

**ATTACHMENT A**

**NIAGARA MOHAWK POWER CORPORATION**

**LICENSE NO. DPR-63**

**DOCKET NO. 50-220**

**Proposed Changes to the Technical Specifications**

Existing pages 171 and 172 will be replaced with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate the changes.

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LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p data-bbox="199 223 661 256"><b>3.4.3</b>      <u>ACCESS CONTROL</u></p> <p data-bbox="388 297 577 330"><u>Applicability:</u></p> <p data-bbox="388 363 997 437">Applies to the access control to the reactor building.</p> <p data-bbox="388 470 535 503"><u>Objective:</u></p> <p data-bbox="388 536 966 644">To specify the requirements necessary to assure the integrity of the secondary containment system.</p> <p data-bbox="388 677 577 710"><u>Specification:</u></p> <p data-bbox="388 751 1018 999">a. Whenever the reactor is in the power operating condition, or when irradiated fuel is being handled in the reactor building, or during core alterations, or during irradiated fuel cask handling operations in the reactor building, the following conditions will be met:</p> <ol data-bbox="483 1032 1018 1280" style="list-style-type: none"> <li>1. Only one door in each of the double-doored access ways shall be opened at one time.</li> <li>2. Only one door or closeup of the railroad bay shall be opened at one time.</li> </ol>	<p data-bbox="1050 223 1522 256"><b>4.4.3</b>      <u>ACCESS CONTROL</u></p> <p data-bbox="1239 297 1428 330"><u>Applicability:</u></p> <p data-bbox="1239 363 1858 437">Applies to the periodic checking of the condition of portions of the reactor building.</p> <p data-bbox="1239 470 1386 503"><u>Objective:</u></p> <p data-bbox="1239 536 1890 751">To assure that pump compartments are properly closed at all times and to assure the integrity of the secondary containment system by verifying that reactor building access doors are closed, as required by Specifications 3.4.3.a.1 and 3.4.3.a.2.</p> <p data-bbox="1239 784 1438 817"><u>Specification:</u></p> <ol data-bbox="1239 859 1890 1280" style="list-style-type: none"> <li>a. The core and containment spray pump compartments shall be checked once per week and after each entry.</li> <li>b. Verify at least once per 31 days that: <ol data-bbox="1344 1065 1890 1280" style="list-style-type: none"> <li>1. At least one door in each access to the secondary containment is closed.</li> <li>2. At least one door or closeup of the railroad bay is closed.</li> </ol> </li> </ol>



**LIMITING CONDITION FOR OPERATION****SURVEILLANCE REQUIREMENT**

3. The core spray and containment spray pump compartments' doors shall be closed at all times except during passage in order to consider the core spray system and the containment spray system operable.
- b. If these conditions cannot be met, then the actions listed below shall be taken:
1. If in the power operating condition, restore reactor building integrity within 4 hours or be in at least the hot shutdown condition within the next 12 hours and in the cold shutdown condition within the following 24 hours.
  2. Suspend any of the following activities:
    - a. core alterations,
    - b. Handling of irradiated fuel in the reactor building,



**LIMITING CONDITION FOR OPERATION**

**SURVEILLANCE REQUIREMENT**

c. irradiated fuel cask  
handling operations in  
the reactor building.



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## BASES FOR 3.4.3 AND 4.4.3 ACCESS CONTROL

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The reactor building serves as a secondary containment during normal Station operations and as a primary containment during refueling and other periods when the pressure suppression system is open. Maintaining the building integrity and an operative emergency ventilation system for the conditions listed will ensure that any fission products inadvertently released to the reactor building will be routed through the emergency ventilation system to the stack. The worst such incident is due to dropping a fuel assembly on the core during refueling. The consequences of this are discussed in Section XV.C.3 of the FSAR.

As discussed in Section VI-F\* all access openings of the reactor building have as a minimum two doors in series. Appropriate local alarms and control room indicators are provided to always insure that reactor building integrity is maintained. Surveillance of the reactor building access doors provides additional assurance that reactor building integrity is maintained.

Maintaining closed doors on the pump compartments ensures that suction to the core and containment spray pumps is not lost in case of a gross leak from the suppression chamber.

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\*FSAR



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## ATTACHMENT B

### NIAGARA MOHAWK POWER CORPORATION

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#### Supporting Information and No Significant Hazards Consideration Analysis

##### Discussion

Currently, the operating conditions under which Nine Mile Point Unit 1 (NMP1) Technical Specification 3.4.3, "Access Control" apply are not explicitly defined in the Limiting Condition for Operation (LCO). Also, the LCO does not specify an allowable outage time (AOT) for restoration of reactor building integrity. Similarly, the current specification does not address the actions required when the LCO is not met, and the time intervals within which these actions must be implemented. In addition, no surveillance requirements currently exist to periodically confirm that 1) at least one door in each of the double-doored accesses to the secondary containment is closed and 2) at least one door or closeup of the railroad bay is closed.

This proposed amendment is designed to eliminate the above identified weaknesses by adopting BWR Standard Technical Specifications (STS) guidelines pertaining to reactor building access control, consistent with existing NMP1 Technical Specifications restrictions associated with reactor building integrity.

