3/4.3 INSTRUMENTATION

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

LIMITING CONDITIONS FOR OPERATION

3.3.1 As a minimum, the reactor protection system instrumentation channels shown in Table 3.3.1-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3.1-1.

ACTION:

a. With one channel required by Table 3.3.1-1 inoperable in one or more Functional Units, place the inoperable channel and/or that trip system in the tripped condition* within 12 hours. The provisions of Specification 3.0.4 are not applicable.

b. With two or more channels required by Table 3.3.1-1 inoperable in one or more Functional Units:

1. Within one hour, verify sufficient channels remain OPERABLE or tripped* to maintain trip capability in the Functional Unit, and

2. Within 6 hours, place the inoperable channel(s) in one trip system and/or that trip system** in the tripped condition*, and

3. Within 12 hours, restore the inoperable channels in the other trip system to an OPERABLE status or tripped*.

Otherwise, take the ACTION required by Table 3.3.1-1 for the Functional Unit.

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* An inoperable channel or trip system need not be placed in the tripped condition where this would cause the Trip Function to occur. In these cases, if the inoperable channel is not restored to OPERABLE status within the required time, the ACTION required by Table 3.3.1-1 for the Functional Unit shall be taken.

** This ACTION applies to that trip system with the most inoperable channels; if both trip systems have the same number of inoperable channels, the ACTION can be applied to either trip system.

SURVEILLANCE REQUIREMENTS

4.3.1.1 Each reactor protection system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.1.1-1.

4.3.1.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.1.3 The REACTOR PROTECTION SYSTEM RESPONSE TIME of each required reactor trip functional unit shall be demonstrated to be within its limit at least once per 18 months. Neutron detectors are exempt from response time testing. Each test shall include at least one channel per Trip System so that all channels are tested at least once per N times 18 months, where N is the total number of redundant channels in a specific reactor Trip System.

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3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

LIMITING CONDITIONS FOR OPERATION

3.3.2 The isolation actuation instrumentation channels shown in Table 3.3.2-1 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.2-2.

APPLICABILITY: As shown in Table 3.3.2-1.

ACTION:

a. With an isolation actuation instrumentation channel Trip Setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.2-2, declare the channel inoperable until the channel is restored to OPERABLE status with its Trip Setpoint adjusted consistent with the Trip Setpoint value.

b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System, either

   1. Place the inoperable channel(s) in the tripped condition within

      a) 1 hour for trip functions without an OPERABLE channel
      b) 12 hours for trip functions common to RPS Instrumentation, and
      c) 24 hours for trip functions not common to RPS Instrumentation

   or

   2. Take the ACTION required by Table 3.3.2-1.

c. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems,

   1. Place the inoperable channel(s) in one trip system in the tripped condition within one hour, and

   2. a) Place the inoperable channel(s) in the remaining trip system in the tripped condition within

         1) 1 hour for trip functions without an OPERABLE channel
         2) 12 hours for trip functions common to RPS Instrumentation, and
         3) 24 hours for trip functions not common to RPS Instrumentation,

      or

      b) Take the ACTION required by Table 3.3.2-1.

The provisions of Specification 3.0.4 are not applicable.

ISOLATION ACTUATION INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

4.3.2.1 Each isolation actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.2.1-1.

4.3.2.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.2.3 The ISOLATION SYSTEM RESPONSE TIME of each required isolation Trip Function shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one channel per Trip System so that all channels are tested at least once per N times 18 months, where N is the total number of redundant channels in a specific isolation Trip System.

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3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

LIMITING CONDITIONS FOR OPERATION

3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2.

APPLICABILITY: As shown in Table 3.3.3-1.

