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March 19, 2001
NMP2L 2013

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: *Response to Request for Additional Information Related to Request to Use
Risk-Informed Inservice Inspection Alternative (TAC No. MB0297)***

Gentlemen:

By letter dated October 16, 2000 (NMP2L 1990), Niagara Mohawk Power Corporation submitted a request for authorization to use a risk-informed inservice inspection program as an alternative to the current requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for Class 1 and 2 piping at Nine Mile Point Unit 2 (NMP2). A telephone discussion concerning this request was held with the NRC staff on February 8, 2001. As a result of this discussion, a request for additional information (RAI) was issued by the NRC staff on February 15, 2001, pertaining to the status of hardware and procedural modifications credited in the NMP2 Individual Plant Examination. A response to the RAI is provided in Attachment 1.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard B. Abbott", with a stylized flourish at the end.

Richard B. Abbott
Vice President Nuclear Engineering

RBA/JJD/cld

Attachment 1: Response to RAI - 1 page

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

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Niagara Mohawk Power Corporation Response to NRC Request for Additional Information Dated February 15, 2001

Question:

Supply information regarding the status of the hardware and procedural modifications credited in the Nine Mile Point, Unit No. 2, Individual Plant Examination (IPE). Niagara Mohawk Power Corporation's (NMPC) IPE document indicated that these modifications were to be completed by the 1993 refueling outage.

Response:

The NRC review of the IPE for Nine Mile Point Unit 2 (NMP2) dated August 18, 1994, identified one hardware modification and five procedural enhancements for which credit had been taken in the IPE, but which had not yet been implemented. The NRC requested that the changes be implemented or the IPE revised to reflect the as-built, as-operated plant. Any IPE revision did not need to be submitted to the staff, but could be retained in the plant records for future inspections if requested by the NRC.

NMPC's resolution of each of these items is addressed in Table 9.1 of the Probabilistic Risk Assessment (PRA), dated July 1999. This version of the PRA reflects the as-built, as-operated plant with respect to the items identified in the NRC staff's August 18, 1994, letter and is the version of the PRA utilized during development of the NMP2 risk-informed inservice inspection program.