

LONG ISLAND LIGHTING COMPANY

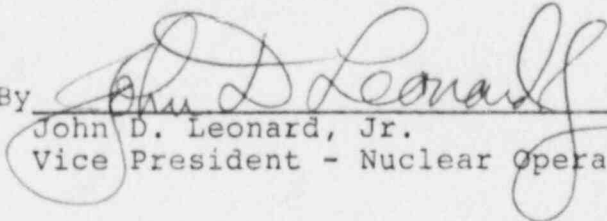
Operating License NPF-36
Docket 50-322
License Change Application 11

This License Change Application requests modification to Operating License NPF-36 for the Shoreham Nuclear Power Station.

1. To provide clarification and eliminate the possibility of Technical Specification misinterpretation.

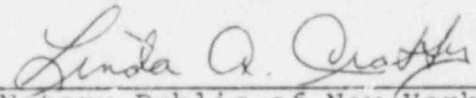
The request and supporting documentation is contained in Attachment 1 to this License Change Application.

Long Island Lighting Company

By 
John D. Leonard, Jr.
Vice President - Nuclear Operations

Subscribed and sworn to before me this 19th day of May 1988.

LINDA A. CRATTY
NOTARY PUBLIC, State of New York
No. 4816267
Qualified in Suffolk County
Commission Expires March 30, 1990


Notary Public of New York

My Commission Expires: March 30, 1990

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

Long Island Lighting Company

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Docket No. 50-322

SHOREHAM NUCLEAR POWER STATION - UNIT 1

CERTIFICATE OF SERVICE

I hereby certify that copies of License Change Application #11 to the Operating License for Shoreham Nuclear Power Station - Unit 1, dated May 19th, 1988, have been served on the following by hand delivery or by deposit in the United States mail, first class, this 19th day of May 1988:

Mr. Jay Dunkleberger
New York State Energy Office
2 Rockefeller Plaza
Albany, New York 12223

L F Britt

L. F. Britt, Manager
Nuclear Licensing and
Regulatory Affairs

Subscribed and sworn to before me this 19th day of May 1988

LINDA A. CRATTY
NOTARY PUBLIC, State of New York
No. 4816267
Qualified in Suffolk County
Commission Expires March 30, 1990

Linda A. Cratty
Notary Public of New York

My Commission Expires March 30, 1990

Attachment 1
To License Change Application #11

1.0 DESCRIPTION OF CHANGE

In Technical Specification 3.5.2 and 3.5.3.1, in Limiting Condition for Operation 3.5.2.a.2b, last line and 3.5.3.1.b.3, last line respectively, change wording "...equivalent to a level of 9 feet." , to read "...equivalent to an indicated level of 11.5 feet."

2.0 REASON FOR CHANGE

For operational conditions 4 and 5, the SNPS Technical Specification requires having at least 100,000 gallons of water available in the Condensate Storage Tank (CST) for use by Core Spray System when the suppression pool level is less than the limit of 76,870 ft³ (equivalent to a level of -6 inches gauge) or is drained. The CST 9 foot level equivalency, as presently identified in the Technical Specification, has always been utilized as a reference value for calculations (i.e., based on a tank internal diameter of 45 ft. and a height of 9 ft., a volume of 107,000 gallons can be calculated), and was never meant to be interpreted as actual tank level. The tank outlet nozzle which is used for all the ECCS systems (including Core Spray) is located approximately 1.75 feet above the floor of the CST. If the 9 foot level equivalency was misinterpreted to be actual indicated tank level, it could erroneously be concluded that only 7.25' (i.e., 9' - 1.75'), equivalent to approximately 86,000 gallons, would be available for ECCS suction. This requested Technical Specification change, as noted in the Description of Change above, continues to meet the SNPS Technical Specification requirement of having 100,000 gallons of water available, eliminates the possibility of misinterpretation, and provides the operator with a direct correlation between a CST tank level reading of 11.5' and the availability of 100,000 gallons or more of usable CST inventory for the Core Spray System during operational conditions 4 and 5.

3.0 BASIS FOR NO SIGNIFICANT HAZARDS FINDING

In addition to the basic criteria of 10 CFR 50.92(c) addressed below, LILCO believes that this amendment request falls within the guidance provided by the Commission (48 FR 14870) regarding examples of amendments that are not likely to involve significant hazards considerations. Specifically, this proposed amendment is an "administrative change" to technical specifications in that it provides clarification and eliminates the possibility of technical specification misinterpretation.

The proposed change does not involve a significant hazards consideration because operation of Shoreham Nuclear Power Station - Unit 1 in accordance with this change would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. This change merely clarifies and identifies the Condensate Storage Tank (CST) level (indicated level) which meets or exceeds the technical specification requirement of maintaining 100,000 gallons of water available for Core Spray system use. The CST low-low level alarm (since May 19, 1982) has always been set at an indicated level of 13 feet as measured from the bottom of the tank. This was always the intended level which was to be used for ECCS reserve.
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated. It has been determined that a new or different kind of accident will not be possible due to this change. Design documentation specifically calls out a low-low level alarm and a CST transfer pump trip at an indicated level of 13 feet of tank elevation. Without the foregoing pumps to drain the tank, the ECCS systems are the only users of the water volume below the 13 foot level. If the suction line elevation (approximately 1.75 ft.) is deducted from the 13 ft., a useable volume of 11.25 ft. is achieved. This is equivalent to an approximate available volume of 133,800 gallons.
- (3) involve a significant reduction in a margin of safety. The use of an 11.5 ft. indicated level as proposed in the technical specification change clarifies the 1.5 foot (i.e., 13 ft. - 11.5 ft) operational deviation that has always existed. If the CST transfer pumps do not deenergize - due to malfunction - at the 13 ft. level, the operator is permitted the same period of time to deenergize the pumps and not place himself in a technical specification violation.

4.0 TIMING OF CHANGE

Since this change provides clarification and eliminates the possibility of a technical specification misinterpretation, LILCO requests that it become effective upon issuance.