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SUBJECT: Forwards application for amend to NMP1 TS Section 3/4.2.3, which supersedes 980702 submittal in entirety.Supporting TSs,encl.

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July 16, 1998
NMP1L 1340

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:

On July 2, 1997, Niagara Mohawk Power Corporation (NMPC) submitted an Application for Amendment to the Nine Mile Point Unit 1 (NMP1) Operating License DPR-63 concerning the reactor coolant chemistry requirements. In response to NRC questions with respect to the proposed changes, NMPC provides this revised submittal, which includes additional changes to NMP1 Technical Specifications (TS) Section 3/4.2.3 that were not included in the previous submittal.

The enclosed Application for Amendment to NMP1 Operating License DPR-63 supersedes the July 2, 1997 submittal in its entirety. This submittal addresses issues discussed with the NRC in telephone conversations on August 22, 1997, February 11, 1998, and February 25, 1998, and documented by a February 24, 1998 NRC memorandum. Enclosed as Attachment A are the proposed changes to the NMP1 TS set forth in Appendix A of the above mentioned license. Supporting information and analyses which demonstrate that the proposed changes involve no significant hazards consideration pursuant to 10CFR50.92 are included as Attachment B. A marked up copy of the affected current NMP1 TS pages is provided as Attachment C to assist your review.

During the 1997 refueling outage at NMP1, inspection of the core shroud vertical welds revealed cracks in excess of the screening criteria. By letter dated April 8, 1997, NMPC provided design documentation and evaluations to demonstrate the acceptability of the as-found vertical weld cracking in the NMP1 core shroud. By letter dated May 8, 1997, the NRC issued a Safety Evaluation approving the restart of NMP1 contingent on: 1) maintaining reactor coolant chemistry within the guidelines set forth in the Electric Power

Research Institute (EPRI) technical report TR-103515-R1 (BWRVIP-29) "BWR Water Chemistry Guidelines - 1996 Revision," in accordance with the commitment to Table 4-4 of the report as stated in NMPC's April 30, 1997 letter to the NRC, and 2) the requirement that NMPC submit an application for a license amendment to address the difference between the current TS conductivity limits for reactor coolant chemistry and the analysis assumptions for core shroud crack growth rates. The NRC approved the NMPC analysis predicated on the condition that NMP1 is operated in accordance with NMPC's commitment to Table 4-4 of the BWR water chemistry guidelines. This application for amendment is being submitted to address the NRC's second contingency.

The proposed changes revise TS Sections 3.2.3 and 4.2.3 to reflect NMPC's commitment to Table 4-4 of the BWR water chemistry guidelines. In addition, the "Bases for 3.2.3 and 4.2.3 Coolant Chemistry" has been revised. These changes address the differences between the current TS conductivity limits for reactor coolant chemistry and the analysis assumptions for core shroud crack growth rates. This Application for Amendment is consistent with NMPC's February 27, 1998 submittal to the NRC which provided the technical justification to support extension of the NMP1 vertical weld inspection interval from 10,600 hours of hot operation to 14,500 hours of hot operation.

Pursuant to 10CFR50.91(b)(1), NMPC has provided a copy of this license amendment request and the associated analysis regarding no significant hazards consideration to the appropriate state representative.

Very truly yours,

John H. Mueller
Chief Nuclear Officer

JHM/TRE/kap
Attachments

xc: Mr. H. J. Miller, NRC Regional Administrator
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