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B. Ralph Sylvia
Executive Vice President
Nuclear

May 14, 1993
NMP1L 0756

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

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

Gentlemen:

Niagara Mohawk Power Corporation hereby transmits an Application for Amendment to Nine Mile Point Unit 1 Operating License DPR-63. Enclosed are proposed changes to the Technical Specifications set forth in Appendix A to the above mentioned license. Supporting information and analysis demonstrating that the proposed changes involve no significant hazards consideration pursuant to 10 CFR 50.92 are included in Attachment B.

The current Technical Specifications for Nine Mile Point Unit 1 contain several pages that are barely legible. Moreover, the Technical Specification pages differ in their type-set because individual pages have been re-typed each time an amendment request was submitted. This situation has contributed to the introduction of typographical errors when processing Technical Specification changes. This amendment request is submitted in order to eliminate the administrative problems that these situations have created. Accordingly, the Technical Specifications have been re-typed in their entirety and several editorial changes and administrative corrections have been made as detailed in the following sections. This re-typing was subsequently verified by several 100% reviews of the revised text, confirming the accuracy of the equations, words, numerical values, graphs and scientific notations. These alterations are purely administrative and do not involve substantive changes to the Technical Specifications.

The editorial changes made throughout the Technical Specifications involve the following types of changes:

- Corrections of obvious typographical errors
- Addition of temperature degree signs (°)
- Addition of commas and periods for clarity
- Providing consistent page headings/titles
- Adjusting of line spacing (repagination)
- Removal of all intentionally blank pages
- Re-numbering of all Technical Specification pages
- Removal of outdated footnotes
- Addition of the delta sign (Δ) in place of the word delta

A001

In addition to the editorial changes, this amendment makes several administrative corrections. These were determined to be administrative in nature and do not constitute a substantive change to the Technical Specifications. The requested corrections are briefly described below with the detailed justification discussed in Attachment B to this letter.

1.	Page 51	Delete footnote *, regarding the one time extension of the Core Spray System quarterly pump operability check.
2.	Pages 93 and 94	Updated Technical Specifications to reference recent amendment to 10 CFR 50.55a, which separates requirements of Inservice Testing from those for Inservice Inspection.
3.	Page 140b	Correct item (f), word "Monitor" in title should be "Monitoring".
4.	Page 163	Delete last paragraph in Bases Section 3.3.7 and 4.3.7.
5.	Page 213	Add "Shutdown," "Refuel," "Startup," and "Run" to Table 3.6.2f.
6.	Page 224	Add "Shutdown," "Refuel," "Startup," and "Run" to Table 3.6.2h.
7.	Page 241vvv	Correct typographical error, under Objective section, from 3.15.b.1 to 3.6.15.b.1.
8.	Page 266	Correct items b, c, and d by deleting material in parentheses and adding section 4.2.6 after word specification.
9.	Pages 186, 192, 196a, 198, 204, 224, 225a, 270	Delete footnotes and table notations dealing with the Hydrogen Water Chemistry feasibility test. This test has been completed.

Niagara Mohawk's November 24, 1992 Application for Amendment proposed changes to Section 6.0, "Administrative Controls," for the Nine Mile Point Unit 1 Technical Specifications. In anticipation of this Amendment's issuance within the next few weeks, Niagara Mohawk has included in this Application for Amendment the changes proposed in the November 24, 1992 application. This will avoid re-submittal of the affected pages.

Pursuant to 10 CFR 50.91(b)(1), Niagara Mohawk 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,

B. Ralph Sylvia
Executive Vice President - Nuclear

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ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. DPR-63
DOCKET NO. 50-220

Proposed Changes to the Technical Specifications

This proposed amendment requests that all existing pages of the Technical Specifications be replaced with the revised attached pages. These pages have been re-typed in their entirety. The pages requiring administrative corrections are listed below.

