ATTACHMENT A

Niagara Mohawk Power Corporation
License No. NPF-69
Docket No. 50-410

Proposed Changes to Technical Specifications

Replace existing pages 3/4 6-27 and 3/4 6-35 with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

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TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

ISOLATION VALVE NO.	VALVE FUNCTION	VALVE GROUP	ISOLATION SIGNAL(a)	MAXIMUM CLOSING TIME (SECONDS)
2RHS*MOV142(j)(m)	RHS Drain to Radwaste Outside IV	4	A,Z,F,RM	30
2RHS*MOV149(j)(m)	RHS Drain to Radwaste Inside IV	4	A,Z,F,RM	25
2RHS*SOV35 A/B (j)(m)	RHS Sample HX Inside IVs	4	A,Z,F,RM	5
2RHS*SOV36 A/B (j)(m)	RHS Sample HX Outside IVs	4	A,Z,F,RM	5
2RDS*AOV124(k)	SCRAM Discharge Volume Vent	NA		NA
2RDS*AOV132(k)	SCRAM Discharge Volume Vent	NA		NA
2RDS*AOV123(k)	SCRAM Discharge Volume Drain	NA		NA
2RDS*AOV130(k)	SCRAM Discharge Volume Drain	NA		NA
B. Remote Manual				
2RHS*MOV15 A,B	Containment Spray to Drywell Outside IV's	12	RM	NA
2RHS*MOV 1 A,B,C(o)	RHS Pump Suction Outside IVs	12	RM	NA
2RHS*MOV30 A,B	RHS Test Line to SP Outside IVs	12	RM	NA
2RHS*MOV25 A,B (n)	Containment Spray to Drywell Outside IVs	12	RM	NA
2RHS*MOV24 A,B,C	RHS/LPCI to RPV Outside IVs	12	RM	NA
2CSH*MOV118(n)(o)	CSH Suction from SP Outside IV	12	RM	NA
2CSH*MOV105	HPCS Min Flow Bypass Outside IV	12	RM	NA
2CSH*MOV107	CSH to RPV Outside IV	12	RM	NA
2CSL*MOV112(o)	CSL Suction from SP Outside IV	12	RM	NA
2CSL*MOV104	CSL to RPV Outside IV	12	RM	NA
2ICS*MOV136(n)(o)	ICS Suction from SP Outside IV	12	RM	NA
2ICS*MOV143(n)	ICS Min flow to SP Outside IV	12	RM	NA

TABLE 3.6.3-1 (Continued)
PRIMARY CONTAINMENT ISOLATION VALVES
TABLE NOTATION

* Isolates on injection signal, not primary containment isolation signal.

(a) See Specification 3.3.2, Table 3.3.2-4, for valve groups operated by isolation signal(s).

(b) Deleted.

(c) These valves are the RHR heat exchangers vent lines isolation valves. The vent line connects to the RHR safety relief valves (SRVs) Discharge Header before it penetrates the primary containment. The position indicators for these valves are provided in the Control Room for remote manual isolation.

(d) Type C leakage tests not required.

(e) The associated instrument lines shall not be isolated during Type A testing. Type C testing is not required. These valves shall be tested in accordance with Surveillance Requirement 4.6.3.4.

(f) These valves are check valves, located on the vacuum breaker lines for RHR SRVs discharge headers. The SRV discharge header terminates under pool water and therefore has no containment isolation valves other than those on lines feeding into it.

(g) 2SLS*MOV5A and B are globe stop check valves. These valves close upon reverse flow. The motor operator is provided to remote manually close the valve from the control room.

(h) These valves are testable check valves. They close upon reverse flow. The air operator on each valve is provided only for periodic testing of the valve. These valves can only be tested against a zero d/p.

(i) Valves are maintained closed. The FPW lines are capped. Valves are Type C tested.

(j) Not primary containment penetration isolation valves. These valves close on an isolation signal to provide integrity of "A" and "B" LPCI loops.

(k) Valves close on a SCRAM signal; not part of primary containment isolation system but are included here for Type C testing per Specification 3.6.1.2. These valves are not required to be OPERABLE per this specification but are required to be OPERABLE per Specification 3.1.3.1.

(l) Not subject to Type A or Type C leak test because of constant monitoring under constant 1800 psig pressure and the possible detrimental effects of shutdown.

(m) Not subject to Type C test per 10CFR50, Appendix J. A hydrostatic test is performed in accordance with Specification 4.6.1.2.d.3.

