

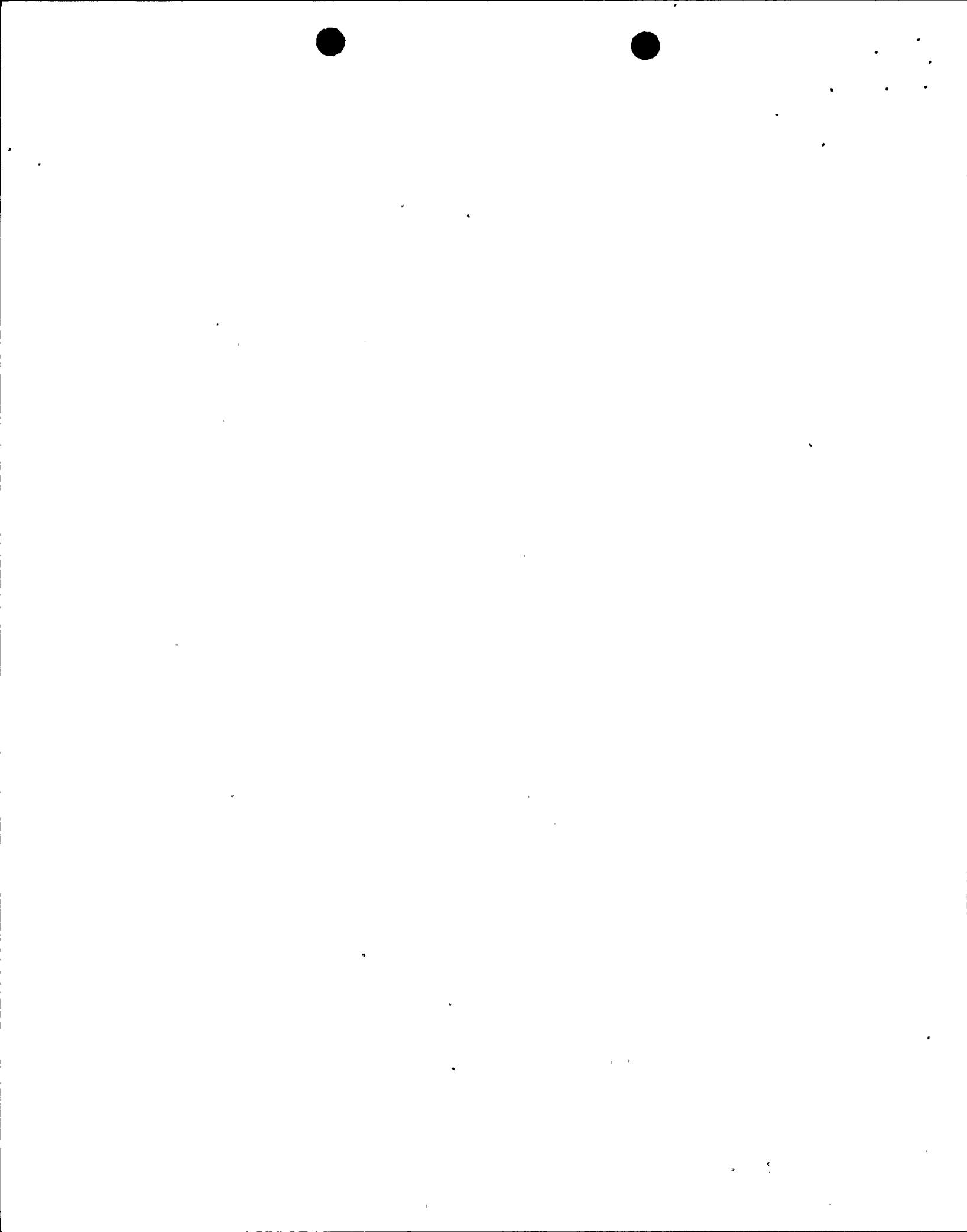
ATTACHMENT A

**Niagara Mohawk Power Corporation
License No. DPR-63
Docket No. 50-220**

Proposed Changes to Technical Specifications

Replace existing pages 277, 278, 279, and 281 with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate the changes to the text.

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LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p>3.6.13 <u>REMOTE SHUTDOWN PANELS</u></p> <p><u>Applicability:</u></p> <p>Applies to the operating status of the remote shutdown panels.</p> <p><u>Objective:</u></p> <p>To assure the capability of the remote shutdown panels to provide 1) initiation of the emergency condensers independent of the main/auxiliary control room 2) control of the motor-operated steam supply valves independent of the main/auxiliary control room and 3) parameter monitoring outside the control room.</p> <p><u>Specification:</u></p> <p>a. During power operation, the remote shutdown panels' Functions in Table 3.6.13-1 shall be operable.</p>	<p>4.6.13 <u>REMOTE SHUTDOWN PANELS</u></p> <p><u>Applicability:</u></p> <p>Applies to the periodic testing requirements for the remote shutdown panels.</p> <p><u>Objective:</u></p> <p>To assure the capability of the remote shutdown panels to provide 1) initiation of the emergency condensers independent of the main/auxiliary control room 2) control of the motor-operated steam supply valves independent of the main/auxiliary control room and 3) parameter monitoring outside the control room.</p> <p><u>Specification:</u></p> <p>The remote shutdown panels surveillance shall be performed as indicated below:</p> <p>a. Each remote shutdown panel monitoring instrumentation channel shall be demonstrated operable by performance of the operations and frequencies shown in Table 4.6.13-1.</p> <p>b. <u>During each major refueling outage</u></p> <p>1. Each remote shutdown panel shall be demonstrated to initiate the emergency condensers independent of the main/auxiliary control room.</p>



LIMITING CONDITION FOR OPERATION

- b. With the valve control Function inoperable, restore the required Function to operable status within 30 days.
- c. With one or more required monitoring instrument Functions inoperable, restore the required Function to operable status within 30 days or establish an alternate method of monitoring the parameter within 30 days and restore the required Function to operable status within 90 days.
- d. If the required action and associated completion time is not met, be in hot shutdown within the next 12 hours.

