ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
DOCKET NO. 50-410

Proposed Change to Technical Specifications

Replace existing pages 1-6, 3/4 6-3, 3/4 6-7 and 3/4 6-13 with attached revised pages 1-6, 3/4 6-3, 3/4 6-7 and 3/4 6-13. These pages have been retyped in their entirety with marginal markings to indicate the changes.

PRIMARY CONTAINMENT INTEGRITY

1.31 (Continued)

1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

2. Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except as provided in Specification 3.6.3.

b. All primary containment equipment hatches are closed and sealed.

c. Each primary containment air lock is in compliance with the requirements of Specification 3.6.1.3.

d. The primary containment leakage rates are within the limits of Specification 3.6.1.2, except as provided in Specification 3.6.1.2.

e. The suppression pool is in compliance with the requirements of Specification 3.6.2.1.

f. The sealing mechanism associated with each primary containment penetration (e.g., welds, bellows, or O-rings) is OPERABLE.

PROCESS CONTROL PROGRAM

1.32 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formula sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of radioactive wastes, based on demonstrated processing of actual or simulated wet or liquid wastes, will be accomplished in such a way as to assure compliance with 10 CFR 20, 10 CFR 61, 10 CFR 71, and Federal and State regulations and other requirements governing the transport and disposal of radioactive waste.

PURGE - PURGING

1.33 PURGE and PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, concentration, or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

1.34 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3467 MWt.

REACTOR PROTECTION SYSTEM RESPONSE TIME

1.35 REACTOR PROTECTION SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor

LIMITING CONDITIONS FOR OPERATION

3.6.1.2 (Continued)

ACTION:

b. The measured combined leakage rate on a minimum pathway basis for all penetrations and all Primary Containment Isolation Valves, except for main steam line isolation valves* and valves which are hydrostatically leak tested, subject to Type B and C tests equaling or exceeding 0.60 La, or

c. The measured combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment exceeding 1 gpm times the total number of such valves, or

d. The measured leakage rate through any valve that is part of a potential bypass leakage pathway exceeding the limit specified in Table 3.6.1.2-1

Restore:

a. The overall integrated leakage rate to less than 1.0 La, and

b. The combined leakage rate on a minimum pathway basis for all penetrations and all Primary Containment Isolation Valves, except for main steamline isolation valves* and valves which are hydrostatically leak tested, subject to Type B and C tests to less than 0.60 La, and

c. The combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 1 gpm times the total number of such valves, and

d. The leakage rate to less than or equal to that specified in Table 3.6.1.2-1 for any valve that is part of a potential bypass leakage path. Alternatively, in lieu of restoring the inoperable valve to OPERABLE status, isolate the affected bypass leakage path by use of one closed and de-activated automatic valve, closed manual valve, or blind flange. The isolation device must meet the leakage limit of Table 3.6.1.2-1 associated with the inoperable valve. Enter applicable ACTION statement(s) for system(s) made inoperable by isolating a bypass leakage path.

* Exemption to Appendix J to 10 CFR 50.

TABLE 3.6.1.2-1 (Continued)

ALLOWABLE LEAK RATES THROUGH VALVES IN

POTENTIAL BYPASS LEAKAGE PATHS

LINE DESCRIPTION	VALVE MARK NO.	TERMINATION REGION	PER VALVE LEAK RATE, SCFH
Inst. Air to ADS Valve Accumulator	IAS*SOV164 IAS*V448	Yard Area	0.9375
Inst. Air to ADS Valve Accumulator	IAS*SOV165 IAS*V449	Yard Area	0.9375
N_2 Purge to TIP Index Mechanism	GSN*SOV166 GSN*V170	Yard Area	*
Inst. Air to SRV Accumulator	IAS*SOV166 IAS*SOV184	Yard Area	*
Inst. Air to Drywell	IAS*SOV167 IAS*SOV185	Yard Area	*
Inst. Air to Drywell	IAS*SOV168 IAS*SOV180	Yard Area	*
Inst. Air to CPS Valve in Suppression Chamber	CPS*SOV132 CPS*V50	Yard Area	*
Inst. Air to CPS Valve in Suppression Chamber	CPS*SOV133 CPS*V51	Yard Area	*

* The combined leakage of these six penetrations shall not exceed 3.6 SCFH. The leakage through each penetration shall be that of the valve with the highest rate in that penetration. However, if a penetration is isolated by one closed and de-activated automatic valve, closed manual valve, or blind flange, the leakage through the penetration shall be that of the isolation device.