OLD PAGE NUMBER	NEW PAGE NUMBER
51	54
93	106
94	107
140b	138
163	163
186	192
192	199
196a	204
198	206
204	212
213	223
224	234
225a	236
241vvv	319
266	368
270	372

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. DPR-63
DOCKET NO. 50-220

SUPPORTING INFORMATION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS ANALYSIS

INTRODUCTION

The proposed changes to Niagara Mohawk Power Corporation's Nine Mile Point Unit 1 Technical Specifications contained herein represent a complete re-typing of all pages, with the exception of graphs and figure pages. The proposed amendment will correct typographical errors, adjust line spacing (repagination), delete blank pages and make editorial and administrative corrections. These changes will alleviate administrative problems that have existed with the current Technical Specifications. The changes proposed are purely administrative and do not involve substantive changes to the Technical Specifications. The proposed amendment will result in the reissuance of all pages in Appendix A of the Technical Specifications. The proposed amendment will remove all previous amendment numbers which appeared on Technical Specification pages.

DESCRIPTION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

Niagara Mohawk Power Corporation (NMPC) proposes the following administrative corrections. These corrections have been reviewed to ensure that they are administrative in nature and do not constitute a substantive change to the Technical Specification.

1. Section 4.1.4, Core Spray System

   By letter dated October 16, 1992, Niagara Mohawk submitted a request for changes to the Unit 1 Technical Specifications (adding footnote*) to revise Surveillance Requirement 4.1.4.b to extend the quarterly pump surveillance interval for Core Spray (CS) System 11 from January 10, 1993 until February 20, 1993. The NRC issued Amendment No. 135 on December 17, 1992. Since this footnote was a one-time only requirement, Niagara Mohawk requests that this footnote be deleted because it is now outdated.

2. Section 3.2.6/4.2.6, Inservice Inspection and Testing

   The Nuclear Regulatory Commission amended 10 CFR Part 50, specifically Section 10 CFR 50.55a, to separate the requirements for Inservice Testing from those for "Inservice Inspection Requirements," 50.55a(g), (57 FR 34666, effective September 8, 1992). Previously reserved Section, 50.55a(f), now contains the "Inservice Testing" requirements, while all existing requirements for inservice examination and system pressure testing are retained in Section 10 CFR 50.55a(g). Accordingly, Niagara Mohawk has updated Section 3.2.6/4.2.6, "Inservice Inspection and Testing," to reflect the correct references to the amended 10 CFR 50.55a. Specifically, 3.2.6.b.1/4.2.6.b.1 reference to 10 CFR 50.55a(g) has been revised to 10 CFR 50.55a(f). In addition, the

Bases for 3.2.6 and 4.2.6 Inservice Inspection and Testing has been revised to add the reference to 10 CFR 55a(f). Specifically, the first paragraph, first sentence, the reference to 10 CFR 50 will now delineate Section 50.55a(f) and (g). Also, in the first paragraph, as corrected above, a request for relief is submitted in accordance with 10 CFR 50, Section 50.55a(f)(6)(i) and 50.55a(g)(6)(i). Since these updates are administrative in nature, Niagara Mohawk requests that Section 3.2.6/4.2.6 and its Bases be corrected.

3. **Section 4.3.3, Leakage Rate**

In Technical Specification Section 4.3.3f, the word "Monitor" in the section heading "Continuous Leak Rate Monitor" incorrectly leads one to believe this section describes detection instrumentation rather than monitoring requirements. Accordingly, Niagara Mohawk requests that the word "Monitor" be corrected to the word "Monitoring."

4. **Section 3.3.7, Containment Spray System**

The proposed Bases Change, dated November 21, 1988 for Sections 3.3.7 and 4.3.7, Containment Spray System, was issued after Technical Specification Amendment No. 105 was issued on May 16, 1989. The Application for Amendment No. 105, dated January 13, 1989, proposed to delete the last paragraph of the Bases for Section 3.3.7 and 4.3.7. However, with the issuance of this Bases page after Amendment No. 105, the paragraph in question was allowed to remain in the Technical Specifications. Since no purpose exists for this paragraph to remain, Niagara Mohawk requests that the last paragraph of the Bases for Section 3.3.7 and 4.3.7 be deleted.