SURVEILLANCE REQUIREMENT

- 2. Each remote shutdown panel shall be demonstrated to open both the motor-operated steam valves.

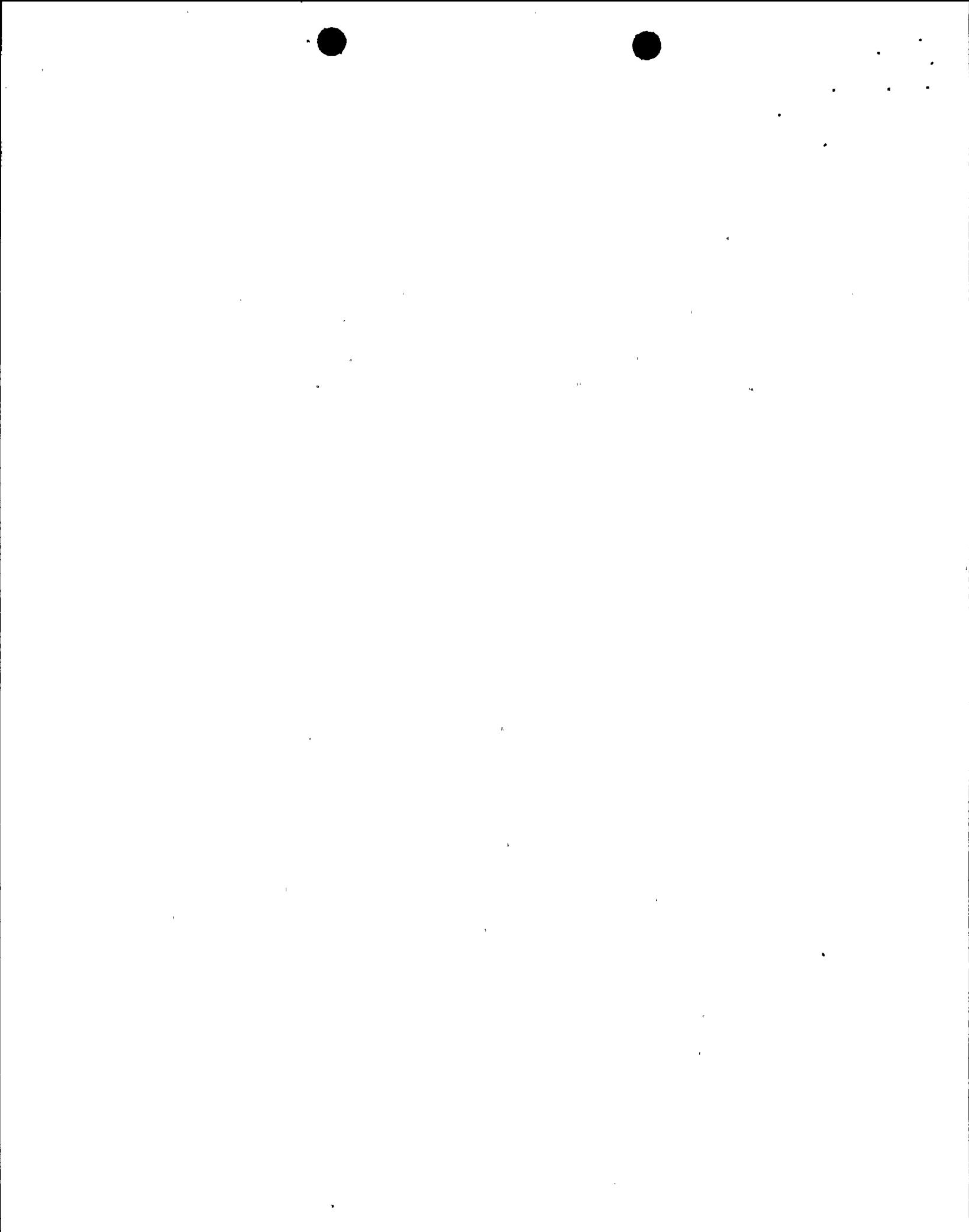
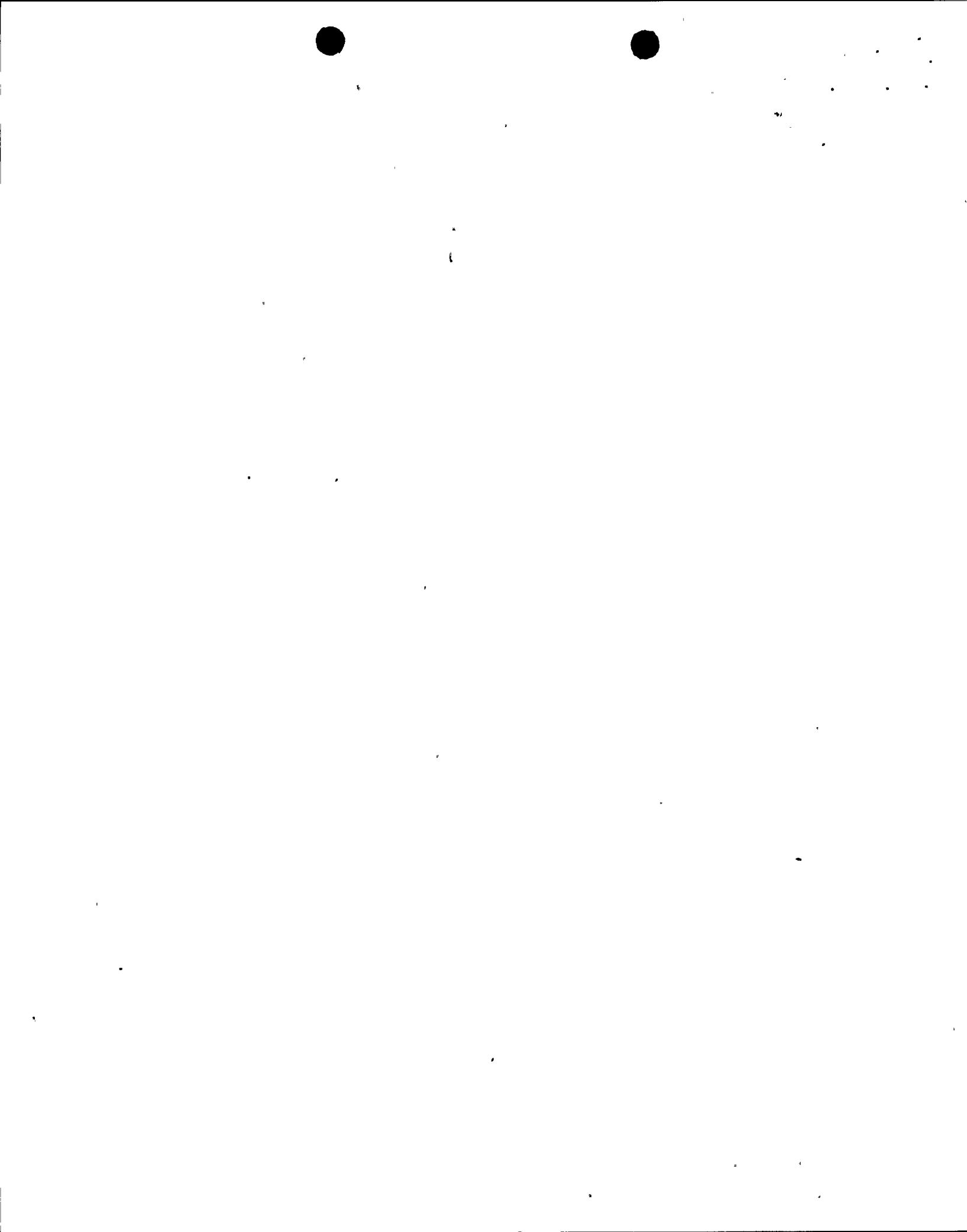