ACTION:

a. With an ECCS actuation instrumentation channel Trip Setpoint less conservative than the value shown in the Allowable Value column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its Trip Setpoint adjusted consistent with the Trip Setpoint value.

b. With one or more ECCS actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.3-1.

c. With either ADS Trip System "A" or "B" inoperable, restore the inoperable Trip System to OPERABLE status within:

   1. 7 days, provided that the HPCS and RCIC systems are OPERABLE, or
   2. 72 hours, provided either the HPCS or RCIC systems are inoperable.

   Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to less than or equal to 100 psig within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.3.1-1.

4.3.3.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.3.3 The ECCS RESPONSE TIME of each required ECCS System shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per Trip System so that all channels are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ECCS Trip System.

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INSTRUMENTATION

RECIRCULATION PUMP TRIP ACTUATION INSTRUMENTATION

END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM INSTRUMENTATION

LIMITING CONDITIONS FOR OPERATION

3.3.4.2 The end-of-cycle recirculation pump Trip (EOC-RPT) System instrumentation channels shown in Table 3.3.4.2-1 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.4.2-2.

APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER.

ACTION:

a. With an end-of-cycle recirculation pump Trip System instrumentation channel Trip Setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.4.2-2, declare the channel inoperable until the channel is restored to OPERABLE status with the channel setpoint adjusted consistent with the Trip Setpoint value.

b. With the number of OPERABLE channels one less than required by the Minimum OPERABLE Channels per Trip System requirement for one or both Trip Systems, place the inoperable channel(s) in the tripped condition within 12 hours.

c. With the number of OPERABLE channels two or more less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System and:

   1. If the inoperable channels consist of one turbine control valve channel and one turbine stop valve channel, place both inoperable channels in the tripped condition within 1 hour.

   2. If the inoperable channels include two turbine control valve channels or two turbine stop valve channels, declare the Trip System inoperable.

d. With one Trip System inoperable, restore the inoperable Trip System to OPERABLE status within 72 hours or take the ACTION required by Specification 3.2.3.

e. With both Trip Systems inoperable, restore at least one Trip System to OPERABLE status within 1 hour or take the ACTION required by Specification 3.2.3.

INSTRUMENTATION

RECIRCULATION PUMP TRIP ACTUATION INSTRUMENTATION

END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

4.3.4.2.1 Each end-of-cycle recirculation pump Trip System instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.4.2-1.

4.3.4.2.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.4.2.3 The END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM RESPONSE TIME of each Trip Function shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least the logic of one type of channel input, turbine control valve fast closure or turbine stop valve closure, so that both types of channel inputs are tested at least once per 36 months.

TABLE 3.3.4.2-2

END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM SETPOINTS

TRIP FUNCTION		TRIP SETPOINT	ALLOWABLE VALUE
1.	Turbine Stop Valve - Closure	≤5% closed	≤7% closed
2.	Turbine Control Valve - Fast Closure	≥530 psig	≥465 psig

TABLE 4.3.4.2-1

END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM SURVEILLANCE REQUIREMENTS

TRIP FUNCTION		CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION
1.	Turbine Stop Valve - Closure	Q	R
2.	Turbine Control Valve - Fast Closure	Q	R

BASES

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

The reactor protection system (RPS) automatically initiates a reactor scram to:

a. Preserve the integrity of the fuel cladding.

b. Preserve the integrity of the reactor coolant system.

c. Minimize the energy which must be adsorbed following a loss-of-coolant accident, and

d. Prevent inadvertent criticality.

This specification provides the Limiting Conditions for Operation necessary to preserve the ability of the system to perform its intended function even during periods when instrument channels may be out of service because maintenance is being performed. When necessary, one channel may be made inoperable for brief intervals to conduct required surveillance.

The reactor protection system is made up of two independent trip systems. There are usually four channels to monitor each parameter, and there are two channels in each trip system. The outputs of the channels in a trip system are combined in a logic so that either channel will trip that trip system. The tripping of both trip systems will produce a reactor scram. The system meets the intent of IEEE-279 for nuclear power plant protection systems. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30851P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," and MDE-78-0485, "Technical Specification Improvement Analysis for Nine Mile Point Nuclear Station, Unit 2." The bases for the trip settings of the RPS are discussed in the bases for Specification 2.2.1. When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains RPS trip capability.