5. **Table 3.6.2f, Instrumentation that Initiates Auto Depressurization**

Technical Specification Table 3.6.2f does not include the headings, "Shutdown, "Refuel," "Startup," and "Run" under the column "Reactor Mode Switch Position in Which Function Must be Operable." Amendment No. 45 issued on June 1, 1981 contained the required headings, however, they were inadvertently left off in Amendment No. 64, dated December 7, 1990. Since no reason exists for this omission, Niagara Mohawk requests that Technical Specification Table 3.6.2f headings "Shutdown," "Refuel," "Startup," and "Run" be corrected.

6. **Table 3.6.2h, Vacuum Pump Isolation**

Technical Specification Table 3.6.2h does not include the headings, "Shutdown," "Refuel," "Startup," and "Run" under the column "Reactor Mode Switch Position in Which Function Must be Operable." Amendment No. 87 dated March 9, 1987 contained the required headings, however, they were inadvertently left off in Amendment No. 94 dated February 8, 1988 and Amendment No. 119 dated December 7, 1990. Since no reason exists for this omission, Niagara Mohawk requests that Technical Specification Table 3.6.2h headings "Shutdown," "Refuel," "Startup," and "Run" be corrected.

7. **Section 3.6.18, Mark I Containment**

The "Objective" of Section 3.6.18 incorrectly references Section 3.15.b.1. The correct Specification is 3.6.15.b.1. The discrepancy with the section reference was apparently inserted by Amendment No. 66. The reference 3.15.b.1 does not exist in the current Technical Specifications. Niagara Mohawk requests that the correct section reference of 3.6.15.b.1 be corrected in Technical Specification 3.6.18.

8. **Section 6.9.3, Special Reports**

The Technical Specification request dated November 4, 1983 for Amendment No. 57, proposed to delete the parenthetical information referencing Tables 4.2.6(a), (b), (c) and add the reference number 4.2.6 after the word "Specification" in Technical Specification Section 6.9.3, Special Reports, items b, c, and d. Amendment No. 57 was issued on April 18, 1984. In a subsequent amendment to this page, the old references were re-inserted. Since no basis exists for the re-inclusion of this Section 6.9.3 information, Niagara Mohawk requests that Section 6.9.3 be corrected as amended in Amendment No. 57.

9. **Section 3.6.1, Station Process Effluents, Section 6.12, High Radiation Area, Table 3.6.2a, Instrumentation That Initiates Scram, Table 3.6.2b, Instrumentation That Initiates Primary Coolant System or Containment Isolation, Table 3.6.2h, Vacuum Pump Isolation**

Technical Specification Amendment No. 87, dated July 10, 1986, responded to Niagara Mohawk's application of May 27, 1986. The amendment modified Technical Specifications Section 3.6.1, Station Process Effluents, Section 6.12, High Radiation Area, Table 3.6.2a, Instrumentation That Initiates Scram, Table 3.6.2b, Instrumentation That Initiates Primary Coolant System or Containment Isolation, Table 3.6.2h, Vacuum Pump Isolation, and the notes to these three tables to allow Niagara Mohawk to demonstrate the feasibility of a Hydrogen Water Chemistry System as a mitigator of intergranular stress corrosion cracking of stainless steel piping at Nine Mile Point Unit 1. This feasibility test has been completed and the Technical Specification requirements are no longer required. The word "deleted" has been inserted in the notes to these tables, where applicable. Since this requirement was a one-time only requirement, Niagara Mohawk requests that these table notations and footnotes be deleted.