TABLE 3.6.13-1
REMOTE SHUTDOWN PANELS FUNCTIONS
Limiting Condition for Operation

<u>FUNCTION</u>	<u>MINIMUM NUMBER OF OPERABLE CHANNELS PER FUNCTION</u>
Reactor Pressure	1
Reactor Water Level	1
Reactor Water Temperature	1
Torus Water Temperature	1
Drywell Pressure	1
Emergency Condenser Water Level	1
Drywell Temperature	1
"All Rods In" Light	1
Emergency Condenser Condensate Return Valve and Motor-Operated Steam Supply Valves Control on the Same Panel	1

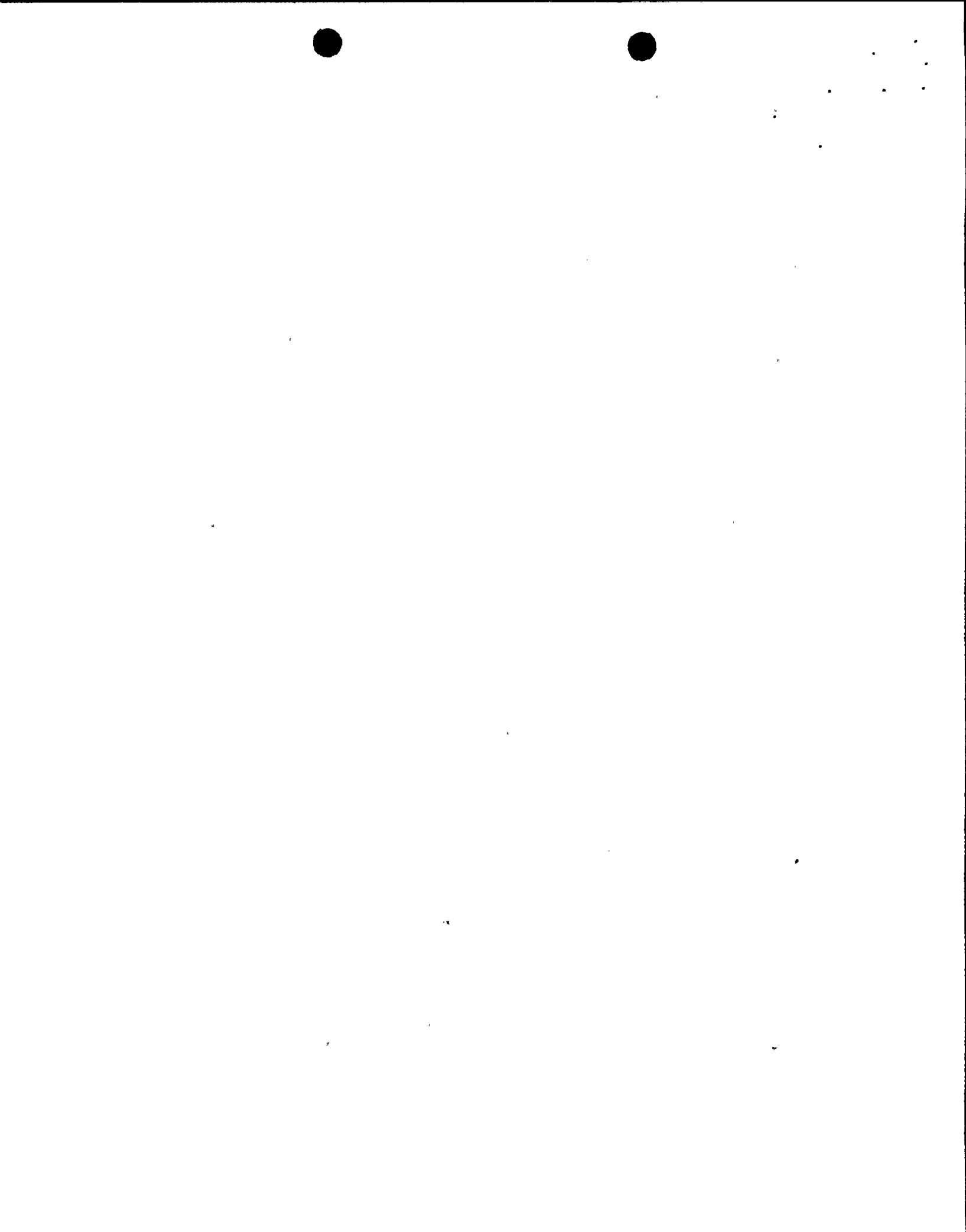


BASES FOR 3.6.13 AND 4.6.13 REMOTE SHUTDOWN PANELS

The remote shutdown panels provide 1) manual initiation of the emergency condensers 2) manual control of the steam supply valves and 3) parameters monitoring independent of the main/auxiliary control room. Two panels are provided, each located in a separate fire area, for added redundancy. Both panels are also in separate fire areas from the main/auxiliary control room. One channel of each Function provides the necessary capabilities consistent with 10CFR50 Appendix R. Therefore, only one channel of either remote shutdown panel monitoring instrument or control is required to be operable. The electrical design of the panels is such that no single fire can cause loss of both emergency condensers.

