

Enclosure A to  
NMP2L 2075

**IDENTIFICATION OF CHANGES, REASONS AND BASES  
FOR NINE MILE POINT NUCLEAR STATION, L.L.C.,  
QUALITY ASSURANCE PROGRAM TOPICAL REPORT,  
NINE MILE POINT NUCLEAR STATION - UNIT 2  
(USAR APPENDIX B)**

50-410  
10/31/02  
023082015

# ENCLOSURE A

## IDENTIFICATION OF CHANGES, REASONS, AND BASES FOR QA PROGRAM DESCRIPTION CHANGES (UNIT 2 USAR APPENDIX B)

UFSAR Appendix B Page/Section	Identification of Change	Reason for Change	Basis for Concluding that the Revised Program Continues to Satisfy 10CFR50 Appendix B and Commitments Previously Approved by the NRC
Page B-ii, List of Tables	Deleted Table B-3.	The information in Tables B-2 and B-3 has been incorporated into the revised Table B-2.	This change is strictly editorial and has no material impact on features of the QA plan or its implementation.
Page B.0-1, Before Introduction	Added two paragraphs to explain the method of using generic position titles within the body of the QA plan, and to explain the process of implementing changes to the plan to incorporate generic position titles.	Implement the use of generic position titles within the QA plan, to reduce the number of future plan changes necessary for nominal organizational changes.	The change to the QA plan to use generic position titles is specifically identified in the applicable regulation [10CFR50.54(a)(3)(iii)] as a change that does not reduce QA Program effectiveness and does not require prior NRC approval.
Page B.0-2, Section B.0 Last paragraph Page B.1-1, Section B.1.2.1 Page B.1-4, Section B.1.2.1.1, Item 5. Page B.1-5, Section B.1.2.1.1, Items a. through d. Page B.2-5, Section B.2.2.15, Item 2. Page B.2-10, Section B.2.2.17, Item 2.	"Manager Quality Assurance" was changed to "manager quality assurance."	Implement the use of generic position title of manager quality assurance.	The change to the QA plan to use generic position titles is specifically identified in the applicable regulation [10CFR50.54(a)(3)(iii)] as a change that does not reduce QA Program effectiveness and does not require prior NRC approval.
Page B.1-1, Section B.1.1, Third paragraph Page B.1-3, Section B.1.2.1.1, Item 3.	Moved cross-reference to Table B-1 to a new location and eliminated unnecessary cross-reference to the UFSAR and USAR.	Other organizational changes within the QA plan make revised references more appropriate.	These changes are strictly editorial and have no material impact on features of the QA plan or its implementation.

<p>Page B.1-2, Section B.1.2.1.1 First paragraph Second Paragraph</p> <p>Page B.1-2, Section B.1.2.1.1, Item 1.</p> <p>Page B.1-3, Section B.1.2.1.1, After Item g.</p> <p>Item 2.</p> <p>Item 3.</p> <p>Page B.1-4, Section B.1.2.1.1, Item 4.</p>	<p>Added "Quality Assurance" after "(NSAS)."</p> <p>Added "Quality Assurance" after "Engineering."</p> <p>Added "has responsibility for Training/Emergency Preparedness, and" after "Generation" in the second sentence, and added "Manager Training" after "Plant Managers" in the third sentence.</p> <p>Added "Manager Training" after "Plant Managers."</p> <p>Added "and is responsible for Engineering, Licensing, and Security" after "Officer."</p> <p>Deleted "Quality Assurance, Licensing, Training/Emergency Preparedness, Security, and" after "responsible for."</p> <p>Changed existing item 4. to item 5. Added new item 4. as follows: "The Vice President Quality Assurance - Nuclear reports to the Chief Nuclear Officer and is responsible for Quality Assurance. Quality Assurance responsibilities are described in the Unit 1 UFSAR Section XIII and Unit 2 USAR Section 13. See Table B-1 for QA Program element responsibilities. "</p>	<p>Organizational change - responsibilities and functions realigned. The principle organizational change is the creation of the position of Vice President Quality Assurance - Nuclear, reporting directly to the Chief Nuclear Officer. As a result of this change, other functions previously assigned to the NSAS organization have been reassigned to the Engineering and Generation organizations, and the position of Manager Quality Assurance has been eliminated. The generic title of manager quality assurance is being implemented contemporaneously with this organization change to minimize the impact of any future title changes that do not involve a change in functional responsibility.</p>	<p>The only change affecting the QA organization is the creation of the position of Vice President Quality Assurance – Nuclear and the elimination of the position of Manager Quality Assurance. The QA Program functional groups, previously under the Manager Quality Assurance, now report to the Chief Nuclear Officer directly, rather than through an intervening corporate executive. The other QATR changes resulting from the organizational change do not involve a change in QA Program content or requirements; therefore, none of these changes reflect a reduction in effectiveness.</p>
<p>Page B.1-4, Section B.1.2.1.1, Item 5. First paragraph</p> <p>Second paragraph</p>	<p>Deleted all of paragraph after "QA Program."</p> <p>Replaced "The Manager Quality Assurance's responsibilities" with "The responsibilities of the individual assigned the manager quality assurance's function."</p>	<p>Implement the use of generic position title of manager quality assurance.</p>	<p>The change to the QA plan to use generic position titles is specifically identified in the applicable regulation [10CFR50.54(a)(3)(iii)] as a change that does not reduce QA Program effectiveness and does not require prior NRC approval.</p>
<p>Page B.1-5, Section B.1.2.1.2</p>	<p>Changed Unit 1 UFSAR reference to Section XIII.A.1.</p>	<p>Correction of previous typographical error; i.e., omission of "X."</p>	<p>This change is strictly editorial and has no material impact on features of the QA plan or its implementation.</p>

Page B.2-1, Section B.2.2.2	Changed "at least annually" to "as required by 10CFR50.71(e)."	Revised to incorporate the requirement of the controlling regulation.	The regulations do not require certain changes to be submitted annually, but do require these changes to be submitted with the FSAR update submittal. This change makes the QATR consistent with current regulations, does not affect implementation of the QA Program, and does not constitute a reduction in effectiveness.
Page B.2-2, Section B.2.2.5	Replaced "Manager Quality Assurance" with "individual assigned the manager quality assurance function."	Implements the use of generic position title of manager quality assurance.	The change to the QA plan to use generic position titles is specifically identified in the applicable regulation [10CFR50.54(a)(3)(iii)] as a change that does not reduce QA Program effectiveness and does not require prior NRC approval.
Page B.2-3, Section B.2.2.10	Deleted reference to Table B-3.	The information in Tables B-2 and B-3 has been incorporated into the revised Table B-2.	This change is strictly editorial and has no material impact on features of the QA plan or its implementation.
Page B.2-12, Section B.2.2.18	Replaced "Quality First Program (Q1P)" with "Employee Concerns Program."	Program name change.	There are no changes to the program described in this section of the QATR, other than the change in program title. The program title change does not affect the QA Program content or requirements and, therefore, does not constitute a reduction in effectiveness.
Page B.3-1, Section B.3.2.4	Deleted last sentence and replaced with "An acceptable method of design verification for materials, parts, and processes is the use of qualification testing."	Clarification.	This change makes the QATR consistent with applicable QA standards, and clarifies that qualification testing is an acceptable method of design verification, rather than an alternative to design verification. This change does not affect the QA Program content or requirements and, therefore, does not constitute a reduction in effectiveness.
Page B.4-1, Section B.4.2.5	Added "and/or service(s)" after "item(s)" in first sentence.	Clarification.	This change makes this subsection consistent with the remainder of Section B.4, which recognizes that procurement requirements apply to both items and services. This change does not affect the QA Program content or requirements and, therefore, does not constitute a reduction in effectiveness.

