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign material, the same tests and sample analysis shall be performed as required for operational use. The determination of significant shall be made by the operator on duty at the time of the incident. Knowledgeable staff members should be consulted prior to making this determination.

Demonstration of the automatic initiation capability and operability of filter cooling is necessary to assure system performance capability. If one emergency ventilation system is inoperable, the other system must be verified to be operable daily. This substantiates the availability of the operable system and thus reactor operation or refueling operation may continue during this period.



ATTACHMENT B
NIAGARA MOHAWK POWER CORPORATION
LICENSE No. DPR-63
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Supporting Information and No Significant Hazards Consideration Analysis

Proposed Technical Specification Changes

Niagara Mohawk proposes to change the Nine Mile Point Unit 1 Technical Specifications that require excessive testing of a system or subsystem when its redundant system or subsystem is inoperable. Specifically, Niagara Mohawk proposes to revise Technical Specification Surveillance Requirements 4.1.2.c (Liquid Poison System), 4.1.3.f (second paragraph) (Emergency Cooling System), 4.1.4.e (Core Spray System), 4.1.6.c (Control Rod Drive Pump Coolant Injection), 4.1.8.c (High Pressure Coolant Injection), 4.3.7.d (Containment Spray System) and 4.4.4.i (Emergency Ventilation System). The above Technical Specification surveillance requirements currently state, in general, that when a component or system becomes inoperable, its redundant component or system shall be demonstrated operable immediately and daily thereafter. Niagara Mohawk proposes to require that the operability of redundant equipment be verified instead of demonstrated. To verify operability, an administrative check would be performed, by examination of appropriate plant records (e.g. appropriate surveillance tests, temporary modification logs, equipment tagging records, operating logs, and shift turnover records). Definition 1.2 has been revised to delineate the actions to verify the operability of a system/component.

In addition Niagara Mohawk proposes to make the following administrative changes:

- 1) delete Technical Specification 4.3.7.e which requires checks be made to assure the "conditions listed in 3.3.7.f are met". Technical Specification 3.3.7.f was deleted by Amendment No. 105 which was issued on May 16, 1989. Therefore 4.3.7.e is not applicable and will be deleted
- 2) revise 3.3.7.e to delete the reference made to 3.3.7.f for the reasons provided above
- 3) delete Technical Specification 3.1.3.b, the first paragraph of 4.1.3.f, and revise Technical Specifications 4.1.3.f (second paragraph) and 3.1.3.c. 3.1.3.b and 4.1.3.f (first paragraph) were applicable to Cycle 8 only and, therefore, will be deleted. 3.1.3.c and 4.1.3.f



(second paragraph) refer to Cycle 9 and will be revised to reflect that these sections are no longer cycle dependent

- 4) the Bases for 3.4.4 have been revised to reflect the change to the "additional surveillance" requirements.

Background

Nine Mile Point Unit 1 Technical Specifications currently require a redundant system/component to be demonstrated operable (tested) immediately and daily thereafter when a system/component is declared inoperable. This Technical Specification amendment is being proposed to remove these excessive system testing requirements while maintaining adequate assurance of the operability of systems needed for accident mitigation. The present redundant system testing requirements were designed to be conservative at a time when there was a lack of plant operating history and an insufficient equipment failure data base to select other testing frequencies. Industry operating experience has demonstrated that multiple testing of these systems when one system is inoperable is not necessary to provide adequate assurance of system operability. Recent Boiling Water Reactor (BWR) Technical Specifications accept system operability based on satisfactory performance of monthly, quarterly, refueling interval, post maintenance or other specified performance tests without requiring additional testing when another system is inoperable. Instead, redundant systems will be verified operable by examining appropriate plant records.

