

# CATEGORY 1

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SUBJECT: Submits response to RAI re proposed changes to TSS for CR air treatment sys-License Condition.

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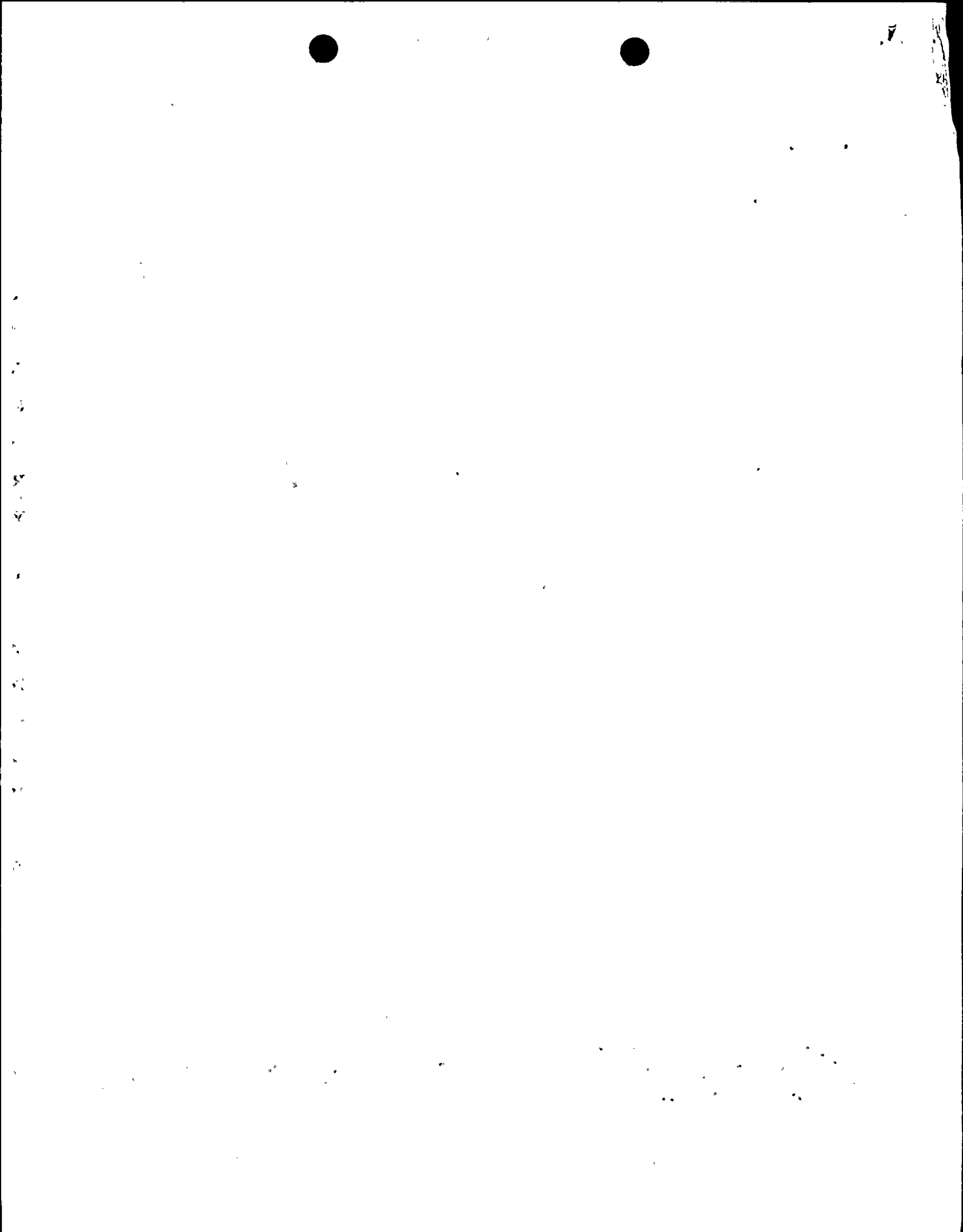
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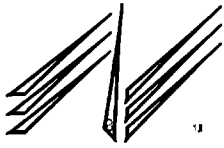
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CARL D. TERRY  
Vice President  
Nuclear Safety Assessment and Support

