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SUBJECT: Forwards application for amend & TS,representing addition of Spec 3.7.2/4.7.2, "Special Test Exception-Sys Leakage & Hydrostatic Testing," to NMP1 TSs.

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September 26, 1996
NMP1L 1136

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Gentlemen:

Niagara Mohawk Power Corporation hereby transmits an Application for Amendment to Nine Mile Point Unit 1 (NMP1) Operating License DPR-63. Also enclosed are the proposed changes to the Technical Specifications (TS) set forth in Appendix A of the above mentioned license. Included as Attachment B is a hand marked version of the proposed changes. Supporting information and analyses demonstrating that the proposed changes involve no significant hazards consideration pursuant to 10 CFR 50.92 are included as Attachment C.

The proposed changes contained herein represent the addition of Specification 3.7.2/4.7.2, "Special Test Exception - System Leakage and Hydrostatic Testing," to the NMP1 TSs. The addition of Specification 3.7.2/4.7.2 allows the reactor to be considered in cold shutdown (defined as reactor coolant temperatures below 212°F) when the actual reactor coolant temperature is greater than 212°F (i.e., hot shutdown) while performing system leakage or hydrostatic testing and scram time testing. This change permits system leakage or hydrostatic testing and scram time testing without primary containment integrity, with two Core Spray subsystems (versus four subsystems) operable, and with other operational flexibility. Although some variations were required, these changes are consistent with NUREG-1433, "Standard Technical Specifications." NUREG-1433 permits performing an inservice leak or hydrostatic test while in "Mode 4" (cold shutdown) with the reactor coolant temperature above 200°F (temperature above 200°F would normally be considered Mode 3 (hot shutdown)). As indicated in NUREG-1433, Mode 4 does not require that a full complement of Emergency Core Cooling Systems be available or that primary containment integrity be established and maintained. This amendment application also proposes that the TSs for those systems required to maintain reactor building integrity be met during hot shutdown conditions.

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During a refueling outage, the requirement to establish and maintain primary containment integrity during the hydrostatic or system leakage test (i.e., with coolant temperatures greater than 215°F) can add approximately eight hours to the outage. Also, requiring primary containment integrity, both Core Spray Systems to be operable or having to meet other hot shutdown TS requirements while performing a pressure test could potentially delay the test and the outage. Accordingly, Niagara Mohawk proposes the addition of Specification 3.7.2/4.7.2, "Special Test Exception - System Leakage and Hydrostatic Testing." In order to support the upcoming refueling outage currently scheduled for February 1997, approval of this license amendment is requested by February 8, 1997.

Pursuant to 10 CFR 50.91(b)(1), Niagara Mohawk has provided a copy of this license amendment request and the associated analyses regarding no significant hazard considerations to the appropriate state representative.

Very truly yours,

B. Ralph Sylvia
Chief Nuclear Officer

BRS/JMT/lmc
Attachments

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