Each remote shutdown panel is provided with controls for one emergency condenser loop. The emergency condensers are designed such that automatic initiation is independently assured in the event of a fire 1) in the Reactor Building (principle relay logic located in the auxiliary control room or 2) in the main/auxiliary control room or Turbine Building (redundant relay logic located in the Reactor Building). Each remote shutdown panel also has controls to operate the two motor-operated steam supply valves on its respective emergency condenser loop. A key operated bypass switch is provided to override the automatic isolation signal to these valves. Once the bypass switch is activated, the steam supply valves can be manually controlled from the remote shutdown panels. Since automatic initiation of the emergency condenser is assured, the remote shutdown panels serve as additional manual controlling stations for the emergency condensers. In addition, certain parameters are monitored at each remote shutdown panel.

The remote shutdown panels are normally de-energized, except for the monitoring instrumentation, which is normally energized. To energize the remaining functions on a remote shutdown panel, a power switch located on each panel must be activated. Once the panels are completely energized, the emergency condenser condensate return valve and steam supply valve controls can be utilized.



ATTACHMENT B

Niagara Mohawk Power Corporation
License No. DPR-63
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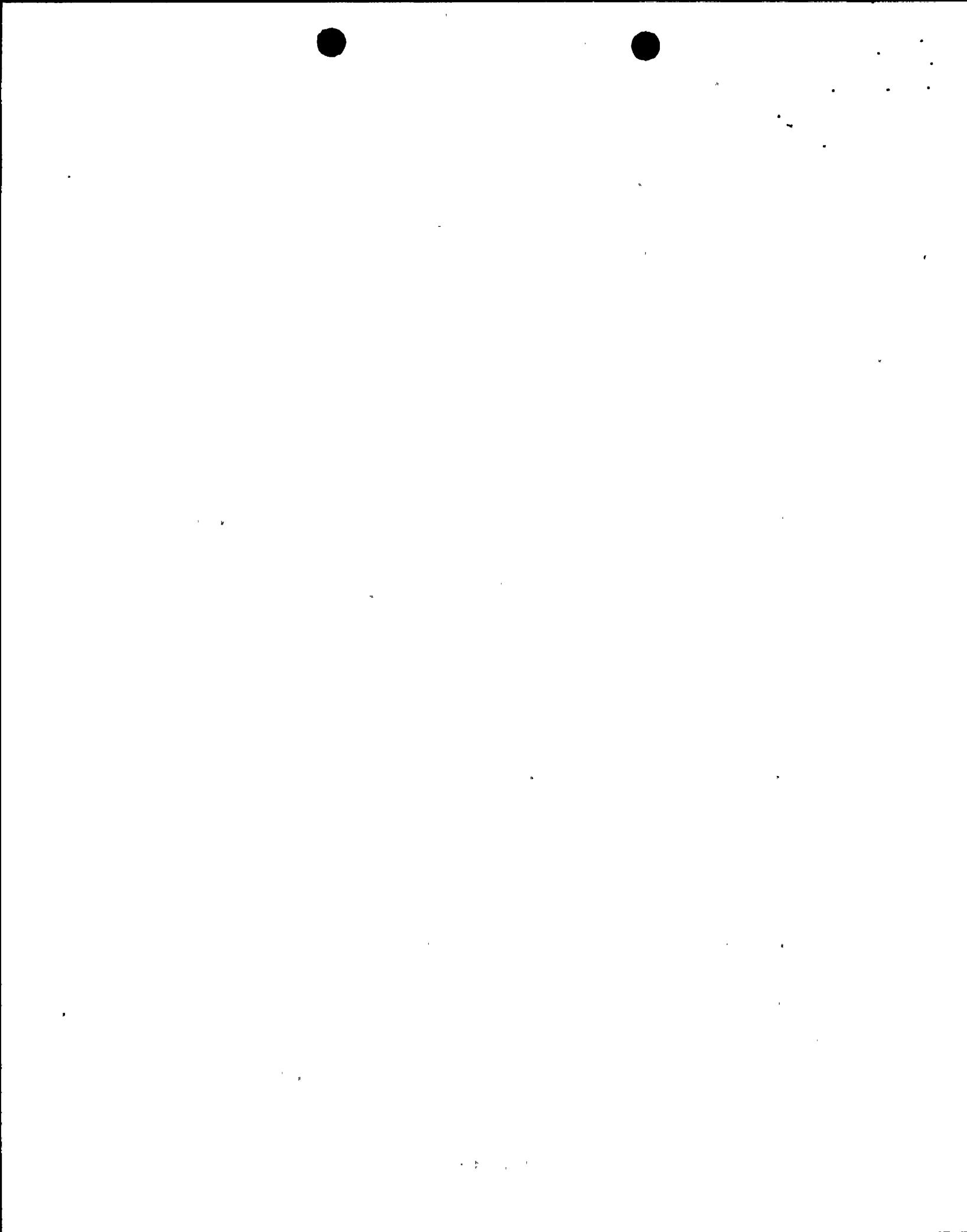
Supporting Information and No Significant Hazards Consideration Introduction

BACKGROUND

The Nine Mile Point Unit 1 (NMP1) Remote Shutdown System provides the capability to safely shut down the plant in a controlled manner independent of the main and auxiliary control rooms. The Remote Shutdown System is designed to achieve hot shutdown for events which cause a functional loss and/or evacuation of the main and auxiliary control rooms. The Remote Shutdown System consists of two independent panels, Panel 11 and Panel 12.

