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Niagara Mohawk

Richard B. Abbott
Vice President
Nuclear Engineering

Phone: 315.349.1812
Fax: 315.349.4417

December 30, 1998
NMP2L 1844

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

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

Subject: *Request for Additional Information*

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) transmitted an Application for Amendment regarding conversion of the Nine Mile Point Unit 2 (NMP2) Current Technical Specifications to the Improved Technical Specifications (ITS) by letter dated October 16, 1998 (NMP2L 1830). Subsequently, by teleconference dated November 18, 1998, the Staff has requested information regarding the incorporation of Technical Specification Task Force (TSTF) changes into the proposed license.

In your request for additional information, the Staff requested a brief explanation of how NMPC addressed TSTF changes in its proposed License Amendment. This explanation is provided below.

As indicated in our letter dated October 16, 1998, NMPC incorporated certain generic changes approved through September 1, 1998, into our proposed License Amendment for NMP2. NMP2 addressed all TSTFs applicable to NUREG-1434, Rev. 1, Improved Standard Technical Specifications (ISTS), approved through September 1, 1998. The approved TSTFs were annotated in the ISTS Markup and the ISTS Bases Markup by use of the TSTF numbers in "clouds" next to the marked up changes. Deviations from the approved TSTFs are also annotated, and discussions of the deviations are cross referenced, if necessary, by "clouds," consistent with all other deviations to the ISTS (and as described in Attachment 1 of NMPC's letter dated October 16, 1998). 1/1
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In addition, some pending TSTFs were also incorporated. These changes are annotated in the ISTS Markup and ISTS Bases Markup consistent with other, non-TSTF changes. That is, a specific Justification for Deviation (JFD) is provided. In some cases, the pending TSTF number is provided in the JFD; however, NMP2 requests that these changes not be tied to the approval of the pending TSTF change, since the JFD provided by NMP2 should provide adequate justification to approve the change for NMP2, regardless of whether or not the change is approved generically.



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Furthermore, in your request for additional information, the Staff requested a matrix table for all incorporated TSTF changes showing the applicable specification(s), whether the TSTF has been approved, and whether a JFD is warranted. Attached to this letter is a list of the TSTFs that were addressed in NMPC's submittal.

This attachment provides the information requested by the Staff and categorizes the TSTFs into the following four categories:

1. Approved TSTFs incorporated and therefore not requiring JFDs.
2. Approved TSTFs incorporated with changes, with JFDs provided as appropriate.
3. Approved TSTFs not incorporated, with JFDs provided.
4. Pending TSTFs incorporated in whole or part, with appropriate JFDs.

Thank you for your prompt consideration of our proposed License Amendment.

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/KWK/kap
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator
Mr. S. S. Bajwa, Director, Project Directorate I-1, NRR
Mr. G. K. Hunegs, Senior Resident Inspector
Mr. D. S. Hood, Senior Project Manager, NRR
Mr. John P. Spath
NYSERDA
286 Washington Avenue Ext.
Albany, NY 12203-6399
Records Management



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TSTF'S ADDRESSED FOR NMP2

A. Approved TSTFs incorporated (no JFDs):*

<u>TSTF No.</u>	<u>LCO's Affected</u>
TSTF-2, R1	ITS 3.8.3
TSTF-5, R1	ITS 2.0
TSTF-34, R0	ITS 3.1.3
TSTF-38, R0	ITS 3.8.4
TSTF-45, R1	ITS 3.6.1.3
TSTF-46, R1	ITS 3.6.1.3, ITS 3.6.4.2, ISTS 3.6.5.3
TSTF-76, R0	ITS 5.5
TSTF-104, R0	ITS LCO 3.0.4
TSTF-118, R0	ITS 5.5
TSTF-137, R0	ITS 3.4.8
TSTF-165, R0	ITS LCO 3.0.5
TSTF-166, R0	ITS LCO 3.0.6
TSTF-206, R0	ITS 3.6.2.1
TSTF-222, R0	ITS 3.1.4
TSTF-253, R0	ITS 3.8.1
TSTF-278, R0	ITS 3.8.6
TSTF-279, R0	ITS 5.5

* Typographical and grammatical errors have been corrected.

B. Approved TSTFs incorporated with changes (with JFDs as appropriate):

<u>TSTF No.</u>	<u>LCO's Affected</u>
TSTF-17, R1	ITS 3.6.1.2
TSTF-30, R2	ITS 3.6.1.3
TSTF-32, R0	ITS 3.1.3
TSTF-33, R0	ITS 3.1.3
TSTF-35, R0	ITS 3.4.11
TSTF-65, R1	ITS 2.0, ITS 5.1, ITS 5.2, ITS 5.5, ITS 5.7
TSTF-106, R1	ITS 5.5
TSTF-152, R0	ITS 5.6
TSTF-153, R0	ITS 3.4.9, ITS 3.4.10, ITS 3.9.8, ITS 3.9.9
TSTF-163, R2	ITS 3.8.1
TSTF-207, R0	ITS 3.6.1.3
TSTF-225, R0	ITS 3.9.1
TSTF-230, R0	ITS 3.6.2.3
TSTF-269, R0	ITS 3.6.1.3



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C. Approved TSTFs not incorporated (with JFDs):

<u>TSTF No.</u>	<u>LCO's Affected</u>
TSTF-8, R1	ITS SR 3.0.1, ITS 3.8.1, ITS 3.8.4
TSTF-60, R0	ITS 3.4.7
TSTF-139, R1	ITS 3.7.6

D. Pending TSTFs incorporated, in whole or part (with JFDs):

<u>TSTF No.</u>	<u>LCO's Affected</u>
TSTF-16, R1	ITS 3.8.8
TSTF-18, R0	ITS 3.6.4.1
TSTF-36, R3	ITS 3.8.2, ITS 3.8.5, ITS 3.8.9
TSTF-37, R2	ITS 3.3.3.1, ITS 3.8.1, ISTS 5.6.7
TSTF-52, R0	ITS 3.6.1.1, ITS 3.6.1.2, ITS 3.6.1.3, ITS 5.5
TSTF-120, R1	ITS 5.5
TSTF-122, R0	ITS LCO 3.0.2
TSTF-203, R0	ITS 3.8.6
TSTF-227, R0	ITS 3.3.4.1
TSTF-229, R0	ITS 3.2.2
TSTF-231, R0	ITS 3.3.1.1
TSTF-232, R0	ITS 3.9.1
TSTF-266, R0	ITS 3.3.3.2
TSTF-275, R0	ITS 3.3.5.1

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