LIMITING CONDITIONS FOR OPERATION

3.6.1.7 The drywell and suppression chamber 12-inch and 14-inch purge supply and exhaust isolation valves shall be OPERABLE and:

a. The 12-inch (2CPS*AOV105, 2CPS*AOV107, 2CPS*AOV109, 2CPS*AOV111) and 14-inch (2CPS*AOV104, 2CPS*AOV106, 2CPS*AOV108, 2CPS*AOV110) valves in the purge system supply and exhaust lines may be open for up to 135 hours per 365 days for VENTING or PURGING.*

b. Purge system valves 2CPS*AOV105 (12-inch), 2CPS*AOV107 (12-inch), 2CPS*AOV109 (12-inch), and 2CPS*AOV110 (14-inch) shall be blocked to limit the opening to 70°. Purge system valve 2CPS*AOV111 (12-inch) shall be blocked to limit the opening to 60°.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With the drywell and suppression chamber purge supply and/or exhaust isolation valve(s) inoperable, or open for more than 135 hours per 365 days for other than pressure control*, close the open valve(s); otherwise isolate the penetration(s) within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With a drywell and suppression chamber purge supply and/or exhaust isolation valve(s) with resilient material seals having a measured leakage rate exceeding the limit of Surveillance Requirement 4.6.1.7.2, restore the inoperable valve(s) to OPERABLE status within 24 hours or isolate the affected purge system line by use of one closed and de-activated automatic valve, closed manual valve, or blind flange within 24 hours, or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. If a valve with resilient seals is utilized to satisfy the requirement of this ACTION statement, it must have been demonstrated to meet the leakage requirement of SR 4.6.1.7.2. In addition, SR 4.6.1.7.2 must be performed once per 92 days for the resilient seal valve closed to comply with this ACTION statement. Enter the applicable ACTION statement(s) for system(s) made inoperable by isolating the affected purge system line.

* The 135-hour limit shall not apply to the use of valves 2CPS*AOV108 (14-inch) and 2CPS*AOV110 (14-inch), or 2CPS*AOV109 (12-inch) and 2CPS*AOV111 (12-inch), for primary containment pressure control, provided 2GTS*AOV101 is closed, and its 2-inch bypass line is the only flow path to the standby gas treatment system.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
DOCKET NO. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

INTRODUCTION

This amendment application revises 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) on Table 3.6.1.2-1, titled "Allowable Leak Rates Through Valves in Potential Bypass Leakage Paths," and/or isolation valve(s) listed in Limiting Condition of Operation (LCO) 3.6.1.7, titled "Primary Containment Purge System" 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.

The revision to these Specifications is needed to reduce the likelihood of a plant shutdown due to the potential of Suppression Chamber Purge Supply valves, 2CPS*AOV105 and 2CPS*AOV107, failing to satisfy the leakage testing requirements of SR 4.6.1.7.2. TS SR 4.6.1.7.2 requires that these valves be tested at least once per 92 days and that the leakage of each valve does not exceed 3.75 standard cubic feet per hour (SCFH). The test results (in SCFH) for these valves following restart from the last refueling outage are as follows:

Test Date	2CPS*AOV105	2CPS*AOV107
07/09/98	2.126	2.687
09/29/98	1.878	2.431
12/22/98	2.097	2.869
03/18/99	1.668	2.559
06/08/99	1.86**	1.86**
09/08/99	2.93	3.26

** Actual value of 3.719 applied to each valve as a result of pressurizing the piping between these valves and the actual leakage from the test volume being less than the TS SR. For trending purposes, half of the leakage value is assigned to each valve.

