

# CATEGORY 1

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SUBJECT: Submits response to RAI re proposed changes to TSS for CR  
air treatment sys. Proposed changes to TS is encl.

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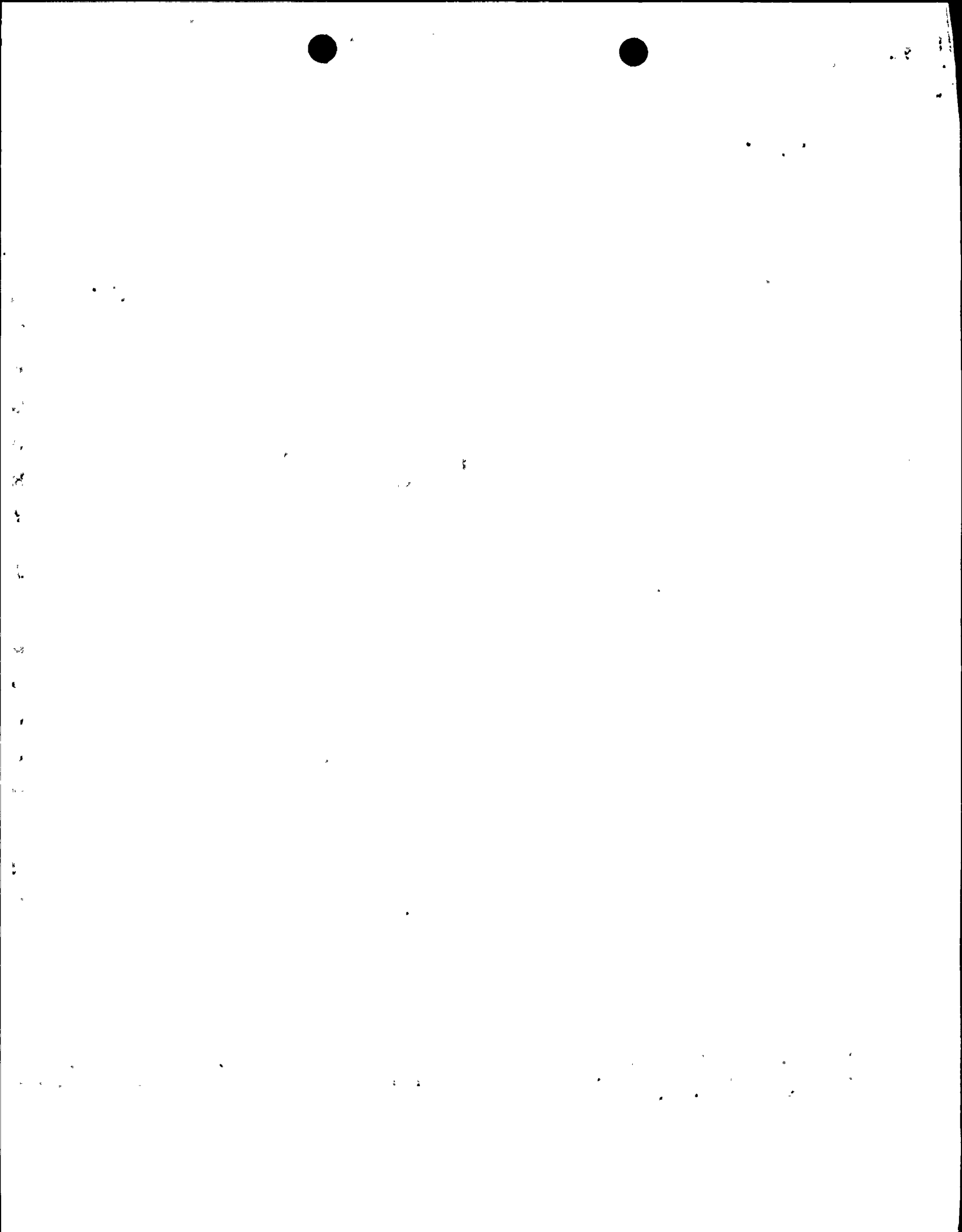
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May 23, 1998  
NMP1L 1321

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*

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  $\mu\text{Ci/gm}$ . 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.

NMPC herein submits the proposed changes to NMP1 TS Section 3.2.4a and the associated Bases. The proposed changes limit total iodine radioactivity concentration in the reactor coolant to  $\leq 9.47$  microcuries per gram. These changes supplement NMPC's previous

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Application for Emergency Amendment to the NMP1 TS, dated May 2, 1998. The previously submitted no significant hazards consideration has not changed and remains bounding. The rationale for requesting approval of the amendment on an Emergency basis has also not changed.

Enclosed as Attachment A are the proposed changes to the NMP1 TS and the associated Bases. A new paragraph has been added to the Bases to clarify that the limit of 9.47  $\mu\text{Ci/gm}$  is based on the most limiting small break LOCA outside containment and is for control room habitability purposes only. Also, to assist the NRC Staff with their review, hand mark-up copies of the TS and Bases pages are provided as Attachment B.

Very truly yours,



John H. Mueller  
Chief Nuclear Officer

JHM/TWP  
Attachments

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