The measurement of response time at the specified frequencies provides assurance that the protective functions associated with each channel are completed within the time limit assumed in the safety analyses. Response time may be demonstrated by any series of sequential, overlapping or total channel test measurement, provided such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either (1) inplace, onsite, or offsite test measurements, or (2) utilizing replacement sensors with certified response times.

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

This specification ensures the effectiveness of the instrumentation used to mitigate the consequences of accidents by prescribing the OPERABILITY trip setpoints for isolation of the reactor systems. When necessary, one channel may be inoperable for brief intervals to conduct required surveillance. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30851P-A, Supplement 2, "Technical Specification Improvement Analyses for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," and with NEDC-31677P-A, "Technical Specification Improvement Analyses for BWR Isolation Actuation Instrumentation." When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains primary containment isolation capability. Some of the trip settings may have tolerances explicitly stated where both the high and low values are critical and may have a substantial effect on safety. The setpoints of other instrumentation, where only the high or low end of the setting has a direct bearing on safety, are established at a level away from the normal operating range to prevent inadvertent actuation of the systems involved.

Except for the MSIVs, the FSAR Chapter 15 safety analysis does not address individual sensor response times or the response times of the logic systems to which the sensors are connected. For AC-operated valves, it is assumed that the AC power supply is lost and is restored by startup of the emergency diesel generators. In this event, a time of 13 seconds is assumed before the valve starts to move. In addition to the pipe break, the failure of the DC-operated valve is assumed; thus the signal delay (sensor response) is concurrent with the 13-second diesel startup. The safety analysis considers an allowable inventory loss in each case which in turn determines the valve speed in conjunction with the 13-second delay. It follows that checking the valve speeds and the 13-second time for establishing emergency power will establish the response time for the isolation functions.

Operation with a trip set less conservative than its Trip Setpoint but within its specified Allowable Value is acceptable on the basis that the difference between each Trip Setpoint and the Allowable Value is an allowance for instrument drift specifically allocated for each trip in the safety analysis. The Trip Setpoint and Allowable Value also contain additional margin for instrument accuracy and calibration capability.

3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

The emergency core cooling system actuation instrumentation is provided to initiate actions to mitigate the consequences of accidents that are beyond the ability of the operator to control. This specification provides the OPERABILITY requirements and Trip Setpoints that will ensure effectiveness of the systems to provide the design protection. Although the instruments are listed by system, in some cases the same instrument may be used to send the actuation signal to more than one system at the same time.

Operation with a trip set less conservative than its Trip Setpoint but within its specified Allowable Value is acceptable on the basis that the difference between each Trip Setpoint and the Allowable Value is an allowance for instrument drift specifically allocated for each trip in the safety analysis. The Trip Setpoint and Allowable Value also contain additional margin for instrument accuracy and calibration capability.

The HPCS pump suction pressure-low represents an analytical transfer level in the condensate storage tank of 14 feet at maximum flow and 3.0 feet at minimum flow. This is above the corresponding minimum tank level of 10.2 feet at maximum flow and 2.9 feet at minimum flow required to prevent vortexing.

Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30936P-A, "Technical Specification Improvement Methodology, (with Demonstration for BWR ECCS Actuation Instrumentation) Parts 1 and 2," and RE-026, "Technical Specification Improvement Analysis for the Emergency Core Cooling System Actuation Instrumentation for Nine Mile Point Nuclear Station, Unit 2." When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function or the redundant function maintains ECCS initiation capability.