(n) These valves are Type C tested and may be tested in the reverse direction.

(o) Isolation barrier remains waterfilled post-LOCA. Isolation valve is tested with water in accordance with Specification 4.6.1.2.i.

ATTACHMENT B

Niagara Mohawk Power Corporation
License No. NPF-69
Docket No. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

Background

The primary containment completely encloses the reactor vessel, and is designed to retain integrity as a radioactive material barrier during and following design bases accidents that release radioactive material into the primary containment volume. The containment is designed such that periodic testing for leak-tightness may be performed.

Periodic Type A, B, and C tests are performed in accordance with 10CFR50 Appendix J to assure that leakage through the primary reactor containment as well as systems and components penetrating primary containment does not exceed allowable leakage rate values specified in the Plant Technical Specifications and/or Updated Safety Analysis Report.

"Water filled systems" are considered those valves in lines which terminate below the minimum suppression pool water level and are sealed by the suppression pool. The suppression pool will remain water filled post-accident. Therefore, the valves in these lines do not represent a gaseous pathway from the primary containment under normal and post-accident conditions.

Appendix J limits the combined leakage rate for all penetrations and valves subject to Type B and C tests to less than 0.60 La. Leakage from the ECCS and RCIC suction valves does not contribute to gaseous release from containment post-accident. Therefore, leakage rate results of these valves will not be added to the combined leakage rate of Type B and C tested components. Hydrostatic leakage tests which demonstrate that the valves have fluid leakage rates that do not exceed those specified in the Technical Specifications or associated bases will be performed in lieu of a Type C test using air.

Summary

The following valves are located on lines which terminate in the suppression pool at elevations below the postulated minimum post accident pool level and are therefore water-filled systems. These valves do not represent a gaseous pathway from the primary containment under normal/post accident conditions and a seal will be available for at least 30 days post-LOCA.

2RHS*MOV 1A, B, C	RHS Pump Suction Outside Isolation Valve
2CSH*MOV 118	CSH Suction from Suppression Pool Outside Isolation Valve
2CSL*MOV 112	CSL Suction from Suppression Pool Outside Isolation Valve
2ICS*MOV 136	ICS Suction from Suppression Pool Outside Isolation Valve

Currently each of the valves listed above are Type C tested using air. This method of testing requires each system to be isolated and drained resulting in significant emergency core cooling system out of service time.

Niagara Mohawk proposes to revise Technical Specification Table 3.6.3-1 to permit hydrostatic leak testing of the Emergency Core Cooling System (ECCS) and Reactor Core Isolation Cooling System Suppression Pool Isolation Valves in lieu of the air test. This amendment is justified based on the following:

- The ECCS and RCIC suction lines terminate in the containment below the calculated minimum post accident suppression pool water level. The suppression pool water effectively seals the containment isolation valve from the primary containment atmosphere thereby preventing gaseous releases from the primary containment. Performing a leakage test using water as the test medium rather than air will produce leak rate data that realistically reflects leakage out of containment following accidents that release radioactive material into the primary containment volume.

- 10CFR50 Appendix J allows valves which are sealed with fluid from a seal system to be pressurized with that fluid to pressure of at least 1.10 Pa. The ECCS and RCIC suction lines are not sealed with fluid pressurized to at least 1.10 Pa but they remain water-filled post-accident precluding direct communication with the primary containment gaseous atmosphere. Niagara Mohawk will hydrostatically leak test these valves to at least 1.10 Pa (43.73 psig). The combined leakage rate of hydrostatically tested containment isolation valves will be limited to less than or equal to 1 gpm times the total number of containment isolation valves (as specified in the Technical Specifications). Leakage results from hydrostatically tested valves will be excluded from combined Type B and C leak rate calculations as allowed by Appendix J and Technical Specifications.

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:

<u>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.</u>

The proposed amendment would revise the Appendix J test from an air test to a hydrostatic test for the affected valves which will result in tests that more closely reflect leakage that would be expected post-accident. The hydrostatic test will assure isolation valve leak tight integrity is maintained. This change to Appendix J testing methods does not impact plant design or operation of plant systems. The subject valves will continue to isolate as designed. Therefore the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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.

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 2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

A hydrostatic test will be performed in lieu of an air test to determine local leak rate. The proposed change will not affect the existing Technical Specification operational limits. The subject containment isolation valves will be required to meet present Technical Specification leak rate criteria for hydrostatically tested valves assuring leak-tight integrity. Therefore the proposed amendment does not involve a significant reduction in a margin of safety.