NMPC has concluded that these test results are indicative of an increasing trend in each of the valves' leakage. The next required leakage test for these valves occurs no later than December 9, 1999, assuming non-application of the 25% interval extension as provided in SR 4.0.2.

If either or both of the valves fail to satisfy the testing requirements of SR 4.6.1.7.2, ACTION statement "b" of LCO 3.6.1.7 would be entered. This ACTION requires restoration of the inoperable valve(s) to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

In addition, these same valves and the same leakage limit are listed on Table 3.6.1.2-1, titled "Allowable Leak Rates Through Valves in Potential Bypass Leakage Paths" of LCO 3.6.1.2, titled "Primary Containment Leakage." TS SR 4.6.1.2.2 requires leakage testing of the valves on this TS Table in accordance with the 10 CFR 50 Appendix J Testing Program Plan as described in Section 6.8.4.f of the TS. This Program requires testing of both Containment Purge System (CPS) valves. Failure to satisfy the leakage requirements of TS SR 4.6.1.2.2 would require entry into ACTION statement "d" of LCO 3.6.1.2. This ACTION requires restoration of the leakage rate to less than or equal to the leakage value specified in Table 3.6.1.2-1 for any valve that is part of a potential bypass leakage path. There is no time limit specified in ACTION "d" of LCO 3.6.1.2.

However, the definition of PRIMARY CONTAINMENT INTEGRITY states that PRIMARY CONTAINMENT INTEGRITY shall exist when the primary containment leakage rates are within the limits of Specification 3.6.1.2. Therefore, failure to satisfy the leakage requirements of LCO 3.6.1.2 requires entry into the ACTION for Specification 3.6.1.1, titled "Primary Containment Integrity." The ACTION for LCO 3.6.1.1 requires restoration of PRIMARY CONTAINMENT INTEGRITY within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

Accordingly, failure to satisfy the quarterly leakage testing requirements of SR 4.6.1.7.2 for 2CPS*AOV105 and/or 2CPS*AOV107 would require entry into ACTION statement "b" for LCO 3.6.1.7, ACTION statement "d" for LCO 3.6.1.2 and the ACTION statement for LCO 3.6.1.1. The most restrictive of these three action statements with regards to initiation of a plant shutdown is the ACTION for LCO 3.6.1.1. Therefore, the ACTION associated with LCO 3.6.1.1 would govern operation of the unit in the event that one or both of the CPS valve(s) failed to satisfy the leakage testing requirement of SR 4.6.1.7.2.

As described above, the proposed changes to Specifications 3.6.1.2 and 3.6.1.7 and Definition 1.31 would allow an alternative approach to the requirements contained in the identified ACTION statements. This alternate approach is consistent with the requirements of NUREG-1434, the ISTS, as identified in Specification 3.6.1.3, titled "Primary Containment Isolation Valves (PCIVs)," ACTION "D" for potential bypass leakage paths, ACTION "E" for purge valves and the associated Bases of these ACTIONS.

EVALUATION

The proposed allowance provided by ACTION statement "d" of Specification 3.6.1.2, titled "Primary Containment Leakage," permits the use of at least one isolation barrier that cannot be adversely affected by a single failure such as a closed and de-activated

automatic valve, closed manual valve, or blind flange. These isolation barriers are not affected by a single failure since they do not have to change state to perform their safety function. This ensures that a gross breach of a potential bypass leakage pathway does not exist. In addition, the isolation of a bypass leakage path by a device which isolates a primary containment penetration is verified every 31 days and the leakage of the isolation device for the potential bypass leakage pathway is equal to or less than the leakage limit specified on Table 3.6.1.2-1 for the affected bypass leakage path. Verification of the isolation is required by TS SR 4.6.1.1.b. This TS SR requires that at least once per 31 days, verify that all primary containment penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or de-activated automatic valves secured in position. Leak test criteria for the isolation is specified by the proposed change to ACTION "d" of Specification 3.6.1.2.

