ATTACHMENT A

Niagara Mohawk Power Corporation
License No. NPF-69
Docket No. 50-410

Proposed Changes to Technical Specifications

Replace existing pages 1-2, 3/4 3-13, 3/4 3-15, 3/4 3-26, 3/4 3-28, 3/4 9-5 and B3/4 9-1 with the attached revised pages. These pages have been retyped in their entirety with marginal markings to indicate changes to the text. Page 1-2a has been added.

CHANNEL FUNCTIONAL TEST

1.6 (Continued)

The CHANNEL FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total channel steps so that the entire channel is tested.

CORE ALTERATION

1.7 CORE ALTERATION shall be the movement of any fuel, or reactivity control components within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:

a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); and

b. Control rod movement provided there are no fuel assemblies in the associated core cell.

Suspension of CORE ALTERATIONS shall not preclude completion of movement to a safe position.

CORE MAXIMUM FRACTION OF LIMITING POWER DENSITY

1.8 The CORE MAXIMUM FRACTION OF LIMITING POWER DENSITY (CMFLPD) shall be the highest value of the FLPD which exists in the core.

CRITICAL POWER RATIO

1.9 The CRITICAL POWER RATIO (CPR) shall be the ratio of that power in the assembly which is calculated by application of an approved critical power correlation to cause some point in the assembly to experience boiling transition, divided by the actual fuel assembly operating power.

DOSE EQUIVALENT I-131

1.10 DOSE EQUIVALENT I-131 shall be that concentration of I-131, expressed in microcuries per gram, which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites."

$\bar{E}$ - AVERAGE DISINTEGRATION ENERGY

1.11 $\bar{E}$ shall be the average, weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling, of the sum of the average beta and gamma energies per disintegration, expressed in MeV, for isotopes, with half-lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

EMERGENCY CORE COOLING SYSTEM RESPONSE TIME

1.12 The EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS actuation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function, i.e., the valves travel to their required positions, pump

TABLE 3.3.2-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION

TRIP FUNCTION	VALVE GROUPS OPERATED BY SIGNAL (a)	MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (b)	APPLICABLE OPERATIONAL CONDITION	ACTION
1. Primary Containment Isolation Signals (Continued)				
h. SGTS Exhaust - High Radiation	9	1	1, 2, 3	27
i. RWCU System				
1) ΔFlow - High	6, 7	1	1, 2, 3	22
2) ΔFlow - High, Timer	6, 7	1	1, 2, 3	22
3) Standby Liquid Control, SLCS, Initiation	6(f), 7(f)	1	1, 2	22
j. RWCU Equipment Area				
1) Pump Room A Temperature - High	6, 7	1	1, 2, 3	22
2) Pump Room B Temperature - High	6, 7	1	1, 2, 3	22
3) HX Room Temperature - High	6, 7	1	1, 2, 3	22
k. Reactor Building Pipe Chase				
1) Azimuth 180° (Upper), Temperature - High	5, 6, 7, 10	1	1, 2, 3	22
2) Azimuth 180° (Lower), Temperature - High	5, 6, 7, 10	2	1, 2, 3	22
3) Azimuth 40°, Temperature - High	5, 6, 7, 10	1	1, 2, 3	22
l. Reactor Building Temperature - High	5, 10	5	1, 2, 3	22
m. Manual Isolation Pushbutton [NSSSS]	1	2	1, 2, 3	25
	2, 4, 5	2	1, 2, 3	26
	3, 6, 7	1	1, 2, 3	26
	8	2	1, 2, 3	25, 27
	9	2	1, 2, 3	27

TABLE 3.3.2-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION

TABLE NOTATIONS

* During CORE ALTERATIONS and operations with a potential for draining the reactor vessel. This applies to functions described in notes (c) and (d) that isolate secondary containment and automatically start the SGTS.

** When any turbine stop valve is greater than 90% open and/or when the key-locked condenser low vacuum bypass switch is open (in Normal position).

† Deleted.

†† When handling irradiated fuel in the reactor building and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

(a) Refer to Table 3.3.2-4 for valve groups, associated isolation signals and key to isolation signals.

(b) A channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the Trip System in the tripped condition provided at least one other OPERABLE channel in the same Trip System is monitoring that parameter.

