ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

DOCKET NO. 50-410

Proposed Changes to Technical Specifications

Replace existing pages vii, xvii, 3/4 3-74, 3/4 3-75, 3/4 3-76, and B3/4 3-5 with the attached revised pages. The pages have been retyped in their entirety with marginal markings to indicate changes.

PAGE

INSTRUMENTATION (Continued)

PAGE

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MONITORING INSTRUMENTATION

3.4.3.7.2 SEISMIC MONITORING INSTRUMENTATION

The OPERABILITY of the seismic monitoring instrumentation ensures that sufficient capability is available to promptly determine the ground motion effects of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the unit. This instrumentation is consistent with the recommendations of Regulatory Guide (RG) 1.12, "Instrumentation for Earthquakes," April 1974.

3/4.3.7.3 DELETED

3/4.3.7.4 REMOTE SHUTDOWN MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown monitoring instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the unit from locations outside of the control room. This capability is required in the event control room habitability is lost and consistent with GDC 19 and 10 CFR 50.

The OPERABILITY of the remote shutdown system controls ensures that a fire will not preclude achieving safe shutdown. The remote shutdown system instrumentation, controls and power circuits and transfer switches ne' ssary to eliminate effects of a fire and allow operation of instrumentation, control and power circuits required to achieve and maintain a safe shutdown condition are independent of areas in which a fire could damage systems normally used to shut down the reactor. This capability is consistent with GDC 3 and Appendix R to 10 CFR 50.

3/4.3.7.5 ACCIDENT-MONITORING INSTRUMENTATION

The OPERABILITY of the accident-monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of RG 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1980; and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

DOCKET NO. 50-410

Marked Copy of Proposed Changes to Current Technical Specification

The current versions of NMP2 TSs pages vii, xvii, 3/4 3-74, 3/4 3-75, 3/4 3-76, and B3/4 3-5 have been marked-up to reflect the proposed changes.

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

INSTRUMENTATION

MONITORING INSTRUMENTATION

METEOROLOGICAL MONITORING INSTRUMENTATION

LIMITING CONDITIONS FOR OPERATION

3.3.7.3 The meteorological monitoring instrumentation channels shown in Table 3.3.7.3-1 shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

a. With one or more meteorological monitoring instrumentation channels inoperable for more than 7 days, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrumentation to OPERABLE status.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.3 Each of the above required meteorological monitoring instrumentation channels shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.3-1.

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TABLE 3.3.7.3-1

METEOROLOGICAL MONITORING INSTRUMENTATION

INSTRUMENT	ELEVATION	MINIMUM INSTRUMENTS OPERABLE
1. Wind Speed	30 ft	1
	200 ft	1
2. Wind Direction	30 ft	1
	200 ft	1
3. Air Temperature Difference	30/200 ft	1

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TABLE 4.3.7.3-1

METEOROLOGICAL MONITORING INSTRUMENTATION SUPVEILLANCE REQUIREMENTS

INSTRUMENT	ELEVATION	CHANNEL CHECK	CHANNEL CALIBRATION
1. Wind Speed	30 ft	D	SA
	200 ft	D	SA
2. Wind Direction	30 ft	D	SA
	200 ft	D	SA
3. Air Temperature Difference	30/200 ft	D	SA

This Page is Not Used

AMENDMENT NO.

MONITORING INSTRUMENTATION

3.4.3.7.2 SEISMIC MONITORING INSTRUMENTATION

The OPERABILITY of the seismic monitoring instrumentation ensures that sufficient capability is available to promptly determine the ground motion effects of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the unit. This instrumentation is consistent with the recommendations of Regulatory Guide (RG) 1.12, "Instrumentation for Earthquakes," April 1974.

DELETED

3/4.3.7.3 ~~METEOROLOGICAL MONITORING INSTRUMENTATION~~

The OPERABILITY of the meteorological monitoring instrumentation ensures that sufficient meteorological data are available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public. This instrumentation is consistent with the recommendations of RG 1.23 "Onsite Meteorological Programs," February 1972.

3/4.3.7.4 REMOTE SHUTDOWN MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown monitoring instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the unit from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with GDC 19 and 10 CFR 50.

