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 FACIL:50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220  
 AUTH.NAME AUTHOR AFFILIATION  
 DISE,D.P. Niagara Mohawk Power Corp.  
 RECIP.NAME RECIPIENT AFFILIATION  
 EISENHUT,D.G. Division of Licensing

SUBJECT: Forwards table outlining position re commitment to requirements & schedules of five addl TMI-related items, in response to NRC 800507 request. Requests NRC acceptance criteria for response, to ensure timely implementation.

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

June 20, 1980

Mr. Darell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Eisenhut:

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

Your May 7, 1980 letter to all operating reactors requested Niagara Mohawk's commitment to the requirements and associated schedules of five additional TMI-2 related items. The attached table contains our position regarding those requirements which are applicable to boiling water reactors.

It is Niagara Mohawk's intention to be responsive to the requirements contained in your letter; however, clear Nuclear Regulatory Commission acceptance criteria for each item is needed in order to ensure timely implementation.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

D. P. Dise  
Vice President Engineering

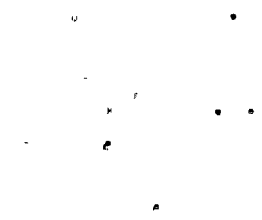
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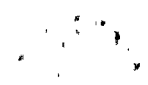


TABLE 1

NINE MILE POINT UNIT 1 COMMITMENT  
TO MEET THE FIVE ADDITIONAL TMI-2 REQUIREMENTS  
CONTAINED IN MR. D.G. EISENHUT'S MAY 7, 1980 LETTER  
TO ALL OPERATING REACTOR LICENSEES