To enable the proper usage of the above proposed allowance, the phrase "except as provided in Specification 3.6.1.2" is proposed to be added to Definition 1.31.d for "Primary Containment Integrity." Without this change to the definition, "Primary Containment Integrity" could be construed as "literally" not met while continued operation of the unit is "technically" permissible using the proposed allowance provided by Action "d." Since the proposed allowance satisfies the leakage requirements of Table 3.6.1.2-1 for the affected bypass leakage path, the allowance also "technically" satisfies "Primary Containment Integrity." Therefore the proposed change to the definition is acceptable and supports the proper usage of the proposed change to Action "d."

Footnote (*) of Table 3.6.1.2-1 states that for certain valves in potential bypass leakage paths, the leakage through each penetration shall be that of the valve with the highest rate in that penetration. Consistent with the proposed change to ACTION "d" of Specification 3.6.1.2, a change is proposed to the footnote which will allow the leakage through the penetration to be the pathway leakage of the isolation device, provided the penetration is isolated by one closed and de-activated automatic valve, closed manual valve, or blind flange. The reason for assuming the pathway is at the maximum pathway leakage is to account for a single failure not closing one of the two valves in the penetration. However, if the penetration is already isolated by one of the methods described above, then a single active failure cannot occur. Therefore, it is acceptable to assume the leakage through the penetration is the actual leakage through the device that is isolating the penetration. Furthermore, the leakage of the affected isolated penetration will continue to satisfy the leakage limit of 3.6 SCFH as stated by footnote (*).

The proposed allowance provided by ACTION statement "b" of Specification 3.6.1.7, titled "Primary Containment Purge System," likewise permits the use of at least one isolation barrier that cannot be adversely affected by a single failure such as a closed and de-activated automatic valve, closed manual valve, or blind flange. This ensures that a gross breach of the primary containment does not exist. This flexibility is provided as long as this isolation is verified every 31 days and the purge valve leak rate test is performed every 92 days if a purge valve with a resilient seal is used to perform the isolation. Verification of the isolation is required by TS SR 4.6.1.1.b. Leak testing every 92 days of the isolation if it contains a resilient seal is required by the proposed change to ACTION "b" of Specification 3.6.1.7.

The proposed allowance provided by ACTION statements "b" and "d" as described above, include entering applicable ACTIONs for those systems made inoperable by isolating an affected bypass leakage path and/or purge system line. This aspect of the proposed changes facilitates the use and understanding of the intent of the proposed allowance for a system made inoperable by isolating a penetration. This clarification is consistent with the intent and interpretation of the existing TSs.

For a typical bypass leakage path and/or purge system line, two isolation valves are provided. With one inoperable isolation valve, continued operation of the unit would be allowed provided the bypass leakage path and/or purge system line was isolated by the OPERABLE isolation valve in accordance with the proposed provisions contained in the applicable ACTION statement.

Similarly, if both isolation valves were inoperable, the proposed allowance would also permit continued operation of the unit provided the affected bypass leakage path and/or purge system line was isolated in accordance with the proposed provisions contained in ACTION statement(s) "b" and/or "d". In addition, the isolation approach which satisfies the requirements of the applicable ACTION statement(s) will be evaluated to ensure that it is capable of performing its safety function.

As appropriate, the actual leakage of the alternative isolation barrier is also evaluated in accordance with the applicable leakage limit(s) of LCO 3.6.1.2. Accordingly, based on the above evaluation these changes are acceptable.

