ATTACHMENT A

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

Proposed Changes to Technical Specifications

Replace existing pages 3/4 8-14, 3/4 8-15, 3/4 8-19, 3/4 8-28, B3/4 6-5, B3/4 8-3, with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

3/4.8.2 DC SOURCES

DC SOURCES - OPERATING

LIMITING CONDITIONS FOR OPERATION

3.8.2.1 As a minimum, the following DC electrical power sources shall be OPERABLE:

a. Division I, consisting of:

1. 125-volt battery 2BYS*BAT 2A and
2. One 125-volt full-capacity charger

b. Division II, consisting of:

1. 125-volt battery 2BYS*BAT 2B and
2. One 125-volt full-capacity charger

c. Division III, consisting of:

1. 125-volt battery 2BYS*BAT 2C and
2. One 125-volt full-capacity charger

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With either Division I or Division II battery and/or charger of the above required DC electrical power sources inoperable, restore the inoperable division DC electrical power source(s) to OPERABLE status within 2 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With Division III battery and/or charger of the above required DC electrical power sources inoperable, declare the HPCS system inoperable and take the ACTION required by Specification 3.5.1.

SURVEILLANCE REQUIREMENTS

4.8.2.1 Each of the above required 125-volt batteries and chargers shall be demonstrated OPERABLE:

a. At least once per 7 days by verifying that:

1. The parameters in Table 4.8.2.1-1 meet the Category A limits, and
2. Total battery terminal voltage is greater than or equal to 130 volts on float charge.

SURVEILLANCE REQUIREMENTS

4.8.2.1 (Continued)

b. At least once per 92 days and within 7 days after a battery discharge with battery terminal voltage below 107 volts, or battery overcharge with battery terminal voltage above 142 volts, by verifying that:

1. The parameters in Table 4.8.2.1-1 meet the Category B limits.
2. There is no visible corrosion at either terminals or connectors, or the resistance of the associated cell-to-cell and terminal connection is less than or equal to 120% of the resistance readings taken during initial installation, and
3. The average electrolyte temperature of one out of five connected cells is above 65°F.

c. At least once per 18 months by verifying that:

1. The cells, cell plates, and battery racks show no visual indication of physical damage or abnormal deterioration,

2. The cell-to-cell and terminal connections are clean, tight, free of corrosion,

3. The resistance of each cell-to-cell and terminal connection is less than or equal to 120% of the resistance readings taken during initial installation,* and

4. The battery charger will supply:

    1. For Divisions I and II, at least 300 amperes at a minimum of 130 volts for at least 4 hours.
    2. For Division III, at least 40 amperes at a minimum of 130 volts for at least 4 hours.

d. At least once per 18 months, during shutdown, by verifying that either:

1. The battery capacity is adequate to supply and maintain in OPERABLE status all of the actual emergency loads for 2 hours for Divisions I and II, and 2 hours for Division III when the battery is subjected to a battery service test, or

2. The battery capacity is adequate to supply a dummy load of the following profile while maintaining the battery terminal voltage greater than or equal to 105 volts for Division I and II and 112.5 volts for Division III:

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* In accordance with IEEE 450-1980.

LIMITING CONDITIONS FOR OPERATION

3.8.2.2 As a minimum, Division I or Division II, and, when the HPCS system is required to be OPERABLE, Division III, of the DC electrical power sources shall be OPERABLE with:

a. Division I consisting of:

   1. 125-volt battery 2BYS*BAT 2A and
   2. One 125-volt full capacity charger.

b. Division II consisting of:

   1. 125-volt battery 2BYS*BAT 2B and
   2. One 125-volt full capacity charger.

c. Division III consisting of:

   1. 125-volt battery 2BYS*BAT 2C and
   2. One 125-volt full capacity charger.

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5, and *.

ACTION:

a. With less than the Division I and/or Division II battery and/or charger of the above required DC electrical power sources OPERABLE, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.

b. With Division III battery and/or charger of the above required DC electrical power sources inoperable, declare the HPCS system inoperable and take the ACTION required by Specifications 3.5.2 and 3.5.3.

c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.8.2.2 At least the above required battery and charger shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.1.

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* When handling irradiated fuel in the secondary containment.