Existing NMP1 Technical Specification 3.6.13, "Remote Shutdown Panels," requires that at least one Remote Shutdown System panel be operable during power operation and when the reactor coolant temperature is above 212°F. If this Specification cannot be met, an orderly plant shutdown must commence within 24 hours and cold shutdown must be reached within 36 hours. A remote shutdown panel is considered inoperable if the emergency condenser condensate return valve control switch is inoperable, either motor-operated steam supply valve control switch is inoperable, or the number of operable instrument channels is less than required by Table 3.6.13-1. A review of Specification 3.6.13 indicates that the Limiting Condition for Operation is overly conservative when compared to the Improved Standard Technical Specifications (ITS), NUREG-1433, and to more recent Remote Shutdown Technical Specification amendments.

Niagara Mohawk proposes to revise Specification 3.6.13 such that with one or more required functions (monitoring instruments or valve controls) inoperable, 30 days is permitted to restore the required function to an operable status. If a monitoring instrument function is inoperable, the proposed changes permit 30 days to establish an alternate method of monitoring the parameter and 90 days to restore the instrument to an operable status. If a required action is not completed, the plant must be brought in to a hot shutdown condition within 12 hours. The potential benefits derived from this change can be illustrated with an example. With the current Technical Specification, an inoperable Reactor Pressure instrument on Panel 11 and an inoperable Reactor Water Level instrument on Panel 12 would result in both panels being administratively inoperable. With both panels inoperable, a plant shutdown would be required even though a channel (and therefore the function) for Reactor Pressure (Panel 12) and Reactor Level (Panel 11) were available. With revised Specification 3.6.13, a plant shutdown would not be required. The proposed changes are consistent with the Improved Standard Technical Specifications, NUREG-1433, and with Amendment No. 216 issued to the James A. Fitzpatrick Nuclear Plant on August 31, 1994.



PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

Current Technical Specification 3.6.13.a., b., c.

- a. During power operation and whenever the reactor coolant temperature is greater than 212°F, at least one remote shutdown panel shall be operable.
- b. A remote shutdown panel shall be considered inoperable if either the emergency condenser condensate return valve control switch is inoperable, either motor-operated steam supply valve control switch is inoperable, or the number of operable instrumentation channels is less than that required by Table 3.6.13-1.
- c. If Specification 3.6.13.a cannot be met, commence an orderly shutdown within 24 hours and be in cold shutdown within 36 hours.

Proposed Technical Specification 3.6.13.a., b., c., d.

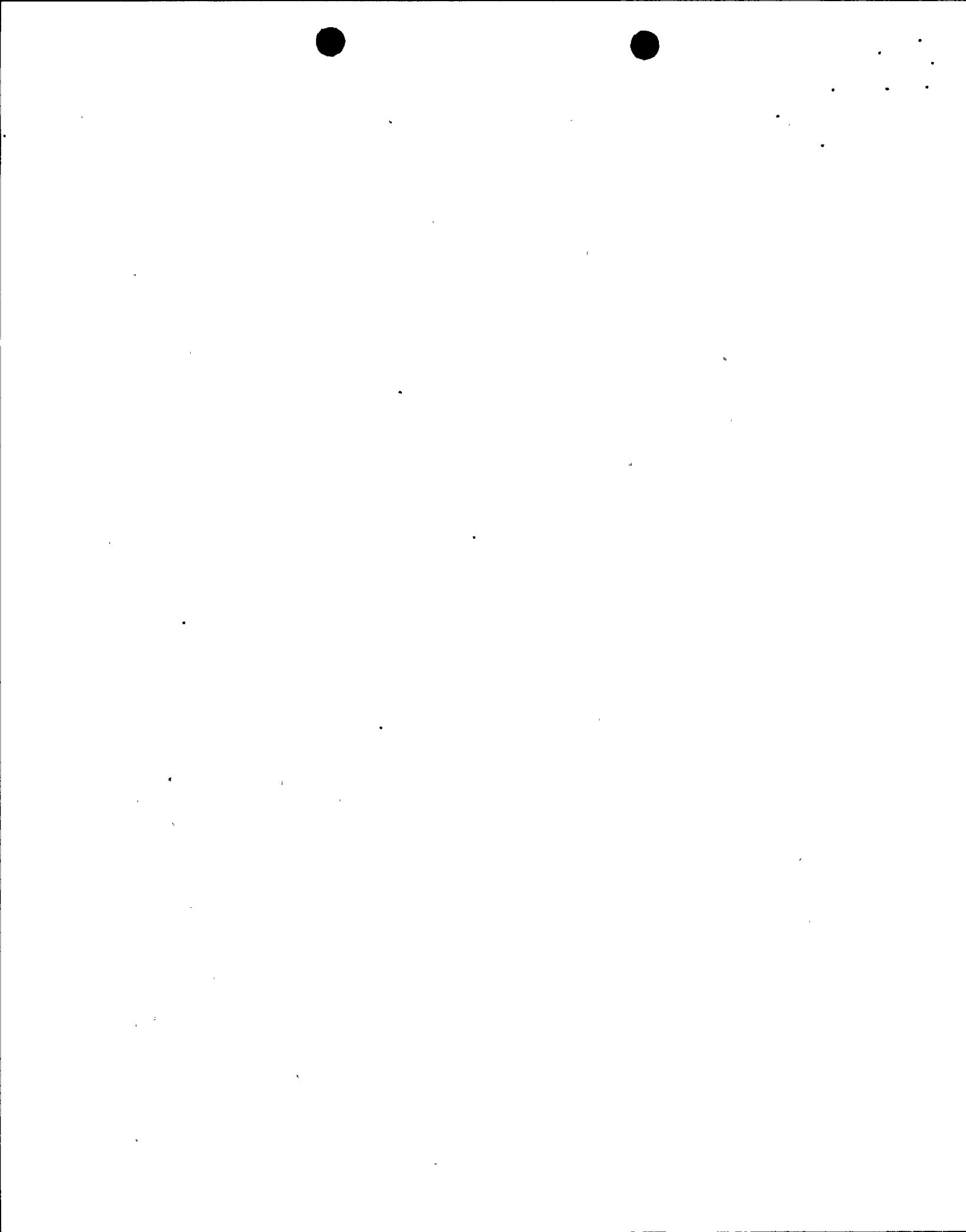
- a. During power operation, the remote shutdown panels' Functions in Table 3.6.13-1 shall be operable.
- b. With the valve control Function inoperable, restore the required Function to operable status within 30 days.
- c. With one or more required monitoring instrument Functions inoperable, restore the required Function to operable status within 30 days or establish an alternate method of monitoring the parameter within 30 days and restore the required Function to operable status within 90 days.
- d. If the required action and associated completion time is not met, be in hot shutdown within the next 12 hours.