CONCLUSION

This amendment application revises 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. Specifically, 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) on Table 3.6.1.2-1, titled "Allowable Leak Rates Through Valves in Potential Bypass Leakage Rates," and/or isolation valve(s) listed in LCO 3.6.1.7, titled "Primary Containment Purge System" to OPERABLE status. Furthermore, the alternative approach requires entry into applicable ACTION statement(s) for systems made inoperable by isolating a bypass leakage path and/or a purge system line. 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.

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 SR 4.6.1.7.2 if the isolation valve

contained resilient seals. Therefore, SR testing would continue to provide early indication of resilient material seal degradation. The actual leakage of the isolation barrier would also be evaluated in accordance with the applicable leakage limit(s) of LCO 3.6.1.2. Accordingly, the alternate approach is acceptable.

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

10 CFR 50.91 requires that at the time a licensee requests an amendment, it must provide to the NRC its analysis using the standards in 10 CFR 50.92 concerning the issue of no significant hazards consideration. According to 10 CFR 50.92(c) a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or

3. Involve a significant reduction in a margin of safety.

NMPC has evaluated this proposed amendment pursuant to 10 CFR 50.91 and has determined that it involves no significant hazards considerations.

The following analyses have been performed.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to the ACTION statements of Specifications 3.6.1.2 and 3.6.1.7 and Definition 1.31.d will allow continued operation if a potential bypass leakage path and/or a purge system line is reduced within leakage limits by one closed and de-activated automatic valve, closed manual valve, or blind flange. The proposed change to the ACTION statements also addresses the effects of isolating a bypass leakage path and/or a purge system line by requiring entry into applicable ACTION statements for the affected LCOs. Since these isolation provisions and their affects on other plant systems are not assumed to be initiators of any design basis accident or transient, this change does not involve a significant increase in the probability of an accident previously evaluated.

The isolation barrier would continue to satisfy the applicable leakage requirements for purge valves with resilient seals, potential bypass leakage pathways and LCO 3.6.1.2. Operation of the unit would reflect the limitations imposed by entry into applicable ACTION statements for LCOs affected by isolation of a bypass leakage path and/or a purge system line. Therefore, the radiological consequences of the proposed change to the ACTION statements are not increased when compared to the current licensing basis of NMP2. Accordingly, this change does not involve a significant increase in the consequences of an accident previously evaluated.

The proposed change to footnote (*) of Table 3.6.1.2-1 would allow the leakage rate through a penetration flow path to be the actual pathway leakage in lieu of the maximum pathway leakage, provided the penetration is isolated by one closed and de-activated automatic valve, closed manual valve, or blind flange. Since an isolated penetration nor the leakage through the isolated penetration is assumed to be the initiator of an accident, this change does not involve a significant increase in the probability of an accident previously evaluated.

While the leakage through an individual valve in a penetration can be exceeding the leakage assumed in the accident analysis, the penetration is isolated by a single active failure proof method; thus the leakage through the isolated penetration is the actual leakage through the valve or blind flange used to isolate the penetration, not the leakage through the valve with the maximum leakage. The leakage of the affected isolated penetration when combined with remaining applicable potential bypass leakage paths will continue to satisfy the leakage limits of 3.6 SCFH as stated in footnote (*) and the applicable leakage limit(s) of LCO 3.6.1.2. Therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not introduce any new failure modes. The proposed change allows the use of isolation barriers that cannot be adversely affected by a single active failure such as a closed and de-activated automatic valve, closed manual valve, or blind flange. These isolation barriers are not affected by a single failure since they do not have to change state to perform their safety function. A valve which contains resilient seals that isolates a purge system line would continue to be leak tested on a periodic basis to provide early indication of resilient material seal degradation. Therefore, since the proposed change ensures that the containment boundary, isolation of potential bypass leakage paths and isolation of purge system lines with a valve that contains resilient seals is maintained by appropriate methods and appropriate ACTION(s) are entered for applicable LCOs, operation with this proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