Page B.6-1, Section B.6.1, Second paragraph	After "controlled documents," added the following: ", other than those identified as minor changes,". At end of paragraph, added: "The criteria for establishing and defining minor changes are provided in approved implementing documents such as directives, procedures, and instructions."	Clarification.	This change clarifies that minor changes, as defined by appropriate documents, do not need to be approved by the original review and approval organization. This is consistent with the intent of the last portion of the original wording; i.e., "or by the organizations designated in accordance with the procedures governing these documents." This change does not affect the QA Program content or requirements and, therefore, does not constitute a reduction in effectiveness.
Page B.11-1, Section B.11.1	Replaced "These parameters" with "Requirements and acceptance criteria."	Clarification.	The existing phrasing does not make logical sense as no 'parameters' are previously identified. The revised wording more clearly explains the intent of this section, and is consistent with the remaining context of this section. This change does not affect the QA Program content or requirements and, therefore, does not constitute a reduction in effectiveness.
Page B.11-2, Section B.11.2.5, Item 5.	Inserted the word "to" after "as."	Correction of previous typographical error; i.e., omission of "to."	This change is strictly editorial and has no material impact on features of the QA plan or its implementation.
Table B-1, Sheets 1 and 2  Table B-1, Sheet 2	Deleted columns for "VP-NSAS," "NL" and "NT." Added an "X" to Column "NG" for row "V" on Sheet 1. Deleted footnote 2. and revised footnote titled "NMPC Organizations" to reflect the organization described in the revised text of Section B.1.2.1.1.	Organizational change – responsibilities and functions realigned.	NSAS is no longer listed because its only responsibility is for ISEG, and it has no responsibilities relative to the areas addressed in this table. The other changes to the table reflect the new alignment of responsibilities resulting from the organizational changes identified in Section B.1.2.1.1. No previously existing QA Program responsibilities have been changed or eliminated; therefore, there is no reduction of effectiveness.
Table B-2, Sheets 1 through 9	Every line item and all material information for the previous Table B-3 has been incorporated into the revised Table B-2.	Improve ability to locate and understand the information contained within the previously existing tables.	Every line item and all material information for the previous Table B-3 have been incorporated into the revised Table B-2. The line items describing interpretations and exceptions are now grouped immediately following the applicable regulatory commitment reference document. Additional internal cross-references have been provided within the table to assist users in identifying appropriate information for related topics. A footnote has been added to direct users to appropriate FSAR sections for those portions of the table involving procedures

			<p>and/or procedural control processes. No previous regulatory commitment, interpretation, or exception has been eliminated or materially modified. All changes were made to improve the ability of users to locate and understand the information contained within the previously existing tables; therefore, this change does not constitute a reduction in the effectiveness of the QA Program.</p>
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**Enclosure B to  
NMP2L 2075**

**NINE MILE POINT – UNIT 2**

**10CFR50.59 EVALUATION SUMMARY REPORT**

**2002**

**Docket No. 50-410  
License No. NPF-69**

**50.59 Evaluation No.:** 96-049

**Implementation Document No.:** Simple Design Change SC2-0017-95

**USAR Affected Pages:** Figures 10.4-7c, 10.4-7h

**System:** Circulating Water (CWS), Chemical Feed – Hypochlorite (WTH)

**Title of Change:** Redesign CWS Water Box Vent to Allow Venting from a Low Dose Area

**Description of Change:**

In order to minimize personnel exposure, reduce maintenance, and enhance filling and venting of the circulating water boxes, the following modifications were performed:

1. Removal of the "NASH" vent valves
2. Line rerouting outside High Radiation area
3. New stainless steel priming pump

**50.59 Evaluation Summary:**

The CWS system and the WTH system are categorized as nonsafety related and no safety concerns exist with the installation of the above design enhancements. The changes will reduce maintenance and operational cost, both in repair time and worker exposure.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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50.59 Evaluation  
Summary Report  
Page 2 of 25

**50.59 Evaluation No.:** 99-053

**Implementation Document No.:** Mod. N2-97-058

**USAR Affected Pages:** 10.4-2, 10.4-4; Tables 9.3-1 Sh 2, 3, 4, 9A.3-6 Sh 7; Figures 1.2-19 Sh 1 & 2, 1.2-22 Sh 1 & 2, 9.3-5e, 9.3-5f, 9.3-7 Sh 1 & 5

**System:** Turbine Sampling (SST), Condensate (CNM), Circulating Water (CWS)

**Title of Change:** Retirement/Abandonment of the Hotwell Sampling Subsystem

**Description of Change:**

USAR Section 10.4.1.3 stated that the CWS system was monitored by two methods for CWS in-leakage. Because of design problems associated with one of the monitoring systems, the hotwell sampling subsystem's pumps have been retired/abandoned. The condensate demineralizer inlet sample location is now the primary means to monitor condenser in-leakage. In addition, the Fire Hazards Analysis table was updated to reflect the removal of the hotwell sample pumps.

**50.59 Evaluation Summary:**

This 50.59 evaluation demonstrates that the equipment abandonment/retirement of the hotwell sampling subsystem will not adversely impact the plant's ability to monitor condenser influent conductivity. The required monitoring of the main condenser for circulating water in-leakage can still be performed using the condensate demineralizer inlet continuous conductivity monitor. Monitoring of the condenser influent conductivity is needed to ensure that adequate design capacity for the demineralizer resin is maintained as required by Regulatory Guide 1.56.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-044

**Implementation Document No.:** Temporary Mod. 2000-006

**USAR Affected Pages:** N/A

**System:** Reactor Water Cleanup (WCS)

**Title of Change:** Restore Previous Design to have Air Assist in Closing RWCU Valtek AOVs

**Description of Change:**

This temporary modification provided a continuous air supply to the WCS Valtek actuators to assist the actuator springs in maintaining the valves closed against high pressure. A permanent modification was completed prior to startup from Refuel Outage RFO8.

**50.59 Evaluation Summary:**

This activity involved reconfiguring the normal air supply to the actuators of the Valtek air-operated valves (2WCS-AOV52A,B,C,D, 2WCS-AOV53A,B,C,D, and 2WCS-AOV26A,B,C,D), which are the high/low pressure interface valves, such that they will be capable of staying closed against high pressure.