Table 3.6.13-1

The word "INSTRUMENT" will be changed to the word "FUNCTION" and the words "PANEL MONITORING" will become "PANELS FUNCTIONS." The emergency condenser condensate return valve control and motor-operated steam supply valves control will be added under "FUNCTION."

The First Paragraph in the Current Bases for 3.6.13 and 4.6.13

The remote shutdown panels provide 1) manual initiation of the emergency condensers 2) manual control of the steam supply valves and 3) parameters monitoring independent of the main/auxiliary control room. Two panels are provided; each located in a separate fire area for added redundancy. Both panels are also in separate fire areas from the main/auxiliary control room. One remote shutdown panel provides the necessary capabilities consistent with 10CFR50 Appendix R. Therefore, only one remote shutdown panel is required to be operable. The electrical design of the panels is such that no single fire can cause loss of both emergency condensers.



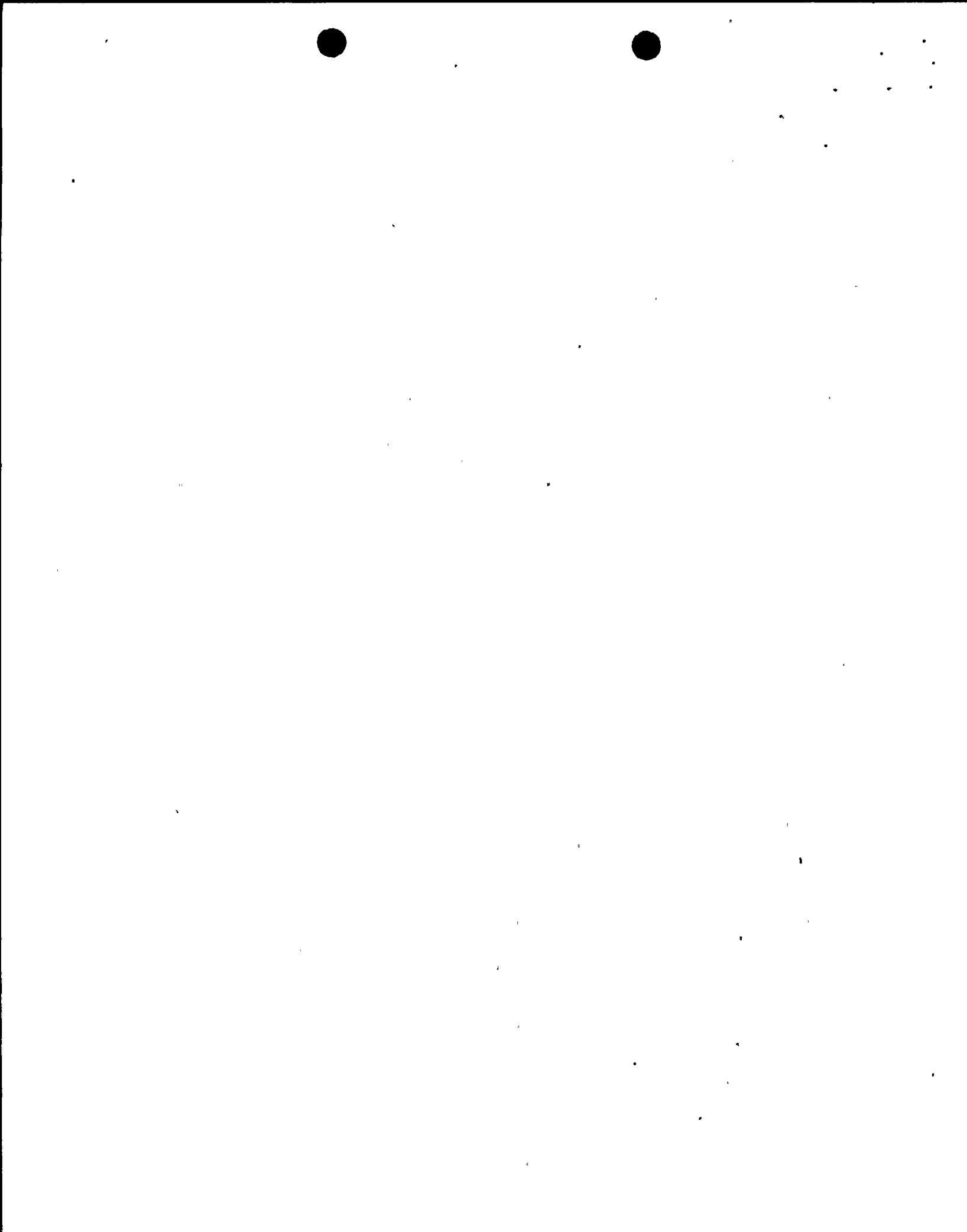
The First Paragraph in the Proposed Bases for 3.6.13 and 4.6.13

The remote shutdown panels provide 1) manual initiation of the emergency condensers 2) manual control of the steam supply valves and 3) parameters monitoring independent of the main/auxiliary control room. Two panels are provided; each located in a separate fire area for added redundancy. Both panels are also in separate fire areas from the main/auxiliary control room. One channel of each Function provides the necessary capabilities consistent with 10CFR50 Appendix R. Therefore, only one channel of either remote shutdown panel monitoring instrument or control is required to be operable. The electrical design of the panels is such that no single fire can cause loss of both emergency condensers.

