



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

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CARL D. TERRY
Vice President
Nuclear Safety Assessment and Support

July 31, 1997
NMP2L 1719

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 Nine Mile Point Unit 2 (NMP2) Operating License NPF-69. Also enclosed as Attachment A is the proposed change to the Technical Specification (TS) set forth in Appendix A to the above mentioned license. Supporting information and analyses which demonstrate that the proposed change involves no significant hazards consideration pursuant to 10CFR50.92 are included as Attachment B. A marked-up copy of the affected TS pages is provided as Attachment C to assist your review.

NMPC proposes to revise TS Table 3.3.3-1, "Emergency Core Cooling System Actuation Instrumentation," Action 36. The proposed revisions would change the wording of Action 36 so that it addresses the plant condition of having more than one inoperable channel per trip function in the High Pressure Core Spray (HPCS) drywell pressure and reactor water level instrumentation. Presently, Action 36 only addresses the plant condition of having one channel per trip function inoperable. The changes will give NMPC the capability of declaring the HPCS system inoperable, and allow entry into the applicable TS action statement, instead of entering TS 3.0.3, when more than one channel per trip function is inoperable in the HPCS drywell pressure and reactor water level instrumentation. Presently, if the plant has more than one channel per trip function inoperable, the plant is in a TS 3.0.3 condition, which requires a plant shutdown.

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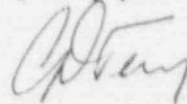


The proposed change provides consistency between the ECCS instrumentation and system TS. The TS also continues to require the operability of other injection systems coincidental with HPCS inoperability.

The plant condition of having more than one channel per trip function inoperable occurred at NMP2 on March 26, 1997. A failure to meet certain response time testing surveillance requirements forced the entry into required action 3.3.3.b and, by reference, Table 3.3.3-1. However, inappropriate wording added by a previous amendment that changed Action 36 of Table 3.3.3-1 resulted in the Action Statement not addressing a plant condition of more than one inoperable channel per trip function in the HPCS drywell pressure and reactor water level instrumentation. As a result, at 1530 hours on March 26, 1997, NMP2 entered TS 3.0.3. On March 27, 1997, at 1550 hours, following discussions with the NRC Staff, NMP2 was granted enforcement discretion with respect to TS 3.0.3. NMPC committed to correct the wording of Action 36 with a TS amendment request submitted on a non-emergency basis.

Pursuant to 10CFR50.91(b)(1), NMPC has provided a copy of this license amendment request and the associated analysis regarding no significant hazards consideration to the appropriate state representative.

Very truly yours,



Carl D. Terry
Vice President

Nuclear Safety Assessment and Support

CDT/TRE/cmk
Attachments

xc: Mr. H. J. Miller, NRC Regional Administrator
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