The OPERABILITY of the remote shutdown system controls ensures that a fire will not preclude achieving safe shutdown. The remote shutdown system instrumentation, controls and power circuits and transfer switches necessary to eliminate effects of a fire and allow operation of instrumentation, control and power circuits required to achieve and maintain a safe shutdown condition are independent of areas in which a fire could damage systems normally used to shut down the reactor. This capability is consistent with GDC 3 and Appendix R to 10 CFR 50.

3/4.3.7.5 ACCIDENT-MONITORING INSTRUMENTATION

The OPERABILITY of the accident-monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of RG 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants To Assess Plant Conditions During and Following an Accident," December 1980; and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

ATTACHMENT C

NIAGARA MOHAWK POWER CORPORATION

LICENSE NO. NPF-69

DOCKET NO. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

INTRODUCTION

The purpose of the Nine Mile Point meteorological monitoring instrumentation is to provide sufficient data for use in estimating potential radiation doses to the public as the result of routine or accidental release of radioactive material to the atmosphere. This instrumentation is consistent with the recommendations of Regulatory Guide (RG) 1.23, "Onsite Meteorological Programs." The current Nine Mile Point Unit 2 (NMP2) meteorological monitoring instrumentation Technical Specification (TS) sections are consistent with the purpose of the instruments and the recommendations of RG 1.23. The current action statement associated with the sections requires a Special Report submission to inform the NRC of specific inoperability conditions with respect to the instruments.

The proposed change removes Sections 3.3.7.3 and surveillance Section 4.3.7.3 (Meteorological Monitoring Instrumentation), the associated Tables 3.3.7.3-1 (Meteorological Monitoring Instrumentation) and 4.3.7.3-1 (Meteorological Monitoring Instrumentation Surveillance Requirements), and Bases Section 3/4.3.7.3 (Meteorological Monitoring Instrumentation) from the NMP2 TSs. With the exception of the special reporting requirements, the meteorological specifications requirements will be relocated to the NMP2 USAR. Section 0.0 (Index) pages vii and xvii of the NMP2 TSs have been revised to reflect the removal of Sections 3.3.7.3 and 4.3.7.3, the associated Tables 3.3.7.3-1 and 4.3.7.3-1, and Bases Section 3/4.3.7.3.

The meteorological requirements will be relocated to the USAR with the same format except for the Special Reporting Action Statement. The meteorological monitoring instrumentation special reporting requirements of the NMP2 TSs are being deleted and will not be relocated to the NMP2 USAR.

ANALYSIS

The NRC Staff has concluded that the provisions of the meteorological monitoring instrumentation specifications are not related to dominant contributors to plant risk. The meteorological monitoring instrumentation does not serve to ensure that the plant is operated within the bounds of initial conditions assumed in design basis accidents and transient analyses, or that the plant will be operated to preclude transients or accidents (10 CFR 50.36 Criterion 2). Likewise, the meteorological monitoring instrumentation does not serve as part of the primary success path of a safety sequence analysis used to demonstrate that the consequences of these events are within the appropriate acceptance criteria (10 CFR 50.36 Criterion 3). Accordingly, the NRC Staff determined in Generic

Letter (GL) 95-10, Relocation of Selected Technical Specifications Requirements Related to Instrumentation, that meteorological monitoring instrumentation does not serve such a primary protective function as to warrant inclusion in the TSs in accordance with 10CFR50.36 criteria. As stated in GL 95-10, the guidance of that generic letter supersedes previous TS related guidance, such as the Standard Review Plan and regulatory guides.

The proposed change removes the meteorological monitoring instrumentation based on the guidance presented in NRC GL 95-10 for line-item removal of instrumentation requirements from the TSs. In GL 95-10, the NRC Staff established that relocation of the meteorological monitoring instrumentation requirements to the USAR (changes to the USAR are controlled by 10CFR50.59) was acceptable.

The proposed change also deletes the special reporting requirements from the relocated requirements on the basis that Niagara Mohawk will continue to evaluate meteorological monitoring instrumentation inoperability for reportability in accordance with the reporting requirements of 10CFR50.72 and 10CFR50.73.

