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 SYLVIA,B.R. Niagara Mohawk Power Corp.
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SUBJECT: Advises that plant has issued amend 66 to license NPF-69.
 Amend,dtd 950428,modifies TSS to authorize an increase in
 max power level for Unit 2 from 3323 Mwt to 3467 Mwt.

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NIAGARA MOHAWK POWER CORPORATION/NINE MILE POINT, P.O. BOX 63, LYCOMING, NY 13093/TELEPHONE (315) 349-2882

B. Ralph Sylvia
Executive Vice President
Nuclear

May 15, 1995
NMP2L 1545

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

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

Gentlemen:

Subject: Power Uprate License Amendment No. 66, Staff Safety Evaluation

In a letter to the Nuclear Regulatory Commission (NRC) dated July 22, 1993, Niagara Mohawk Power Corporation (NMPC) proposed a license amendment to allow Nine Mile Point Unit 2 (NMP2) to operate at an uprated power of 3467 megawatts thermal (MWt). The July 22, 1993 letter was supplemented by letters dated February 4, August 23, September 16, October 6, and December 2, 1994; and January 3, January 9, March 8, and April 10, 1995.

In response to the above correspondence, the Staff has issued License Amendment No. 66, dated April 28, 1995, to Facility Operating License No. NPF-69 for NMP2. This amendment with its related Safety Evaluation modifies the NMP2 Operating License and Technical Specifications to authorize an increase in the maximum power level of NMP2 from 3323 MWt to 3467 MWt. The amendment also approves changes to the Technical Specifications and Bases to implement uprated power operation.

As required by our procedures for amendment implementation, NMPC has compared the above Niagara Mohawk power uprate correspondence with the Staff's related Safety Evaluation. A small number of minor inconsistencies were discovered. The purpose of this letter is to provide the results of our review.

Niagara Mohawk has concluded these inconsistencies do not affect the changes to the Operating License, Technical Specifications and Bases as authorized by License Amendment No. 66. Furthermore, the conclusions reached by the Staff regarding this amendment continue to be valid. Therefore, in accordance with the direction provided by the Staff's letter regarding License Amendment No. 66, Niagara Mohawk will implement this license amendment prior to restart from the fourth refueling outage. Restart of NMP2 is currently scheduled to occur on May 24, 1995.

9505230074 950515
PDR ADOCK 05000410
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Niagara Mohawk has provided a copy of this response to the appropriate state representative.

Very truly yours,



B. R. Sylvia

Exec. Vice President - Nuclear

BRS/KWK/kab

Attachment

**xc: Regional Administrator, Region I
Mr. B. S. Norris, Senior Resident Inspector
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Records Management**

RESULTS OF REVIEW OF NRC POWER UPRATE SER¹

ITEM NO.	PAGE NO.	SECTION NO.	COMMENTS²
1	4	3.3.1	The <u>analytical</u> limits for setpoints rather than the trip setpoints for the relief function of the SRVs are increased by 15 psi for power uprate. See Table 5-2.
2	4	3.3.2	The transient for the ASME Code Overpressure Protection Analysis assumed an initial dome pressure of 1020 <u>psig</u> rather than 1020 psia. See Figure 3-1.
3	5	3.3.3	The cycle-specific core reload analyses will consider the full core flow range, up to <u>113.9</u> Mlb/hr rather than 115 Mlb/hr. See Table 1-2.
4	5	3.3.3	The Recirculation System suction pressure increases almost the same amount (<u>15 psid</u>) as the dome pressure (negligible change in losses down to the pump) because of power uprate. The pump discharge pressure increases less (~ 13 psid) than the suction pressure because the pump is operating at a slightly higher drive loop flow (i.e., less than 1% increase). Niagara Mohawk did not provide to the NRC in any power uprate related correspondence numbers for pump suction or discharge pressures.
5	5	3.3.3	The pump speed and flow control valve position runback functions are <u>not</u> affected by power uprate and ELLL. The ELLL performance improvement feature is already part of the NMP2 licensing basis (see Section 1.3.2 and Table 1-3). NMP2 has two speed recirculation pumps (i.e., 60 Hz power supplies and low frequency motor-generator sets) rather than variable speed recirculation pumps (i.e., motor-fluid coupler-generator sets).