3/4.3.4 RECIRCULATION PUMP TRIP ACTUATION INSTRUMENTATION

The anticipated transient without scram (ATWS) recirculation pump trip system provides a means of limiting the consequences of the unlikely occurrence of a failure to scram during an anticipated transient. The response of the plant to this postulated event falls within the envelope of study events in General Electric Company Topical Report NEDO-10349, dated March 1971, NEDO-24222, dated December 1979; and Section 15.8 of the FSAR.

The end-of-cycle recirculation pump trip (EOC-RPT) system is an essential safety supplement to the reactor trip. The purpose of the EOC-RPT is to recover the loss of thermal margin which occurs at the end of cycle. The physical phenomenon involved is that the void reactivity to the reactor system at a faster rate than the control rods add negative scram reactivity. When actuated, the EOC-RPT system trips both recirculation pumps to the low speed condition, thereby reducing coolant flow in order to reduce the void collapse in the core during two of the most limiting pressurization events. The two events for which the EOC-RPT protective feature will function are closure of the turbine stop valves and fast closure of the turbine control valves.

A fast closure sensor from each of two turbine control valves provides input to the EOC-RPT system; a fast closure sensor from each of the other two turbine control valves provides input to the second EOC-RPT system. Similarly, a position switch for each of two turbine stop valves provides input to one EOC-RPT system; a position switch from each of the other two stop valves provides input to the other EOC-RPT system. For each EOC-RPT system, the sensor relay contacts are arranged to form a 2-out-of-2 logic for the fast closure of turbine control valves and a 2-out-of-2 logic for the turbine stop valves. The operation of either logic will actuate the EOC-RPT system and trip both recirculation pumps.

Each EOC-RPT system may be manually bypassed by use of a switch which is administratively controlled by procedures. The manual bypasses and the automatic Operating Bypass at less than 30% of RATED THERMAL POWER are annunciated in the control room.

The EOC-RPT system response time is the time assumed in the analysis between initiation of valve motion and complete suppression of the electric arc. Included in this time are: the time from initial valve movement to reaching the Trip Setpoint, the response time of the sensor, the response time of the system logic, and the time allotted for breaker arc suppression.

Operation with a trip set less conservative than its Trip Setpoint but within its specified Allowable Value is acceptable on the basis that the difference

ATTACHMENT B

Niagara Mohawk Power Corporation
License No. NPF-69
Docket No. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

Introduction

Niagara Mohawk Power Corporation (NMPC) proposes revisions to the Nine Mile Point Unit 2 (NMP2) Technical 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. The NMP2 Technical Specifications require these systems to be operable with response times as specified in the associated Technical Specification tables for each of these systems. The Surveillance Requirements specify that these systems be tested by verifying that the response time of each function is within its limits. Generic Letter 93-08 provides guidance for relocating the reactor protection system, isolation actuation system and emergency core cooling system instrument response time limit tables to the Updated Safety Analysis Report (USAR). Relocating the end-of-cycle recirculation pump trip system response time table to the USAR is consistent with NUREG 1433, "Standard Technical Specifications, BWR/4."

NMP2 plant surveillance test procedures provide acceptance criteria for the response time limits currently located in the Technical Specification tables. In accordance with Generic letter 93-08, these procedures will continue to include, as applicable, acceptance criteria for the associated response time limits. Additionally, the NMP2 USAR will be revised to include the response time limit tables. This change will be submitted to the NRC in accordance with 10CFR50.71(e) during the next scheduled update following amendment approval. Subsequent changes to these response time limit tables would be subject to the provisions of 10CFR50.59 and 10CFR50.71(e).

For the NMP2 Technical Specifications, in regards to Generic Letter 93-08, the RPS instrumentation specification corresponds to the reactor trip system specification, and the isolation actuation instrumentation specification and the ECCS actuation instrumentation specification correspond to the engineered safety features actuation system specification discussed in the generic letter.