Based on the STS Secondary Containment Integrity Applicability guidelines and on existing NMP1 Technical Specifications restrictions associated with reactor building integrity, the operating conditions under which the Access Control LCO apply, are explicitly described in the proposed amendment as follows:

- 1) Whenever the reactor is in the power operating condition, or
- 2) Whenever irradiated fuel is being handled in the reactor building; during core alterations; or during irradiated fuel cask handling operations in the reactor building.

For the power operating conditions of 1) above, the AOT and action statements in the proposed amendment are consistent with the actions on loss of secondary containment integrity for STS Operational Conditions 1, 2 and 3. These require restoration of reactor building integrity within 4 hours or the reactor to be in at least the hot shutdown condition within the next 12 hours and in the cold shutdown condition within the following 24 hours.

For the operating conditions of 2) above, the proposed action statement is consistent with the STS actions on loss of secondary containment integrity for STS Operational Condition "3", by requiring suspension of: a) core alterations; b) irradiated fuel handling in the secondary containment; c) irradiated fuel cask handling operations in the reactor building.

The proposed Access Control LCO restrictions associated with irradiated fuel cask handling operations in the reactor building, are consistent with similar restrictions currently contained in NMP1 Technical Specifications 3.4.1, "Leakage Rate", and 3.4.2, "Reactor



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Building Integrity - Isolation Valves", both of which require suspension of irradiated fuel cask handling operations in the reactor building if the respective specification is not met.

The existing Access Control Surveillance Requirements are expanded in the proposed amendment by inclusion of STS surveillances that pertain to reactor building access control. The Objective paragraph of the existing Access Control Surveillance Requirement section is expanded in the proposed amendment to denote the role of the newly proposed surveillances in assuring the integrity of the secondary containment system.

#### **Proposed Technical Specification Changes**

Niagara Mohawk proposes to change the Limiting Condition for Operation (LCO), the Surveillance Requirement, and the associated Bases for Technical Specification 3.4.3/4.4.3, "Access Control".

The proposed changes:

- 1) explicitly define the operating conditions under which the LCO applies;
- 2) specify an allowable outage time (AOT) for restoration of reactor building integrity;
- 3) delineate the actions required when the access control LCO is not met;
- 4) define the time intervals within which these actions must be implemented; and
- 5) provide surveillance requirements to periodically confirm that at least one door in each of the double-doored accesses to the secondary containment is closed and at least one door or closeup of the railroad bay is closed.

According to 10 CFR 50.91, 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. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

Niagara Mohawk has evaluated this proposed amendment pursuant to 10 CFR 50.91 and has determined that it involves no significant hazards consideration.

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 to the Technical Specification 3.4.3 LCO and its applicability,



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implement present provisions and STS guidelines for maintenance of secondary containment integrity by requiring operability during the power operating condition, during core alterations, and when irradiated fuel or the irradiated fuel cask is being handled in the reactor building.

The proposed actions are based on STS guidelines and implement the present provisions regarding action to be taken when secondary containment integrity has been lost. This is illustrated by existing NMP1 TS 3.4.1, "Leakage Rate", which currently allows 4 hours of continued plant operation during secondary containment system inoperability. If building integrity cannot be restored within the 4 hour period, existing TS 3.4.1 directs the plant be placed in an operating condition where secondary containment integrity is not required, i.e., cold shutdown. As indicated in NRC's Safety Evaluation supporting NMP1 Technical Specification Amendment No. 38, dated 12/12/80, "Continued plant operation for 4 hours is based on the very small likelihood of an accident occurring during such a brief interval".

The proposed augmentation of existing surveillance requirements by the addition of STS based surveillances requiring periodic confirmation that at least one door in each of the double-doored accesses to the secondary containment is closed and at least one door or closeup of the railroad bay is closed, provides additional assurance of secondary containment system integrity.

Since the aspects of secondary containment integrity affected by reactor building access control are being revised in this proposed amendment to agree with the actions required by "Standard Technical Specifications for General Electric Boiling Water Reactors" (NUREG-0123," Rev. 3) upon loss of secondary containment integrity, and since these revisions remain within the limitations of existing NMP1 allowable outage times for the inoperability of secondary containment integrity, the proposed changes assure retention of the present level of secondary containment system operability, and therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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 to NMP1 Technical Specification sections 3.4.3 and 4.4.3 are based on present provisions and on STS guidelines. These proposed changes have been reviewed for acceptability at NMP1 considering similarity of system design versus the STS. No new conditions of operation are introduced by the proposed changes, considering the acceptable operational conditions in present specification and the STS. Augmentation of the existing Surveillance Requirements by incorporation of additional STS based surveillances, provides additional assurance of secondary containment system integrity. The proposed changes to the LCO actions are based on present provisions and on STS guidelines.

Since the proposed changes maintain at least the present level of system operability, while adding provisions from STS, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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 changes are intended to improve the clarity and understanding of technical specification requirements while maintaining acceptable levels of safe operation. Since the proposed changes are based on present provisions and applicable STS guidelines associated with secondary containment integrity, and since existing allowances on



secondary containment integrity operability are maintained, the proposed changes do not involve a significant reduction in a margin of safety.

Therefore, based on the above evaluation, Niagara Mohawk has concluded that these changes do not involve a significant hazards consideration.



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