(c) Also actuates the standby gas treatment system.

(d) Also actuates reactor building ventilation isolation dampers per Table 3.6.5.2-1.

(e) Also trips and isolates the air removal pumps.

(f) Initiation of SLCS pump 2SLS*P1B closes 2WCS*MOV102 and manual initiation of SLCS pump 2SLS*P1A closes 2WCS*MOV112.

(g) For this signal one Trip System has 2 channels which close valves 2ICS*MOV 128 and 2ICS*MOV 170, while the other Trip System has 2 channels which close 2ICS*MOV 121.

(h) Manual initiation only isolates 2ICS*MOV121 and only following manual or automatic initiation of the RCIC system.

(i) Only used in conjunction with low RCIC steam supply pressure and high drywell pressure to isolate 2ICS*MOV148 and 2ICS*MOV164.

(j) Signal from LPCS/RHR initiation circuitry.

TABLE 4.3.2.1-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TRIP FUNCTION	CHANNEL CHECK	CHANNEL FUNCTION TEST	CHANNEL CALIBRATION	OPERATION CONDITIONS FOR WHICH SURVEILLANCE IS REQUIRED
1. Primary Containment Isolation Signals (Continued)				
h. SGTS Exhaust - High Radiation	NA	Q	R	1, 2, 3
i. RWCU System				
1) ΔFlow - High	S	Q	R	1, 2, 3
2) ΔFlow - High, Timer	NA	Q	R	1, 2, 3
3) Standby Liquid Control, SLCS, Initiation	NA	R	NA	1, 2
j. RWCU Equipment Area				
1) Pump Room A Temperature - High	S	Q	R(b)	1, 2, 3
2) Pump Room B Temperature - High	S	Q	R(b)	1, 2, 3
3) HX Room Temperature - High	S	Q	R(b)	1, 2, 3
k. Reactor Building Pipe Chase				
1) Azimuth 180° (Upper), Temperature - High	S	Q	R(b)	1, 2, 3
2) Azimuth 180° (Lower), Temperature - High	S	Q	R(b)	1, 2, 3
3) Azimuth 40°, Temperature - High	S	Q	R(b)	1, 2, 3
l. Reactor Building Temperature - High	S	Q	R(b)	1, 2, 3
m. Manual Isolation Pushbutton [NSSSS]	NA	Q(c)	NA	1, 2, 3

TABLE 4.3.2.1-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TABLE NOTATIONS

* During CORE ALTERATIONS and operations with a potential for draining the reactor vessel. This only applies to secondary containment isolation and automatic start of SGTS.

** When any turbine stop valve is greater than 90% open and/or when the key-locked condenser low vacuum bypass switch is open (in Normal position).

† When handling irradiated fuel in the reactor building and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

(a) Perform the calibration procedure for the trip unit setpoint at least once per 92 days.

(b) Calibration excludes sensors; sensor response and comparison shall be done in lieu of.

(c) Manual isolation pushbuttons are tested at least once per operating cycle during shutdown. All other circuitry associated with manual isolation shall receive a CHANNEL FUNCTIONAL TEST at least once per 92 days as part of the circuitry required to be tested for the automatic system isolation.

3/4.9.3 CONTROL ROD POSITION

LIMITING CONDITIONS FOR OPERATION

3.9.3 All control rods shall be fully inserted.*

APPLICABILITY: OPERATING CONDITION 5 when loading fuel assemblies into the core.

ACTION:

With one or more control rods not fully inserted, suspend loading fuel assemblies into the core.

SURVEILLANCE REQUIREMENTS

4.9.3 All control rods shall be verified to be fully inserted at least once per 12 hours during loading of fuel assemblies into the core.

* Except control rods removed per Specification 3.9.10.1 or 3.9.10.2 or with one control rod withdrawn under control of reactor mode switch Refuel position one-rod-out interlock.

