

CENTRAL FILES

NIAGARA MOHAWK POWER CORPORATION



300 ERIE BOULEVARD WEST
SYRACUSE, N. Y. 13202

May 14, 1979

Mr. Boyce H. Grier, Director
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

RE: Docket No. 50-220
I.E. Bulletin 79-08

Dear Mr. Grier:

Your April 14, 1979 I.E. Bulletin 79-08 addressed concerns of events relevant to boiling water reactors identified during the Three Mile Island incident. Our April 24, 1979 letter addressed Item 1 through 10 of that Bulletin.

The attached information supplements our response to Item 7. Changes from our April 24, 1979 response are denoted by vertical lines in the right margin. Additionally, attached is our response to Item 11 of this Bulletin.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

R. R. Schneider
Vice President-Electric Production

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ccp

Attachments

cc. Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, D.C. 20555

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Item 7

Review your operating modes and procedures for all systems designed to transfer potentially radioactive gases and liquids out of the primary containment to assure that undesired pumping, venting or other release of other radioactive liquids and gases will not occur inadvertently.

In particular, ensure that such an occurrence would not be caused by the resetting of engineered safety features instrumentation. List all such systems and indicate:

- a. Whether interlocks exist to prevent transfer when high radiation indication exists, and
- b. Whether such systems are isolated by the containment isolation signal.
- c. The basis on which continued operability of the above features is assured.

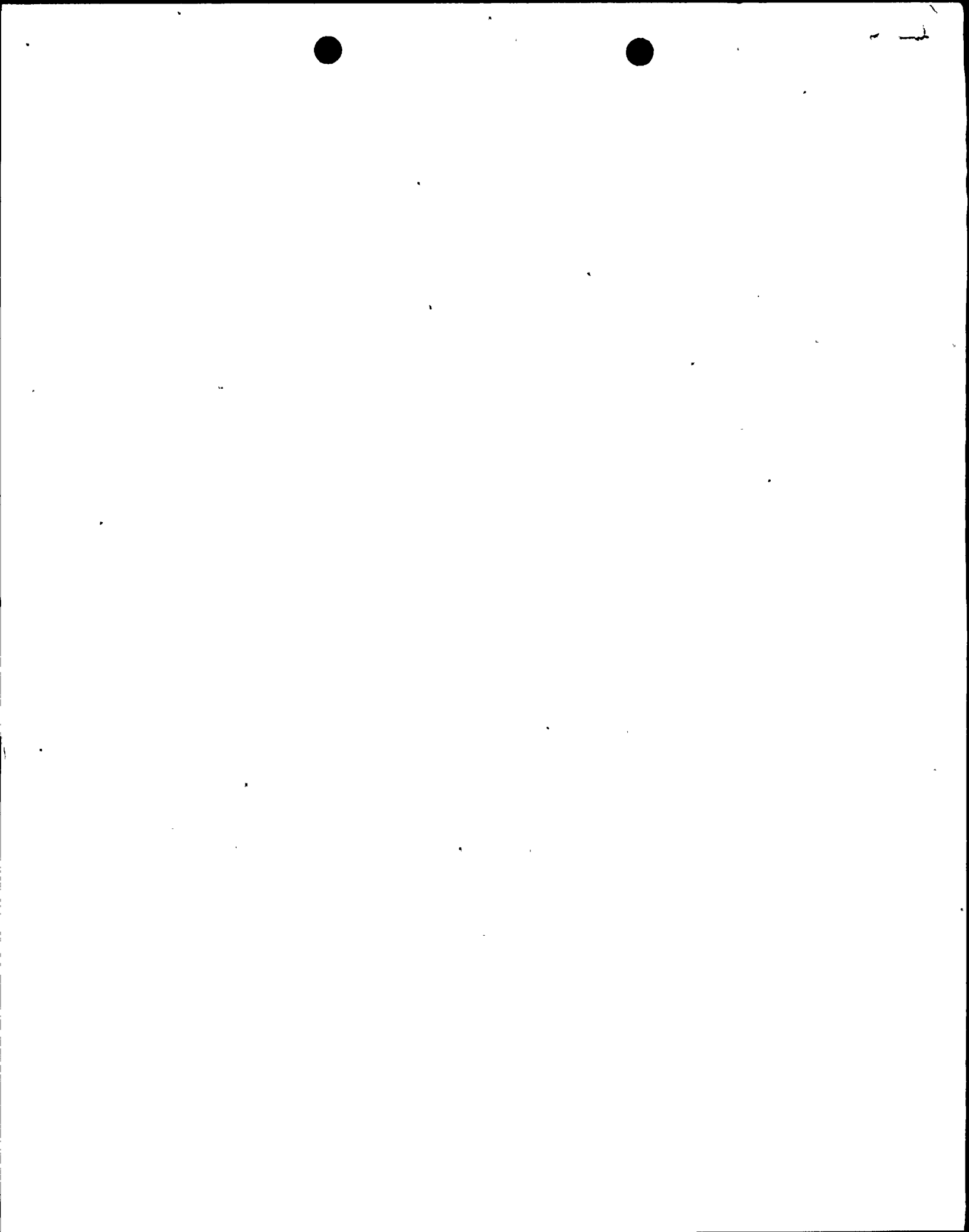
Response to Item 7

There are four potential pathways for radioactive gases or liquids to be transferred out of the primary containment.

- a. N₂ vent and purge system
- b. CAD System
- c. Drywell floor and equipment drains
- d. Recirculation sample line to reactor building sample sink

All of the above except Item d would isolate on a containment isolation signal. Overrides are provided for a and b such that they can be manually re-opened for controlled venting and monitoring purposes. Venting would take place through the reactor building emergency ventilation system. This system would not isolate on high radiation. By procedure, venting is allowed only after containment atmosphere has been sampled and analyzed.

The drywell floor and equipment drains transfer liquid under normal operation. These lines isolate on high drywell pressure and low-low level. Since level below top of fuel is required to produce significant fuel failures, high radioactive liquid would not be automatically transferred to the waste building. Activity in these lines is not normally monitored, however, positive valve position indication is provided in the control room.



Response to Item 7 (Cont'd)

The drywell high pressure signal which initiates containment isolation has a seal-in feature so that both RPS channels must be cleared and manual resetting accomplished before any isolation valves not provided with overrides can be re-opened. Thus, for the pumping of drywell drains to occur, two overt actions would be required. Procedures are being modified to ensure that these positive controls remain in effect during events which produce significant radioactive liquids in the containment. Procedure changes will be completed prior to return to power from current refueling outage.

Three 1 inch manual valves connect a sample line to a reactor recirculation line. These valves are normally closed except during a sampling procedure. The discharge of these 1 inch valves reduces to 1/4 inch tubing which runs around 50 feet to a sample sink. A flow fuse is installed outside of primary containment to limit flow through the line. Niagara Mohawk will install two automatic isolation valves during the next scheduled refueling outage scheduled for early 1981. These valves will close on high drywell pressure or low-low reactor water level. The isolation valves will be provided with manual overrides to permit sampling during an isolated condition.

In the interim, operating procedures will be modified to ensure that positive administrative control assures the sample line is not inadvertently left open after use. During sampling, a member of the Operating Staff will continuously monitor sampling activities and verify that at least two valves are closed when sampling is complete.



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Item 11

Propose changes, as required, to those technical specifications which must be modified as a result of your implementing the items above.

Response to Item 11

At this time, no Technical Specification changes are required as a result of implementation of Items 1 through 10 of this Bulletin.

