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RICKARD B. ABBOTT Vice President Nuclear Generation

January 17, 1996 NMP2L 1602

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 hereby transmits an Application for Amendment to the Nine Mile Point Unit 2 Operating License NPF-69. Also enclosed as Attachment A are the proposed changes to the Technical Specifications as set forth in Appendix A to the above mentioned license. Supporting information and an analysis demonstrating that the proposed changes involve no significant hazards consideration pursuant to 10CFR50.92 are included as Attachment B.

The proposed Technical Specification changes contained herein represent revisions to Specifications 3/4.3.1, "Reactor Protection System Instrumentation," 3/4.3.2, "Isolation Actuation Instrumentation," 3/4.3.3, "Emergency Core Cooling System Actuation Instrumentation," 3/4.3.4.2, "End-of-Cycle Recirculation Pump Trip System Instrumentation," and the associated Bases to relocate response time limit tables from Technical Specifications to the Nine Mile Point Unit 2 (NMP2) Updated Safety Analysis Report. These changes will allow Niagara Mohawk to administratively control changes to the response time limits for reactor protection system instrumentation, isolation actuation instrumentation, emergency core cooling system instrumentation and end-of-cycle recirculation pump trip system instrumentation in accordance with the provisions of 10CFR50.59 without the need to process a license amendment request. The changes to Specifications 3/4.3.1, 3/4.3.2, and 3/4.3.3 are consistent with Generic Letter 93-08. "Relocation of Technical Specification Tables of Instrument Response Time Limits." Similar changes have been approved as Amendment No. 100 for Detroit Edison Company's Fermi 2 Nuclear Power Plant. The changes to Specification 3/4.3.4.2 are consistent with NUREG 1433, "Standard Technical Specifications, BWR/4."

Subsequent to the issue of this Technical Specification amendment, Niagara Mohawk Power Corporation plans to revise the response time limit tables, in accordance with the provisions of 10CFR50.59, now that the NRC staff has approved the BWR Owners' Group Licensing Topical Report, "System Analyses for Elimination of Selected Response Time Testing Requirements," NEDO-32291. This will result in improvements in plant safety as discussed in the evaluation section of Attachment B to this application.

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Niagara Mohawk Power Corporation (NMPC) requests that this Application for Amendment be considered as a Cost Beneficial Licensing Action. Approval of this Application for Amendment and Niagara Mohawk Power Corporation's subsequent revision of the response time limit tables is estimated to result in a lifetime cost savings of \$360,000.00 for NMP2.

NMPC is requesting that this license amendment be issued by June 28, 1996, so that unnecessary on-line testing planned before the upcoming refueling outage can be avoided.

Pursuant to 10CFR50.91(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.

Sincerely,

RB Cleat

R. B. Abbott Vice President - Nuclear Generation

RBA/RLM/Imc Attachments

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