This change does not change the function or operation of any of the equipment or systems involved other than providing a continuous supply air to the actuators of the RWCU Valtek valves. The valves will function as designed. Without the air supply, the valves will not remain closed against high reactor pressure.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-047

**Implementation Document No.:** Temporary Mod. 2000-009

**USAR Affected Pages:** N/A

**System:** Reactor Water Cleanup (WCS)

**Title of Change:** Establish Backup Air Supply for WCS High Pressure-Low Pressure Interface Valves

**Description of Change:**

This temporary modification provided a backup air supply system to the WCS Valtek high pressure-low pressure interface air-operated valves, to assist the actuator springs in maintaining the valves closed in the event of a loss of instrument air until WCS is isolated. A permanent modification was completed prior to startup from Refuel Outage RFO8.

**50.59 Evaluation Summary:**

This activity established a backup air supply system to the normal air supply system, to assist the actuator spring in maintaining the subject valves closed in the event of a loss of instrument air system until the WCS system is isolated from the high pressure sources. This 50.59 evaluation has determined that this temporary change will provide reasonable assurance of the reliability of the WCS system, and ensure the capability of the valves to remain closed with the backup air supply.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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<b>50.59 Evaluation No.:</b>	00-052 Rev. 0 & 1
<b>Implementation Document No.:</b>	Mod. N2-99-047
<b>USAR Affected Pages:</b>	9.4-51, 9.4-53, 9.4-55, 9.4-56; Figures 9.4-2a, 9.4-2b, 9.4-17 Sh 5
<b>System:</b>	Screenwell Building Ventilation (HVY)
<b>Title of Change:</b>	Provide Ventilation for the Demineralized Water Storage Tank Building

**Description of Change:**

This design change installed an exhaust system to reduce the concentration of fumes and odor in the Demineralized Water Storage Tank Building to an acceptable level. The system consists of an exhaust fan placed on an existing platform, with ductwork routed from the fan's exhaust to an existing opening in the east wall, discharging the fumes/odor outside of the building. The opening in the wall contains a backdraft damper and an exhaust hood. The fan takes suction through a ductwork routed to the areas of the worst concentration of fumes.

**50.59 Evaluation Summary:**

This 50.59 evaluation evaluates the adequacy of allowing the installation of a new exhaust system to improve the air quality of personnel accessing the Demineralized Water Storage Tank Building. This proposal was found to be acceptable because the new system includes features which assure that the plant's design standards are not compromised.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-071

**Implementation Document No.:** Fire Protection Engineering Evaluation FPEE  
0-00-003, NFPA 25-1998, NFPA 12-2000

**USAR Affected Pages:** 9A.3-47, 9A.3-48, 9A.3-50, 9A.3-54,  
9A.3-55, 9A.3-57, 9A.3-58

**System:** Fire Protection Water (FPW), Carbon Dioxide  
(FPL), Halon 1301 Suppression

**Title of Change:** Surveillance Frequency Revisions for Fire  
Protection Systems

**Description of Change:**

Several surveillance frequencies have been revised based on Fire Protection Engineering Evaluation 0-00-003, NFPA 25-1998, and NFPA 12-2000. These frequency changes greatly reduce the cost of inspecting and testing several fire protection systems while still providing equivalent reliability as that specified in the NFPA codes.

**50.59 Evaluation Summary:**

This 50.59 evaluation demonstrates that the changes will not degrade the reliability of any fire protection systems installed in the plant. The changes to the surveillance frequencies are for fire protection systems in areas that contain safety-related equipment, and are based on plant-specific failure rates or NFPA code-specified frequencies. These changes do not increase the probability of the postulated fire in the Fire Hazards Analysis, nor do they increase or decrease the severity of a fire.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-074  
**Implementation Document No.:** DDC 2M11776  
**USAR Affected Pages:** Figure 9.4-12b  
**System:** Turbine Building Ventilation (HVT), Turbine Building Floor Drain (DFT)  
**Title of Change:** Condensate Drain Line for 2HVT-CLC1

**Description of Change:**

A drain line was installed for the Turbine Building supply air unit to remove any condensation from the cooling coil that falls outside of the existing drain pans.

**50.59 Evaluation Summary:**

This 50.59 evaluation evaluates the adequacy of allowing installation of a drain line for the Turbine Building supply air unit to eliminate water accumulation in the unit. The 50.59 evaluation found this change acceptable because it enhances the availability of the ventilating unit. This activity will not cause any system or component to operate outside of its safety parameters.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-075

**Implementation Document No.:** Simple Design Change SC2-0144-93

**USAR Affected Pages:** 1.2-27, 3.1-19, 3.1-25, 7.2-8, 7.2-10a, 7.2-19, 7.3-10, 7.3-12, 7.3-23, 7.3-30, 7.6-1, 7.6-13, 7.6-17, 11.5-10, 15.2-11, 15.4-18, 15.4-19, 15.4-20, 15A-44; Tables 6.2-56 Sh 1, 5, 10, 7.2-1, 7.2-3 Sh 1, 7.3-5 Sh 1, 11.5-1 Sh 1; Figures 7.2-1 Sh 1 thru 4, 10.1-3f, 15A-42

**System:** Reactor Protection (RPS), Nuclear Steam Supply Shutoff (NSSSS), Main Steam (MSS), Reactor Coolant (RCS), Nuclear Boiler Instrumentation (ISC)

**Title of Change:** Deletion of RPS & MSIV Inputs from Main Steam Radiation Monitors

**Description of Change:**

This modification only impacts the main steam line radiation monitors' (MSLRM) trip inputs to the RPS and NSSSS logic circuits. This modification removed MSLRMs trip signal inputs to the RPS scram function, the main steam isolation valves' (MSIV) closure circuitry, the main steam line drain valve closure circuitry, and the RCS sample valve (reactor water sample valve) closure circuitry. The MSLRM inputs to the mechanical vacuum pump trip circuitry and the Control Room annunciation remain functional. The RPS A(B) main steam line radiation trip window tiles (603107 & 603407) were replaced to indicate the main steam line high-high radiation level. This modification disconnected power by removing the fuse for the affected relays and required hard-wire jumpers across the affected relay contacts in the RPS and NSSSS circuits.

**50.59 Evaluation Summary:**

The MSLRM consists of four redundant radiation monitors. Each MSLRM (2MSS\*RT46A/B/C/D) has four trip circuits--two upscale (high-high and high), one downscale (low), and one inoperative. The MSLRMs provide inputs (high-high or inoperative) to the RPS and NSSSS systems, and the mechanical vacuum pump trip circuit. They also provide Control Room annunciation and inputs to the Plant Process Computer.

50.59 Evaluation No.:

00-075 (Cont'd.)

**50.59 Evaluation Summary: (Cont'd.)**

The MSLRMs radiation-high (high-high radiation) or inoperative trip circuit inputs to the RPS function (one-out-of-two twice) scram the reactor, close the Group 1 valves (the MSIVs and the main steam line drain valves), and close the Group 2 valves (the RCS sample valves). These inputs trip the mechanical vacuum pumps (2ARC-P1A/1B) and close the associated valve (2ARC-AOV105). The MSLRMs provide inputs to the Control Room annunciator and the Plant Process Computer.

