



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 61 TO FACILITY OPERATING LICENSE NO. NPF-69

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION, UNIT 2

DOCKET NO. 50-410

1.0 INTRODUCTION

By letter dated October 28, 1994, Niagara Mohawk Power Corporation (the licensee) submitted a request for changes to the Nine Mile Point Nuclear Station, Unit 2, Technical Specifications (TSs). The requested changes would revise TS 1.7, "CORE ALTERATION," to state that movement or replacement of incore instrumentation is not considered to be a CORE ALTERATION and that movement of control rods is not considered a CORE ALTERATION provided there are no fuel assemblies in the associated core cell. The proposed amendment would include changes to TS 3/4.9.3, "Control Rod Position," and associated Bases to be consistent with the proposed revision to TS 1.7. TS 3/4.9.3 would be revised to require that all control rods be inserted only during loading of fuel assemblies into the core rather than during CORE ALTERATIONS.

The proposed amendment would also revise Item 1.i.3) of TS Tables 3.3.2-1 and 4.3.2.1-1 to delete the requirement for Reactor Water Cleanup (RWCU) isolation due to actuation of the Standby Liquid Control System (SLCS) in OPERATIONAL CONDITION 5.

2.0 EVALUATION

The current version of TS 1.7, "CORE ALTERATION," states that CORE ALTERATION shall be the addition, removal, relocation, or movement of fuel, sources, incore instruments or reactivity controls within the reactor pressure vessel with the vessel head removed and fuel in the vessel. TS 1.7 also states that normal movement of the source range monitors (SRMs), intermediate range monitors (IRMs), traversing incore probes (TIPs) or special movable detectors is not considered a CORE ALTERATION. The proposed revision to TS 1.7 would state that CORE ALTERATION shall be the movement of any fuel, or reactivity control components within the reactor vessel with the vessel head removed and fuel in the vessel. The proposed revision would further state that the following exceptions are not considered to be CORE ALTERATIONS:

- a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special moveable detectors (including undervessel replacement); and,

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- b. Control rod movement provided there are no fuel assemblies in the associated core cell.

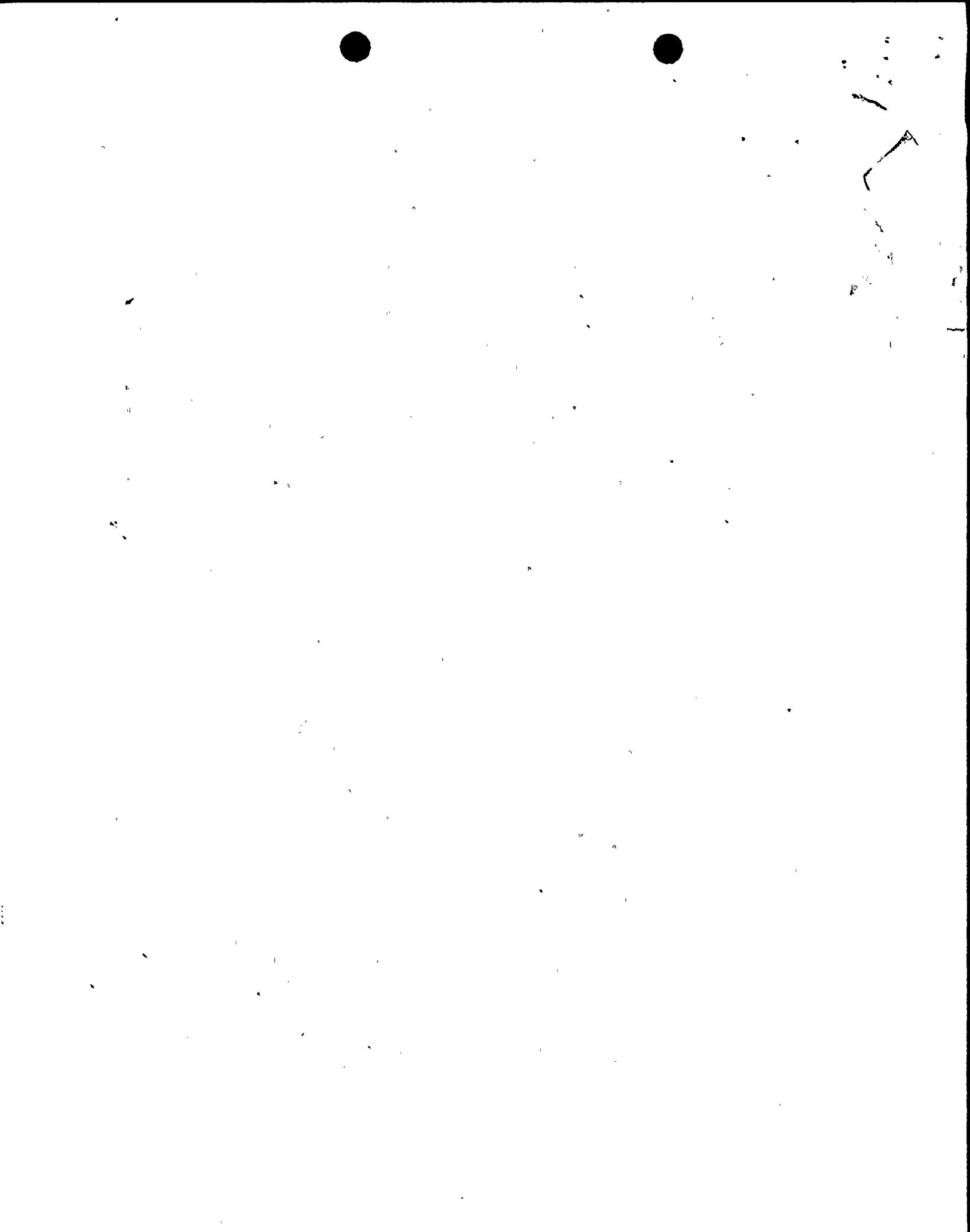
The proposed revision to the definition of CORE ALTERATION (TS 1.7) would expand exceptions to the definition of CORE ALTERATION to include the movement of local power range monitors, the undervessel replacement of incore instruments, and control rod movement without fuel assemblies in the associated core cell.