BASES

3/4.9.1 REACTOR MODE SWITCH

Locking the OPERABLE reactor mode switch in the Shutdown or Refuel position, as specified, ensures that the restrictions on control rod withdrawal and refueling platform movement during the refueling operations are properly activated. These conditions reinforce the refueling procedures and reduce the probability of inadvertent criticality, damage to reactor internals or fuel assemblies, and exposure of personnel to excessive radioactivity.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of at least two source range monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core. The SRMs are provided to monitor the core during periods of station shutdown and to guide the operator during refueling operations and station startup. Requiring two operable SRMs, one in and one adjacent to any core quadrant where fuel or control rods are being moved, assures adequate monitoring of that quadrant during such alterations. The requirement of 3 counts per second provides assurance that neutron flux is being monitored.

A spiral unloading pattern is one by which the fuel in the outermost cells (four fuel bundles surrounding a control blade) is removed first. Unloading continues by removing the remaining outermost fuel by cell. The last cell removed will be adjacent to an SRM. Spiral reloading is the reverse of unloading. Spiral unloading and reloading will preclude the creation of flux traps (moderator filled or partially filled cells surrounded on all sides by fuel).

During spiral unloading, the SRMs shall have an initial count rate of at least 3 cps with all rods fully inserted. It is expected that the count rate of the SRMs will drop below 3 cps before all of the fuel is unloaded. Since there will be no reactivity additions, a lower number of counts will not present a hazard. When all of the fuel has been removed to the spent fuel storage pool, the SRMs will no longer be required. Requiring an SRM to be operational prior to fuel removal from around that SRM assures that the SRMs are OPERABLE and can be relied upon when the count rate goes below the required minimum.

During spiral reload, SRM operability will be verified by using a portable external source once every 12 hours until the required amount of fuel is loaded to maintain 3 cps. As an alternative to the above, four fuel assemblies will be loaded in cells containing control blades around one SRM to obtain the required count rate. The loading of up to four bundles around the SRMs before attaining the required count rate is permissible because analysis has shown that an array of four fuel bundles in any configuration will remain subcritical. Until these four assemblies have been loaded, the 3 cps (or 1.3 cps) requirement is not necessary.

3/4.9.3 CONTROL ROD POSITION

The requirement that all control rods be inserted during loading of fuel assemblies into the core ensures that fuel will not be loaded into a cell without a control rod.

ATTACHMENT B

Niagara Mohawk Power Corporation
License No. NPF-69
Docket No. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

Background

Niagara Mohawk proposes to revise the definition of CORE ALTERATION to be consistent with NUREG-1434, "Improved Standard Technical Specifications for BWR/6," and those to be incorporated into Revision 1. Specifically, the proposed revision clearly defines that movement of SRMs, IRMs, LPRMs, TIPs or special moveable detectors (including undervessel replacement) is not a CORE ALTERATION. The definition is also expanded to state, "in addition, control rod movement is not considered a CORE ALTERATION provided there are no fuel assemblies in the associated core cell." This will provide additional flexibility in that replacement of control rod blades and LPRMs will no longer require secondary containment to be OPERABLE, thereby potentially reducing the duration of the refueling outage.

Currently, Specification 3/4.9.3, "Control Rod Position," requires all control rods to be inserted in OPERATIONAL CONDITION 5, during CORE ALTERATIONS. The proposed change deletes the reference to CORE ALTERATION and replaces it with applicability only during loading fuel assemblies into the core. The proposed change would allow movement of sources, reactivity control components, and other components affecting reactivity when all rods are not inserted. This reflects the only remaining condition which results in addition of positive reactivity into the core and is consistent with the revised definition.

On April 7, 1993, Niagara Mohawk submitted an Application for Amendment to remove the requirement for the Standby Liquid Control System (SLCS) to be OPERABLE in OPERATIONAL CONDITION 5. This was issued as Amendment 48 on September 30, 1993. Currently, Tables 3.3.2-1 and 4.3.2.1-1 show that SLCS initiates Reactor Water Cleanup System (RWCS) isolation in OPERATIONAL CONDITION 5. This requirement should have been deleted at the time of the previous amendment. The proposed revision deletes this requirement along with the associated notes.

Description of Proposed Changes

Changes to Definition 1.7

Existing Definition of 1.7, CORE ALTERATION:

> CORE ALTERATION shall be the addition, removal, relocation, or movement of fuel, sources, incore instruments or reactivity controls within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Normal movement of the SRMs, IRMs, TIPs or special movable detectors is not considered a CORE ALTERATION. Suspension of CORE ALTERATIONS shall not preclude completion of the movement of a component to a safe conservative position.