The operating data presented in General Electric Company Licensing Topical Report NEDO-31400A indicate that the MSLRMs have initiated several reactor shutdowns since 1980, and that all the subject shutdowns resulted from instrument failures, chemistry excursions, radiation monitor maintenance errors, and other causes; however, none of the shutdowns resulted from failed fuel.

To reduce the potential for unnecessary reactor shutdowns caused by the spurious actuation of the MSLRM trips, and to increase the plant operational flexibility, the Boiling Water Reactor Owners' Group (BWROG) proposed to eliminate the MSIV closure function and automatic reactor shutdown function of the MSLRMs. The BWROG provided the safety analysis in NEDO-31400A to support their request to allow elimination of these functions.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-076

**Implementation Document No.:** Mod. N2-98-024

**USAR Affected Pages:** 2.4-36; Figure 9.3-12f

**System:** Miscellaneous Drains (DFM)

**Title of Change:** Reactor Building Mat Drain Level Switch Replacement

**Description of Change:**

This modification replaced level switches 2DFM-LS150, 2DFM-LS151, 2DFM-LS152, 2DFM-LS153, and level elements 2DFM-LE150, 2DFM-LE151, 2DFM-LE152, and 2DFM-LE153, associated with Reactor Building mat sumps 2DFM-SUMP10A and 2DFM-SUMP10B. In addition, discharge piping for both sump pumps was replaced. Check valves were also added to each sump pump discharge line.

**50.59 Evaluation Summary:**

These changes are designed and fabricated to the same codes and requirements as the originally installed equipment. The changes do not adversely affect the structural or mechanical integrity of the dewatering system or the sumps themselves. The change does not cause the dewatering system to be operated outside the design limits. Seismic, structural, piping stress, and impact on the existing pipe support have been evaluated by engineering calculations and found to be acceptable for the new configuration.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-078

**Implementation Document No.:** Mod. N2-00-007

**USAR Affected Pages:** Figure 5.4-16b

**System:** Control Rod Drive (RDS), Reactor Water Cleanup (WCS)

**Title of Change:** WCS Pump Seal Filtration

**Description of Change:**

This modification installed a 20-micron duplex filter prior to flow control valves 2WCS-FV58A/B and FV59A/B in the WCS pump mechanical seal cooling line. In addition, the existing carbon steel piping from the filter to the flow control valves was replaced with stainless steel piping. This change removed the contaminants which were found to challenge the ability of the flow control valves to self regulate. Inability of the valves to self regulate could result in high WCS pump mechanical seal temperatures and potential seal failures.

**50.59 Evaluation Summary:**

Use of the RDS system for the WCS pump seal cooling water was evaluated in 50.59 Evaluation 91-074 for Modification PN2Y88MX059. The evaluation included the effect that a maximum of 16 gpm would have on the hydraulic system of RDS, and the effect of the unmonitored flow on the WCS high differential flow instrumentation. The addition of a duplex filter and the replacement of the carbon steel piping with stainless steel piping will have no effect on the previous evaluations. In addition, the design, fabrication and installation will be performed in accordance with the original codes and specifications, including Seismic II/I.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-080 Rev. 1

**Implementation Document No.:** Procedures N2-OP-29, N2-OP-31

**USAR Affected Pages:** 5.4-35, 5.4-40

**System:** Reactor Recirculation, Residual Heat Removal (RHR)

**Title of Change:** Parallel Operation of Reactor Recirculation and Shutdown Cooling Pumps

**Description of Change:**

Procedures N2-OP-29 and N2-OP-31 have been revised to allow operation of shutdown cooling on the same loop as an operating reactor recirculation pump. Both reactor recirculation pumps must remain in service for Noble Metals application, and shutdown cooling may be required to be placed in service to maintain the required temperature, as a contingency, if steaming mode must be abandoned. Operational practice is to operate one reactor recirculation pump and one loop of shutdown cooling operating while in cold shutdown.

**50.59 Evaluation Summary:**

Operations Procedure N2-OP-29, Reactor Recirculation System, contains a precaution not to run RHR pump in shutdown cooling mode on the same loop as an operating reactor recirculation pump. Procedure N2-OP-31, Residual Heat Removal System, contains a precaution not to run RHR pump in shutdown cooling mode on the same loop as an operating reactor recirculation pump, as damage to the recirculation pump could result. General Electric Company (GE) performed an engineering evaluation, GE-U2-NM007, Transmittal of RHR Operability Report, to address the operation of RHR pump in shutdown cooling mode simultaneously with reactor recirculation pump for Noble Metals Chemical Application. The evaluation shows no negative impact from simultaneous operation of the two systems. The USAR descriptions are silent on the operation of the two systems simultaneously, and the process flow diagrams for the RHR system do not address operation of the reactor recirculation system. Accident and transient analysis would not be impacted by the simultaneous operation of the two systems.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-092

**Implementation Document No.:** Procedure N2-FSP-FPW-R002

**USAR Affected Pages:** 9A.3-54

**System:** 115-kV Reserve Transformer Water Spray

**Title of Change:** Surveillance Frequency Revisions for Fire Protection Systems

**Description of Change:**

This change revised the water spray system flow test scheme for the 115-kV reserve transformers in order to correspond the flow test with normal transformer maintenance outages. Previously, the water spray systems which protect the transformers were required to be flow tested every three years, with the transformer maintenance outages scheduled once every five years. Because of the discrepancy, the water spray test often falls during a time when the transformers are energized.

Due to the equipment damage that can occur if the water spray nozzles are misaligned and directly spray the energized bushings, a partial flow test is conducted while the transformers are energized. The NFPA code requires a full flow test; therefore, the flow test frequency was revised to correspond with the transformer outages.

**50.59 Evaluation Summary:**

This 50.59 evaluation demonstrates that the change will not degrade the reliability of 115-kV reserve transformers. The change is to the surveillance frequency at which the full flow water spray test is performed for the systems providing exposure protection to the transformers. This change will increase personnel safety and decrease the likelihood of equipment damage.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-096

**Implementation Document No.:** Appendix B Determination 90-188

**USAR Affected Pages:** Table 3.9A-12 Sh 5

**System:** Reactor Core Isolation Cooling (ICS) (RCIC)

**Title of Change:** 2ICS\*V249 Reverse Flow Prevention is an Active Function

**Description of Change:**

Valve 2ICS\*V249 has been reclassified from a "passive" function valve to an "active" closure function valve since it is required to change position to accomplish its safety-related function (reverse flow prevention).

**50.59 Evaluation Summary:**

This change of valve function from "passive" to "active" will not impact the ability of the valve to provide a suction flow path from the condensate storage tank to the RCIC turbine- and motor-driven pump. It will assure that the safety function of 2ICS\*V249 is maintained when single failure criteria is applied to valve 2ICS\*MOV129.

