Mr. B. Ralph Sylvia
Executive Vice President
and Chief Nuclear Officer
Niagara Mohawk Power Corporation
Generation Business Group D-2
300 Erie Boulevard West
Syracuse, NY 13202

SUBJECT: CORRECTION AND CLARIFICATION FOR AMENDMENT NO. 74, NINE MILE POINT

NUCLEAR STATION, UNIT 2 (TAC NO. M94641)

Dear Mr. Sylvia:

On August 13, 1996, the Commission issued Amendment No. 74 to Facility Operating License No. NPF-69 for the Nine Mile Point Nuclear Station, Unit 2. The amendment revised the Operating License, Technical Specifications and associated Bases to implement Option B, "Performance-Based Requirements" of Appendix J to 10 CFR Part 50 for Type A, B, and C leakage rate testing in response to your application of February 7, 1996, as supplemented July 26, 1996.

Enclosed is a revised page 4 for the Safety Evaluation that accompanied Amendment No. 74. Please replace the page 4 provided to you August 13, 1996, with the enclosed copy. The revised copy more clearly describes the requested change with respect to testing air lock interlocks. This clarification does not affect our previous findings and is in accordance with my recent discussion with Mr. K. Korcz of your organization.

Sincerely,

/S/

Darl S. Hood, Senior Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure: Page 4 of Safety Evaluation

cc w/encl: See next page

DOCUMENT NAME: G:\NMP2\CORRECTION.SER

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

attachment/enclosure NRR; DSSA/SCSB D:PDI 10 E OFFICE LA:PDI-1 AV E PM:PDI-1 DHood/rst DS# JMitchell /// **CBerlinger** SLittle NAME 08/29/96 BW 08/00/196 08/74/96 08/29/96 DATE

Official Record Copy

ANCE LATE CONTEN CORY



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001 August 29, 1996

Mr. B. Ralph Sylvia
Executive Vice President
and Chief Nuclear Officer
Niagara Mohawk Power Corporation
Generation Business Group D-2
300 Erie Boulevard West
Syracuse, NY 13202

SUBJECT: CORRECTION AND CLARIFICATION FOR AMENDMENT NO. 74, NINE MILE POINT

NUCLEAR STATION, UNIT 2 (TAC NO. M94641)

Dear Mr. Sylvia:

On August 13, 1996, the Commission issued Amendment No. 74 to Facility Operating License No. NPF-69 for the Nine Mile Point Nuclear Station, Unit 2. The amendment revised the Operating License, Technical Specifications and associated Bases to implement Option B, "Performance-Based Requirements" of Appendix J to 10 CFR Part 50 for Type A, B, and C leakage rate testing in response to your application of February 7, 1996, as supplemented July 26, 1996.

Enclosed is a revised page 4 for the Safety Evaluation that accompanied Amendment No. 74. Please replace the page 4 provided to you August 13, 1996, with the enclosed copy. The revised copy more clearly describes the requested change with respect to testing air lock interlocks. This clarification does not affect our previous findings and is in accordance with my recent discussion with Mr. K. Korcz of your organization.

Sincerely,

Darl & Hood

Darl S. Hood, Senior Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure: Page 4 of Safety Evaluation

cc w/encl: See next page

B. Ralph Sylvia Niagara Mohawk Power Corporation

cc:

Mr. Richard B. Abbott
Vice President and General Manager Nuclear
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, NY 13093

Mr. Martin J. McCormick, Jr.
Vice President
Nuclear Safety Assessment
and Support
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, NY 13093

Ms. Denise J. Wolniak
Manager Licensing
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, NY 13093

Mr. Kim A. Dahlberg General Manager - Projects Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station P.O. Box 63 Lycoming, NY 13093

Mr. John T. Conway
Plant Manager, Unit 2
Nine Mile Point Nuclear Station
Niagara Mohawk Power Corporation
P.O. Box 63
Lycoming, NY 13093

Regional Administrator, Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

Resident Inspector Nine Mile Point Nuclear Station P.O. Box 126 Lycoming, NY 13093 Nine Mile Point Nuclear Station Unit 2

Charles Donaldson, Esquire Assistant Attorney General New York Department of Law 120 Broadway New York, NY 10271

