

November 7, 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: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Your July 2, 1979 I.E. Bulletin 79-14 and Revision 1, dated July 18, 1979, addressed concerns with seismic analysis for as-built safety-related piping systems.

Niagara Mohawk originally responded to the I.E. Bulletin by letter dated August 17, 1979. The attached information summarizes the work performed to date, and provides an updated schedule for completion of remaining items in response to that Bulletin.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION


R. R. Schneider,
Vice President - Electric Production

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NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 1

STATUS REPORT ON INSPECTION AND ENFORCEMENT

BULLETIN 79-14

November 6, 1979



As committed by our August 17, 1979 letter, Niagara Mohawk has completed inspection on all accessible safety related piping systems using the inspection elements identified in that letter. Additionally, we completed inspections in all inaccessible areas outside of the drywell and the recirculation pump cooling water piping inside the drywell. Our inspections to date constitute approximately 80% of the linear footage of all safety-related piping.

Approximately 50% of the inspection information has been evaluated using a general engineering acceptance criteria and specific engineering analysis to assure compliance with the original design.

Results indicate the evaluated systems comply with the original design with certain minor discrepancies discussed below.

- 1) A seismic restraint for the containment spray system was found not in place. Although our initial engineering assessment indicated the missing restraint did not affect the operability of the system during a design earthquake, the restraint was installed immediately to meet the original design.
- 2) Two out of four lugs on a dead weight support on the core spray system outside the drywell were missing. Although these would not affect the operability of the system during a design earthquake, they were installed immediately to meet the original design.
- 3) One of the three directional restraints on a seismic restraint for the recycle condensate demineralizer loop was not in place. Rather than reanalyzing this system, this directional restraint will be installed before December 15, 1979.
- 4) The reactor feedwater booster pump discharge piping for moisture separator cooling was installed using a diagrammatically designed piping sketch. The inspection of this system indicated some discrepancies between the sketch and the actual installation. This system will be investigated for adequacy based on "as-built" information by December 15, 1979.
- 5) A two inch non-safety related local area cooler pipe was found to be supported on the containment spray test line. Although this would not affect the operability of the system during a design earthquake, independent supports will be installed for this two inch pipe by December 15, 1979.
- 6) One hanger shown in the design for the instrument air system was not in place. Although this would not affect the operability of the system during a design earthquake, this hanger will be installed by December 15, 1979.
- 7) The safety-related control room ventilation chilled water system piping has no detailed design records since it was originally installed to non-safety related requirements. The adequacy of this system to withstand earthquake loads will be verified by December 15, 1979 based on the "as-built" information obtained.



- 8) Other minor dimensional discrepancies were found in restraint location and piping run length, but these were determined not to affect the operation of the system by our specific engineering analysis.

Niagara Mohawk plans to complete the evaluation of inspection information and verify seismic analysis computer code input data for Nine Mile Point Unit 1 by December 15, 1979. Any significant deficiencies will be reported by December 31, 1979.

Niagara Mohawk will make drawing revisions to reflect as-built information and dimensions resulting from this inspection by August 30, 1980. Our method for assuring adequate as-built records in the future will be explained in our December 31, 1979 response to this Bulletin.

Niagara Mohawk has concluded that the continuation of this inspection program to those piping systems inside the drywell which are subject to reactor pressure and temperature is not required because there is adequate assurance that these piping systems have been installed in accordance with the design. This assurance is based on the following:

- 1) To date few discrepancies on safety related piping systems have been found as a result of I.E. Bulletin 79-14.
- 2) The majority of the piping in the drywell is of special geometry and each piece was fabricated and installed in accordance with dimensionally designed piping and fabrication drawings. If this piping were not fabricated to the design specification, the piping could not have been installed in this congested area.
- 3) Quality Assurance records exist for all fabricated piping pieces 2-1/2" and greater in the drywell.
- 4) In 1969, all piping 2-1/2" and greater which is subject to reactor pressure and temperature was audited (including field checking of hangers, restraints and snubbers) and reanalyzed (including weight, thermal, and seismic loadings) by an outside consultant. During each refueling outage since 1969, Niagara Mohawk has confirmed that the piping configuration, hanger, snubber and restraint locations are in accordance with design.
- 5) Different portions of drywell piping, hangers, restraints and snubbers are inspected each refueling outage in accordance with our 10 year in service inspection program. The latest inspection was made during our spring 1979 refueling outage.

Those piping systems inside the drywell not subject to reactor pressure and temperature will be inspected by the completion of the next refueling outage which is scheduled for the spring 1981 period.



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