NMP2 LER 96-14 reported that the elevations for the meteorological instruments were not identified as nominal, as they had been identified in the Nine Mile Point Unit 1 (NMP1) TSs (the meteorological instrumentation requirements have since been removed from the NMP1 TSs). Therefore, as part of the corrective actions for LER 96-14, the NMP2 USAR will be revised to indicate that the elevations listed on the meteorological instrumentation tables are nominal elevations. The instruments will continue to satisfy NRC Regulatory Guide 1.23 (Safety Guide 23) recommendations for meteorological monitoring instrumentation. The data utilized by NMP2 procedures is based on the actual differences in elevations of the meteorological instrumentation, which ensures accurate estimation of off-site dose. The addition of the word nominal to the tables and to the USAR does not reduce the effectiveness of the instruments. The clarification to the relocated Technical Specification restores the original intent of the general description of the system.

The NMP2 meteorological monitoring instrumentation is used to provide data for use in radioactive dose assessment with respect to routine or accidental releases of radioactive materials to the atmosphere and is not used to detect abnormal degradation of the reactor coolant pressure boundary (10 CFR 50.36 Criterion 1). The relocation of the instrumentation requirements from the NMP2 TSs to the NMP2 USAR is an administrative change and does not reduce the effectiveness of the current instrumentation requirements.

With respect to the proposed changes, there are no proposed changes to surveillance frequencies or methods. Also, there is no physical change or modification to the meteorological monitoring instrumentation, and there are no changes to the manner in which the meteorological data is processed and utilized. There will be no change to the Site Emergency Plan with respect to these proposed changes, so no submittal of Site Emergency Plan changes will be made to the NRC with respect to the relocation of the meteorological requirements to the USAR or the deletion of special reporting requirements. The meteorological monitoring instrumentation is not credited in the NMP2 Individual Plant Examination and is not considered risk significant (10 CFR 50.36 Criterion 4).

The proposed change to the NMP2 TSs is similar to amendment requests previously approved by the NRC Staff for Joseph N. Farley Nuclear Plant Units 1 and 2 (Amendments 115 and 107, approved May 22, 1995), and Davis-Besse Nuclear Power Station (Amendment 201, approved November 11, 1995), which relocated meteorological monitoring instrumentation requirements to the USAR and deleted the associated special reporting requirements for those stations.

Incorporation of the specifications' requirements into licensee controlled documents is also consistent with NUREG-1434, Rev. 1; Standard Technical Specifications, General Electric Plant, BWR/6. This reflects the NRC staff position that the meteorological requirements do not meet the 10CFR50.36 criteria for inclusion in the TSs.

CONCLUSIONS

In 10CFR50.47 and 10CFR50, Appendix E, the Commission requires power plant licensees to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Timely access to meteorological data is important for estimating potential radioactive doses to the public and for determining the appropriate protective measures. This requires the ability to acquire meteorological data in the vicinity of the reactor. However, the meteorological monitoring instrumentation provisions do not meet the 10CFR50.36 criteria for inclusion in the TSs. In Generic Letter 95-10, the NRC Staff established that relocation of the meteorological monitoring instrumentation requirements to the USAR (changes to the USAR are controlled by 10CFR50.59) was acceptable. The NMP2 meteorological monitoring instrumentation requirements will be relocated to the NMP2 USAR except for the special reporting requirements. The special reporting requirements serve no nuclear related protective function and are being deleted.

The NMP2 meteorological monitoring instrumentation is used to provide data for use in radioactive dose assessment with respect to routine or accidental releases of radioactive materials to the atmosphere. The relocation of the instrumentation requirements from the NMP2 TSs to the NMP2 USAR is an administrative change and does not reduce the effectiveness of the current instrumentation requirements.

