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RICHARD B. ABBOTT  
Vice President  
Nuclear Generation

February 7, 1996  
NMP2L 1603

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

RE: Nine Mile Point Unit 2  
Docket No. 50-410  
NPF-69

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) hereby transmits an Application for Amendment to Nine Mile Point Unit 2 (NMP2) Operating License NPF-69. Enclosed as Attachment A is the proposed change to the Operating License, the Technical Specifications and Bases as set forth in the above mentioned license. Included as Attachment B is a hand marked version of the proposed change. Supporting information and an analysis, demonstrating that the proposed change involves no significant hazards consideration pursuant to 10 CFR 50.92, are included as Attachment C.

The proposed Operating License change contained herein represents a revision to Section 2.D(ii). The proposed Technical Specification change includes: "Primary Containment Integrity" Surveillance Requirement (SR) 4.6.1.1.a; "Primary Containment Leakage" Limiting Condition of Operation (LCO) 3.6.1.2, SR 4.6.1.2 and Table 3.6.1.2-1, entitled "Allowable Leak Rates Through Valves in Potential Bypass Leakage Paths"; "Primary Containment Air Locks" SR 4.6.1.3; "Primary Containment Structural Integrity" SR 4.6.1.4.1; "Drywell and Suppression Chamber Hydrogen Recombiner Systems" SR 4.6.6.1.c.2 and a program entitled "10 CFR 50 Appendix J Testing Program Plan" as described in Administrative Controls Section 6.8.4.f. A change is made to "Primary Containment Leakage" and "Primary Containment Structural Integrity" Bases Sections 3/4.6.1.2 and 3/4.6.1.4 so as to be consistent with the proposed change to the Operating License and the Technical Specifications. Various footnotes are also deleted from certain of the above Technical Specifications.

This change is needed to implement Option B, "Performance-Based Requirements," of Appendix J to 10 CFR 50 for Type A, B and C leakage rate testing. Currently, Type A, B and C testing, with five exemptions, conforms to the requirements of Option A, "Prescriptive Requirements," of Appendix J to 10 CFR 50.

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NMPC is requesting that this license amendment (and the revised relief requests) be issued by August 5, 1996 to support the upcoming fifth refueling outage. The implementation of this license amendment will enable Niagara Mohawk to eliminate a Type A test from the fifth refueling that would have otherwise had to be performed to satisfy the requirements of Option A of Appendix J.

A copy of the license amendment request and the associated analysis which demonstrates that no significant hazards consideration exists have been provided to the appropriate state representative in accordance with 10 CFR 50.91(b)(1).

Very truly yours,



R. B. Abbott

Vice President - Nuclear Generation

RBA/KWK/lmc  
Attachments

xc: Regional Administrator, Region I  
Mr. B. S. Norris, Senior Resident Inspector  
Mr. L. B. Marsh, Director, Project Directorate I-1, NRR  
Mr. G. E. Edison, Senior Project Manager, NRR  
Mr. John P. Spath  
NYSERDA  
2 Empire Plaza, Suite 1901  
Albany, NY 12223-1253  
Records Management

Consistent with Niagara Mohawk's decision to implement Option B at NMP2, NMPC has reviewed the need/basis for the five exemptions which currently apply to what is now Option A of Appendix J. Niagara Mohawk has concluded that three of these exemptions are no longer needed and two continue to be necessary to support implementation of Option B. Accordingly, a portion of the above proposed change deletes references and discussions to these exemptions that are no longer applicable. No new exemptions are needed to permit implementation of Option B for NMP2. The bases for Niagara Mohawk's conclusions and these proposed changes are provided in Attachment C.

Regulatory Guide (RG) 1.163 dated September 1995, entitled "Performance-Based Containment Leak-Test Program" provides specific guidance concerning a performance-based leakage test program, acceptable leakage-rate test methods, procedures and analyses that may be used to satisfy the requirements of Option B to Appendix J of 10 CFR 50. With one exception, the proposed change and the implementation plan for Option B is consistent with the RG. Niagara Mohawk has concluded that the exception to the RG is technically equivalent to and replaces an exemption that was applicable to Option A and is no longer needed upon implementation of Option B of Appendix J. This exception is needed since a prescriptive requirement in Option A has been retained by those regulatory and industry documents which satisfy the criteria of Option B. The basis for this conclusion is also provided in Attachment C.

The change and the implementation plan satisfies the requirements for implementation as prescribed by Section V.B of Option B of Appendix J of 10 CFR 50.

In concert with the above proposed change, Niagara Mohawk is also requesting, under separate cover, revision of approved relief requests for certain components. These relief requests provide relief from the requirements of Section XI of the American Society of Mechanical Engineers (ASME) Code. Specifically, NMPC is requesting that the prescriptive testing intervals of Section XI of the ASME Code be replaced with the performance based testing intervals of Option B to Appendix J of 10 CFR 50. These revised relief requests are needed in order to avoid unnecessary testing as credit is currently taken for Appendix J leakage testing as satisfying certain testing requirements of Section XI of the ASME Code. As indicated in the relief request, Niagara Mohawk has determined that compliance with certain ASME Section XI testing requirements would be impractical or result in hardship, and has proposed alternative testing to provide an acceptable level of quality and safety.

NMPC is submitting this Application for Amendment as a cost beneficial licensing action (CBLA). This change will result in a total cost savings of approximately 30 million dollars over the life of NMP2 by reducing refueling outage lengths and the amount of Type A, B, and C tests that would have otherwise had to be performed to satisfy the requirements of Option A of Appendix J.