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AUTH.NAME AUTHOR AFFILIATION
BARTLETT,J. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation

SUBJECT: Forwards response to NRC 791030 ltr re requirements of NUREG-0578.Util will reluctantly comply by 800101 w/items re positive indication for safety valve position & instruments to detect inadequate core cooling & containment radiation.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

November 26, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Dear Mr. Denton:

Your letter of October 30, 1979 requested Niagara Mohawk to address the areas where we were not in complete agreement with the staff's requirements of NUREG-0578. The attached information responds to your request. As indicated, Niagara Mohawk has revised its commitments and will comply with the requirements of NUREG-0578.

Although Niagara Mohawk plans to adhere with the implementation schedule contained in NUREG-0578, we are complying reluctantly with the following items:

1. Positive indication for safety valve position.

2. Instrumentation to detect inadequate core cooling.

3. Installation of in-containment radiation monitors with increased range.

Niagara Mohawk believes that providing direct indication for safety valve position is technically not necessary, since operator action would be the same for either a safety valve opening or a LOCA in the drywell. Furthermore, requiring a special plant shutdown to implement this requirement may result in a net reduction in safety due to the potential for transients during shutdown and startup of the plant.

Niagara Mohawk's system generation requirements peak during the winter period. A shutdown of our base loaded nuclear plant to install this instrumentation will result in the loss of an inexpensive generating source during this period and will have a major economic impact on our customers. A more realistic approach would be to install this instrument during the next cold shutdown after equipment delivery.

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Installation of the remaining two items listed above will require a plant shutdown on or before January 1, 1981. Since instrumentation currently exists at Nine Mile Point Unit 1 to detect inadequate core cooling and to monitor containment radiation, a special cold shutdown to install this additional equipment two months prior to our next scheduled refueling outage is not justified.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

James Bartlett
Executive Vice President

PEF/kmb
Attachment

RESPONSE TO OCTOBER 30, 1979 LETTER -
DISCUSSION OF TMI LESSONS LEARNED SHORT-TERM REQUIREMENTS

Recommendation 2.1.1

Emergency Power Supply Requirements for the Pressurizer Heaters, Power-Operated Relief and Block Valves, and Pressurizer Level Indicators in PWR's.

Position

As stated in our original response dated October 18, 1979, no action is required at Nine Mile Point Unit 1.

Recommendation 2.1.2

Performance Testing for BWR and PWR Relief and Safety Valves.

Position

Specific requirements for safety and relief valve testing for BWR's are being developed by the BWR Owner's Group. If testing is required, a test schedule and program description will be submitted by the BWR Owner's Group. Niagara Mohawk will adhere to the testing schedule and program agreed to by the BWR Owner's Group and the NRC staff.

Recommendation 2.1.3a

Direct Indication of Power-Operated Relief Valve and Safety Valve Position for PWR's and BWR's.

Position

Niagara Mohawk's position regarding this item is that we will comply with this requirement for the safety valves and the power-operated relief valves. Acoustic monitors will be installed on the safety valves and the relief valve discharge piping or on the torus in the areas where the quenchers discharge.

The acoustic monitoring instrumentation for relief valve monitoring was ordered in September, 1979. Delivery of the instrumentation has been expedited and expanded to include the safety valves and is currently expected by December 28, 1979. The plant will be shutdown, and installation will commence within seven days of delivery.

Position (Continued)

Niagara Mohawk does not believe that providing direct indication for safety valve position is necessary. These valves discharge directly to the containment, and high drywell pressure and temperature signals will indicate safety valve opening. Although a LOCA in the drywell would give the same indications, the operator cannot and would not take different actions for either incident. Therefore, there is no increase in safety to justify an unscheduled cold shutdown of Nine Mile Point Unit 1 to provide direct indication of safety valve position. We believe a cold shutdown solely to install this instrumentation results in a net reduction in safety due to transient potential during shutdown and startup. Relief valve instrumentation may not require a plant shutdown.

Recommendation 2.1.3b

Instrumentation for Detection of Inadequate Core Cooling for PWR's and BWR's.

Position

Except for the development of procedures, Niagara Mohawk will comply with the requirements of this recommendation.

The development of procedures to be used by the operator to recognize inadequate core cooling cannot be done until the analysis and guidelines for inadequate core cooling has been performed. The completion of the analysis and the development of guidelines and procedures will be done on a schedule consistent with agreements established with the Bulletins and Orders Task Force by the BWR Owner's Group.