ITEM NO.	PAGE NO.	SECTION NO.	COMMENTS ²
6	5	3.3.3	<p>The Staff's SER states: "NMPC should perform power uprate startup testing on the RRC system to demonstrate flow control over the entire pump speed range to enable a complete calibration of the flow control instrumentation including signals to the Process Computer." This testing does not enable calibration of the flow control instrumentation including signals to the Process Computer. Calibration of <u>flow control</u> instrumentation and recirculation <u>loop flow</u> instrumentation is accomplished during refueling outages prior to plant restart whereas recirculation <u>core flow</u> instrumentation is calibrated at rated power. Niagara Mohawk interprets this sentence in the Staff's SER as continuation of the above work practices regarding calibration of flow control, loop flow, and core flow instrumentation. There have been no power uprate related changes to the NMP2 recirculation system nor changes to calibration of the flow control instrumentation since increased core flow is already part of the NMP2 licensing basis. See Section 1.3.2 and Table 1-3.</p>
7	9	3.4.6	<p>The impact of Increased Core Flow (ICF), up to <u>113.9</u> Mlb/h, on LOCA results was evaluated at the <u>3536</u> MWt power level using S/G-LOCA methodology for NMP2 rather than at an ICF up to 115 Mlb/h at a 3629 MWt power level. See item 3 above for 113.9 Mlb/h. See note (1) of Table 4-3 for 3536 MWt (i.e., 102% of uprated power level of 3467 MWt).</p>
8	10	3.5.1	<p>Cycle specific analyses will be done at each reload and the <u>results</u> of the analyses will be part of the COLR developed by NMPC rather than the analyses being part of the COLR. NMPC does not provide reload submittals for Staff review and approval but rather performs a 10CFR50.59 evaluation for each set of reload analyses and revises the COLR as appropriate. Then, in accordance with Section 6.9.1.9.d of the Administrative Controls of the NMP2 Technical Specifications, Niagara Mohawk sends a copy of the COLR to the Staff.</p>
9	10	3.5.3	<p>The NMP2 response to a postulated SBO uses the <u>RCIC</u> for core cooling rather than the RCIC and HPCS. A coping evaluation was performed to demonstrate performance based on the <u>RCIC</u> system rather than on HPCS with backup provided by the RCIC system. The <u>RCIC</u> system is the source for initial operation rather than the preferred source for initial operation since no reliance is placed on the HPCS system.</p>

<i>ITEM NO.</i>	<i>PAGE NO.</i>	<i>SECTION NO.</i>	<i>COMMENTS²</i>
9 (Cont'd.)	10	3.5.3	Section 9.3.2 does not specifically identify the systems used in response to a SBO. However, Section 9.3.2 states, "No changes to the systems or equipment used to respond to a SBO are necessary due to the power uprate..." NMPC's submittal on SBO dated April 13, 1989 (NMP2L 1194) places reliance on RCIC for core cooling and no reliance on HPCS.
10	25	3.14	For item 1 of the NRC's SER, the <u>allowable</u> value rather than the analytical limit of the reactor vessel pressure high scram is changed from 1057 psig to 1072 psig. See item 3 on page 4 of Enclosure 1 to NMPC's proposed power uprate license amendment dated July 22, 1993 (NMP2L 1397).
11	25	3.14	For item 3 of the NRC's SER, the allowable value for the turbine first-stage scram bypass pressure is changed to <u>136.4</u> psig rather than 135.4 psig. See item 6 on page 5 of Enclosure 1 to NMPC's proposed power uprate license amendment dated July 22, 1993. Also see License Amendment No. 66 Technical Specification change pages 3/4 3-4, 3/4 3-5 and 3/4 3-52.
12	30	3.17.2	NMPC evaluated the NMP2 control rod drive mechanism for the uprated power conditions in accordance with ASME Boiler and Pressure Vessel Code, Section III, <u>1971 Edition/Winter 1972 Addenda</u> through 1974 Edition/Winter 1975 Addenda rather than only 1974 Edition with addenda through Winter 1975. See NMPC's letter dated January 3, 1995 (NMP2L 1518), response to question 1 of the Staff's request for additional information.
13	30	3.17.2	The CRDM has been tested at simulated reactor pressure up to 1250 psig, which bounds the <u>analytical limit</u> of 1086 psig for the power uprate rather than high pressure scram trip setpoint of 1086 psig. See Table 5-1.

- NOTES:
- Columns entitled "Page No." and "Section No." correspond to NRC's SER dated April 28, 1995 for License Amendment No. 66 for NMP2.
 - Unless otherwise indicated, section, table, and figure numbers correspond to Enclosure 3 (GE Topical Report NEDC-31994P, entitled "Power Uprate Licensing Evaluation for Nine Mile Point Nuclear Station Unit 2) of NMPC's proposed power uprate license amendment dated July 22, 1993 (NMP2L 1397).