Mr. Richard M. Kessel Chair and Executive Director State Consumer Protection Board 99 Washington Avenue Albany, NY 12210

Mark J. Wetterhahn, Esquire Winston & Strawn 1400 L Street, NW. Washington, DC 20005-3502

Gary D. Wilson, Esquire Niagara Mohawk Power Corporation 300 Erie Boulevard West Syracuse, NY 13202

Mr. F. William Valentino, President New York State Energy, Research, and Development Authority 2 Rockefeller Plaza Albany, NY 12223-1253

Supervisor Town of Scriba Route 8, Box 382 Oswego, NY 13126

Mr. Richard Goldsmith Syracuse University College of Law E. I. White Hall Campus Syracuse, NY 12223

Mr. John V. Vinquist, MATS Inc. P.O. Box 63 Lycoming, NY 13093 B. Ralph Sylvia Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station Unit 2

cc:

Mr. Jim Rettberg
New York State Electric & Gas
Corporation
Corporate Drive
Kirkwood Industrial Park
P.O. Box 5224
Binghamton, NY 13902-5224

DATED: August 29, 1996

CORRECTION FOR AMENDMENT NO. 74, NINE MILE POINT NUCLEAR STATION, UNIT 2

Mecket-Lile

PUBLIC

PDI-1 Reading

S. Varga, 14/E/4 J. Mitchell

S. Little

D. Hood

OGC

G. Hill (2), T-5 C3 C. Grimes, 11/E/22

ACRS

L. Doerflein, Region I

R. Lobel

C. Berlinger

cc: Plant Service list

of SSER 5)." The licensee concludes that this prior exemption will no longer be needed once Option B is implemented because, unlike Option A, Option B does not include a requirement that air locks opened during periods when containment integrity was not required by the plant's TS be tested at the end of such periods. The NRC staff agrees that this exemption is not needed under Option B and, therefore, finds the proposed deletion acceptable.

Under Option B, a licensee may choose the performance-based option for performing (1) Type A tests, (2) Type B and C tests, or (3) Type A, B, and C tests. For Unit 2, the licensee has elected to perform Type A, B, and C testing on a performance basis.

The NRC staff finds the TS changes proposed by the licensee to be in compliance with the requirements of Option B and consistent with the guidance of RG 1.163 and the model TS of November 2, 1995, with the exceptions discussed below.

The licensee has proposed an exception to RG 1.163 which states that leakage measured from a main steam isolation valve (MSIV) is excluded from the combined leakage rate of 0.6 La. (This also represents an exception to NEI 94-01 inasmuch as treatment of MSIV leakage apart from La differs from the guidance in NEI 94-01). The staff finds this exception acceptable because it is consistent with an existing Appendix J exemption authorized by Unit 2 Operating License Paragraph 2.D.ii(b) that allows MSIV leakage to be treated separately from La in dose analyses for the design basis accident. In addition, the licensee proposed an exception to RG 1.163 that would permit not performing as-found testing of the MSIVs. The NRC staff finds this acceptable since the test interval of the MSIVs will not be performance based and the MSIV leakage is not included in La.

NEI 94-01 states that door seals must be tested prior to re-establishing containment integrity. The licensee proposes the following exception to this guidance:

Primary containment airlocks' door seals are tested prior to reestablishing containment integrity when something has been done that would bring into question the validity of the previous door seal test.

The staff notes that SR 4.6.1.3.a.2 requires that a seal test must be performed when an air lock has been used. The exception would permit not testing the air lock seals when the reactor had been in a condition where containment integrity had not been required but the air lock had not been opened. The staff finds this change to be acceptable.

Apart from TS changes proposed under Appendix J, the licensee also proposed to change the testing interval of the air lock interlock specified in SR 4.6.1.3.c from 6 months to an interval based upon air lock usage. Specifically, the change would require an airlock door interlock test prior to performing the air lock door seal test which is required after each air lock door usage. The licensee finds that the interlock test is more convenient when performed before the air lock door seal leakage test. To support this change, the licensee reviewed air lock interlock operating experience for approximately 10 years at Nine Mile Point, Unit 2 and