

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

DOCKET NO. 50-410

PROPOSED CHANGE TO THE TECHNICAL SPECIFICATIONS

Replace page 3/4 6-4 with the attached revised page. This page has been retyped in its entirety with marginal markings to indicate changes to the text.

CONTAINMENT SYSTEMS

PRIMARY CONTAINMENT

PRIMARY CONTAINMENT LEAKAGE

SURVEILLANCE REQUIREMENTS

4.6.1.2 The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR 50 using the methods and provisions of ANSI N45.4-1972:

- a. Three Type A overall integrated containment leakage rate tests shall be conducted at 40 ± 10 -month intervals during shutdown at Pa, 39.75 psig or at Pt, 20.0 psig, during each 10-year service period.* The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection.
 - b. If any periodic Type A test fails to meet 0.75 La or 0.75 Lt, as applicable, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet 0.75 La or 0.75 Lt, as applicable, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet 0.75 La or 0.75 Lt, as applicable, at which time the above test schedule may be resumed.
 - c. The accuracy of each Type A test shall be verified by a supplemental test which:
 1. Confirms the accuracy of the test by verifying that the difference between the supplemental data and the Type A test data is within 0.25 La or 0.25 Lt, as applicable.
 2. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test.
 3. Requires the quantity of gas injected into the containment or bled from the containment during the supplemental test to be equivalent to at least 25% of the total measured leakage at Pa, 39.75 psig, or Pt, 20.0 psig, as applicable.
 - d. Type B and C tests shall be conducted with gas at Pa, 39.75 psig, at intervals no greater than 24 months except for tests involving:
 1. Air locks
 2. Main steam line isolation valves and the remainder of the valves specified in Table 3.6.1.2-1.
 3. Containment isolation valves in hydrostatically tested lines which penetrate the primary containment, and
 4. Purge supply and exhaust isolation valves with resilient seals.
- * The test interval for conducting the second Type A test of the first 10-year service period shall be extended to 54 months to allow the Type A test to be performed during the 4th refueling outage. This extension expires upon completion of the 4th refueling outage.

ATTACHMENT B

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SUPPORTING INFORMATION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS ANALYSIS

Introduction

Niagara Mohawk Power Corporation (NMPC) proposes a one time only change to the Technical Specification surveillance interval requirement for the Primary Containment Integrated Leakage Rate Test (Type A), as specified in Surveillance Requirement 4.6.1.2.a, from a frequency of 40 ± 10 -months to the fourth refueling outage (RF-04), for a total of 54 months between Type A tests. This interval extension will avoid the necessity of Nine Mile Point Unit 2 performing an additional Type A test beyond the required three tests during the first 10-year service interval. Without this extension a fourth test will be required during the shutdown for the 10-year inservice inspection in order to fully meet Surveillance Requirement 4.6.1.2.a. If granted, this interval extension will bring Nine Mile Point Unit 2's Type A testing in line with the 10-year plant inservice inspection.

Description

This amendment proposes to modify the present Technical Specification Surveillance interval requirement for the Type A test, as specified in Surveillance Requirement 4.6.1.2.a, from a frequency of 40 ± 10 months to allow a one time test interval of 54 months. This will bring Nine Mile Point Unit 2's Type A testing in line with the 10-year plant inservice inspection.

Evaluation

The required interval and acceptance criteria for containment integrated leakage testing are specified in 10CFR50 Appendix J, which endorses ANSI N45.4-1972. Testing intervals are also identified in Nine Mile Point Unit 2 Technical Specification Surveillance Requirement 4.6.1.2.a, which states that:

"Three Type A overall integrated containment leakage rate tests shall be conducted at 40 ± 10 month intervals during shutdown at Pa, 39.75 psig or at Pt, 20.0 psig, during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection."

The first Type A test of the first 10-year service period was conducted on January 14, 1991 during the first refueling outage (RF-01). If the second Type A test is performed during the third refueling outage (RF-03), (an interval of 34 months since the previous test), then the third Type A test would be required during the fifth refueling outage (RF-05) in 1996 or 1997. A fourth test would then be required during the sixth refueling outage (RF-06) in 1998 or 1999 to coincide with the end of the 10-year inservice inspection period. This would result in 4 tests being performed in the first 10-year inservice period, instead of the 3 Type A tests required by the Technical Specification and by 10CFR50 Appendix J.

If the second Type A test is deferred to RF-04, scheduled to start in May or June 1995 (a total of 53 months since the previous test), the third Type A test would be due in RF-06. This would meet the three required Type A tests in a 10-year inservice period requirement of Technical Specification 4.6.1.2.a and of 10CFR50 Appendix J. Also, this third test would coincide with Nine Mile Point Unit 2's scheduled 10-year inservice inspection.

This inconsistency in meeting all the requirements of the Technical Specification has resulted from a short second fuel cycle (12 months). In addition, a conflict with Nine Mile Point Unit 1's 1995 refueling cycle will occur. In order to ensure the most efficient scheduling for each plant's refueling in 1995, it is necessary to stagger the outages. As a result, the start of RF-04 is currently scheduled for May or June 1995 with a one month contingency.

The proposed change extends the allowed test interval beyond the current maximum of 50 months by four months to permit performance of a Type A test during RF-04. The intent of the established test interval is to conduct three approximately equally-spaced Type A tests within a given 10-year inservice period. The proposed extension remains consistent with that intent. In fact, the extension will provide for a more uniform spacing of the three Type A tests during the first 10-years. Also, the alternative of conducting the second periodic Type A test during RF-03 in order to meet the 40 ± 10 -month requirement would necessitate conducting tests during RF-05 and RF-06. This would result in four Type A tests during the first 10-year inservice period, which is clearly not the intent of the 10CFR50 Appendix J regulations.