The 50.59 evaluation has considered the possible impacts of this activity in the system response and components. It was determined that this activity, which is a document change only, will not cause any system or component to operate outside of its safety parameters.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-099

**Implementation Document No.:** Procedure NTP-TQS-102

**USAR Affected Pages:** 13.2-6, Table 1.8-1 Sh 2

**System:** N/A

**Title of Change:** Change Licensed Operator Requalification Program at NMP2 (Delete ANSI/ANS 3.1-1978)

**Description of Change:**

This change deleted the reference and, therefore, requirement in the USAR to meet or exceed ANSI/ANS 3.1-1978 with regard to Licensed Operator Requalification Training. This requirement is obsolete and unnecessary. Current regulatory requirements (10CFR55) and Industry Standards (INPO guidelines and accredited programs) are sufficient to maintain appropriate licensed operator qualifications and proficiency. This change is recognized by the NRC as an appropriate method of ensuring adequate controls are established and maintained to ensure the knowledge and abilities of licensed operators.

**50.59 Evaluation Summary:**

Requirements in the Unit 2 USAR regarding the Licensed Operator Requalification Program are overly restrictive, obsolete, and will be removed. The NRC has approved this allowance based on continued compliance with 10CFR55 and maintenance of accredited training programs. No reduction in training effectiveness or the scope of the training programs will occur. Licensed Operator Requalification Programs at Nine Mile Point meet the requirements of 10CFR55, and are accredited by the National Nuclear Accreditation Board.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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<b>50.59 Evaluation No.:</b>	00-100
<b>Implementation Document No.:</b>	Fire Protection Engineering Evaluation FPEE 2-00-015
<b>USAR Affected Pages:</b>	9A.3-43, 9A.3-44, 9A.3-57
<b>System:</b>	Fire Detection and Halon 1301 Suppression
<b>Title of Change:</b>	Surveillance Frequency Revisions for Control Room and Relay Room Fire Protection Systems

**Description of Change:**

Two surveillance frequencies have been revised, resulting in reduced costs of inspecting and testing fire detection and Halon systems associated with Fire Zones 353SG, 354SG, 357XG, 358XG, 362SG, 374SG, 375SG, 376XG and 381SG, while still providing equivalent reliability as specified in the National Fire Protection Association (NFPA) codes.

**50.59 Evaluation Summary:**

This 50.59 evaluation demonstrates that the changes will not degrade the reliability of any fire protection system installed in the plant. The changes to the surveillance frequencies are for fire protection systems in areas that contain safety-related equipment, and are based on plant-specific failure rates. These changes do not increase the probability of the postulated fire in the Fire Hazards Analysis, nor do they increase or decrease the severity of a fire.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-101  
**Implementation Document No.:** DDC 2M11850  
**USAR Affected Pages:** Figure 4.6-5a  
**System:** Control Rod Drive (RDS)  
**Title of Change:** Remove 2RDS-V11 and Associated Piping & Support

**Description of Change:**

This change removed the pump seal line between 2RDS-P1A and 2RDS-P1B, including valve 2RDS-V11, and plugged each end of the piping. Ball check valve unions were removed and replaced with piping. This change was necessary because the standby RDS pump seal keep-fill line check valves had a high failure frequency.

**50.59 Evaluation Summary:**

The seal supply cross connect line is not required because of the available system static head. The available net positive suction head (NPSH) is higher than the required NPSH and, therefore, there is no possibility of air entering the system through the seals of the standby pump when the operating pump is running.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-104

**Implementation Document No.:** LDCR 2-00-TRM-020

**TRM Affected Sections:** TRM Specification 3.3-38; TRM Bases B3.3-16

**System:** Offgas System (OFG)

**Title of Change:** Revise TRM 3.3.11 Condition, Actions and Bases

**Description of Change:**

This evaluation applies to Technical Requirements Manual (TRM) Specification 3.3.11 changes and 2OFG-AT115 utilization as an alternate to the grab sample technique. These changes included redefining the Explosive Monitoring Channel and modifying the current TRM 3.3.11 Condition, Actions, Completion Time, and Bases.

**50.59 Evaluation Summary:**

The TRM changes described above and the alternate use of 2OFG-AT115 do not impact the ability of the operator to obtain timely information about the hydrogen concentration in the offgas stream. Furthermore, they provide the operator with two means to monitor hydrogen concentration, when required under TRM 3.3.11, precluding the buildup of explosive concentrations of hydrogen in the OFG system.

This 50.59 evaluation has considered the changes and the possible impact on the system ability to verify the hydrogen concentration. It was determined that these changes will not cause any system or component to operate outside of its safety parameters.

Based on these considerations, it is concluded that the changes do not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-105 Rev. 0 & 1

**Implementation Document No.:** Mod. N2-98-019

**USAR Affected Pages:** Figures 10.1-5d, 10.1-6a

**System:** Feedwater (FWR)

**Title of Change:** Replacement of FWR-FV2A, B and C Valves

**Description of Change:**

This modification replaced the existing Fisher Model EHT control valves (2FWR-FV2A, B & C) with CCI DRAG Series 100D control valves; installed a new flow orifice plate in the existing flanges at each main condenser nozzle downstream of each valve; and installed new control display stations for each valve in an instrument rack in the Relay Room.

The new valves are specifically designed for this application and eliminate the cavitation, noise, erosion and vibration experienced by the previous valves. This also reduced the amount of maintenance required on these valves. The new orifice plates provide the optimum backpressure for the new minimum flow valves, and the new control display stations permit the remote adjustment of the flow setpoint. This was not practical in the previous configuration.

**50.59 Evaluation Summary:**

This modification enhances the operation and reliability of the FWR system by eliminating the cavitation and erosion previously experienced in these valves. The failure positions and mechanisms, both mechanically and electrically, are the same as the existing design. The modification meets the original design, material and installation codes and standards. Evaluation of the design has shown that no design ratings will be exceeded.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 00-107

**Implementation Document No.:** LDCR 2-00-TRM-021

**TRM Affected Sections:** TRM Specification 3.3.7.3

**System:** Traversing In-Core Probe (TIP)

**Title of Change:** Revision to Technical Requirements Manual  
for the Number of Required Traversing  
In-Core Probes to Calibrate LPRMs

**Description of Change:**

Section 3.3.7.3 of the Unit 2 Technical Requirements Manual (TRM) currently mandates that five TIP subsystems be operable in order for the TIP system to be considered operable, and thereby available for calibration of the Local Power Range Monitor (LPRM) instrumentation. The TIP system allows calibration of LPRM signals by correlating TIP signals to LPRM signals as the TIP is positioned in various radial and axial locations in the core. This 50.59 evaluation evaluated including a TRM action statement that allows calibration of the LPRM system with one TIP subsystem out of service. This change has been made successfully in numerous plants and is necessary to avoid a lapse in the calibration of the LPRMs, as a result of the occasional problems that have historically occurred with the TIP system. The data provided in place of the nonfunctioning TIP subsystem could be generated by utilizing readings from TIPs placed in symmetrical core locations, or by using 3D Monicore BWR core simulation for locations without symmetrical counterparts. The additional uncertainties introduced by this change have been included in the uncertainties in the GESTAR analysis. The use of the TIP system to monitor thermal limits is not affected by this change.