EVALUATION

Technical Specification 3.6.13.a. currently requires that the remote shutdown panels be operable during power operation and whenever the reactor coolant temperature is greater than 212°F. The proposed change would revise 3.6.13.a. to require that the remote shutdown panel functions be operable during power operation only (i.e., the requirement that the panels be operable when reactor coolant temperature is above 212°F [hot shutdown] would be deleted). This change is consistent with the Improved Standard Technical Specifications (ITS) which indicates that the Remote Shutdown System (RSS) is applicable in Mode 1 (power operation) and 2 (startup). The ITS indicates that the RSS shall be operable in Modes 1 and 2 so that the plant can be placed and maintained in Mode 3 (hot shutdown) for an extended period of time from a location other than the control room. The ITS Limiting Condition for Operation (LCO) is not applicable in Modes 3, 4 (cold shutdown), and 5 (refueling) because the plant is already subcritical and in a condition of reduced reactor coolant inventory energy. Under these conditions, considerable time is available to restore necessary functions if they become unavailable. Consequently, the ITS do not require operability of the RSS during Modes 3, 4, and 5.

Technical Specification 3.6.13.a. currently requires that at least one remote shutdown panel be operable. Technical Specification 3.6.13.b. currently indicates that a remote shutdown panel is considered inoperable if the emergency condenser condensate return valve control switch is inoperable, either motor-operated steam supply valve control switch is inoperable, or the number of operable instrument channels is less than required by Table 3.6.13-1. Table 3.6.13-1 provides the remote shutdown panel instruments and the minimum number of operable channels required per instrument per panel. These requirements are conservative when compared to the ITS. To bring consistency with the ITS, the proposed change would require that one channel of each required "Function" (monitoring instruments and valve controls) be operable for the function to be operable. One channel of each function is adequate to monitor the status of a parameter or for the control of a valve. If a required function is declared inoperable (i.e., both channels are inoperable), the proposed changes allow 30 days to restore the inoperable function to an operable status. As indicated in the ITS, the allowed completion time of 30 days is acceptable based on operating experience and the low probability of an event that would require evacuation of the control room. A review of relevant industry events and a NMP1 plant-specific probabilistic risk assessment support this ITS conclusion. With one or more monitoring instrument functions inoperable, the proposed change gives an operator an additional option. Specifically, the operator is allowed 30 days to establish an alternate method of monitoring the parameter and 90 days to restore the function to operable



status. The use of an alternate method is acceptable since it will provide the operator with indication of the parameter of interest. The use of an alternate method of monitoring was found acceptable by the NRC as indicated in Amendment No. 216 to the James A. Fitzpatrick Nuclear Plant operating license.

Specification 3.6.13.c currently requires that the plant be brought to a cold shutdown condition if the required actions cannot be met. As indicated above, the proposed changes will require that the remote shutdown functions be operable during power operation. As indicated in the ITS, if any action and associated completion times cannot be met, the plant must be brought to an operational condition in which the LCO does not apply. Because this specification no longer applies to hot shutdown, and to be consistent with the guidance provided in the ITS, Specification 3.6.13.c will require that the plant be brought to a hot shutdown condition (versus cold shutdown condition) in 12 hours. As indicated in the ITS, the 12-hour completion time is reasonable, based on operating experience to reach hot shutdown from full power conditions in an orderly manner and without challenging plant systems, and still within the 24-hour limit of the current Technical Specifications.

The Bases Section to 3.6.13 and 4.6.13 was revised to be consistent with the proposed changes to the Specification. The Bases currently indicate that one remote shutdown panel is required to be operable. As explained above, one channel of each required function is adequate to maintain remote shutdown operability, and the proposed Bases state such.

Editorial changes were made to Table 3.6.13-1 to be consistent with the changes made to the Specification. Specifically, the word "INSTRUMENT" was changed to "FUNCTION" and the words "PANEL MONITORING" were changed to the words "PANELS FUNCTIONS." These changes make it clear that one channel of each function, on either Panel 11 or Panel 12, is acceptable to maintain operability. The emergency condenser condensate return valve control and motor-operated steam supply valves control were relocated from Specification 3.6.13.b to Table 3.6.13-1 to be consistent with the proposed changes.

CONCLUSION

The proposed changes will bring consistency between the NMP1 Technical Specifications and the ITS. One channel per function on either remote shutdown panel will assure remote shutdown capability. Thirty days to restore a function to operable status is acceptable based on the low probability of a control room evacuation. The use of an alternate method of monitoring a parameter for 90 days is acceptable because an operator will be provided indication. In conclusion, the proposed changes will not adversely affect the health and safety of the public or the common defense and security.

No Significant Hazards Consideration Analysis

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in Section 50.92 about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed.