EVALUATION

The proposed amendment will correct typographical errors, adjust line spacing (repagination), delete blank pages and make editorial and administrative corrections. The Technical Specification pages were re-typed, with the exception of graphs and figures, and are verified to be in accordance with current Technical Specifications. This re-typing was subsequently verified by several 100% reviews of the revised text, confirming the accuracy of the equations, words, numerical values, graphs and scientific notations.

This amendment request will eliminate the administrative problems and errors that exist with the current Technical Specifications. The re-typing of the Technical Specifications into a word processing database will allow future changes to a Technical Specification page to be made

without re-typing the entire page. Retyping the Technical Specification page has led to the introduction of typographical errors in past Technical Specification Amendment requests. Niagara Mohawk concludes that the proposed editorial and administrative corrections do not reduce the effectiveness of the Technical Specifications and will reduce the administrative errors made in Technical Specification Amendment requests.

Retyping the Technical Specifications provides better clarity and readability of pages. It also enhances the overall management control of the Technical Specification pages for future amendment requests.

CONCLUSION

The proposed amendment incorporates administrative and editorial corrections and does not affect assumptions contained in any safety analyses. There are no physical changes to the facility or any changes to operating procedures. Limiting conditions for operation (LCOs), limiting safety system settings, and safety limits specified in the Technical Specifications will also remain unchanged as a result of the proposed amendment. Since there are no changes in the way the plant is operated and plant equipment and physical features are not affected, the potential for an unanalyzed accident is not created. Furthermore, the quality of the Technical Specifications will be preserved since its contents were verified by several reviews of the re-typed text. For these reasons, there is reasonable assurance that the administrative and editorial changes that would be authorized by the proposed amendment can be implemented without endangering the health and safety of the public and are consistent with common defense and security.

NO SIGNIFICANT HAZARDS CONSIDERATION

10 CFR 50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in 10 CFR 50.92, concerning the issue of no significant hazards consideration. Therefore, in accordance with 10 CFR 50.92, the following analysis has been performed:

The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment incorporates administrative changes and does not affect assumptions contained in any safety analyses nor do the changes affect Technical Specifications that preserve safety analyses assumptions. Additionally, these proposed changes do not modify the physical design or operation of the plant. The proposed changes are purely administrative in nature and only change typographical errors, make editorial changes for consistency, repaginate and renumber the document, and delete pertinent portions of the Technical Specifications that are no longer effective or have been previously approved for deletion. Retyping of the Technical Specification pages allows for better clarity, readability and control of Technical Specification pages for future amendment requests. Therefore, the proposed amendment will not increase the probability or consequences of an accident previously evaluated.

The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Since there are no changes in the way the plant is operated and plant equipment and physical features are not affected, the potential for an unanalyzed accident is not created. The proposed changes are administrative in nature and do not affect any accident initiators for Nine Mile Point Unit 1. The proposed changes are purely administrative in nature and only change typographical errors, make editorial changes for consistency, repaginate and renumber the document, and delete pertinent portions of the Technical Specifications that are no longer effective or have been previously approved for deletion. Niagara Mohawk believes that it is prudent to have the Technical Specification pages re-typed into a word processing database. This allows for better clarity, readability and control of Technical Specification pages for future amendment requests. The proposed amendment will, therefore, not create the possibility of a new or different kind of accident from any accident previously evaluated.

The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

As a result of the proposed amendment, there will be no changes to the physical design of the plant. No margin of safety is affected by this change. The initial conditions and methodologies utilized in the conduct of the accident analyses are unchanged. The analysis results are not impacted.

With the proposed changes, all safety criteria previously evaluated are still met since these changes are purely administrative in nature and only change typographical errors, make editorial changes for consistency, repaginate and renumber the document, and delete pertinent portions of the Technical Specifications that are no longer effective or have been previously approved for deletion.

The proposed changes are administrative in nature and do not affect the safe operation of the plant. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Therefore, based on the above evaluation, Niagara Mohawk has concluded that these changes do not involve significant hazards consideration.