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April 14, 2000
NMP2L 1955

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

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

Subject: *Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves" (TAC No. M93489)*

Gentlemen:

The purpose of this letter is to inform the Staff of a revision to our commitment regarding Generic Letter (GL) 95-07 for Nine Mile Point Unit 2 (NMP2). Specifically, six valves (four pump minimum flow valves and two intertie valves) were modified during NMP2 Refueling Outage 7 (RFO7) so that they would not be susceptible to pressure locking.

On August 17, 1995, the NRC issued 95-07, titled "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves," to request that licensees take actions to ensure that safety-related power-operated gate valves susceptible to pressure locking or thermal binding, are capable of performing their safety functions. By letters dated October 16, 1995, and February 13, 1996, Niagara Mohawk Power Corporation (NMPC) provided responses to GL 95-07. The NRC Staff requested additional information on May 21, 1996, to which we responded on June 20, 1996.

On November 21, 1996, NMPC revised previous responses to GL 95-07 based upon review of our method for evaluating pressure locking and thermal binding. By letter dated February 8, 1999, the Staff indicated that additional information was required concerning our November 21, 1996, submittal. On April 21, 1999, NMPC provided the requested information, The NRC Staff issued a Safety Evaluation by letter dated May 17, 1999, which found that NMPC had adequately addressed the actions requested in GL 95-07.

In our April 21, 1999 response, NMPC stated that six valves did not meet the Commonwealth Edison methodology and would be modified prior to the end of NMP2 RFO7 to meet the Commonwealth Edison methodology plus an additional 20% margin.

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Based upon the review of possible modifications, NMPC has modified the six valves to no longer be susceptible to pressure locking conditions. Specifically, five of the valves (2CSL*MOV107, 2RHS*MOV4A/B/C, and 2RHS*MOV115), were modified by drilling a hole in the disk. Additionally, for the remaining valve (2RHS*MOV116), a bonnet vent line has been installed.

Therefore, in lieu of modifications to meet the Commonwealth Edison methodology plus an additional 20% margin, NMPC has modified the specific six valves to alleviate any pressure locking concerns. These actions satisfy the requirements of the Generic Letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard B. Abbott", with a long horizontal flourish extending to the right.

Richard B. Abbott
Vice President - Nuclear Engineering

RBA/SHC/tmk

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Gamberoni, Action Section Chief, Project Directorate I-1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR
Records Management