This change ensures that the safety function of the primary containment and its associated bypass leakage paths and/or purge system lines is maintained and the affects of the isolation approach are properly addressed by entering applicable ACTION statements. The isolation approach which includes one closed and de-activated automatic valve, closed manual valve, or blind flange will isolate bypass leakage paths and/or purge system lines to ensure leakage is within limits and cannot be adversely affected by a single active failure. Furthermore, a benefit is gained by reducing unnecessary plant shutdown transients when compensatory measures exist to ensure that the containment boundary, isolation of potential bypass leakage paths and isolation of purge system lines with a valve that contains resilient seals is maintained. Therefore, operation in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

ATTACHMENT C

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
DOCKET NO. 50-410

Eligibility for Categorical Exclusion from Performing an Environmental Assessment

10 CFR 51.22 provides criteria for, and identification of, licensing and regulatory actions eligible for exclusion from performing an environmental assessment. NMPC has reviewed the proposed amendment and determined that it does not involve a significant hazards consideration, and there will be no significant change in the types or a significant increase in the amounts of any effluents that may be released offsite; nor will there be any significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and , pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is required to be prepared in connection with this license amendment application.

ATTACHMENT D

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
DOCKET NO. 50-410

Mark-Up Copy of the Proposed Change to the Current Technical Specifications

Pages 1-6, 3/4 6-3, 3/4 6-7 and 3/4 6-13 of the current TS have been marked-up by hand to reflect the proposed changes.

PRIMARY CONTAINMENT INTEGRITY

1.31 (Continued)

1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

2. Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except as provided in Specification 3.6.3.

b. All primary containment equipment hatches are closed and sealed.

c. Each primary containment air lock is in compliance with the requirements of Specification 3.6.1.3.

d. The primary containment leakage rates are within the limits of Specification 3.6.1.2 except as provided by Specification 3.6.1.2.

e. The suppression pool is in compliance with the requirements of Specification 3.6.2.1.

f. The sealing mechanism associated with each primary containment penetration (e.g., welds, bellows, or O-rings) is OPERABLE.

PROCESS CONTROL PROGRAM

1.32 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formula sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of radioactive wastes, based on demonstrated processing of actual or simulated wet or liquid wastes, will be accomplished in such a way as to assure compliance with 10 CFR 20, 10 CFR 61, 10 CFR 71, and Federal and State regulations and other requirements governing the transport and disposal of radioactive waste.

PURGE - PURGING

1.33 PURGE and PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, concentration, or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

1.34 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3467 MWt.

(1)e

REACTOR PROTECTION SYSTEM RESPONSE TIME

1.35 REACTOR PROTECTION SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor

LIMITING CONDITIONS FOR OPERATION

3.6.1.2 (Continued)

ACTION:

b. The measured combined leakage rate on a minimum pathway basis for all penetrations and all Primary Containment Isolation Valves, except for main steam line isolation valves* and valves which are hydrostatically leak tested, subject to Type B and C tests equaling or exceeding 0.60 La, or

c. The measured combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment exceeding 1 gpm times the total number of such valves, or

d. The measured leakage rate through any valve that is part of a potential bypass leakage pathway exceeding the limit specified in Table 3.6.1.2-1

Restore:

a. The overall integrated leakage rate to less than 1.0 La, and

b. The combined leakage rate on a minimum pathway basis for all penetrations and all Primary Containment Isolation Valves, except for main steamline isolation valves* and valves which are hydrostatically leak tested, subject to Type B and C tests to less than 0.60 La, and

c. The combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 1 gpm times the total number of such valves, and

d. The leakage rate to less than or equal to that specified in Table 3.6.1.2-1 for any valve that is part of a potential bypass leakage path. Alternatively, in lieu of restoring the inoperable valve to OPERABLE status, isolate the affected bypass leakage path by use of one closed and de-activated automatic valve, closed manual valve, or blind flange. The isolation device must meet the leakage limit of Table 3.6.1.2-1 associated with the inoperable valve. Enter applicable ACTION statement(s) for system(s) made inoperable by isolating a bypass leakage path.

