

Niagara Mohawk[®]

John T. Conway
Vice President
Nuclear Generation

August 23, 2000
NMP1L 1528

Phone: 315.349.4213
Fax: 315.349.2605

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

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Subject: *Control Room Habitability (TAC No. MA4388)*

Gentlemen:

By application dated December 18, 1998, Niagara Mohawk Power Corporation (NMPC) proposed deletion of license condition C(4) and license page 3B from the Nine Mile Point Unit 1 (NMP1) Operating License. License condition C(4) required that the application be submitted by December 18, 1998, to demonstrate compliance with General Design Criterion 19 (GDC-19) dose guidelines under accident conditions based upon system design so that reliance upon the use of potassium iodide tablets would no longer be necessary. The results of updated analyses that were performed consistent with NMPC's 1984 response to NUREG-0737, Item III.D.3.4, regarding Control Room Habitability, were provided as Attachment E to the application. These results demonstrated that the use of potassium iodide tablets is not required as a means to satisfy GDC-19 dose guidelines.

This letter restates NMPC's position that license condition C(4) was satisfied by submittal of the above analytical results and, therefore, it may be deleted.

The analytical approach used by several utilities in satisfaction of NUREG-0737 items has been the subject of discussion between the staff and the industry through the Nuclear Energy Institute (NEI) Task Force on Control Room Habitability. NMPC actively supports the work of the task force. Generic adoption of a standardized analytical approach may result in NMPC electing to address satisfaction of GDC-19 dose guidelines for the NMP1 control room by the use of alternative methods some time in the future. As stated in our letter dated May 23, 1998 (NMP1L 1323), NMPC continues to maintain the availability of potassium iodide tablets at NMP1.

Sincerely,



John T. Conway
Vice President Nuclear Generation

JHM/KLE/kap

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Geroni, 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

A003