**50.59 Evaluation Summary:**

This 50.59 evaluation evaluates the addition of a TRM action statement that will make provisions for a single TIP system being out of service when calibrating the LPRM system.

Based on these considerations, it is concluded that reducing the number of required TIP subsystems for LPRM calibration from five to four does not involve an unreviewed safety question.

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<b>50.59 Evaluation No.:</b>	01-057
<b>Implementation Document No.:</b>	Configuration Change 2E12369
<b>USAR Affected Pages:</b>	6.2-57; Table 6.2-62
<b>System:</b>	Secondary Containment
<b>Title of Change:</b>	Revise USAR Section 6.2.3.1 to Delete Reference to a Dedicated Monitor and Read-Only Printer in the Control Room for Reactor Building Radiation Access Door Alarms

**Description of Change:**

USAR Section 6.2.3.1 previously stated in part, "All entrances to the reactor building which are radiation access control doors on the access control computer system have position indicators to detect unauthorized access. Alarms generated by these doors are received on the dedicated monitor and read-only printer in the control room." Table 6.2-62 included a note that stated, "These doors have access controls that monitor entry into radiation areas; an alarm is provided in the Control Room." Contrary to the above, there is no dedicated monitor and read-only printer in the Control Room for these doors. In addition, there is no alarm in the Control Room, as stated in the note in Table 6.2-62. The USAR has been revised to reflect the actual plant design. The asterisk (\*) on Table 6.2-62 has been added to doors R240-6, RR261-2A and RR261-2B to show they have alarm capability, and removed from doors RR261-1 and RS353-1, as they do not have alarm capability.

**50.59 Evaluation Summary:**

This change revises the description of the secondary containment design in the USAR. Based on the analysis, the change does not increase the probability of occurrence or consequences of an accident or malfunction of equipment previously evaluated in the USAR. It does not create the possibility of an accident or malfunction of equipment of a different type than already analyzed in the USAR. There is no decrease in the margin of safety and no adverse impact on the safe operation or shutdown of NMP2. There is no adverse effect on the ALARA program, Equipment Qualification, ISI, IST, Fire Protection, Appendix R, Fuels, and Control Room Habitability.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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<b>50.59 Evaluation No.:</b>	01-058
<b>Implementation Document No.:</b>	Mod. N2-01-004
<b>USAR Affected Pages:</b>	Figure 6.2-71a
<b>System:</b>	Containment Monitoring (CMS)
<b>Title of Change:</b>	Install a Pipe Cap Upstream of the Moisture Collector on the Discharge Side of the H <sub>2</sub> O <sub>2</sub> Analyzer

**Description of Change:**

This modification installed a welded pipe cap upstream of the moisture collector on the discharge side of the H<sub>2</sub>O<sub>2</sub> analyzer in the North Auxiliary Bay (Train A). This isolates (abandons in place) the moisture collector located downstream. A pipe section downstream of the welded pipe cap was removed from the portion which is abandoned in place because it would not be sufficiently supported.

**50.59 Evaluation Summary:**

This 50.59 evaluation evaluates the adequacy of allowing the installation of a pipe cap isolating the Train A moisture collector located on the return line to the primary containment. The 50.59 evaluation found this proposal acceptable because the new configuration ensures that the plant's design and licensing bases are not compromised.

This 50.59 evaluation has determined that this activity does not affect the operation or functionality of the H<sub>2</sub>O<sub>2</sub> monitoring/analyzing apparatus and will not cause any system or component to operate outside its safety parameters.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 01-059

**Implementation Document No.:** Procedure N2-FHP-13.3

**USAR Affected Pages:** 15E.2-1, 15E.3-2; Table 1.6-2 Sh 1

**System:** Reactor Protection (RPS)

**Title of Change:** Control of RPS Shorting Links

**Description of Change:**

This change modified USAR Chapter 15E requirements for the removal of the RPS shorting links. The previous requirement, to remove the shorting links during control rod testing following refueling, regardless of available shutdown margin, was changed. It now requires the removal of the shorting links during refueling, when fuel is loaded using a spiral loading sequence with control rods withdrawn, or when control rods are withdrawn and adequate shutdown margin has not been demonstrated for the current core configuration. This change is consistent with other design basis information and supporting regulatory requirements.

**50.59 Evaluation Summary:**

This change will maintain the RPS system in its normal configuration during control rod withdraw as long as adequate shutdown margin is demonstrated for the current core configuration. Shutdown margin may be demonstrated by test, a combination of testing and analysis, or calculation not associated with a test. When shutdown margin is demonstrated by calculation not associated with a test, additional design margin will be added to the Technical Specification 3.1.1 limit of .38 percent  $\Delta k/k$  to account for added uncertainty associated with this method. The change is bounded by the continuous control rod withdrawal error from subcritical or low power conditions described in USAR Section 15.4.1. The change was found to be acceptable when evaluated against applicable criteria.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 01-062  
**Implementation Document No.:** Temporary Mod. 2001-005  
**USAR Affected Pages:** N/A  
**System:** Feedwater (FWS)  
**Title of Change:** Allow Disconnecting the Actuator of  
2FWS\*AOV23B

**Description of Change:**

This temporary modification disconnected the actuator of 2FWS\*AOV23B without impacting any function important to safety. The previous design of 2FWS\*AOV23B included an actuator to provide testing capability. The actuator used air to open and spring to close. The function of the actuator is not safety related because reactor pressure closes the valve to provide containment isolation, and feedwater flow keeps the valve open. The valve was repaired and the actuator restored in Refuel Outage RFO8.

**50.59 Evaluation Summary:**

This 50.59 evaluation evaluates the adequacy of removing the actuator of 2FWS\*AOV23B. The disconnecting of the valve actuator from this check valve will not adversely affect the check valve from performing its intended function of containment isolation and preventing reverse flow in line 2-FWS-024-51-1. The valve actuator is only used for testing of the valve and will not be needed for the subject valve to perform its function. Testing of the check valve is performed every refuel outage and the valve shall be repaired before the actuator will be needed again.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**50.59 Evaluation No.:** 02-026

**Implementation Document No.:** Design Change Package N2-01-204

**USAR Affected Pages:** 3.7B-17, 3C-7; Tables 3.9A-12 Sh 8, 6.2-56  
Sh 2 & 3; Figures 5.4-13a, 9.3-1g

**System:** Residual Heat Removal (RHS)

**Title of Change:** Internal Modification and Removal of Remote  
Testing and Position Indication from  
2RHS\*AOV39A&B

**Description of Change:**

This design change modified the internals of Anchor Darling testable check valves 2RHS\*AOV39A and B. This modification increases the reliability of the check valves and eliminates position indication and remote test capability. These are the containment isolation valves (as well as the high-low pressure interface) of the RHR shutdown cooling return lines.