PRIMARY CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

LIMITING CONDITIONS FOR OPERATION

3.8.4.2 All primary containment penetration conductor overcurrent protective devices* shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With one or more of the primary containment penetration conductor overcurrent protective devices* inoperable, declare the affected system or component inoperable and apply the appropriate ACTION statement for the affected system and:

   1. For 13.8-kV circuit breakers, deenergize the 13.8-kV circuits by tripping the associated redundant circuit breaker(s) within 72 hours and verify the redundant circuit breaker(s) to be tripped at least once every 7 days thereafter.

   2. For 600 volt MCC circuit breakers, remove the inoperable circuit breaker(s) from service by opening the breaker within 72 hours and verify the inoperable breaker(s) to be in the open position at least once every 7 days thereafter.

   Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. The provisions of Specification 3.0.4 are not applicable to overcurrent devices in 13.8-kV circuits which have their redundant circuit breakers tripped or to 600-volt circuits which have the inoperable circuit breaker disconnected.

SURVEILLANCE REQUIREMENTS

4.8.4.2 Each of the primary containment penetration conductor overcurrent protective devices* shall be demonstrated OPERABLE:

a. At least once per 18 months:

   1. By verifying that the medium voltage 13.8-kV circuit breakers are OPERABLE by selecting, on a rotating basis, at least 10% of the circuit breakers and performing:

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* Excluded from this specification are those penetration assemblies that are capable of withstanding the maximum current available because of an electrical fault inside containment.

PRIMARY CONTAINMENT

PRIMARY CONTAINMENT ISOLATION VALVES

3/4.6.3 (Continued)

GDC 54 through 57 of Appendix A to 10 CFR 50. Measurement of the closure time of automatic containment isolation valves is performed for the purpose of demonstrating PRIMARY CONTAINMENT INTEGRITY and system OPERABILITY (Specification 3/4.6.1).

The list of primary containment isolation valves is contained in procedure NIP-DES-04 and revisions will be processed in accordance with Section 6.0, Administrative Controls.

The maximum isolation times for primary containment automatic isolation valves are either the analytical times used in the accident analysis as described in the FSAR; or times derived by applying margins to the vendor test data obtained in accordance with industry codes and standards. For non-analytical automatic primary containment isolation valves, the maximum isolation time is derived as follows:

1) Valves with full stroke times less than or equal to 10 seconds, maximum isolation time approximately equals the vendor tested closure time multiplied by 2.0.

2) Valves with full stroke time greater than 10 seconds, maximum isolation time approximately equals the vendor tested closure time multiplied by 1.5. Valve closing times do not include isolation instrumentation response times.

Valve closing times do not include isolation instrumentation response times. The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

3/4.6.4 SUPPRESSION CHAMBER - DRYWELL VACUUM BREAKERS

Vacuum relief breakers are provided to equalize the pressure between the suppression chamber and drywell. This system will maintain the structural integrity of the primary containment under conditions of large differential pressures.

The vacuum breakers between the suppression chamber and the drywell must not be inoperable in the open position since this would allow bypassing of the suppression pool in case of an accident. There are four pairs of valves to provide redundancy so that operation may continue for up to 72 hours with no more than one pair of vacuum breakers inoperable in the closed position.

3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES

Primary containment electrical penetrations and penetration conductors are protected by either de-energizing circuits not required during reactor operation or demonstrating the OPERABILITY of primary and backup overcurrent protection circuit breakers by periodic surveillance. The list of primary containment AC circuits required to be deenergized is contained in administrative procedure NIP-DES-04 and revisions will be processed in accordance with Section 6.0, Administrative Controls.

The Surveillance Requirements applicable to lower voltage circuit breakers provides assurance of breaker reliability by testing at least one representative sample of each manufacturer's brand of circuit breaker. Each manufacturer's molded case and metal case circuit breakers are grouped into representative samples which are then tested on a rotating basis to ensure that all breakers are tested. If a wide variety exists within any manufacturer's brand of circuit breakers, it is necessary to divide that manufacturer's breakers into groups and treat each group as a separate type of breaker for surveillance purposes.

The emergency lighting system overcurrent protective devices ensure that a failure of the non-Class 1E portion of the circuit will not affect the operation of the remaining portions of the Class 1E circuits that are necessary for safe shutdown. The list of these overcurrent protective devices is contained in administrative procedure NIP-DES-04 and revisions will be processed in accordance with Section 6.0, Administrative Controls.

