

John T. Conway Vice President Nuclear Generation

Office: (315) 349-4213 Fax: (315) 349-2605 **Uctober 16, 1998** NMP2L 1830

" S. Nuclear Regulatory Commission 1: Document Control Desk washington, DC 20555

RE:

Nine Mile Point Unit 2 Docket No. 50-410 **NPF-69**

Gentlemen:

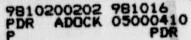
Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission (NRC) (10CFR50.90), Niagara Mohawk Power Corporation (NMPC) hereby transmits an Application for Amendment to the Nine Mile Point Unit 2 (NMP2) Operating License NPF-69. Also enclosed are the proposed changes to the current technical specifications (CTS) and the associated Bases set forth in Appendix A to the above mentioned license.

This proposed amendment revises the NMP2 CTS to a format and content consistent with NUREG-1434, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR 6," including certain generic changes approved through September 1, 1998 except as noted in Volumes 1 through 11 of the Enclosure to this letter. In addition, the proposed amendment extends the interval of selected Surveillance Requirements from 18 months to 24 months to support conversion of NMP2 to a 24-month fuel cycle and includes pending changes to the CTS as described in Attachment 2.

The detailed description and justification for the proposed CTS amendment consists of 12 volumes. A detailed description of the contents and organization of the 12 volumes is included as Attachments 1 through 4 of this letter. These attachments include:

Attachment 1, "NMP2 Improved Technical Specification (ITS) Submittal Synopsis," which describes the organization and content of the submittal and of each of the 12 volumes. This attachment is designed to facilitate distribution of each section within the NRC and to familiarize reviewers with the content and organization of each 2222 distribution section.

Attachment 2, "NMP2 ITS Conversion Document Status," which describes and provides the status of pending changes to the NMP2 CTS that are incorporated into this amendment request. This information is intended to facilitate NMPC and NRC document control during the ITS review and approval process.



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Attachment 3, "ITS Deviations from the NMP2 CTS and NUREG-1434, Rev. 1." The purpose of this attachment is to identify those changes which are beyond the scope of both NUREG-1434 (and NUREG-1433, if applicable) and the NMP2 CTS.

Attachment 4, "Justification of 24-Month Surveillance Requirement Frequencies." This attachment provides a detailed description of the methodology used to justify the extension of the interval for selected Surveillance Requirements from 18 months to 24 months to support conversion of NMP2 to a 24-month fuel cycle.

This proposed amendment is scheduled to be implemented during August, 2000. This implementation date reflects consideration of the following: 1) the training schedules for licensed and non-licensed personnel and 2) the tentative date of the seventh refueling outage which is March, 2000. Implementation will be predicated on NRC issuance of a Safety Evaluation by March, 2000, along with Safety Evaluations for the pending changes which have been incorporated into the ITS (see Attachment 2). NMPC will notify the Staff when the ITS implementation actions are complete.

NMPC has determined that the proposed changes do not involve a significant hazards consideration. The evaluations supporting this determination are included in Volumes 1 through 11. In addition, the proposed changes as discussed herein do not create a potential for a significant change in the types or a significant increase in the amount of any effluent that may be released offsite, nor do the changes involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the changes meet the eligibility criteria for a categorical exclusion as set forth in 10CFR51.22(c)(9). Therefore, pursuant to 10CFR51.22(b), an environmental assessment of the proposed changes is not required.

This proposed amendment request was approved by the Station Operations Review Committee (SORC) and the Safety Review Audit Board (SRAB). In accordance with 10CFR50.91, the State of New York has been provided a copy of this proposed amendment.

Sincerely,

John T. Conny

John T. Conway Vice President Nuclear Generation

JTC/KWK/kap Attachments 1-4 Enclosure:

Improved Technical Specifications Conversion Document - NMP2 (12 Volumes)

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 Mr. H. J. Miller, Regional Administrator, Region I
Mr. S. S. Bajwa, Director, Project Directorate I-1, NRR (w/o attachments/enclosures)
Mr. B. S. Norris, Senior Resident Inspector
Mr. D. S. Hood, Senior Project Manager, NRR

Mr. J. P. Spath

NYSERDA

286 Washington Avenue Ext.

Albany, NY 12203-6399

Records Management