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October 22, 2001
NMP2L 2035

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

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69
TAC No. MB1481

Subject: *Response to NRC Question Regarding the 10CFR50, Appendix H, Reactor Vessel Material Surveillance Program Requirements, Report of Test Results*

- References:
1. Letter NMP2L 2015, "10CFR50, Appendix H, Reactor Vessel Material Surveillance Program Requirements, Report of Test Results," R.B. Abbott (NMPC) to NRC, dated March 8, 2001
 2. Letter NMP2L 1595, "Generic Letter 92-01, Revision 1, Supplement 1, "Reactor Vessel Structural Integrity," R.B. Abbott (NMPC) to NRC, dated November 20, 1995

Gentlemen:

On March 8, 2001, Niagara Mohawk Power Corporation (NMPC) submitted a technical report summarizing the analyses performed for the material specimens contained in the surveillance capsule withdrawn on March 12, 2000 from the 3° azimuth position inside the reactor vessel (see Reference 1). The technical report was submitted pursuant to 10CFR50, Appendix H. On May 14, 2001, the NRC initiated a conference call to discuss the reason for not using best-estimate chemistry data for Welds 4P7216 (single) and 4P7216 (tandem) in Table 7-1 of the report. Best-estimate data was reported in the November 20, 1995 response to Generic Letter 92-01, Revision 1, Supplement 1 (see Reference 2), and it was the NRC staff's expectation that best-estimate data would also be used in subsequent reports.

During the May 14, 2001 conference call, NMPC personnel explained the reason for using plant-specific chemistry data instead of best-estimate data for these two welds. The following information documents and confirms the information provided verbally to the NRC staff during the conference call:

The data in Table 7-1 of the March 8, 2001 technical report were calculated using plant-specific weld data to determine the limiting beltline material. The analysis was conservatively applied to

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provide assurance that the Nine Mile Point Unit 2 (NMP2) reactor vessel is plate limited (rather than weld limited). NMPC understands that the NRC staff's preferred approach would be to use best-estimate material chemistry. Therefore, with the exception of the conservative establishment of the limiting beltline material, NMPC intends to use best-estimate chemistry data, consistent with our response to Generic Letter 92-01, Revision 1, Supplement 1, for future changes to NMP2 pressure-temperature limits or upper shelf energy information.

Very truly yours,



Richard B. Abbott

Vice President Nuclear Engineering

RBA/CDM/cld

cc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)
Records Management