NMP2 LER 96-14 reported that the elevations for the meteorological instruments were not identified as nominal, as they had been identified in the NMP1 TSs (the meteorological instrumentation requirements have since been removed from the NMP1 TSs). Therefore, as part of the corrective actions for LER 96-14, the NMP2 USAR will be revised to indicate that the elevations listed on the meteorological instrumentation tables are nominal elevations. The instruments will continue to satisfy NRC Regulatory Guide 1.23 (Safety Guide 23) recommendations for meteorological monitoring instrumentation. The data utilized by NMP2 procedures is based on the actual differences in elevations of the meteorological instrumentation, which ensures accurate estimation of off-site dose. The addition of the word nominal to the tables and to the USAR does not reduce the effectiveness of the instruments. The clarification to the relocated Technical Specification restores the original intent of the general description of the system.

The deletion of the meteorological special reporting requirements is also an administrative change. Niagara Mohawk will continue to evaluate future meteorological monitoring instrumentation inoperability for reportability in accordance with the requirements of 10CFR50.72 and 10CFR50.73.

Therefore, the criteria of the NRC staff guidance provided in GL 95-10 are met for removal of the meteorological monitoring specifications from the NMP2 TSs.

ENVIRONMENTAL CONSIDERATION

10CFR51.22 provides criteria for, and identification of, licensing and regulatory actions eligible for exclusion from performing an environmental assessment. Niagara Mohawk has reviewed the proposed amendment and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10CFR50.92 concerning the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91, the following analysis has been performed with respect to the requested change.

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 NMP2 meteorological monitoring instrumentation is used to provide data for use in radioactive dose assessment with respect to routine or accidental releases of radioactive materials to the atmosphere. The deletion of the special reporting requirements is an administrative change. The subject special reporting requirements serve no nuclear related protective function. The relocation of the meteorological monitoring instrumentation requirements from the TSs to the USAR, and the addition of the word nominal to the USAR and tables, will not increase the probability of an accident since the specification applies only to monitoring instrumentation. This also is an administrative change and does not reduce the effectiveness of the current instrumentation requirements. The meteorological monitoring instrumentation requirements are not precursors to any accident previously evaluated. According to the NRC Staff (GL 95-10), the meteorological monitoring instrumentation does not serve to ensure the plant is operated within the bounds of initial conditions assumed in any design basis accidents or transients previously evaluated, or that the plant will be operated to preclude transients or accidents. In addition, the meteorological monitoring instrumentation does not function as part of the primary success path of a safety sequence analysis used to demonstrate that the consequences of these events are within the appropriate acceptance criteria. Therefore, the proposed changes do not significantly increase 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 deletion of the special reporting requirements is an administrative change. The subject special reporting requirements serve no nuclear related protective function. The proposed change also removes meteorological monitoring instrumentation specifications from the NMP2 TSs. This also is an administrative change and does not reduce the effectiveness of the current instrumentation requirements. The relocation of the meteorological instrumentation requirements to the USAR, and the addition of the word nominal to the USAR and tables, will not create the possibility of a new or different kind of accident since the specification only applies to monitoring instrumentation. The NRC Staff has concluded in GL 95-10 that the provisions of the meteorological monitoring instrumentation specifications are not related to dominant contributors to plant risk. The NMP2 meteorological instrumentation is used to provide data for use in radioactive dose assessment with respect to routine or accidental releases of radioactive materials to the atmosphere. Since no physical modification to the plant is being performed, and no changes to actual plant operations are required by the change, removal of the specifications from the NMP2 TSs 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.

The proposed deletion of the special reporting requirements is an administrative change. The subject special reporting requirements serve no nuclear related protective function. The proposed removal of the instrumentation requirements from the NMP2 TSs is also an administrative change and does not reduce the effectiveness of the current instrumentation requirements. The relocation of the meteorological instrumentation requirements to the USAR, and the addition of the word nominal to the USAR and tables, will not involve a reduction in a margin of safety since the specification only applies to monitoring instrumentation. The instrumentation will continue to meet the requirements of Regulatory Guide 1.23, and the offsite dose calculations will continue to use the actual measured elevation differences. In GL 95-10, the NRC Staff concluded 1) that the meteorological monitoring instrumentation does not function as part of the primary success path of a safety sequence analysis, and 2) that the meteorological monitoring instrumentation specifications are not related to dominant contributors to plant risk. Therefore, the removal of the meteorological monitoring instrumentation specifications from the NMP2 TSs will not result in a significant reduction in any margin of safety.