The definition of CORE ALTERATION identifies operations which have the potential for adding positive reactivity to the core while the vessel head is removed and fuel is in the vessel. Controls for these operations are provided in several TSs which ensure that the necessary precautions will be taken to preclude and/or mitigate the consequences of a potential inadvertent criticality while in OPERATIONAL CONDITION 5 (REFUELING).

The current definition of CORE ALTERATION (TS 1.7) excludes the SRMs, IRMs, and TIPs from this definition. The proposed revision of TS 1.7 would expand these exclusions to include the local power range monitors (LPRMs) and any special moveable detectors (including undervessel replacement). Exclusion of incore detectors (SRMs, IRMs, TIPs, LPRMs, and any special moveable detectors, including undervessel replacement) from this definition is acceptable since movement of the incore detectors does not result in any significant change in core reactivity. Therefore, expansion of TS 1.7 to include exclusion of the LPRMs and any special moveable detectors (including undervessel replacement) from the definition of CORE ALTERATION is acceptable.

The proposed revision to the definition of CORE ALTERATION (TS 1.7) would also state that control rod movement is not considered to be a CORE ALTERATION provided there are no fuel assemblies in the associated core cell. Control rod movement with no fuel assemblies in the associated core cell has a negligible impact on the reactivity of the remaining core. Therefore, revising TS 1.7 to state that control rod movement is not considered a CORE ALTERATION provided there are no fuel assemblies in the associated core cell is acceptable.

The proposed amendment would revise TS 3/4.9.3. The applicability requirement for TS 3/4.9.3 currently requires all control rods to be inserted when the unit is in OPERATIONAL CONDITION 5 during CORE ALTERATIONS. The proposed change would revise this applicability requirement to delete the reference to "during CORE ALTERATIONS" and replace it with the phrase "when loading fuel assemblies into the core." The proposed change would make this TS and its applicability requirement consistent with the proposed revision to TS 1.7. Therefore, this portion of the proposed change is acceptable. TS 3/4.9.3 would also be revised by deleting the requirement to verify all control rods are fully inserted within 2 hours prior to the start of CORE ALTERATIONS. The revision to TS 3/4.9.3 would require that all control rods be verified fully inserted at least once per 12 hours during the loading of fuel assemblies into the core. The proposed frequency for verifying all control rods are fully inserted is consistent with safe operation of the facility and current NRC



staff guidance for this TS (as reflected in the NRC Improved Standard Technical Specifications, NUREG-1434). Therefore, the proposed change is acceptable. Conforming changes would also be made to the Bases for TS 3/4.9.3; the NRC staff does not object to these changes.

The proposed amendment would revise Item 1.i.3) of TS Tables 3.3.2-1 and 4.3.2.1-1 to delete the requirement for RWCU isolation due to actuation of the SLCS in OPERATION CONDITION 5. License Amendment No. 48 was issued on September 30, 1993. License Amendment No. 48 deleted the requirement for SLCS to be OPERABLE in OPERATIONAL CONDITION 5; however, due to an administrative oversight at that time, this requirement was not then deleted. This revision corrects that administrative oversight and is, therefore, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (59 FR 60382). Accordingly, the 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 the amendment.

5.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: January 20, 1995



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