

B. Ralph Sylvia
Executive Vice President
Nuclear

September 2, 1993
NMP2L 1444

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Re: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69
TAC No. M86185

Gentlemen:

Niagara Mohawk Power Corporation hereby transmits an Application for Amendment to Nine Mile Point Unit 2 Operating License NPF-69. Also enclosed are the proposed changes to the Technical Specifications set forth in Appendix A of the above mentioned license. Supporting information and analyses demonstrating that the proposed changes involve no significant hazards considerations pursuant to 10 CFR § 50.92 are included as Attachment B. This letter supersedes in its entirety our previous Application for Amendment dated April 7, 1993 (NMP2L 1376).

The proposed Technical Specification changes contained herein represent revisions to Section 3/4.1.3.5, "Control Rod Scram Accumulators." The proposed changes contained in Niagara Mohawk's April 7, 1993 Application would have deleted the surveillance requirement for Control Rod Drive (CRD) scram accumulator check valve leak testing. Testing would have continued to be performed under the Inservice Testing Program in accordance with Surveillance Requirement 4.0.5. In addition, the April 7, 1993 Application would have changed the required actions for more than one accumulator inoperable with a control rod associated with an inoperable accumulator withdrawn. The changes would have allowed the operator 20 minutes to restart at least one CRD pump provided reactor pressure was greater than or equal to 900 psig, or with reactor pressure less than 900 psig, would have required placing the mode switch in the shutdown position immediately.

As a result of their review, the Staff commented that they can no longer accept amendment applications requesting that the Technical Specification testing requirement for accumulator check valves be solely located within the testing program of Surveillance Requirement 4.0.5. The Staff, however, indicated that it would be agreeable to delete entirely the leak testing requirement if it could be demonstrated that the accumulator check valves are not required to hold pressure for a specified time period during any design basis event. While Niagara Mohawk believes that this can be shown, the justification necessary to support such a conclusion goes beyond the scope of the April 7, 1993, submittal and necessitates additional Technical Specification changes. Additional required actions addressing operation with one CRD accumulator inoperable need to be added to the changes originally proposed. Therefore, Niagara Mohawk is superseding the April 7, 1993, submittal with this Application for Amendment.

Surveillance Requirement 4.1.3.5.b.2, which requires CRD scram accumulator check valve testing once per 18 months and specifies test acceptance criteria, is being deleted. To support the deletion of the leak test requirement on the check valves, the required actions for inoperable control rod scram accumulators in OPERATIONAL CONDITIONS 1 and 2, contained in Actions a.1 and a.2 of Limiting Condition for Operation 3.1.3.5, are being modified in accordance with the Improved Standard Technical Specifications. The changes address required actions for one control rod scram accumulator inoperable (Action a.1) as well as the required actions for more than one accumulator inoperable (Action a.2). The proposed changes also allow the operator 20 minutes to restart at least one CRD pump provided reactor pressure is greater than or equal to 900 psig. These changes are consistent with the Improved Standard Technical Specifications.

Niagara Mohawk's April 7, 1993 Application to delete the surveillance requirement for CRD scram accumulator check valve testing was submitted to allow sufficient lead time for Staff review and approval prior to the outage. The justification provided in the April 7, 1993 Application was based on the Staff's safety evaluation approving the same change for Limerick (Amendment Nos. 6 and 39), which included a Staff recommendation that this surveillance be removed from other operating BWR Technical Specifications. However, the Staff has concluded that they can no longer accept the justification provided in our April 7, 1993 Application. This change has required Niagara Mohawk to submit the attached Application which supersedes our previous Application in its entirety. The scram accumulator check valve testing is currently scheduled to begin on October 2, 1993, and activities associated with the testing are a potential critical path item in the refueling outage schedule. Therefore, to minimize impact on the refueling outage schedule, Niagara Mohawk requests that the enclosed Application be given priority review in order to effect the desired changes. Pursuant to 10 CFR § 50.91(b)(1), Niagara Mohawk has provided a copy of this license amendment request and the associated analysis regarding no significant hazards to the appropriate state representative.

Very truly yours,



B. Ralph Sylvia
Exec. Vice President - Nuclear

TDF/lmc

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