Proposed Definition of 1.7, CORE ALTERATION:

CORE ALTERATION shall be the movement of any fuel, or reactivity control components within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:

a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special moveable detectors (including undervessel replacement); and

b. Control rod movement provided there are no fuel assemblies in the associated core cell.

Suspension of CORE ALTERATIONS shall not preclude completion of movement to a safe position.

Changes Related to Control Rod Position

Existing Specification 3/4.9.3:

3.9.3 All control rods shall be inserted.*

APPLICABILITY: OPERATIONAL CONDITION 5, during CORE ALTERATIONS.**

ACTION:

With all control rods not inserted, suspend all other CORE ALTERATIONS.

4.9.3 All control rods shall be verified to be inserted, except as above specified:

a. Within 2 hours before:

1. The start of CORE ALTERATIONS.
2. The withdrawal of one control rod under the control of the reactor mode switch Refuel position one-rod-out interlock.

b. At least once per 12 hours.

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* Except control rods removed per Specification 3.9.10.1 or 3.9.10.2, or with one control rod withdrawn under control of the reactor mode switch Refuel position one-rod-out interlock.

** See Special Test Exception 3.10.3.

Proposed Specification 3/4.9.3:

*3.9.3 All control rods shall be fully inserted.**

APPLICABILITY: OPERATIONAL CONDITION 5, when loading fuel assemblies into the core.

ACTION:

With one or more control rods not fully inserted, suspend loading fuel assemblies into the core.

4.9.3 All control rods shall be verified to be fully inserted at least once per 12 hours during loading of fuel assemblies into the core.

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* *Except control rods removed per Specification 3.9.10.1 or 3.9.10.2, or with one control rod withdrawn under control of the reactor mode switch Refuel position one-rod-out interlock.*

Existing Bases for 3/4.9.3:

The requirement that all control rods be inserted during other CORE ALTERATIONS ensures that fuel will not be loaded in a cell without a control rod.

Proposed Bases for 3/4.9.3:

The requirement that all control rods be inserted during loading of fuel assemblies into the core ensures that fuel will not be loaded into a cell without a control rod.

Changes related to SLCS

Existing Item 1.i.3) on Table 3.3.2-1:

				APPLICABLE OPERATIONAL CONDITION
1.	i.	3)	Standby Liquid Control, SLCS, Initiation	1, 2, 5†

Proposed Item 1.i.3) on Table 3.3.2-1:

				APPLICABLE OPERATIONAL CONDITION
1.	*i.*	*3)*	*Standby Liquid Control, SLCS, Initiation*	*1, 2*

Existing Note † on Table 3.3.2-1:

Valves 2WCS*MOV102 and 2WCS*MOV112 are also required to be OPERABLE or closed in OPERATIONAL CONDITION 5 with any control rod withdrawn but not with control rods removed per Specifications 3.9.10.1 and 3.9.10.2.

Proposed Note † on Table 3.3.2-1: Deleted.

Existing Item 1.i.3) on Table 4.3.2.1-1:

				OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE IS REQUIRED
1.	i.	3)	Standby Liquid Control, SLCS, Initiation	1, 2, 5††

Proposed Item 1.i.3) on Table 4.3.2.1-1:

				OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE IS REQUIRED
1.	*i.*	*3)*	*Standby Liquid Control, SLCS, Initiation*	*1, 2*

Existing Note †† on Table 4.3.2.1-1:

> Valves 2WCS*MOV102 and 2WCS*MOV112 are required to be OPERABLE or closed in OPERATIONAL CONDITION 5 with any control rod withdrawn but not with control rods removed per Specifications 3.9.10.1 and 3.9.10.2.

Proposed Note †† on Table 4.3.2.1-1: Deleted.

EVALUATION

Currently, the addition, removal, relocation, and movement of fuel, sources, incore instruments or reactivity controls are considered CORE ALTERATIONS except for normal movement of SRMs, IRMs, TIPs or special moveable detectors. The revised definition expands the above list of exceptions to include LPRMs and undervessel replacement of incore instruments. In addition, control rod movement without fuel assemblies in the associated core cell is not considered to be a CORE ALTERATION.