The EPAs provide Class 1E isolation capabilities for the RPS power supplies and the scram power supplies. This is required because the power supplies are not Class 1E power supplies.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
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Supporting Information and No Significant Hazards Consideration Analysis

INTRODUCTION

The Nine Mile Point Unit 2 emergency 125-volt DC system consists of three physically separate, electrically independent DC power divisions corresponding to the three divisions of the onsite AC power system. Each division feeds a separate emergency load group through a separate distribution system. Each division of the emergency DC system has its own battery, primary and backup battery chargers, DC switchgear and distribution panels. Division I and II emergency batteries are designated 2BYS*BAT2A and 2BYS*BAT2B, respectively. Each battery has two (2) 100-percent capacity battery chargers. The Division I battery chargers are designated 2BYS*CHGR2A1 and 2BYS*CHGR2A2 and the Division II battery chargers are designated 2BYS*CHGR2B1 and 2BYS*CHGR2B2. Each primary or backup battery charger is capable of supplying the largest combined steady-state loads on the battery while recharging the battery from the design minimum charge state to the fully charged state within 24 hours. The emergency 125-volt DC systems supply backup power to their associated Uninterruptible Power Supplies.

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

"Note" for LCOs 3.8.2.1.a.2, 3.8.2.1.b.2, 3.8.2.2.a.2, 3.8.2.2.b.2

Present Wording: Two 125-volt full capacity chargers are required when the Uninterruptible Power Supply is powered from its backup DC power supply.

The proposed change will delete this "note" from the above LCOs.

Current Surveillance Requirement 4.8.2.1.b.3, "DC Sources-Operating"

3. The average electrolyte temperature of one out of five connected cells is above 60°F.

Proposed Surveillance Requirement 4.8.2.1.b.3, "DC Sources-Operating"

3. The average electrolyte temperature of one out of five connected cells is above 65°F.

Current Surveillance Requirement 4.8.4.2.a.1, "Electrical Equipment Protective Devices"

1. By verifying that the medium voltage 13.8-kV circuit breakers are OPERABLE by selecting, on a rotating basis, at least 10% of the circuit breakers of each voltage level and performing:

Proposed Surveillance Requirement 4.8.4.2.a.1, "Electrical Equipment Protective Devices"

1. By verifying that the medium voltage 13.8-kV circuit breakers are OPERABLE by selecting, on a rotating basis, at least 10% of the circuit breakers and performing:

Current Bases for Specifications 3/4.6.3 and 3/4.8.4

The present wording references Administrative Procedure AP-8.8 in several places.

Proposed Bases for Specifications 3/4.6.3 and 3/4.8.4

The proposed wording would reference Nuclear Interfacing Procedure NIP-DES-04 in place of AP-8.8.

Current Bases for Specification 3/4.6.3

. . . The maximum isolation times for the primary containment automatic isolation valves listed in this specification are either . . .

Proposed Bases for Specification 3/4.6.3

. . . The maximum isolation times for the primary containment automatic isolation valves are either . . .

EVALUATION

Deletion of the "notes" that require two (2) 125-volt full capacity chargers when the Uninterruptible Power Supply is powered by its backup DC power supply-Technical Specification 3/4.8.2 (pages 3/4 8-14, 3/4 8-19)

The existing "notes" at the bottom of pages 3/4 8-14 and 3/4 8-19 indicate that two (2) 125-volt full capacity chargers are required when the Uninterruptible Power Supply is powered by its backup DC power supply. These "notes" apply to the Division I and II DC sources during operating and shutdown conditions. This requirement was placed in the Technical Specifications based on overly conservative load calculations that determined that two battery chargers were required to provide adequate power to an Uninterruptible Power Supply and connected loads. Niagara Mohawk has calculated that emergency battery charger 2BYS*CHGR2A1 or 2BYS*CHGR2A2 (Division I) and 2BYS*CHGR2B1 or 2BYS*CHGR2B2 (Division II) are capable of recharging the battery from the designed minimum charge to full charge in 24 hours while supplying the largest combined steady state DC loads, including an Uninterruptible Power Supply. Therefore, only one (1) battery charger per Division is required to meet current design requirements and the criteria delineated in Regulatory Guide 1.32, "Criteria for Safety-Related Electric Power Systems for Nuclear Power Plants."

In summary, only one (1) battery charger per division is required to assure adequate voltage is available to connected loads. Therefore, the "notes" that require that two (2) chargers be available to satisfy the Division I and Division II DC sources Limiting Condition for Operation will be deleted.

