

July 30, 1979

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

Dear Mr. Grier:

Re: I. E. Bulletin 79-12  
Docket No. 50-220

I. E. Bulletin 79-12, dated May 31, 1979, which addresses short period scrams at BWR facilities, describes three separate events. In each event, the use of the "notch override" feature in the CRD system resulted in short period scrams. Niagara Mohawk has added procedural restrictions to limit the use of the notch override feature during approach to criticality. The response to the five items contained in this bulletin is as follows:

1. Accurate estimated critical predictions are technically difficult to perform due to the time dependence of the variables involved in the calculation. The inaccuracy of such predictions would be counter-productive in that it would induce a false sense of security for the operator. Additionally, estimated critical predictions will not necessarily prevent short period scrams, which are a function of reactivity insertions. In this regard, Niagara Mohawk believes estimated critical predictions are not necessary.

Although fast period scrams have little safety significance, Niagara Mohawk will take steps to avoid operational concerns. Responses 2 and 3 below provide Niagara Mohawk solutions to short period scrams. These solutions limit reactivity insertions and do not rely on estimated critical predictions.

2. An "Approach to Criticality" procedure has been added to the operators startup procedure and the Reactor Analyst operator instructions. This procedure describes neutron monitoring and single notch withdrawal requirements during approach to criticality.

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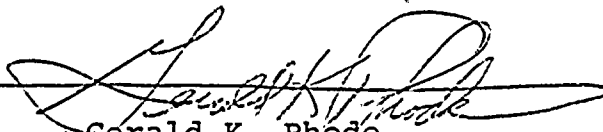
3. Since initial startup, the Nine Mile Point #1 facility has used General Electric's control rod blade withdrawal sequence recommendations. These recommendations for withdrawal sequence when power is less than 20% are constructed to:
- a) comply with rod drop accident requirements
  - b) avoid high notch worth situations during all reactor startups
  - c) maintain consistency with subsequent power ascension and control rod distribution requirements.

In lieu of the above, no new special rod sequence is required.

4. A work request will be initiated to examine the "emergency rod in" switch during the next scheduled refueling outage.
5. The Training Department will review with operators the new approach to criticality procedures and this bulletin during the operators requalification program.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

  
Gerald K. Rhode  
Vice President  
System Project Management