The purpose of the definition of CORE ALTERATIONS is to identify operations which have the potential for adding positive reactivity to the core while the vessel head is removed and fuel is in the vessel. While such operations are in progress, special precautions must be taken to preclude and mitigate the consequences of an inadvertent criticality. Prevention of reactivity excursions while in OPERATIONAL CONDITION 5 is provided by the one-rod-out interlock, maintaining proper shutdown margin, neutron monitoring scrams, and control rod block instrumentation. These precautions prevent an unexpected criticality in OPERATIONAL CONDITION 5.

Incore instruments are being excluded from this definition because the amount of fissile material contained in the detectors is so minimal that their movement does not result in any significant change in core reactivity. Therefore, movement of incore instruments does not require secondary containment or Standby Gas Treatment System to mitigate the event. Deleting the requirement to maintain the operability of these systems provides

outage planning flexibility. Systems which were previously required to be operable can be made inoperable during required surveillance testing or preventive maintenance.

Control rod movement with no fuel assemblies in the associated core cell has a negligible impact on the reactivity of the remaining core. Therefore, special precautions to mitigate a LPRM or blade drop event are not required. The bounding analysis for radiological consequences, is that for a fuel bundle drop which does not take credit for secondary containment or the Standby Gas Treatment Systems. Since both LPRMs and control rods are lighter than fuel bundles, an LPRM or control rod drop would result in less fuel rods being damaged.

All references to CORE ALTERATIONS within the Technical Specifications have been reviewed for potential conflict with the proposed definition. The sections reviewed are as follows:

3/4.1.1	Shutdown Margin
3/4.1.2	Reactivity Anomalies
Table 3.3.1-1	Reactor Protection System Instrumentation
Table 3.3.2-1	Isolation Actuation Instrumentation
Table 3.3.7.1-1	Radiation Monitoring Instrumentation
3/4.6.5.1	Secondary Containment
3/4.6.5.2	Secondary Containment Auto Isolation Dampers
3/4.6.5.3	Standby Gas Treatment System
3/4.7.1.2	Plant Service Water System Shutdown
3/4.7.3	Control Room Outdoor Air Special Filter Train System
3/4.8.1	AC Sources
3/4.8.2	DC Sources
3/4.9.1	Reactor Mode Switch
3/4.9.2	Instrumentation
3/4.9.5	Communications

None of the above specifications were found to be in conflict with the proposed definition and, therefore, do not require revision.

Currently, Specification 3/4.9.3, requires that all control rods are required to be inserted during core alterations when the unit is in Operational Condition 5, Refueling. The proposed change deletes the reference to core alterations and replaces them with the phrase "loading of fuel assemblies into the core." This proposed change would allow the movement of sources, reactivity control components, and other components affecting reactivity when the vessel head is removed, fuel is in the vessel, and all control rods are not inserted. Protection against inadvertent criticality in this case is provided as follows. While in Operational Condition 5, Specification 3/4.9.1, "Reactor Mode Switch," requires the reactor mode switch to be locked in the refuel position. This initiates the refuel position One-Rod-Out interlock which prevents the selection of more than one control rod for movement when any other control rod is not fully inserted. Specification 3/4.1.1 also requires that the SDM be greater than or equal to 0.38% delta k/k analytically determined or 0.28% delta k/k determined by test. The refuel position One-Rod-Out interlock and this SDM ensure that the reactor will not become critical when all control rods are not fully inserted. In addition, the requirement to verify that all control rods are fully inserted within two hours prior to the start of CORE ALTERATIONS has been deleted. The 12-hour verification provides adequate assurance that the LCO conditions are satisfied.

Specification 3.9.1 requires the following refuel position equipment interlocks operable when equipment associated with the interlock is being operated for core alterations: 1) All Rods-In; 2) Refuel Platform Position; 3) Refuel Platform Hoists Fuel-Loaded; 4) Fuel Grapple Position; and 5) Service Platform Hoist Fuel-Loaded. These refuel position equipment interlocks prevent the loading of fuel into the core with any control rod withdrawn and prevent the withdrawal of a rod from the core during fuel loading. Therefore, criticality is prevented during the insertion of fuel, provided all control rods are fully inserted and the refuel position equipment interlocks are operable.

