ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications (Appendix A)

Existing page 47 will be replaced with the attached revised page. This page has been retyped in its entirety with marginal markings to indicate changes to the text.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.1.3 EMERGENCY COOLING SYSTEM	4.1.3 EMERGENCY COOLING SYSTEM
Applicability:	Applicability:
Applies to the operating status of the emergency cooling system.	Applies to periodic testing requirements for the emergency cooling system.
Objective:	Objective:
To assure the capability of the emergency cooling system to cool the reactor coolant in the event the normal reactor heat sink is not available.	To assure the capability of the emergency cooling system for cooling of the reactor coolant.
Specification:	Specification:
a. During power operating conditions and whenever the reactor coolant temperature is greater than 212°F except for hydrostatic testing with the reactor not critical, both emergency cooling systems shall be operable except as specified in 3.1.3.b and c.	The emergency cooling system surveillance shall be performed as indicated below:
b. During the remainder of Cycle 8 with one emergency cooling system inoperable, Specification 3.1.3a shall be considered fulfilled, provided the additional surveillance required in 4.1.3.f is performed.	a. At least once every five years - The system heat removal capability shall be determined.
c. During Cycle 9 and subsequent cycles, if one emergency cooling system becomes inoperable, Specification 3.1.3.a shall be considered fulfilled, provided that the inoperable system is returned to an operable condition within 7 days and the additional surveillance required in 4.1.3.f is performed.	b. At least once daily - The shell side water level and makeup tank water level shall be checked.
	c. At least once per month - The makeup tank level control valve shall be manually opened and closed.

ATTACHMENT B

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Supporting Information

Hydrostatic test temperatures and pressures are governed by the requirements of Technical Specification 3.2.2. The pressure temperature limits set forth therein are periodically revised based on measured nil-ductility temperature shifts of irradiated vessel material samples. Recent revisions to these pressure/temperature limits will result in minimum temperatures for pressurization in excess of 212°F. The Emergency Cooling System is normally an integral part of the hydrostatic test performed at Nine Mile Point Unit 1. During the test the Emergency Cooling System steam supply piping and emergency condenser tube bundles are filled with water. In this condition, the Emergency Cooling System is not available to perform its intended function. Therefore, the requirements for Emergency Cooling System operability when the reactor coolant is greater than 212°F is requested to be modified to exempt this requirement during hydrostatic testing with the reactor not critical.

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in Section 50.92, about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed:

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The Emergency Cooling System is a standby high pressure system designed to act as a redundant backup to the main station condenser for receiving reactor core decay heat following reactor vessel isolation and scram.

In addition, for small line breaks, the Emergency Cooling System assists the Automatic Depressurization System (ADS) in depressurizing the reactor vessel.

The Emergency Cooling System is not intended to mitigate the affects of initial pressure peaks resulting from various transients such as turbine trip, or main steam line isolation valve closure, but rather longer term decay heat removal.

The Emergency Cooling System consists of two independent loops each designed to remove decay heat at a rate of approximately three percent of maximum reactor steam flow. This capacity is sufficient to handle the decay heat production at 100 seconds following SCRAM. Each loop consists of a 12-inch steam supply header, two parallel condensers, a 10-inch condensate return line, two steam supply isolation valves and one condensate return isolation valve, separate shell steam vents and separate instrumentation and control.

The Emergency Cooling System is designed such that operation is maintained by natural circulation. Steam flows from the reactor vessel to the condensers where it is condensed. The condensate returns by gravity to the suction side of a reactor recirculation loop where it is returned to the reactor vessel.

The configuration of Nine Mile Point Unit 1 for the hydrostatic test conditions differs from normal operation. Control rods are fully inserted and water level is outside its normal band. Pressurization is controlled utilizing the control rod drive system and/or hydrostatic test pump while temperature changes are affected utilizing the reactor recirculation system and/or other supplemental heat sources. Also, the reactor coolant system, with the exception of the Emergency Cooling System, is isolated. In this configuration, the capability of the Emergency Condenser System to remove decay heat following reactor isolation or to assist in reactor depressurization for small line break is not required.

Therefore, the proposed amendment will not invoke a significant increase in the probability of consequences of an accident previously evaluated.

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment eliminates the requirement for Emergency Condenser System operability with reactor coolant temperature greater than 212°F during hydrostatic testing with the reactor not critical. The Emergency Cooling System is normally included in hydrostatic testing of the reactor coolant system. With its steam supply lines full of water, the system is not available nor necessary to perform its designed function. A break in the Emergency Condenser System under hydrostatic conditions is enveloped by a similar break under normal operating conditions. Also, transients, which operation of the Emergency Cooling System would mitigate, are not feasible to occur due to the plant configuration existing during hydrostatic testing. The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant reduction in a margin of safety.

Implementation of the proposed change will have no effect on the availability of the Emergency Cooling System for those plant operating conditions where it is required to mitigate the effects of operational transients. Excluding the operability of the Emergency Cooling System during hydrostatic testing of the reactor coolant system with the reactor not critical will not result in a reduction in the margin of safety.

As determined by the analysis above, this proposed amendment involves no significant hazards consideration.