Description of Proposed Changes

The proposed amendment revises Limiting Condition for Operation (LCO) 3.3.1 and Surveillance Requirement 4.3.1.3 in Section 3/4.3.1, "Reactor Protection System Instrumentation," to delete the reference to the response time table. Further, Surveillance Requirement 4.3.1.3 is revised to add the word "required" to the first sentence since the table denoting the response time limits may identify functional units with response times marked as not applicable, "NA." Additionally, the sentence "Neutron detectors are exempt from response time testing," is being added after the first sentence. This statement is currently denoted as a footnote in Table 3.3.1-2 and is being relocated to the Surveillance Requirement consistent with the guidance provided in Generic Letter 93-08. Table 3.3.1-2, "Reactor Protection System Response Times," is removed from the Technical

Specifications and relocated to the USAR. Bases Section 3/4.3.1 is also revised to delete the sentence in the last paragraph which states that no response time credit was taken for those instrument channels with response times indicated as not applicable.

Additionally, the proposed amendment revises LCO 3.3.2 and Surveillance Requirement 4.3.2.3 in Section 3/4.3.2, "Isolation Actuation Instrumentation," to delete the reference to the response time table. Further, Surveillance Requirement 4.3.2.3 is revised to add the word "required" to the first sentence since the table denoting the response time limits may identify functional units with response time limits marked as not applicable, "NA.". Table 3.3.2-3, "Isolation System Instrumentation Response Time," is removed from the Technical Specifications and relocated to the USAR. Bases Section 3/4.3.2 has been revised to delete the reference to response times and to correct a previous typographical error by changing the word "ensure" to "ensures."

The proposed amendment also revises LCO 3.3.3 and Surveillance Requirement 4.3.3.3 in Section 3/4.3.3, "Emergency Core Cooling System Actuation Instrumentation," to delete the reference to the response time table. Further, Surveillance Requirement 4.3.3.3 is revised to add the word "required" to the first sentence since the table denoting the response time limits may identify functional units with response time limits marked not applicable, "NA." Surveillance Requirement 4.3.3.3 is also revised to replace the words "Trip Function," in the first sentence, with "System," to match the description in Table 3.3.3-3. Table 3.3.3-3, "Emergency Core Cooling System Response Times," is removed from the Technical Specifications and relocated to the USAR. Bases section 3/4.3.3 has been revised to delete the reference to response times and to insert the word "and" for readability.

The proposed amendment revises LCO 3.3.4.2, "End-of-Cycle Recirculation Pump Trip System Instrumentation" and Surveillance Requirement 4.3.4.2.3 to delete the reference to the response time table. Table 3.3.4.2-3, "End-of-Cycle Recirculation Pump Trip System Response Time" is removed from the Technical Specifications and relocated to the USAR. Bases section 3/4.3.4 has been revised to delete the denotation of the response time as 190 milliseconds.

Finally, the proposed amendment revises page "v" and "vi" of the Technical Specifications' index to delete Tables 3.3.1-2, 3.3.2-3, 3.3.3-3, and 3.3.4.2-3.

Evaluation

NMP2's current Technical Specifications contain Limiting Conditions for Operation tables of response time limits and Surveillance Requirements for RPS instrumentation, isolation actuation system instrumentation, ECCS actuation instrumentation, and end-of-cycle recirculation pump trip system instrumentation. The purpose of the Surveillance Requirements is to ensure that changes in response times beyond acceptable limits assumed in safety analyses are detected. The information obtained from these tests is compared to Technical Specification response time limits to demonstrate that the specified performance is met. The proposed Technical Specification amendment would relocate the response time limit tables for reactor protection system instrumentation, isolation actuation system instrumentation, and emergency core cooling system instrumentation from the Technical Specifications to the USAR, in accordance with the guidance provided in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits." The relocation of the end-of-cycle recirculation pump trip system instrumentation response time limit table is consistent with NUREG-1433, "Standard Technical Specifications, BWR/4." Additionally, this change is consistent with the Commission's

Final Policy Statement on Technical Specifications Improvements, published July 22, 1993 (58 FR 39132). Operability requirements and surveillance requirements are retained in the Technical Specifications because the Limiting Conditions for Operation and the Surveillance Requirements are not changed. The inclusion of specific response time limits is not required. The response time limits are an operational detail related to safety analyses and are adequately controlled by the requirements of 10CFR50.59. Future changes to the response time limits in the USAR, or in procedures which contain the various response time limits, would be made in accordance with 10CFR50.59. Therefore, the proposed amendment has no effect on the surveillance or system operability requirements, thus having no detrimental effect on plant safety.