Control rod movement by normal means in OPERATIONAL CONDITION 5 would be done to perform friction testing of control rods immediately following refueling and before the head is placed on the vessel. Other normal movement would be done to troubleshoot control rod drives to determine maintenance requirements. Therefore, the proposed amendment clarifies the applicability of Specification 3.9.3 by deleting the reference to "CORE ALTERATIONS" and incorporating the language "loading of fuel assemblies into the core." Based upon the above, the note referencing Special Test Exemption 3.10.3 has also been removed to be consistent with the revised definition.

Amendment 48 deleted the requirement to have the Standby Liquid Control System (SLCS) OPERABLE during OPERATIONAL CONDITION 5. SLCS is not required during refueling since only a single control rod can be withdrawn and adequate shutdown margin prevents criticality under these conditions. Therefore, since SLCS is not required to be OPERABLE during refueling, it is likewise not necessary that the RWCU isolate upon SLCS initiation during refueling.

CONCLUSION

Niagara Mohawk proposes to change the definition of CORE ALTERATION to be consistent with NUREG-1434, "Improved Standard Technical Specifications," and those to be incorporated into Revision 1. This definition clearly states that the movement of incore instrumentation (SRMs, IRMs, LPRMs, TIPs or special moveable detectors) including undervessel replacement is not a CORE ALTERATION. The amount of fissile material contained in any of these instruments is insignificant and thus movement does not result in a significant change in core reactivity. Additionally, the definition was expanded to state that control rod movement is not a CORE ALTERATION as long as the associated fuel cell is empty. This would not impact the reactivity of the remaining core. This will allow replacement of LPRMs and control blades without requiring secondary containment and Standby Gas Treatment System to be OPERABLE and thus could potentially reduce refuel outage times.

Specification 3/4.9.3 is also proposed for change to reflect the remaining conditions which could result in the addition of positive reactivity. Specifically, CORE ALTERATIONS in the APPLICABILITY, ACTION and SURVEILLANCE requirements is being replaced with "loading loading of fuel assemblies into the core." In addition, the requirement to verify that all control rods are fully inserted within two hours prior to the start of CORE ALTERATIONS has been deleted. The 12-hour verification provides adequate assurance that the LCO conditions are satisfied. Based upon the above note referencing Special Test Exemption 3.10.3 is not required and has been removed. Amendment 48 deleted the requirement to have the SLCS OPERABLE in OPERATIONAL CONDITION 5. However, Tables 3.3.2-1 and 4.3.2.1-1 currently require that RWCU isolation be initiated whenever SLCS is initiated in OPERATIONAL CONDITION 5. This proposed revision is consistent with Amendment 48

which deleted the requirement for SLCS to be OPERABLE in OPERATIONAL CONDITION 5.

Therefore, there is reasonable assurance that the 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

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 purpose of the definition of CORE ALTERATION is to identify operations which have the potential for adding reactivity to the core while the vessel head is removed and fuel is in the vessel. The proposed definition of CORE ALTERATION explicitly states that movement of incore instruments and undervessel replacement is not considered to be a CORE ALTERATION. The amount of fissile material contained in any of these instruments is insignificant and thus would not result in any change in reactivity of the core. Similarly, control rod movement with no fuel assemblies in the associated core cell has negligible impact on the reactivity of the remaining core. Removal of a control rod by either the normal control rod drive system or uncoupling and removing the blade from the top of the vessel with no fuel in the associated cell is not considered a CORE ALTERATION. It has negligible impact on the reactivity of the remaining core and is not required to be covered by Specification 3/4.9.3. In addition, the drop of a blade on irradiated fuel is bounded by the fuel bundle drop.

The proposed change to Specification 3/4.9.3, "Control Rod Position," making it applicable only during loading of fuel assemblies to reflect the remaining condition that results in the addition of positive reactivity. Specification 3/4.9.1, "Reactor Mode Switch," requires the mode switch be locked in the refuel position. This initiates the one-rod-out interlock which prevents the selection of more than one control rod for movement. Specification 3/4.1.1, "Shutdown Margin," requires shutdown margin be greater than or equal to 0.38% delta k/k analytically determined or 0.28% delta k/k determined by test. These specifications ensure that the reactor will not become critical when all control rods are not inserted. Removal of the note referencing Special Test Exemption 3.10.3 is to be consistent with the revised definition.