May 23, 1998

NMP1L 1323

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

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

**Subject:** *Additional Information Related to Proposed Changes to the Technical Specifications for the Control Room Air Treatment System - License Condition*

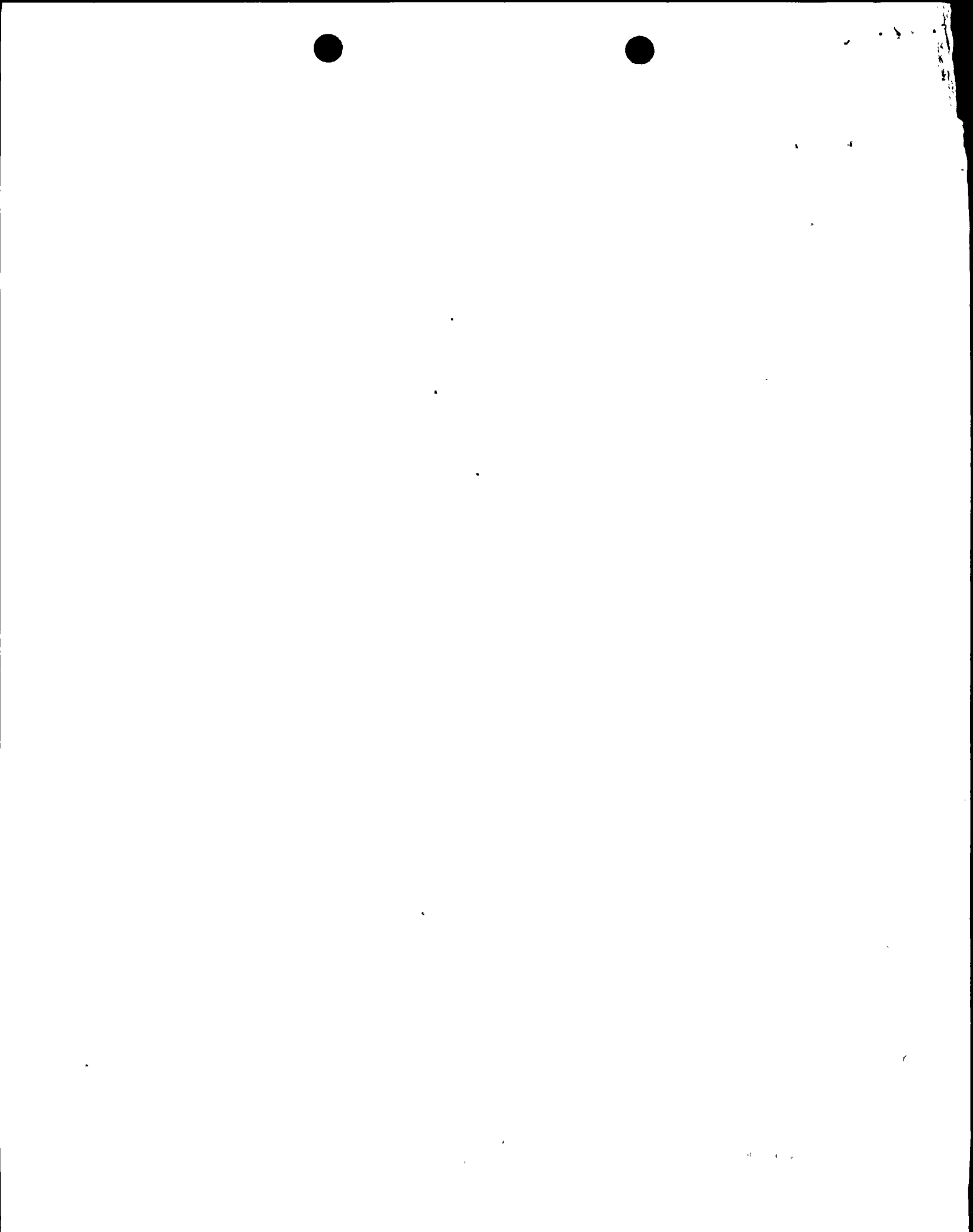
Gentlemen:

By letter (NMP1L 1312), dated May 2, 1998, Niagara Mohawk Power Corporation (NMPC) transmitted an Application for Emergency Amendment to the Nine Mile Point Unit 1 (NMP1) Technical Specifications (TS) as set forth in Appendix A of Operating License DPR-63. The application contains proposed changes to Sections 3.6.2 and 4.6.2, "Reactor Protection," to incorporate modifications to the initiation circuitry for the Control Room Air Treatment System.

During subsequent conference calls held with the NRC Staff on May 21, 1998, details of the small break Loss of Coolant Accident (LOCA) coping analysis were discussed. This coping analysis was performed to specifically support control room habitability issues related to the above referenced modifications. The analysis resulted in a maximum total iodine radioactivity concentration in the reactor coolant of 9.47 microcuries per gram ( $\mu\text{Ci/g}$ ). Provided the maximum total iodine radioactivity concentration is maintained within this limit, control room habitability is assured under small break LOCA conditions without relying on the Control Room Air Treatment System. Accordingly, our letter dated May 23, 1998 submitted proposed changes to NMP1 TS Section 3.2.4a which limited the total iodine radioactivity concentration to  $\leq 9.47 \mu\text{Ci/g}$  as well as changes to the associated Bases. These changes supplemented NMPC's previous Application for Emergency Amendment to the NMP1 TS dated May 2, 1998.

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By telephone conversation held on May 23, 1998, NMPC committed to provide a submittal demonstrating compliance with GDC 19 dose limits for the NMP1 Control Room without the use of potassium iodide. Attachment A delineates this commitment. Also, procedural controls currently exist to provide direction in the determination of need and administration of potassium iodide to NMP1 Control Room Operators. Therefore, the availability of potassium iodide to Control Room Operators is currently and will continue to be assured.

NMPC has determined that the additional information does not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in individual or cumulative occupational exposure. Therefore, we conclude that the proposed amendments meet the requirements of 10 CFR 51.22(c)(9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared. The original "No Significant Hazards" determinations for operation under the proposed Technical Specifications remain applicable.