Also, an implementation schedule of January 1, 1981 for installing instrumentation to detect inadequate core cooling may require an unscheduled cold shutdown for this work. We plan to begin a refueling outage by approximately February 28, 1981. We believe a special cold shutdown to install equipment will not improve safety for the two-month period to compensate for the increased safety risk experienced during an extra shutdown and startup.

Recommendation 2.1.4

Containment Isolation Provisions for PWR's and BWR's.

Position

Niagara Mohawk will comply with the requirements of this recommendation as described in our October 18, 1979 response. Any required modifications resulting from this design review to ensure that:

Position (Continued)

1. Containment isolation system design complies with the recommendation of SRP 6.2.4.

2. Non-essential systems are automatically isolated by containment isolation signals or are normally isolated by manual valves

3. Control systems for automatic containment isolation valves are such that resetting the isolation signal will not result in automatic reopening of the containment isolation valves

will be performed by January 1, 1980.

Recommendation 2.1.5a

Dedicated Penetrations for External Recombiners or Post-Accident Purge Systems.

Position

Niagara Mohawk will comply with the requirements of this recommendation. Any necessary modifications resulting from our review of the Nine Mile Point Unit 1 purge system will be performed by January 1, 1981.

Recommendation 2.1.5c

Capability to Install Hydrogen Recombiners at Each Light Water Nuclear Power Plant.

Position

As stated in our original response dated October 18, 1979, no action is required at Nine Mile Point Unit 1.

Recommendation 2.1.6a

Integrity of Systems Outside Containment Likely to Contain Radioactive Materials for PWR's and BWR's.

Position

Niagara Mohawk will comply with the requirements of this recommendation.

Recommendation 2.1.6b

Design Review of Plant Shielding of Spaces for Post-Accident Operations.

Position

Based upon our current perception of necessary plant modification, Niagara Mohawk will comply with the requirements of this recommendation for complete implementation. The preliminary results of our design review and a schedule for implementing each plant modification will be submitted by January 1, 1980. However, if the design review reveals that extensive modifications are required, additional time may be required to complete implementation.

Recommendation 2.1.7a

Automatic Initiation of the Auxiliary Feedwater System for PWR's.

Position

As stated in our original response dated October 18, 1979, no action is required at Nine Mile Point Unit 1.

Recommendation 2.1.7b

Auxiliary Feedwater Flow Indication to Steam Generators for PWR's.

Position

As stated in our original response dated October 18, 1979, no action is required at Nine Mile Point Unit 1.

Recommendation 2.1.8a

Improve Post-Accident Sampling Capability.

Position

Niagara Mohawk will comply with the requirements of this recommendation assuming that equipment can be delivered in time to complete installation by January 1, 1981.

Recommendation 2.1.8b

Increased Range of Radiation Monitors.

Position

Niagara Mohawk will comply with the requirements of this recommendation.

An implementation schedule of January 1, 1981 to install the in-containment radiation monitor may require an unscheduled cold shutdown for this work. We plan to begin a refueling outage by approximately February 28, 1981. We believe a special cold shutdown to install equipment will not improve safety for the two-month period to compensate for the increased safety risk experienced during an extra shutdown and startup.

Recommendation 2.1.8c

Improved In-plant Iodine Instrumentation.

Position

Niagara Mohawk will comply with the requirements of this recommendation.

Recommendation 2.1.9

Analysis of Design and Off-normal Transients and Accidents.

Position

Niagara Mohawk will comply with the requirements of this recommendation on a schedule consistent with agreements established with the Bulletin and Orders Task Force and the BWR Owner's Group.

Recommendations for:

Containment Pressure Monitor
Containment Water Level Monitor
Containment Hydrogen Monitor

Position

Niagara Mohawk will comply with the requirements of this recommendation.

Recommendations for:

Reactor Coolant System Venting

Position

As stated in our original response dated October 18, 1979, Nine Mile Point Unit 1 already has sufficient reactor coolant system venting. Therefore, no action is required.

Recommendation 2.2.1a

Shift Supervisor's Responsibilities.

Position

Niagara Mohawk will comply with the requirements of this recommendation.

Recommendation 2.2.1b

Niagara Mohawk will comply with the requirements of this recommendation as described in our original October 18, 1979 response.

Recommendation 2.2.1c

Shift and Relief Turnover Procedures.

Position

Niagara Mohawk will comply with requirements of this recommendation.

Recommendation 2.2.2a

Control Room Access.

Position

Niagara Mohawk will comply with the requirements of this recommendation.

Recommendations 2.2.2b

On-site Technical Support Center.

Position

Niagara Mohawk will comply with the requirements of this recommendation.

Recommendation 2.2.2c

On-site Operational Support Center.

Position

Niagara Mohawk will comply with the requirements of this recommendation.