The proposed change to eliminate RWCU isolation requirement upon initiation of SLCS in OPERATIONAL CONDITION 5 is consistent with Amendment 48, which eliminated the requirement for SLCS to be OPERABLE in OPERATIONAL CONDITION 5.

Therefore, these changes will not involve a significant increase in the probability or consequences of an accident from any 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 changes to the definition of CORE ALTERATION and Specification 3/4.9.3, "Control Rod Position," and deletion of the RWCU isolation requirement on SLCS initiation in OPERATIONAL CONDITION 5 do not involve a physical change in any system's configuration. Systems required to be OPERABLE for CORE ALTERATIONS are still required to be OPERABLE, however, no new modes of operation are introduced based on the proposed definition.

The purpose of the definition of CORE ALTERATION is to identify operations which have the potential for adding reactivity to the core while the vessel head is removed and fuel is in the vessel. The proposed definition of CORE ALTERATION explicitly states that movement of incore instruments and undervessel replacement is not considered to be a CORE ALTERATION. The amount of fissile material contained in any of these instruments is insignificant and thus would not result in any change in reactivity of the core. Similarly, control rod movement with no fuel assemblies in the associated core cell has negligible impact on the reactivity of the remaining core. Removal of a control rod by either the normal control rod drive system or uncoupling and removing the blade from the top of the vessel with no fuel in the associated cell is not considered a CORE ALTERATION. It has negligible impact on the reactivity of the remaining core and is not required to be covered by Specification 3/4.9.3. In addition, the drop of a blade on irradiated fuel is bounded by the fuel bundle drop.

The proposed change to Specification 3/4.9.3, "Control Rod Position," making it applicable only during loading of fuel assemblies to reflect the remaining condition which results in the addition of positive reactivity. Specification 3/4.9.1, "Reactor Mode Switch," requires the mode switch be locked in the refuel position. This initiates the one-rod-out interlock which prevents the selection of more than one control rod for movement. Specification 3/4.1.1, "Shutdown Margin," requires shutdown margin be greater than or equal to 0.38% delta k/k analytically determined or 0.28% delta k/k determined by test. These specifications ensure that the reactor will not become critical when all control rods are not inserted. Removal of the note referencing Special Test Exemption 3.10.3 is to be consistent with the revised definition.

The proposed change to eliminate RWCU isolation requirement upon initiation of SLCS in OPERATIONAL CONDITION 5 is consistent with Amendment 48, which eliminated the requirement for SLCS to be OPERABLE in OPERATIONAL CONDITION 5.

Therefore, these changes 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 the margin of safety.

The proposed definition of CORE ALTERATION clearly details what constitutes a CORE ALTERATION. The definition is consistent with NUREG-1433, "Improved Standard Technical Specifications." The definition has no impact on safety limits, setpoints, or plant design and thus does not affect a margin of safety.

The proposed change to Specification 3/4.9.3, "Control Rod Position," making it applicable only during loading of fuel assemblies to reflect the remaining condition that results in the addition of positive reactivity. Specification 3/4.9.1, "Reactor Mode Switch," requires the mode switch be locked in the refuel position. This initiates the one-rod-out interlock which prevents the selection of more than one control rod for movement. Specification 3/4.1.1, "Shutdown Margin," requires shutdown margin be greater than or equal to 0.38% delta

k/k analytically determined or 0.28% delta k/k determined by test. These specifications ensure that the reactor will not become critical when all control rods are not inserted, thus does not affect a margin of safety. The removal of the note referencing Special Test Exemption 3.10.3 is consistent with the revised definition.

Elimination of the requirement to initiate RWCU isolation based upon SLCS initiation in OPERATIONAL CONDITION 5 is consistent with deletion of the requirement to have the SLCS OPERABLE during OPERATIONAL CONDITION 5. Therefore, there is no impact on a margin of safety.

Therefore, based upon the above, these proposed changes will not involve a significant reduction a margin of safety.