Revise the required battery cell average electrolyte temperature from 60°F to 65°F - Technical Specification 3/4.8.2 (page 3/4 8-15)

Existing Technical Specification 4.8.2.1 requires that the 125-volt batteries be demonstrated to be operable by verifying that the average electrolyte temperature of one out of five connected cells is above 60°F. Current battery capacity calculations and the Nine Mile Point Unit 2 Updated Safety Analysis Report assume an electrolyte temperature of 65°F. Although the batteries can provide adequate voltage with an average electrolyte temperature of 60°F, battery capacity will be increased by raising the electrolyte temperature to 65°F. The battery rooms are maintained at a temperature above 65°F. Therefore, to improve the capacity of the batteries and make the Technical Specifications consistent with the Nine Mile Point Unit 2 Updated Safety Analysis Report and applicable battery capacity calculations, Niagara Mohawk proposes to change the required electrolyte temperature from 60°F to 65°F.

In summary, this change is conservative in that battery capacity is increased. In addition, the Technical Specifications will become consistent with assumptions made in the Updated Safety Analysis Report and relevant battery capacity calculations.

Deletion of the words "of each voltage level" - Technical Specification 3/4.8.4 (page 3/4 8-28)

Technical Specification 4.8.4.2.a.1 requires that overcurrent protective devices shall be demonstrated operable "By verifying that the medium voltage 13.8-kV circuit breakers are OPERABLE by selecting, on a rotating basis, at least 10% of the circuit breakers of each voltage level and performing. . ." Because Specification 4.8.4.2.a.1 delineates Surveillance Requirements only for 13.8-kV breakers, the words "of each voltage level" are inappropriate. These words were an option in the Standard Technical Specifications and were incorrectly included in the Nine Mile Point Unit 2 Technical Specifications. Therefore, Niagara Mohawk proposes to delete these words from Specification 4.8.4.2.a.1. This is an administrative change and does not affect plant systems or operation.

Revise the references made to Administrative Procedure AP-8.8 to Nuclear Interfacing Procedure NIP-DES-04 - Bases for Technical Specifications 3/4.6.3 and 3/4.8.4 (pages B3/4 6-5, B3/4 8-3)

The Bases for Technical Specifications 3/4.6.3 and 3/4.8.4 presently make reference to Administrative Procedure AP-8.8, "List of Controlled Lists." AP-8.8 has been superseded by Nuclear Interfacing Procedure NIP-DES-04, "List of Controlled Lists." Accordingly, the references made to AP-8.8 will be replaced with NIP-DES-04. Revisions to NIP-DES-04, as were revisions to AP-8.8, will be processed in accordance with Section 6.0 of the Technical Specifications, Administrative Controls. This is an administrative change and does not affect plant systems or operation.

Deletion of the references made to valves "listed in this specification" - Bases for Technical Specification 3/4.6.3 (page B3/4 6-5)

The Bases for Technical Specification 3/4.6.3 presently makes reference to the "maximum isolation times for the primary containment automatic isolation valves listed in this specification . . ." The primary containment isolation valves were removed from Specification 3/4.6.3 via Nine Mile Point Unit 2 Technical Specification Amendment

No. 37. Therefore, the reference made to valves "listed in this specification" is no longer appropriate and will be deleted from the Bases. This is an administrative change and does not affect plant systems or operation.

CONCLUSIONS

The existing "notes" at the bottom of pages 3/4 8-14 and 3/4 8-19 indicate that two (2) 125-volt full capacity chargers are required when the Uninterruptible Power Supply is powered by its backup DC power supply. Niagara Mohawk has determined that one (1) battery charger is adequate to charge the associated battery and meet the DC load demands including an Uninterruptible Power Supply. Current design requirements and the criteria of Regulatory Guide 1.32 are met. Therefore, this note is no longer warranted.

Existing Technical Specification 4.8.2.1 requires that the 125-volt batteries be demonstrated to be operable by verifying that the average electrolyte temperature of one out of five connected cells is above 60°F. Since battery sizing is calculated for 65°F and the Updated Safety Analysis Report assumes an electrolyte temperature of 65°F when the battery is fully charged, Niagara Mohawk proposes to change the required electrolyte temperature from 60°F to 65°F. This change is conservative in that battery capacity and therefore capacity margin is increased.

