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April 26, 2000
NMP2L 1959

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 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors" (TAC No. 7119)

Gentlemen:

By letter dated July, 1994, the Commission issued Generic Letter (GL) 94-02, titled "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors." Generic Letter 94-02, in part, requested that licenses submit a plan describing the long-term solution option it has selected and the associated implementation schedule. Furthermore, the GL states: "If the licensee plans to take an action requested, or a substitute action, within thirty (30) days of the completion of the action, inform the NRC, in writing and under oath and or affirmation, of the action taken and verify its completion or implementation." The purpose of this letter is to provide notification to the NRC that the long-term actions have been completed for Nine Mile Point Unit 2 (NMP2) with regard to GL 94-02. Interim actions regarding this GL were completed as described in our letter to the Staff dated September 8, 1994.

Our letter dated November 8, 1994, indicated that Niagara Mohawk Power Corporation (NMPC) had selected stability Option III, as delineated in NEDO-31960, titled "BWR Owners' Group Long-Term Solutions Licensing Methodology," to address the thermal-hydraulic stability issue at NMP2. Specifically, NMPC elected to replace the current Power Range Monitor System with the General Electric (GE) Nuclear Measurement Analysis and Control (NUMAC) Power Range Neutron Monitor (PRNM) System with a core stability monitoring function (i.e., Oscillation Power Range Monitor (OPRM)). The NUMAC-PRNM together with the OPRM uses local power range monitor signals to initiate a reactor scram upon identification of neutron flux oscillations characteristic of a thermal-hydraulic instability.

ADD1

Consistent with our response above regarding GL 94-02, Niagara Mohawk submitted to the Staff a proposed amendment to the NMP2 Facility Operating License by letter dated October 31, 1997, as supplemented by letter dated February 3, 1998. Specifically, the proposed License Amendment provided Technical Specification and Bases changes which supported design changes to upgrade the analog-based Average Power Range Monitor (APRM) System with the GE NUMAC-PRNM, including an OPRM function. The Staff issued License Amendment No. 80, dated March 31, 1998, with regard to this matter. The design changes to the facility and its associated License Amendment were implemented during refueling outage (RFO) 6. During the subsequent fuel cycle, the OPRM functions were operated in the "indicate only" mode to allow collection and assessment of operating data so as to ensure that the OPRM algorithms performed according to their design specification before using the OPRM as part of the trip instrumentation. The collected data confirmed that the OPRM performed as designed.

Accordingly, Niagara Mohawk submitted a second proposed amendment to the NMP2 Facility Operating License. Specifically, by letter dated October 25, 1999, as supplemented by letters dated February 2 and 7, 2000, NMPC proposed Technical Specification and Bases changes to enable the OPRM to activate the Reactor Protection System upon detection of excessive neutron flux oscillation from thermal-hydraulic instability. The NRC issued License Amendment No. 92, dated March 2, 2000 which approved activation of the OPRM trip function. This License Amendment was implemented during RFO7.

Niagara Mohawk has taken the above long-term actions and verified implementation of these actions. Accordingly, NMPC has concluded that the long-term stability corrective actions associated with GL 94-02 for NMP2 have been completed.

Sincerely,



Richard B. Abbott
Vice President - Nuclear Engineering

RBA/KWK/cr

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Niagara Mohawk Power Corporation) Docket No. 50-410
)
Nine Mile Point Unit 2)

AFFIDAVIT

Richard B. Abbott, being duly sworn, certifies as follows: I am Vice President - Nuclear Engineering of Niagara Mohawk Power Corporation; that I am authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the information hereto; and that all such information is true and correct to the best of my knowledge, information and belief.

NIAGARA MOHAWK POWER CORPORATION

By Richard B. Abbott
Richard B. Abbott
Vice President - Nuclear Engineering

Subscribed and sworn to before me
on this 26th day of April 2000.

Eunice B. Wescott
Notary Public

My Commission expires:

4/2/2002

Eunice B. Wescott #4884883
Notary Public, State of New York
Qualified in Jefferson County
My Commission Expires on April 2, 2002