

Niagara Mohawk

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NMP2L 1821

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 (NMPC) hereby transmits an Application for Amendment to the Nine Mile Point Unit 2 (NMP2) Technical Specifications (TSs) as set forth in Appendix A of Operating License NPF-69.

Enclosed as Attachment A are the proposed changes to the NMP2 TSs. Supporting information and analyses pursuant to 10 CFR 50.92 which demonstrate that the proposed changes do not involve a significant hazards consideration are provided as Attachment B. The basis for concluding that this application meets the criteria of 10 CFR 51.22 for categorical exclusion from performing an environmental assessment is included as Attachment C. Also, to assist the NRC Staff with their review, hand marked-up copies of the affected TS pages are provided as Attachment D.

Limiting Condition for Operation (LCO) 3.7.1.1, "Plant Service Water System - Operating," and LCO 3.7.1.2, "Plant Service Water System - Shutdown," each currently requires two independent Service Water (SW) System loops to be operable, with one of the loops (which requires two pumps) in operation. However, a recent analysis concluded that, in order to support a Loss of Coolant Accident (LOCA) without a coincident Loss of Offsite Power (LOOP), a minimum of three operating SW pumps are required to be operating during plant operation (Operational Conditions 1, 2, and 3) when the divisional cross connect valves and essential to non-essential interface valves are open. NMPC proposes to revise LCO 3.7.1.1 and its associated Actions and Surveillance Requirements (SRs) to provide assurance that four SW pumps are operable and are operating within acceptable system parameters, with the divisional cross connect valves open, during Operational Conditions 1, 2, and 3 to meet the current limiting LOCA analysis assumptions. In addition, NMPC has implemented administrative controls based on the results of the current analysis to assure that the SW System remains capable of performing its design function.

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TS Section 3/4.7.1 currently specifies a value for SW supply header discharge water temperature of 81 degrees F. However, existing analyses support a supply header discharge temperature of 82 degrees F, which is the analytical limit. The one degree difference between these values was intended to provide a margin to account for the accuracy of the monitoring instrumentation. NMPC has determined that TS LCO 3.7.1.1, including its associated Actions and SRs should specify the analytical limit of 82 degrees F, rather than 81 degrees F. This change is consistent with other NMP2 TSs where analytical limits are used (e.g., drywell temperature, suppression pool temperature, suppression pool level).

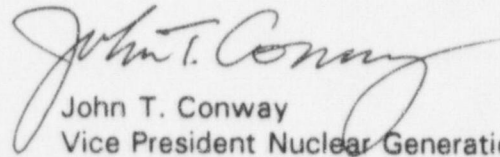
TS Table 3.3.9-1, "Plant Systems Actuation Instrumentation," Action 144, requires the Intake Deicing Heater System heaters to be placed in service when the Lake Ontario water temperature reaches 39 degrees F. In addition, TS Section 3/4.7.1 currently specifies 39 degrees F as the limiting temperature for Intake Deicing Heater System operability. NMPC has determined that TS Table 3.3.9-1, Action 144, and TS LCO 3.7.1.1, including its associated Actions and SRs should specify 38 degrees F. This change is consistent with the Allowable Value listed in TS Table 3.3.9-2, "Plant Systems Actuation Instrumentation Setpoints."

Appropriate changes to LCO 3.7.1.2 and its associated Actions and SRs are also proposed in order to assure consistency with the SW System analyses assumptions during shutdown conditions. While the current TSs require the same number of SW pumps to be operable in Operational Conditions 4 and 5 as are required in Operational Conditions 1, 2, and 3, the Actions only require (after some allowed outage time) the associated components to be declared inoperable and the applicable Actions taken as required by the associated TSs. The current LCO Actions do not account for the varying heat load that may be required for various plant shutdown conditions. In addition, NMPC proposes to revise the Applicability for LCO 3.7.1.2, TS Table 3.3.9-1, "Plant Systems Actuation Instrumentation," and TS Table 4.3.9.1-1, "Plant Systems Actuation Instrumentation Surveillance Requirements," to include periods when handling irradiated fuel in the secondary containment. These changes will assure that the necessary portions of the SW System are operable that are supporting equipment required to be operable for these conditions.

It is further proposed to change the system title identified in the Index and in TS Section 3/4.7.1, including the LCOs and SRs, from "Plant Service Water System" to "Service Water System" to be consistent with the NMP2 Updated Final Safety Analysis Report (UFSAR). The Bases for 3/4.7.1 have been revised to reflect the title change and provide clarification of certain Actions consistent with the changes described above.

Pursuant to 10 CFR 50.91(b)(1), NMPC has provided a copy of this license amendment application and the associated analysis regarding no significant hazards consideration to the appropriate state representative.

Very truly yours,


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JTC/CDM/kap
Attachments

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