The Bases for Technical Specifications 3/4.6.3 and 3/4.8.4 presently make reference to Administrative Procedure AP-8.8, "List of Controlled Lists." AP-8.8 has been superseded by Nuclear Interfacing Procedure NIP-DES-04, "List of Controlled Lists." Accordingly, the references made to AP-8.8 will be replaced with NIP-DES-04. The Bases for Technical Specification 3/4.6.3 presently make reference to the "maximum isolation times for the primary containment automatic isolation valves listed in this specification . . ." The primary containment isolation valves were removed from Specification 3/4.6.3 via Nine Mile Point Unit 2 Technical Specification Amendment No.37. Therefore, the reference made to valves "listed in this specification" is no longer appropriate and will be deleted from the Bases. Technical Specification 4.8.4.2.a.1 requires that overcurrent protective devices shall be demonstrated operable "By verifying that the medium voltage 13.8-kV circuit breakers are OPERABLE by selecting, on a rotating basis, at least 10% of the circuit breakers of each voltage level and performing . . ." Because Specification 4.8.4.2.a.1 delineates Surveillance Requirements only for 13.8-kV breakers, the words "of each voltage level" are inappropriate. Therefore, Niagara Mohawk proposes to delete these words from Specification 4.8.4.2.a.1. These changes are administrative and do not affect plant systems or operation.

The effect of the proposed changes has been evaluated and found to have no resulting impact on system reliability or performance. 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 and that issuance of the proposed amendment will not be inimical to the common defense and security.

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

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 Section 50.92 about the issue of no

significant hazards consideration. Therefore, in accordance with 10 CFR 50.91 and 10 CFR 50.92, 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 existing "notes" at the bottom of pages 3/4 8-14 and 3/4 8-19 indicate that two (2) 125-volt full capacity chargers are required when the Uninterruptible Power Supply is powered by its backup DC power supply. These "notes" were based on an overly conservative calculation which determined that both chargers were required to supply adequate power to connected loads including an Uninterruptible Power Supply. More recent calculations indicate that one (1) charger is adequate to supply power to connected loads and an Uninterruptible Power Supply. Based on these more recent calculations, Niagara Mohawk proposes to delete these "notes." Because it has been determined adequate power will be provided to connected loads with one (1) charger, deletion of these "notes" will not affect the reliability of connected loads nor their ability to perform their intended function. Therefore, this change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Existing Technical Specification 4.8.2.1 requires that the 125-volt batteries be demonstrated to be operable by verifying that the average electrolyte temperature of one out of five connected cells is above 60°F. The Nine Mile Point Unit 2 Updated Safety Analysis Report and current battery capacity calculations assume a battery electrolyte temperature of at least 65°F. To improve the capacity of the batteries and make the Technical Specifications consistent with the Updated Safety Analysis Report and current battery capacity calculations, Niagara Mohawk proposes to change the required electrolyte temperature from 60°F to 65°F. The change from 60°F to 65°F is conservative in that battery capacity is increased. Increasing the capacity of the batteries will not adversely affect the reliability of connected loads nor their ability to perform their intended function. Therefore, this change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes made to Technical Specification 3/4.8.4 and to the Bases of Specifications 3/4.6.3 and 3/4.8.4 are administrative changes and do not affect plant systems or operation. Accordingly these changes 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 function of the battery chargers is to provide adequate power to connected loads. Since it has been determined that one (1) battery charger is sufficient to provide adequate power, deletion of these "notes" which require that two (2) chargers be available does not affect the capability of the chargers to perform their function. The proposal to change the required electrolyte temperature from 60°F to 65°F increases the capacity of the batteries and therefore improves the capability of the batteries to perform their intended function. The remaining changes are administrative changes and do not affect plant systems or operation.

The proposed changes do not introduce any new accident precursors and do not involve any physical alterations to plant configurations which could initiate a new or different kind of accident. The changes do not adversely affect the design or performance characteristics of the batteries, battery chargers or connected loads. The proposed change to increase the required electrolyte temperature will increase battery capacity. Therefore, the proposed amendment will not create the possibility of a new or different kind of 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.

Niagara Mohawk proposes to delete the existing "notes" that indicate that two (2) 125-volt full capacity chargers are required when the Uninterruptible Power Supply is powered by its backup DC power supply. Niagara Mohawk engineering has determined that one (1) battery charger is adequate to meet the maximum DC load demands including the Uninterruptible Power Supply. The proposed change to increase the required electrolyte temperature will increase battery capacity. The remaining changes are administrative.

These changes will not adversely affect the design or performance characteristics of the batteries, battery chargers, or connected loads nor will they affect the capability of the batteries, battery chargers, or connected loads to perform their intended function. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.