* Exemption to Appendix J to 10 CFR 50

TABLE 3.6.1.2-1 (Continued)

ALLOWABLE LEAK RATES THROUGH VALVES IN

POTENTIAL BYPASS LEAKAGE PATHS

LINE DESCRIPTION	VALVE MARK NO	TERMINATION REGION	PER VALVE LEAK RATE, SCFH
Inst. Air to ADS Valve Accumulator	IAS*SOV164 IAS*V448	Yard Area	0.9375
Inst. Air to ADS Valve Accumulator	IAS*SOV165 IAS*V449	Yard Area	0.9375
N_2 Purge to TIP Index Mechanism	GSN*SOV166 GSN*V170	Yard Area	*
Inst. Air to SRV Accumulator	IAS*SOV166 IAS*SOV184	Yard Area	*
Inst. Air to Drywell	IAS*SOV167 IAS*SOV185	Yard Area	*
Inst. Air to Drywell	IAS*SOV168 IAS*SOV180	Yard Area	*
Inst. Air to CPS Valve in Suppression Chamber	CPS*SOV132 CPS*V50	Yard Area	*
Inst. Air to CPS Valve in Suppression Chamber	CPS*SOV133 CPS*V51	Yard Area	*

* The combined leakage of these six penetrations shall not exceed 3.6 SCFH. The leakage through each penetration shall be that of the valve with the highest rate in that penetration. However, if a penetration is isolated by one closed and de-activated automatic valve, closed manual valve, or blind flange, the leakage through the penetration shall be that of the isolation device.

CONTAINMENT SYSTEMS

PRIMARY CONTAINMENT

PRIMARY CONTAINMENT PURGE SYSTEM

LIMITING CONDITIONS FOR OPERATION

3.6.1.7 The drywell and suppression chamber 12-inch and 14-inch purge supply and exhaust isolation valves shall be OPERABLE and:

a. The 12-inch (2CPS*AOV105, 2CPS*AOV107, 2CPS*AOV109, 2CPS*AOV111) and 14-inch (2CPS*AOV104, 2CPS*AOV106, 2CPS*AOV108, 2CPS*AOV110) valves in the purge system supply and exhaust lines may be open for up to 135 hours per 365 days for VENTING or PURGING.*

b. Purge system valves 2CPS*AOV105 (12-inch), 2CPS*AOV107 (12-inch), 2CPS*AOV109 (12-inch), and 2CPS*AOV110 (14-inch) shall be blocked to limit the opening to 70°. Purge system valve 2CPS*AOV111 (12-inch) shall be blocked to limit the opening to 60°.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With the drywell and suppression chamber purge supply and/or exhaust isolation valve(s) inoperable, or open for more than 135 hours per 365 days for other than pressure control*, close the open valve(s); otherwise isolate the penetration(s) within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With a drywell and suppression chamber purge supply and/or exhaust isolation valve(s) with resilient material seals having a measured leakage rate exceeding the limit of Surveillance Requirement 4.6.1.7.2, restore the inoperable valve(s) to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

or isolate the affected purge system line by use of one closed and de-activated automatic valve, closed manual valve, or blind flange within 24 hours,

If a valve with resilient seals is utilized to satisfy the requirement of this ACTION statement, it must have been demonstrated to meet the Leakage requirement of SR 4.6.1.7.2. In addition, SR 4.6.1.7.2 must be performed once per 92 days for the resilient seal valve closed to comply with this ACTION statement, Enter the applicable ACTION statement(s) for system(s) made inoperable by isolating the affected purge system line,

* The 135 hour limit shall not apply to the use of valves 2CPS*AOV108 (14-inch) and 2CPS*AOV110 (14-inch), or 2CPS*AOV109 (12-inch) and 2CPS*AOV111 (12-inch), for primary containment pressure control, provided 2GTS*AOV101 is closed, and its 2-inch bypass line is the only flow path to the standby gas treatment system.