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 present testing requirements for the liquid poison, core spray, control rod drive pump coolant injection, HPCI, containment spray, emergency cooling, and emergency ventilation systems requires when a component or system becomes inoperable, its redundant component or system shall be demonstrated operable immediately and daily thereafter. This represents requirements beyond those necessary to adequately demonstrate system operability. Other testing requirements in place not affected by this proposed amendment provide adequate assurance that remaining redundant systems are operable and capable of performing their design function. Verifying the operability of redundant



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systems/components are administrative checks that will assure their availability. The proposed deletion of multiple system testing will conform NMP1 to current BWR plant operating practices. Because changing testing requirements will not change the probability of accident precursors, this proposed amendment does not affect the probability of an accident previously evaluated. The proposed amendment does not involve a significant increase in the consequences of an accident previously evaluated because normal surveillance testing ensures that the operability for the above systems is maintained.

Furthermore, the removal of the additional surveillance testing from the technical specifications would decrease the probability of equipment failure because the excessive testing causes unnecessary wear on the safety related equipment and unnecessary challenges to the safety systems. Also, the probability of human error will decrease as a result of removing the excessive testing. The potential misdirection of the operators' attention from monitoring and directing plant operations becomes less probable if this testing is not performed. Removing the excessive scope and frequency of surveillance testing, many of which are required on a daily basis during LCO's, will actually decrease the probability of equipment failure which could require plant shutdown.

Changes/Deletions were made to 3.1.3 and 4.1.3 to remove references to Fuel Cycle 8 and Fuel Cycle 9. NMP1 is currently in Fuel Cycle 11, making these references inapplicable. 4.3.7.e requires checks be made to assure the "conditions listed in 3.3.7.f are met". Technical Specification 3.3.7.f was deleted by Amendment No. 105 which was issued on May 16, 1989. Therefore, 4.3.7.e is not applicable and will be deleted. 3.3.7.e also refers to 3.3.7.f and will be revised to reflect Amendment No. 105. These changes are administrative in nature and will not increase the probability or consequences of an accident.

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 change deletes excessive testing requirements for the liquid poison, core spray, control rod drive pump coolant injection, HPCI, containment spray, emergency cooling, and emergency ventilation systems. Verifying the operability of redundant systems/components are administrative checks that will assure their availability. These changes do not introduce any new modes of operation which could initiate a new or different kind of accident. Therefore, the proposed amendment will not introduce any new types of equipment failure that could cause a new or different kind of accident.

Changes/Deletions were made to 3.1.3 and 4.1.3 to remove references to Fuel Cycle 8 and Fuel Cycle 9. NMP1 is currently



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in Fuel Cycle 11, making these references inapplicable. 4.3.7.e requires checks be made to assure the "conditions listed in 3.3.7.f are met". Technical Specification 3.3.7.f was deleted by Amendment No. 105 which was issued on May 16, 1989. Therefore, 4.3.7.e is not applicable and will be deleted. 3.3.7.e also refers to 3.3.7.f and will be revised to reflect Amendment No. 105. These changes are administrative in nature and will not create the possibility of a new or different kind of accident.

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.

The proposed Technical Specification changes will not reduce the equipment required by the Technical Specifications during an LCO or normal operation conditions for the liquid poison, core spray, control rod drive pump coolant injection, HPCI, containment spray, emergency cooling, and emergency ventilation systems. The testing that will remain in the Technical Specifications provides adequate assurance of system performance. The reduction in testing will decrease the probability of equipment failure and human error. Verifying the operability of redundant systems/components are administrative checks that will assure their availability. Therefore, the proposed changes do not represent a significant reduction in a margin of safety.

Changes/Deletions were made to 3.1.3 and 4.1.3 to remove references to Fuel Cycle 8 and Fuel Cycle 9. NMP1 is currently in Fuel Cycle 11, making these references inapplicable. 4.3.7.e requires checks be made to assure the "conditions listed in 3.3.7.f are met". Technical Specification 3.3.7.f was deleted by Amendment No. 105 which was issued on May 16, 1989. Therefore, 4.3.7.e is not applicable and will be deleted. 3.3.7.e also refers to 3.3.7.f and will be revised to reflect Amendment No. 105. These changes are administrative in nature and will not involve a significant reduction in a margin of safety.



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