Subsequent to the issue of this Technical Specification amendment, NMP2 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 by: (1) minimizing the time when safety systems are out-of-service or otherwise incapable of responding to degraded plant conditions because of response time testing; (2) reducing the potential for inadvertent engineered safety feature actuations during testing; and (3) allowing critical personnel to be used for other safety significant tasks. Therefore, approval of this proposed amendment will result in a net benefit to plant safety.

Conclusion

The proposed amendment to relocate the response time limit tables from the Technical Specifications to the USAR is in accordance with Generic Letter 93-08 and consistent with the Standard Technical Specifications, BWR/4. No physical alteration of structures, systems or components is involved. The capability of the associated systems to perform their intended functions within their required response times is not affected. Future changes to the response time limits in the USAR, or in procedures which contain the various response time limits, would be in accordance with 10CFR50.59. Therefore, there is reasonable assurance that the operation of NMP2 in accordance with the proposed amendment will ensure the public health and safety.

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10CFR50.92 concerning the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91, the following analysis has been performed:

The operation of Nine Mile Point Unit 2, 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 relocates Tables 3.3.1-2, "Reactor Protection System Response Times," 3.3.2-3, "Isolation System Instrumentation Response Time," 3.3.3-3, "Emergency Core Cooling System Response Times" and 3.3.4.2-3, "End-of-Cycle Recirculation Pump Trip System Response Time" from the Technical Specifications to the USAR. The Technical Specification Surveillance Requirements and associated actions are not affected and remain in the Technical Specifications. This change to the reactor protection system instrumentation, isolation actuation instrumentation, and emergency core cooling system instrumentation is being done in accordance with the guidance provided in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," and the change to the end-of-cycle recirculation pump trip system instrumentation is

consistent with NUREG 1433, "Standard Technical Specifications, BWR/4." This change allows NMP2 to administratively control subsequent changes to the response time limits in accordance with 10CFR50.59. Additionally, procedures which contain the various response time limits are also subject to the change control provisions of 10CFR50.59. Relocating this information does not affect the initial conditions of a design basis accident or transient analysis. The proposed Technical Specification changes do not affect the capability of the associated systems to perform their intended functions within their required response times. Since any subsequent changes to the USAR or procedures which contain the response time limits are evaluated in accordance with 10CFR50.59, the proposed amendment does not involve an increase in the probability or consequences of an accident previously evaluated.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change would relocate the response time limit tables from the Technical Specifications to the USAR. Subsequent changes to the USAR, or in procedures which contain the various response time limits, would be evaluated in accordance with the requirements of 10CFR50.59, which would evaluate the possibility of the creation of a new or different kind of accident. The proposed change does not involve any physical alteration of the plant, change in a Limiting Condition for Operation or change in Surveillance Requirements. No new failure modes are introduced. Therefore, this proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

The proposed change would relocate the response time limit tables from the Technical Specifications to the USAR. Future changes to the response time limits in the USAR, or in procedures which contain the various response time limits, would be in accordance with 10CFR50.59, which would evaluate the proposed change to determine whether it involved any reduction in the margin of safety. The response time limits to be transposed from the Technical Specifications to the USAR are the same as the existing Technical Specifications. Therefore, this proposed change does not involve a significant reduction in a margin of safety.

Niagara Mohawk's evaluation of this proposed amendment pursuant to 10CFR50.91 has determined that it involves no significant hazards consideration.