**50.59 Evaluation Summary:**

This design change eliminates the indicator rod packing frictional torque, the indicator limit switch torque, and any potential resistive torque from the actuator on the valve disk. This is accomplished by removing the indicator rod and the air actuator assembly. This equipment removal results in elimination of remote valve disk position indication and remote testing capability. The actuator is not needed for opening the valve, as its sole purpose is testing; thus, this only impacts the testing of the check valves. Under accident differential pressure, by design, the valve will effectively close.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**Enclosure C to  
NMP2L 2075**

**NINE MILE POINT - UNIT 2**

**TECHNICAL REQUIREMENTS MANUAL  
CHANGE SUMMARY**

**2002**

**Docket No. 50-410  
License No. NPF-69**

**Technical Requirements Manual  
Summary Report  
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**LDCR No.:** 2-00-TRM-018

**TRM Affected Pages:** Pages 3.4-2 (3.4.1 Condition D), 3.4-5 (3.4.1 Condition I), B3.0-1 (Bases 3.0) and B3.4-1 (Bases 3.4)

**TRM Revision No.:** 1

**Implementing Document No.:** 10 CFR 50.59 Evaluation 99-089 and Modification PN2Y89MX076

**Description of Change:** This revision to the TRM corrects editorial errors in the initial version of the TRM issued to NMCA. The changes include: revising the format for ph in Conditions "D" and "I" and correcting a symbol error and numerical error, revising the word "should" to "Shall" in Bases 3.0 regarding use of TLCO 3.0.3 and correcting a grammatical error (allows vs. allow) in Bases 3.4.

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**LDCR No.:** 2-00-TRM-019

**TRM Affected Pages:** Page 3.6-6 (Table T3.6.1-1, Page 5 of 5)

**TRM Revision No.:** 2

**Implementing Document No.:** M2-0001, Revision 9, Table 2 and P&ID 35C, Revision 21

**Description of Change:** Revised TRM Table T3.6.1-1 to reflect valves 2ICS\*V185 and 2ICS\*186 as sealed closed.

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Technical Requirements Manual  
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**LDCR No.:** 2-01-TRM-001

**TRM Affected Pages:** Page 3.6-6 (Table T3.6.1-1, Page 5 of 5)

**TRM Revision No.:** 3

**Implementing Document No.:** DDC 2M11893

**Description of Change:** Revised Table T3.6.1-1 to show valves  
2CSH\*V83, 2CSH\*V84, 2FWS\*V89A,  
2FWS\*V89B, 2FWS\*V90A, 2FWS\*V90B,  
2ICS\*V182, 2ICS\*V183, 2RCS\*V83A,  
2RCS\*V83B, 2RCS\*V84A, 2RCS\*V84B,  
2RHS\*V209, 2RHS\*V210, 2RHS\*V211,  
2RHS\*V212, 2RHS\*V220, and 2RHS\*V221 as  
normally locked closed.

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**LDCR No.:** 2-00-TRM-020

**TRM Affected Pages:** Pages 3.3-38 (Section 3.3.11) and B3.3-16 (TRM  
B3.3.11)

**TRM Revision No.:** 4

**Implementing Document No.:** 50.59 Evaluation 2000-104

**Description of Change:** The TRM changes reflect using analyzer 2OFG-  
AT115 as an alternate to the grab sampling  
technique and to the hydrogen concentration  
verification frequency.

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LDCR No.: 2-01-TRM-002

TRM Affected Pages: Page 3.3-2 (Section 3.3.1.2)

TRM Revision No.: 5

Implementing Document No.: License Amendment 21 (Spiral Loading) and License Amendment 91 (ITS)

Description of Change: Corrected applicability of TRM Specification 3.3.1.2 to reflect the added restriction that the RPS shorting links be removed when in MODE 5 during spiral reload with multiple control rods withdrawn.

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LDCR No.: 2-01-TRM-006

TRM Affected Pages: Pages 3.6-18, 3.6-19, 3.6-20 and 3.6-21 (Table T3.6.1-2)

TRM Revision No.: 6

Implementing Document No.: License Amendment 96 (dated 7/12/01) and NRC letter dated 9/17/01, Approval of IST Relief Request GVRR-8

Description of Change: License Amendment 96 allowed a relaxed test frequency for reactor instrumentation line excess flow check valves (SR 3.6.1.3.9). The TRM was revised to distinguish reactor instrumentation line EFCVs from other instrumentation line EFCVs (to which SR 3.6.1.3.9 does not apply). The reactor instrumentation line EFCVs are identified in NRC-approved IST relief request GVRR-8).

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**LDCR No.:** 2-01-TRM-005

**TRM Affected Pages:** Pages 3.3-25 (TLCO 3.3.7.2) and 3.3-26 (Table T3.3.7.2-1)

**TRM Revision No.:** 7

**Implementing Document No.:** NER-2S-001, Revision 0 and NRC Generic Letter 91-04

**Description of Change:** Revised the surveillance interval of the triaxial peak accelerographs from 18 months to 24 months in order to accommodate the shift to a 24-month refueling cycle.

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**LDCR No.:** 2-00-TRM-021

**TRM Affected Pages:** Page 3.3-27 (Section 3.3.7.3)

**TRM Revision No.:** 8

**Implementing Document No.:** APC-NMP2-2001-1, ITS Bases Section 2.1.1.2, USAR Sections 15.0.3 and 15B.2, and 50.59 Evaluation 2-2000-107

**Description of Change:** TRM was revised to make allowances for single TIP subsystem out of service when calibrating LPRMs, and to correct typo in core thermal limits (APLHGR not APLRH).

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Technical Requirements Manual  
Summary Report  
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**LDCR No.:** 2-01-TRM-007

**TRM Affected Pages:** Pages 3.3-30 (Section 3.3.9), 3.7-1 (Section 3.7.1), B3.3-14 (Section B3.3.9) and B3.7-1 (Section B3.7.1)

**TRM Revision No.:** 8

**Implementing Document No.:** Calculation PR-C-18E-03G and License Amendment 101

**Description of Change:** License Amendment 101 changed the Technical Specifications to allow movement of recently irradiated fuel without having secondary containment intact. The applicability statement of TLCOs 3.3.9 and 3.3.7 were revised to reflect License Amendment 101.

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**LDCR No.:** 2-02-TRM-005

**TRM Affected Pages:** Page 3.4-14 [Table T3.4.6-1 (Page 1 of 1)] and Page 3.6-16 [Table T3.6.1-2 (Page 10 of 17)]

**TRM Revision No.:** 9

**Implementing Document No.:** Modification N2-96-017, DDC 2M11902 and 2E12421

**Description of Change:** Modification N2-96-017 replaced testable check valves 2ICS\*AOV156 and 2ICS\*AOV157 with new check valves that do not have remote testing capabilities (i.e., no air operator). Therefore, the new configuration renames these valves as 2ICS\*V156 and 2ICS\*V157.