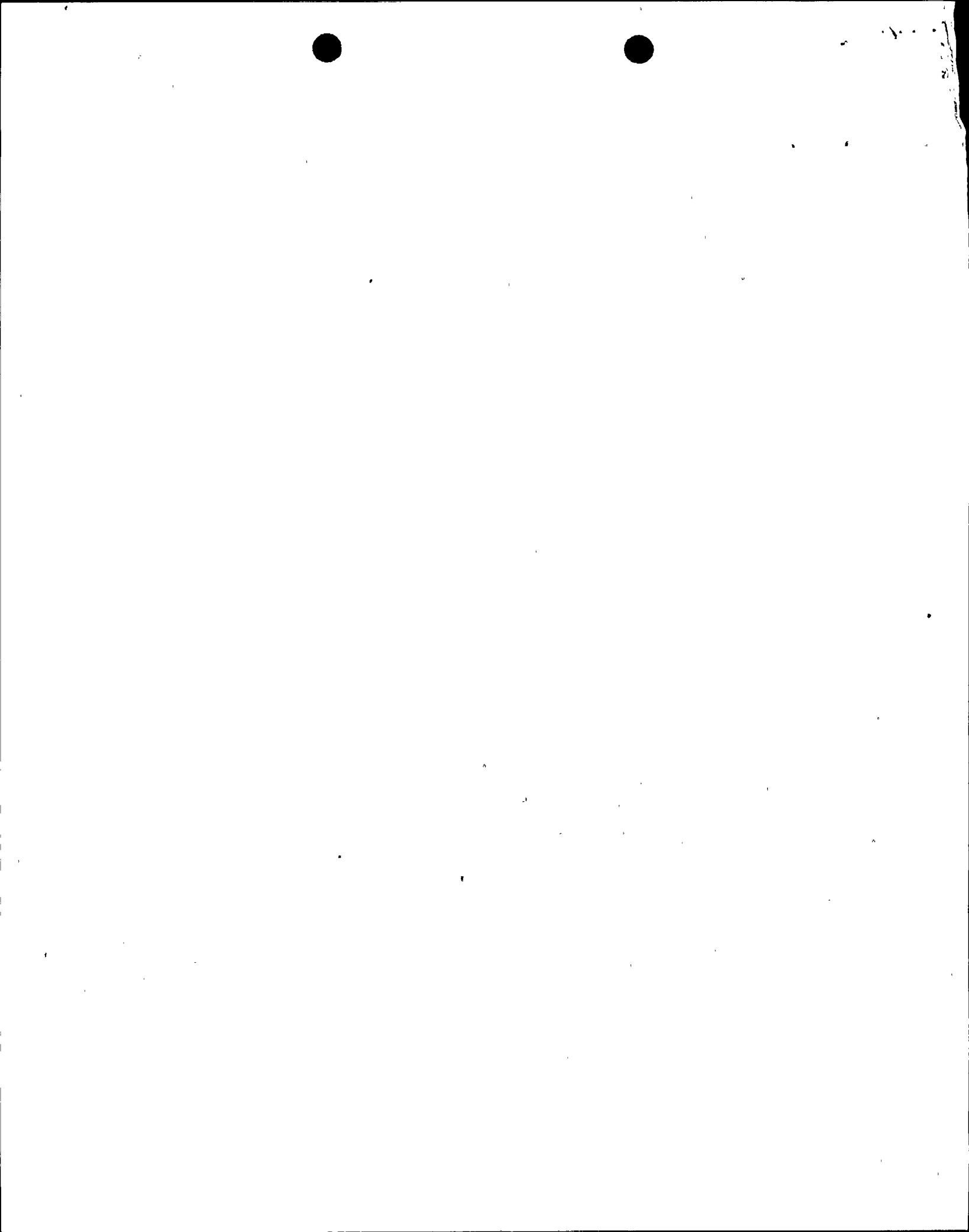
Very truly yours,



Carl D. Terry  
Vice President  
Nuclear Safety Assessment and Support

CDT/JMT/clm  
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I  
Mr. S. S. Bajwa, Director, Project Directorate, I-1, NRR  
Mr. B. S. Norris, Senior Resident Inspector  
Mr. D. S. Hood, Senior Project Manager, NRR  
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## ATTACHMENT A

### COMMITMENT TO PROVIDE A SUBMITTAL DEMONSTRATING COMPLIANCE WITH 10 CFR 50, APPENDIX A, GENERAL DESIGN CRITERION 19 DOSE LIMITS WITHOUT THE USE OF POTASSIUM IODIDE

The commitment to provide a submittal demonstrating compliance with GDC 19 dose limits for NMP1 without the use of potassium iodide follows:

NMPC will provide a submittal demonstrating compliance with the dose limits associated with 10 CFR 50 Appendix A, GDC 19, which states:

*“Control Room. A control room shall be provided from which actions can be taken to operate the nuclear power unit safely under normal conditions and to maintain it in a safe condition under accident conditions, including loss-of-coolant accidents. Adequate radiation protection shall be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident.”*

#### Proposed Plan and Schedule

NMPC proposes that this commitment will consist of analyses and evaluations that will demonstrate how the GDC 19 dose limits can be achieved without the use of potassium iodide. The analyses and evaluations will include all design basis accidents that are considered applicable for radiological consequences in the control room. These analyses and evaluations will be completed and submitted within six months of this letter.

