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November 8, 1999  
NMP2L 1908

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. Enclosed as Attachment A is the proposed change to the Technical Specifications (TS) as set forth in Appendix A to the above mentioned license. Supporting information and an analysis, demonstrating that the proposed change involves no significant hazards consideration pursuant to 10 CFR 50.92, are included 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. A hand marked-up copy of the affected TS pages is provided as Attachment D to assist in your review.

The proposed changes contained herein revise Specification 3.6.1.2, titled "Primary Containment Leakage," ACTION statement "d" and Specification 3.6.1.7, titled "Primary Containment Purge System," ACTION statement "b" to allow an alternative approach to the existing requirements contained in these statements. The alternative approach would allow isolation of a bypass leakage path and/or a purge system line by use of one closed and de-activated automatic valve, closed manual valve, or blind flange in lieu of restoring inoperable isolation valve(s) to OPERABLE status. Consistent with the alternative approach provided in these ACTION statements, changes are also proposed for Definition 1.31, titled "Primary Containment Integrity" and footnote (\*) of Table 3.6.1.2-1, titled "Allowable Leak Rates Through Valves in Potential Bypass Leakage Paths." The proposed changes affect valves that are purge system line isolation valves with resilient seals and/or isolation valves for potential bypass leakage paths. This proposed alternative is consistent with NUREG-1434, the Improved Standard Technical Specifications (ISTS).

The alternative approach of ACTION statement "d," as supported by the change to the definition and the revised footnote (\*) for the affected bypass leakage path would continue to satisfy the leakage requirements of Table 3.6.1.2-1, titled "Allowable Leak Rates Through Valves in Potential Bypass Leakage Paths." Furthermore, the alternative approach to satisfying ACTION statement "b" for the affected purge system line would continue to satisfy the resilient seal testing requirements of TS Surveillance Requirement (SR) 4.6.1.7.2 if the isolation valve contains resilient seals. Therefore, SR testing would continue to provide early indication of resilient material seal degradation. Accordingly, the alternative approach is acceptable.

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NMPC requests that the NRC approve these proposed changes by December 6, 1999, so that the likelihood of a plant shutdown would be reduced due to the potential of Suppression Chamber Purge Supply valves failing to satisfy the leakage testing requirements of SR 4.6.1.7.2. The next required leakage testing for these valves occurs no later than December 9, 1999, assuming non-application of the 25% extension as provided by SR 4.0.2

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

Very truly yours,



John T. Conway  
Vice President Nuclear Generation

JTC/KWK/kap  
Attachments

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I  
Mr. S. S. Bajwa, Section Chief PD-I, Section 1, NRR  
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