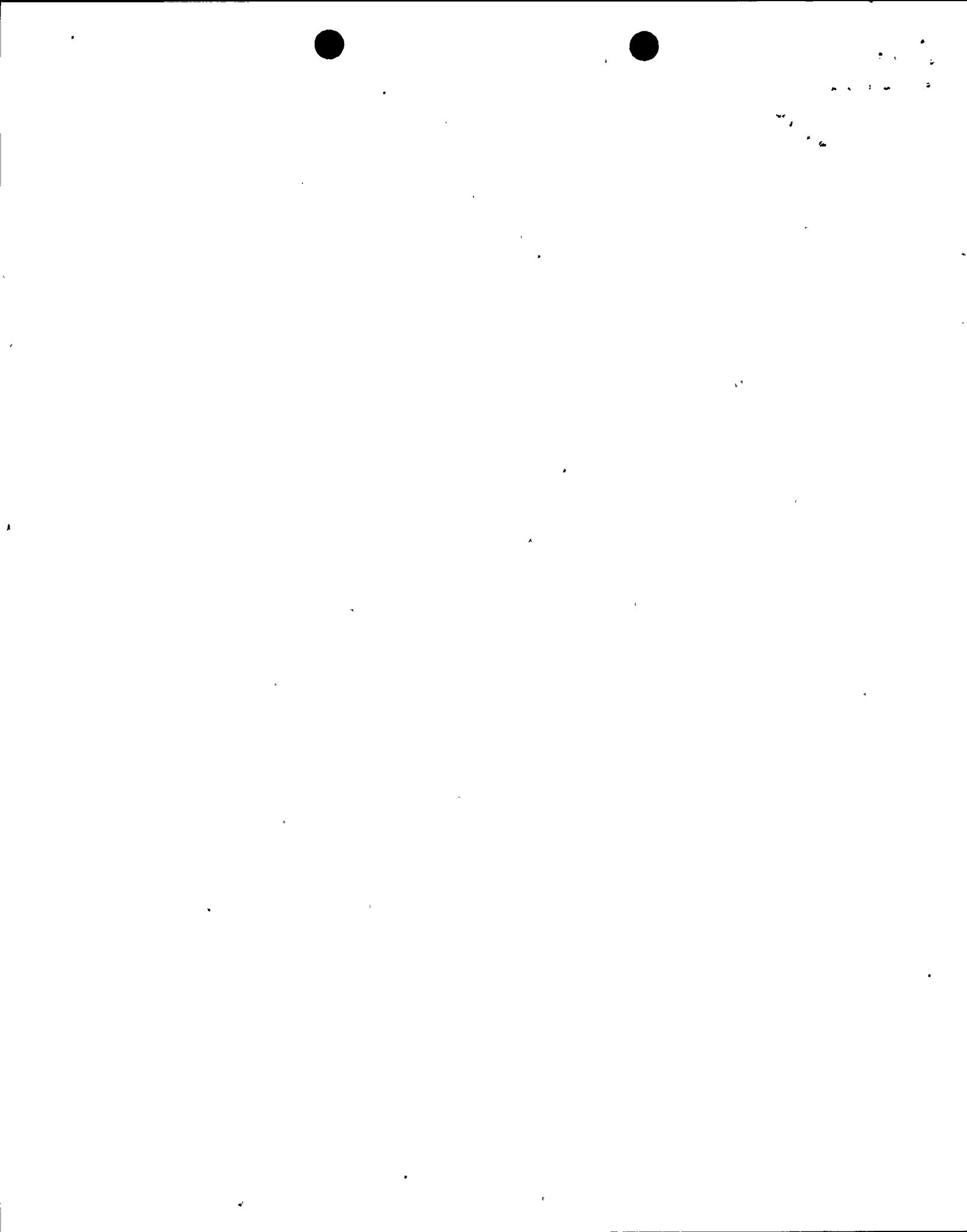
The operation of Nine Mile Point Unit 1, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The remote shutdown panel monitoring instruments and controls are not initiators or precursors to an accident. The remote shutdown panels provide the operator with sufficient monitoring instruments and controls to place and maintain the plant in a safe shutdown condition from a location other than the control room. Therefore, the proposed changes to Specification 3.6.13, "Remote Shutdown Panels," cannot affect the probability of a previously evaluated accident.

The proposed changes, in part, require that one channel (on either panel) for each function be operable. This change could potentially avoid an unnecessary plant shutdown without affecting an operator's ability to cope with a control room evacuation. One channel of each function is adequate to assure a safe shutdown. The proposed changes would also allow 30 days to restore an inoperable function to an operable status. As indicated in the ITS, the allowed time of 30 days is acceptable based on operating experience and the low probability of an event that would require evacuation of the control room. With one or more monitoring instrument functions inoperable, the proposed change gives an operator an additional option. Specifically, the operator is allowed 30 days to establish an alternate method of monitoring the parameter and 90 days to restore the function to operable status. The use of an alternate method is acceptable since it will provide the operator with indication of the parameter of interest. The remote shutdown panels will not be required to be operable in hot shutdown because the plant is already subcritical and in a condition of reduced reactor coolant inventory energy. Because this Specification no longer applies to hot shutdown and to be consistent with the guidance provided in the ITS, Specification 3.6.13.d will require that the plant be brought to a hot shutdown condition (versus cold shutdown condition) in 12 hours. As indicated in the ITS, the 12-hour completion time is reasonable based on operating experience. The Bases Section to 3.6.13 and 4.6.13 was revised to be consistent with the proposed changes to the Specification. The Bases currently indicates that one remote shutdown panel is required to be operable. As explained above, one channel of each required function is required to maintain remote shutdown operability. In summary, the proposed changes will not affect the ability of the Remote Shutdown System to provide the operator with sufficient instrumentation and controls to place and maintain the plant in a safe shutdown condition from a location other than the control room. Therefore, the consequences of an event requiring a control room evacuation will not significantly increase.

Editorial changes were made to Table 3.6.13-1 to be consistent with the changes made to the Specification. Specifically, the word "INSTRUMENT" was changed to "FUNCTION" and the words "PANEL MONITORING" were changed to the words "PANELS FUNCTIONS." These changes make it clear that one channel of each function, on either panel is acceptable to maintain operability. The emergency condenser condensate return valve control and motor-operated steam supply valves control were relocated from Specification 3.6.13.b to Table 3.6.13-1 to be consistent with the proposed changes.

Based on the above, the consequences of an accident previously evaluated are not significantly increased.



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 changes do not introduce any new accident precursors and do not involve any alterations to plant configurations which could initiate a new or different kind of accident. The proposed changes require that one channel of each function be operable to assure the remote shutdown panels can meet their intended function. No changes have been made which will affect the operation of the remote shutdown panels in a way which would create a new or different kind of accident. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any 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 will not affect the ability of the Remote Shutdown System to provide the operator with sufficient instrumentation and controls to place and maintain the plant in a safe shutdown condition from a location other than the control room. The ability to respond to a control room evacuation is maintained with one channel operable for each required function. The allowed outage time of 30 days is acceptable based on operating experience and the low probability of an event requiring control room evacuation. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

