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SUBJECT: Forwards application for amend to license NPF-69, revising
 Tech Specs Sections 4.8.4.4a & 4.8.4.5a to require testing
 of electrical protection assemblies at least once every 6
 months.

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November 19, 1998
NMP2L 1836

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

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) hereby transmits an Application for Amendment to Nine Mile Point Unit 2 (NMP2) Operating License NPF-69. Also enclosed as Attachment A are the proposed changes to the Technical Specifications (TS) set forth in Appendix A to 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. Hand marked-up copies of the affected Technical Specification pages are provided as Attachment C to assist your review.

The proposed changes to the NMP2 TS revise the current surveillance frequencies of NMP2 TS Sections 4.8.4.4a and 4.8.4.5a to require testing of the Electrical Protection Assemblies (EPAs) at least once every 6 months. NMPC has modified the NMP2 design for the Reactor Protection System (RPS) Motor Generator Set (M/G) and RPS Uninterruptible Power Supply (UPS) EPAs to provide relay actuated protection systems. The previous NMP2 RPS M/G and RPS UPS EPA design was such that channel functional testing performed on logic cards within the EPA system tripped the associated breaker and interrupted power to the associated essential circuit. NMP2 TS Amendment No. 11 (approved by the NRC on November 29, 1989) was implemented because of challenges presented to the plant systems and operators while performing the required EPA surveillance testing with the plant in operation. Testing of EPAs could only be accomplished with the plant in shutdown. The existing NMP2 TS Sections 4.8.4.4a and 4.8.4.5a, implemented by NMP2 TS Amendment No. 11, require that channel functional tests be performed on the RPS M/G EPAs and RPS UPS EPAs each time the plant is in cold shutdown for a period of more than 24 hours, unless performed within the previous 6 months. The proposed changes will reinstate the 6 month frequency for testing.

The relays of the new design may be individually isolated from an essential power circuit for testing and may be actuated without tripping the associated breaker. The relay actuated system will allow the EPA system monitoring an essential power supply to be functionally tested with the plant on-line. No EPA relay actuation setpoints were affected by the modification or the proposed changes. The modification to the EPA systems and

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the revision of the surveillance testing frequencies will present less challenge to plant operations during functional testing, while facilitating the scheduling of testing.

The EPA modification was completed during NMP2 Refueling Outage 6 (RFO6).

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

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/KLL/sc
Attachments

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