



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 7 1985

Docket No. 50-410

Mr. B. G. Hooten
Executive Director of Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Hooten:

SUBJECT: EXEMPTION REQUEST CONCERNING LOCAL LEAK RATE TESTING OF THE TIP
SYSTEM FOR NINE MILE POINT 2

On February 13, 1985 Niagara Mohawk Power Corporation (NMPC) submitted through its attorney, Conner and Wetterhahn, an application for exemption from the requirements of 10 CFR 50 Appendix J for Nine Mile Point Unit 2. The application for exemption concerned testing requirements set forth in 10 CFR 50 Appendix J for the isolation valves on the Traversing Incore Probe System (TIP system).

The staff has determined that the TIP system at Nine Mile Point, Unit 2, is the same as that employed at similar Mark II plants. We have uncovered no uniqueness associated with this system which would preclude its being tested in a similar manner as the other Mark II plants.

NMPC indicated that the basis for not performing Type C testing of the TIP system was as follows:

1. The TIP system is operated only four hours per month and the maximum potential leakage is small.
2. Any testing would expose the plant maintenance personnel to relatively high radiation doses (on the order of 3 to 12.5 man rem per outage).
3. The valves are located in a sealed leakage housing which would have to be resealed following the test.

The staff has reviewed similar arguments set forth by other plants. We have found them unacceptable in the past for the following reasons:

1. The maximum potential leakage cannot be considered small; and
2. The dose estimates provided reflect worst case maintenance procedures, not the more efficient test methods that might be employed if minor component modifications were made to facilitate the TIP system testing.

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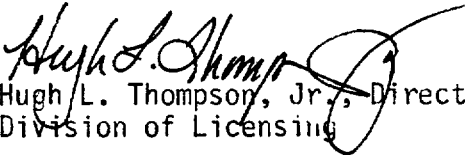
Mr. B. G. Hooten

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Consequently, we do not believe a basis exists for granting an exemption to Appendix J for the TIP system. NMPC should therefore commit to the Type C testing of the TIP system.

If you have any questions regarding the above information please contact the licensing project manager, Mary Haughey (301-492-7897).

Sincerely,


Hugh L. Thompson, Jr., Director
Division of Licensing

cc: See next page

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Mr. B. G. Hooten
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit 2

cc:

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