

NIAGARA MOHAWK POWER CORPORATION/NINE MILE POINT, P.O. BOX 63, LYCOMING, NY 13093/TELEPHONE (315) 349-2882.

B. Ralph Sylvia Executive Vice President Nuclear

August 28, 1995 NMP2L 1564

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

> RE: Nine Mile Point Unit 2 Docket 50-410 NPF-69

Gentlemen:

Niagara Mohawk Power Corporation hereby transmits an Application for Amendment to Nine Mile Point Unit 2 Operating License NPF-69. Also enclosed as Attachment A is the proposed change to the Technical Specifications as set forth in Appendix A of the Nine Mile Point Unit 2 Operating License. Pursuant to 10 CFR 50.92, supporting documentation and an analysis demonstrating that the proposed change involves no significant hazards consideration are included as Attachment B.

Niagara Mohawk requests this Application for Amendment be processed as an emergency amendment as defined in 10 CFR 50.91. Information contained in Attachment C demonstrates that the criteria contained in 10 CFR 50.91(a)(5) for issuance of the license amendment without prior notice or opportunity for a hearing or public comment are met. Attachment D presents the environmental considerations for the proposed Technical Specification change and concludes that no adverse environmental consequences would result from the requested amendment.

Technical Specification 3.6.1.7, <u>Primary Containment Purge System</u>, limits the amount of time the 12-inch and 14-inch purge system supply and exhaust lines may be used for VENTING or PURGING in OPERATIONAL CONDITION 1, 2, and 3 to 90 hours per 365 day period. Nine Mile Point 2 has accumulated approximately 84.4 hours of operating time towards the 90 hour limit. The proposed amendment would increase the time restriction from 90 hours to 135 hours per 365 day period, revise the associated Bases section, and delete expired footnotes as an editorial change.

Niagara Mohawk plans to remove Nine Mile Point 2 from service and de-inert the primary containment to allow entry into the primary containment to perform corrective maintenance on recirculation flow control valve position monitoring instrumentation. Recent attempts to correct the problem with this instrumentation without primary containment entry have been unsuccessful. The primary containment will also be entered to repair the normal position monitoring instrumentation for a suppression chamber to drywell vacuum breaker. This

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outage is scheduled from September 1, 1995 to September 5, 1995. Niagara Mohawk has determined that the planned outage is prudent from a nuclear safety and plant reliability perspective.

Treatment of this application as an emergency situation is needed in order to allow personnel access inside primary containment for system inspections during restart from the planned outage. Inability to perform these inspections due to the present 90 hour time restriction would prohibit Niagara Mohawk's ability to detect and correct leakage from hot, pressurized systems inside primary containment, and evaluate the effectiveness of the corrective maintenance on the recirculation flow control valve position monitoring instrumentation prior to resumption of normal power operation, thereby increasing the potential for thermal cycling of the reactor vessel and forced unit shutdown. The proposed change is similar to that approved for the Washington Nuclear Project No. 2 (Amendment No. 56 dated May 5, 1988).

Niagara Mohawk is requesting this license amendment be issued by September 1, 1995. A copy of the license amendment request and the associated analysis which demonstrates that no significant hazards consideration exists have been provided to the appropriate state representative in accordance with 10 CFR 50.91(b)(1).

Very truly yours,

BRalph Sylva

B. Ralph Sylvia

Executive Vice President - Nuclear

BRS/KWK/kap Attachments

xc: Regional Administrator, Region I

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