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Technical Requirements Manual  
Summary Report  
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**LDCR No.:** 2-02-TRM-004

**TRM Affected Pages:** Page 3.6-16 [Table T3.6.1-2 (Page 10 of 17)] and Page 3.4-14 [Table T3.4-6-1 (Page 1 of 1)]

**TRM Revision No.:** 9

**Implementing Document No.:** Design Change Package N2-01-204 and 50.59 Evaluation 2-2002-026

**Description of Change:** The remote testable feature of 2RHS\*AOV39A/B has been replaced with a local manual testable feature, and position indication has been eliminated. The mechanical changes involved installation of replacement valve internal parts. Valve numbers have been changed to 2RHS\*V39A/B.

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**LDCR No.:** 2-02-TRM-003

**TRM Affected Pages:** Page 3.6-17 [Table T3.6.1-2 (Page 11 of 17)]

**TRM Revision No.:** 9

**Implementing Document No.:** Design Change Package N2-01-203

**Description of Change:** The testable feature and position indication associated with valves 2FWS\*AOV23A/B were eliminated. The mechanical changes involved installation of replacement valve internal parts. Valve numbers were changed to 2FWS\*V23A/B.

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**Enclosure D to  
NMP2L 2075**

**NINE MILE POINT - UNIT 2**

**TECHNICAL SPECIFICATIONS BASES  
CHANGE SUMMARY**

**2002**

**Docket No. 50-410  
License No. NPF-69**



Technical Specifications Bases  
Change Summary  
Page 1 of 3

**Revision 0** Bases Section B 3.3.3.1 (Page B 3.3.3.1-7) was revised to clarify that manual initiation of the H<sub>2</sub>O<sub>2</sub> analyzers is required to initiate continuous H<sub>2</sub>O<sub>2</sub> monitoring. These changes reflect the effect of information submitted to the NRC in support of License Amendment 102.

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**Revision 1** Bases Section B 3.3.1.1 (Pages B 3.3.1.1-7, B 3.3.1.1-8, B 3.3.1.1-10, B 3.3.1.1-11, B 3.3.1.1-12, B 3.3.1.1-13, B 3.3.1.1-14, B 3.3.1.1-15, B 3.3.1.1-16, B 3.3.1.1-17, B 3.3.1.1-18, B 3.3.1.1-19, B 3.3.1.1-20, B 3.3.1.1-21, B 3.3.1.1-22, B 3.3.1.1-23, B 3.3.1.1-24, B 3.3.1.1-25, B 3.3.1.1-26, B 3.3.1.1-27, B 3.3.1.1-28, B 3.3.1.1-29, B 3.3.1.1-30, B 3.3.1.1-31, B 3.3.1.1-32, B 3.3.1.1-33, B 3.3.1.1-34, B 3.3.1.1-35, B 3.3.1.1-36) and Bases Section B 3.4.1 (Pages B 3.4.1.1-2, B 3.4.1.1-3, B 3.4.1.1-4, B 3.4.1.1-5, and B 3.4.1.1-6) were revised as discussed in License Amendment 92. The License Amendment permitted the use of the Oscillation Power Range Monitoring System. Bases Section B 3.10.8 was revised, as discussed in License Amendment 93, to reflect the renumbering of Functions 2.e and 2.f on Table 3.3.1.1-1 as a consequence of the insertion of a new Reactor Protection System function (i.e., Function 2.e, "OPRM-Upscale"). Technical Specifications Bases Section B 3.7.2 was revised to reflect License Amendment 95. License Amendment 95 included Technical Specifications changes consistent with those requested in NRC Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear Grade Activated Charcoal."

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**Revision 2** Bases Section B 3.7.2 (Pages B 3.7.2-4, B 3.7.2-5, B 3.7.2-6 and B 3.7.2-7) was revised consistent with generic changes identified in TSTF-287. These changes were included with License Amendment 97. TSTF-287, Revision 5, provides specific Conditions and Required Actions for control room barrier degradation (as opposed to ventilation train degradation). The change allows 24 hours in MODES 1, 2, and 3 to restore the capability to maintain proper control room pressure by restoring the control room barrier before requiring an orderly shutdown. Additionally, this TSTF allows intermittent opening of the control room barrier under administrative controls.

Technical Specifications Bases  
Change Summary  
Page 2 of 3

**Revision 3** Bases Section B 3.6.1.3 (Pages B 3.6.1.3-17 and B 3.6.1.3-19) was revised to reflect License Amendment 96. License Amendment 96 revised Technical Specifications SR 3.6.1.3.9 to relax the 24-month EFCV surveillance frequency by limiting the number of tests to a "representative sample" every 24 months such that each EFCV will be tested at least once every 10 years (nominal).

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**Revision 4** Bases Sections B 3.3.8.2 and B 3.3.8.3 (Pages B 3.3.8.2-3, B.3.3.8.2-7, B 3.3.8.3-3 and B 3.3.8.3-6) were revised to reflect License Amendment 99. License Amendment 99 revised surveillance requirements associated with Technical Specifications Section 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring – Logic," and Technical Specifications Section 3.3.8.3, "Reactor Protection System (RPS) Electric Power Monitoring – Scram Solenoids." Specifically, the overvoltage allowable values and associated channel calibration frequency interval were changed. The Bases changes reflect the Technical Specifications changes approved in License Amendment 99.

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**Revision 5** Bases Sections B 3.3.6.2, B 3.6.4.1, B 3.6.4.2, and B 3.6.4.3 (Pages B 3.3.6.2-6, B 3.6.4.1-1, B 3.6.4.1-2, B 3.6.4.1-3, B 3.6.4.1-4, B 3.6.4.2-1, B 3.6.4.2-2, B 3.6.4.2-5, B 3.6.4.3-2, B 3.6.4.3-3, and B 3.6.4.3-4) were revised to reflect License Amendment 101. The Amendment revised the Technical Specifications and Technical Specifications Bases to eliminate the requirement for certain engineered features operability during core alterations, and movement of irradiated fuel which had decayed for at least 2 days. The word "recently" is quantitatively defined (i.e., 2 days) in the Technical Specifications Bases change pages.

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**Revision 6** Bases Section B 3.8.5 (Pages B 3.8.5-1 and B 3.8.5-3) was revised to reflect License Amendment 103. License Amendment 103 revised Technical Specifications Section 3.8.5 to conform with the optional version of Standard Technical Specifications Section 3.8.5, with certain plant-specific differences to restore the pre-ITS operability requirements. Changes to Technical Specifications Bases have been made consistent with Technical Specifications LCO 3.8.5 changes.

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**Revision 7** Bases Section B 3.3.3.1 (Page B 3.3.3.1-7) was revised to reflect License Amendment 102. License Amendment 102 imposes a new license condition in Operating License NPF-69 to approve a change in the licensing basis regarding post-safety injection hydrogen monitoring. Specifically, the amendment changes the permissible delay from 30 minutes to 90 minutes. The Technical Specifications Bases changes reflect continuous monitoring of hydrogen and oxygen concentrations in the control room, upon manual actuation of the analyzers.

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