It is estimated that performance of an additional test would add 4 days to the outage schedule and result in an estimated 2.25 man-rem of exposure to test personnel. This extra Type A test will cost approximately \$2.5 million.

The allowable leakage rate given in Technical Specification 3.6.1.2.a is 1.1%/day when tested at 39.75 psig. The pre-operational Type A test performed on April 14, 1986 resulted in an integrated leakage rate of 0.6585%/day. The Type A test performed on January 14, 1991 resulted in an integrated leakage rate of 0.623%/day. The results of both previous Type A tests showed that the actual average integrated leakage of primary containment was less than 58% of the total leakage allowed by the Technical Specifications. Results of the first inservice Type A test showed that no degradation in the ability of the containment to maintain leakage at or below the required limits had occurred during the previous 57 months. Hence, an extension of

the maximum test interval by approximately 4 months would not jeopardize the ability of the containment to maintain the leakage rate at or below the required Type A limits.

There have been no permanent modifications to the containment structure, liner, or penetrations since the last Type A test that could adversely affect the Type A test results. Likewise, there have been no temporary alterations to the containment features that could invalidate previous Type A test results. No such modifications to the containment boundary are planned prior to RF-04 when the next Type A test will be conducted under this proposed change. Any unplanned modifications to the containment prior to the next scheduled Type A test would be subject to the special testing requirements of Section IV.A of Appendix J. In addition, there have been no pressure or temperature excursions in the containment which could have adversely affected containment integrity.

Actual testing at Nine Mile Point Unit 2 has shown that approximately two thirds of the total leakage in the primary containment is from penetrations that receive Type B and C Local Leak Rate Tests. These Type B and C tests will continue to be performed at the frequency required by Nine Mile Point Unit 2's Technical Specifications with repairs being performed as necessary. Demonstrated operability of these penetrations and components will provide added assurance that overall containment leakage remains satisfactory.

This proposed modification of the Type A schedule is a one time extension. Following RF-04, the Type A test schedule will be appropriately planned to meet the test interval required by the Technical Specifications and 10CFR50 Appendix J.

Conclusion

NMPC proposes a one time only change to the Technical Specification Surveillance interval requirement for a Primary Containment Integrated Leakage Rate Test as specified in Surveillance Requirement 4.6.1.2.a, from an interval of 40 ± 10 months to 54 months. This interval extension will avoid the necessity of Nine Mile Point Unit 2 performing an additional Type A test beyond the required three tests during the first 10-year inservice period including the required test during the shutdown for the 10-year inservice inspection. Actual results of the first inservice Type A test showed no degradation in the ability of the containment to maintain leakage at or below the required limits had occurred between the pre-operational and the first inservice Type A tests. Two thirds of the total primary containment leakage in the previous Type A test was from penetrations that receive Type B and Type C Local Leak Rate Tests. These Type B and C tests will continue to be performed at the frequency required by Nine Mile Point Unit 2's Technical Specification, with repairs being performed as necessary. The absence of degradation of the containment and performance of Type B and C testing provides reasonable assurance that an extension of the maximum test interval by approximately 4 months will not jeopardize the ability of the containment to maintain the leakage rate at or below the required Type A limits.

Therefore, there is reasonable assurance that operation of Nine Mile Point Unit 2 in the proposed manner will not endanger the public health and safety.

10 CFR 50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10 CFR 50.92 concerning the issue of no significant hazards consideration. Therefore, in accordance with 10 CFR 50.91, the following analysis has 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 extension of the Type A test surveillance interval does not increase the chances of a previously analyzed accident occurring. Containment integrity is required for the mitigation of accident consequences. Furthermore, containment leakage is not the precursor to any analyzed event. Extension of the Type A test surveillance interval will not affect the containment's ability to maintain leakage below that assumed in the safety analysis. The previous Type A test was completed successfully and there have been no plant modifications (other than those that required Type B or C testing) since the last test which could directly affect the test results. Type B and C testing of individual penetrations has been satisfactory and will continue to be performed in accordance with the Technical Specifications. There have been no pressure or temperature excursions in the containment which could have adversely affected containment integrity. Hence, the ability of the containment to maintain leakage within the Type A test limits will be maintained.

Therefore, the proposed change will not involve a significant increase in the probability or 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 one time extension of the Type A test frequency will not affect the test methodology or acceptance criteria nor does it alter the physical containment structure or boundary in any way. There will be no addition or removal of plant hardware. No new plant operating modes are being introduced. Results of the previous Type A tests are well below allowable limits, and there have been no plant modifications since the last test nor are any planned, that could directly impact the previous Type A test results.

Therefore, the proposed change will not create the possibility of a new or different accident from any 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.

Safety margins are established through the Nine Mile Point Unit 2 safety analyses as reflected in the Technical Specification Limiting Conditions for Operation. Containment leak rates assumed in the safety analyses are not increased by the proposed change to the surveillance interval. The acceptance criteria which must be met to verify that leak rates remain within assumed values will also not be changed.

Although the test frequency will be relaxed for the one time extension, no plant modifications have been made nor are planned which would invalidate past leak test results which confirm acceptable containment integrity. Furthermore, Type B and C testing of individual penetrations has been satisfactory and will continue to be performed in accordance with the Technical Specifications to assure that containment integrity is maintained.

Therefore, the proposed change will not involve a significant reduction in a margin of safety.