<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
I.A.1.3	Shift Manning	Personnel Requirement: July 1, 1982 Overtime Procedures: August 1, 1980	Since the requirements for this item have not been provided, Niagara Mohawk cannot provide a commitment schedule at this time.
I.A.3.1	Revised Scope and Criteria for Licensing Examinations	May 1, 1980	Implementation is complete, with the exception of the long-range criteria and/or requirements contained in Section D of Enclosure 1 to the March 28, 1980 letter from Mr. H.R. Denton.
I.C.5	Procedures for Feedback of Operating Experience to Plant Staff	January 1, 1981	The review of and modification to procedures governing feedback of operating experience to plant staff will be completed and the procedures put into effect by January 1, 1981. Documentation of the method of compliance will be submitted for staff review by January 1, 1981.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.3	Reporting Safety and Relief Valve Failures and Challenges	January 1, 1981	Starting July 1, 1980, all challenges and failures to close of the safety and relief valves at Nine Mile Point Unit 1 will be reported promptly to the Nuclear Regulatory Commission in accordance with Specification 6.9.2 of the Nine Mile Point Unit 1 Technical Specifications for reportable occurrence requiring prompt notification with written followup. Starting with the July, 1980 monthly operating report, all future challenges and failures to close of safety and relief valves will be documented in the monthly operating reports submitted in accordance with Specification 6.9.1.C of the Nine Mile Point Unit 1 Technical Specifications.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.13	Separation of HPCI and RCIC System Initiation Levels	Analysis: October 1, 1980 Implementation: April 1, 1981	This item is not directly applicable to Nine Mile Point Unit 1 because it pertains to boiling water reactors with RCIC and HPCI systems. However, the Nine Mile Point Unit 1 design does include a comparable emergency condenser system and HPCI system which utilizes the feedwater system. These two systems currently initiate on different water level signals. The HPCI system initiates on low water level or automatic turbine trip and the emergency condenser system initiates on low-low water level or high reactor pressure. Therefore, this item requires no further action for Nine Mile Point Unit 1.
II.K.3.14	Isolation of Isolation Condensers on High Radiation	January 1, 1981	The emergency condensers at Nine Mile Point Unit 1 do not isolate on a high radiation signal in the steam line leading to the emergency condensers as indicated in the staff's position statement. The Nine Mile Point Unit 1 emergency condenser system currently automatically isolates on a high radiation signal in the condenser vents or on high steam flow in the steam line leading to the condensers. Therefore, this item requires no further action for Nine Mile Point Unit 1.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.15	Modified Break Detection Logic to Prevent Spurious Isolation of HPCI and RCIC Systems	January 1, 1981	This item is not directly applicable to Nine Mile Point Unit 1 because it pertains to boiling water reactors with steam driven turbines in RCIC and HPCI systems. Since the emergency condenser and HPCI systems at Nine Mile Point Unit 1 do not utilize steam driven turbines, they do not experience spurious isolation of the systems when system operation is initiated. Therefore, this item requires no further action for Nine Mile Point Unit 1.
II.K.3.16	Reduction of Challenges and Failures of Relief Valves	Feasibility Study: January 1, 1981 Submit Proposed System Modification: January 1, 1982 Implement Modification: Refueling if approved six months prior to next refueling	Niagara Mohawk will fund with other utilities a generic study to be performed by General Electric to investigate the feasibility of reducing challenges and failures of relief valves, after which Niagara Mohawk will review and implement any appropriate plant specific modifications. The dedication of resources may not be available to complete the study by January 1, 1981.  Depending on the type and extent of necessary modifications, NRC approval of such modifications six months prior to a refueling outage may be insufficient lead time for implementation.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.17	Report on Outage of ECC Systems	January 1, 1981	Niagara Mohawk will submit a report by January 1, 1981 detailing outage dates and length of outages for all ECC systems for the last five years of operation.
II.K.3.18	Modification of ADS Logic	Feasibility Study: January 1, 1981 Submit Proposed Modification: January 1, 1982 Implement Modification: Refueling, if approved six months prior to next refueling	Niagara Mohawk will fund with other utilities a generic study to be performed by General Electric to investigate the feasibility of modifying the ADS acutation logic, after which Niagara Mohawk will review and implement any appropriate plant specific modifications. The dedication of resources may not be available to complete the study by January 1, 1981.  Depending on the type and extent of necessary modifications, NRC approval of such modifications six months prior to the next refueling outage may be insufficient lead time for implementation.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.19	Interlock on Recirculation Pump Loops	January 1, 1981	Niagara Mohawk currently has administrative controls and Technical Specification requirements at Nine Mile Point Unit 1 to assure that at least two recirculation loops are open for recirculation flow for modes other than cold shutdown. Therefore, no further action on this is required at Nine Mile Point Unit 1.
II.K.3.21	Restart of Core Spray and LPCI Systems on Low Level	Design: January 1, 1981 Modify: Refueling	The core spray pumps at Nine Mile Point Unit 1 will restart automatically following a manual stop, upon receipt of a low-low water level signal or a high drywell pressure signal. There is no separate LPCI system. The core spray pump switches spring return from off to automatic unless locked out. It is possible to place the switches in the locked out mode; however, operators are cautioned not to lock out the system following shutdown. The lock out mode is for performing maintenance. Since the core spray pumps will automatically restart, if required, following manual stop, no modification or further action is required on this item for Nine Mile Point Unit 1.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.22	Automatic Switchover of RCIC System Suction	Verify Design: January 1, 1981 Modify Design: January 1, 1982	This item is indicated as being applicable to boiling water reactors with RCIC system. Therefore, this item is not applicable to Nine Mile Point Unit 1, which does not have a RCIC system. No further action on this item is required for Nine Mile Point Unit 1.
II.K.3.24	Confirm Adequacy of Space Cooling for HPCI and RCIC Systems	January 1, 1982	This item is indicated as being applicable to boiling water reactors with RCIC and HPCI systems. Therefore, this item is not applicable to Nine Mile Point Unit 1, since its design does not include HPCI and RCIC systems with pump rooms which require space cooling to maintain temperatures within allowable limits. No further action is required on this item for Nine Mile Point Unit 1.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.25	Effects of Loss of AC Power on Pump Seals	January 1, 1982	It is Niagara Mohawk's understanding that this analysis was requested to demonstrate that the recirculation pump seals would not be a potential small break LOCA in the event of a loss of cooling water to them. However, since the recirculation pumps at Nine Mile Point Unit 1 can be isolated to prevent a loss of reactor vessel water through failed seals, no analysis is required. Therefore, no further action on this item is required for Nine Mile Point Unit 1.
II.K.3.27	Provide Common Reference Level for Vessel Level Instrumentation	October 1, 1980	All reactor vessel level instrumentation at Nine Mile Point Unit 1 will be referenced to the same point. However, since the Nine Mile Point Unit 1 Technical Specifications provide safety system setpoints in terms of indicator scale, this item cannot be implemented until technical specification changes are submitted and approved by the Nuclear Regulatory Commission. Niagara Mohawk will submit technical specification changes for this item by August 1, 1980.

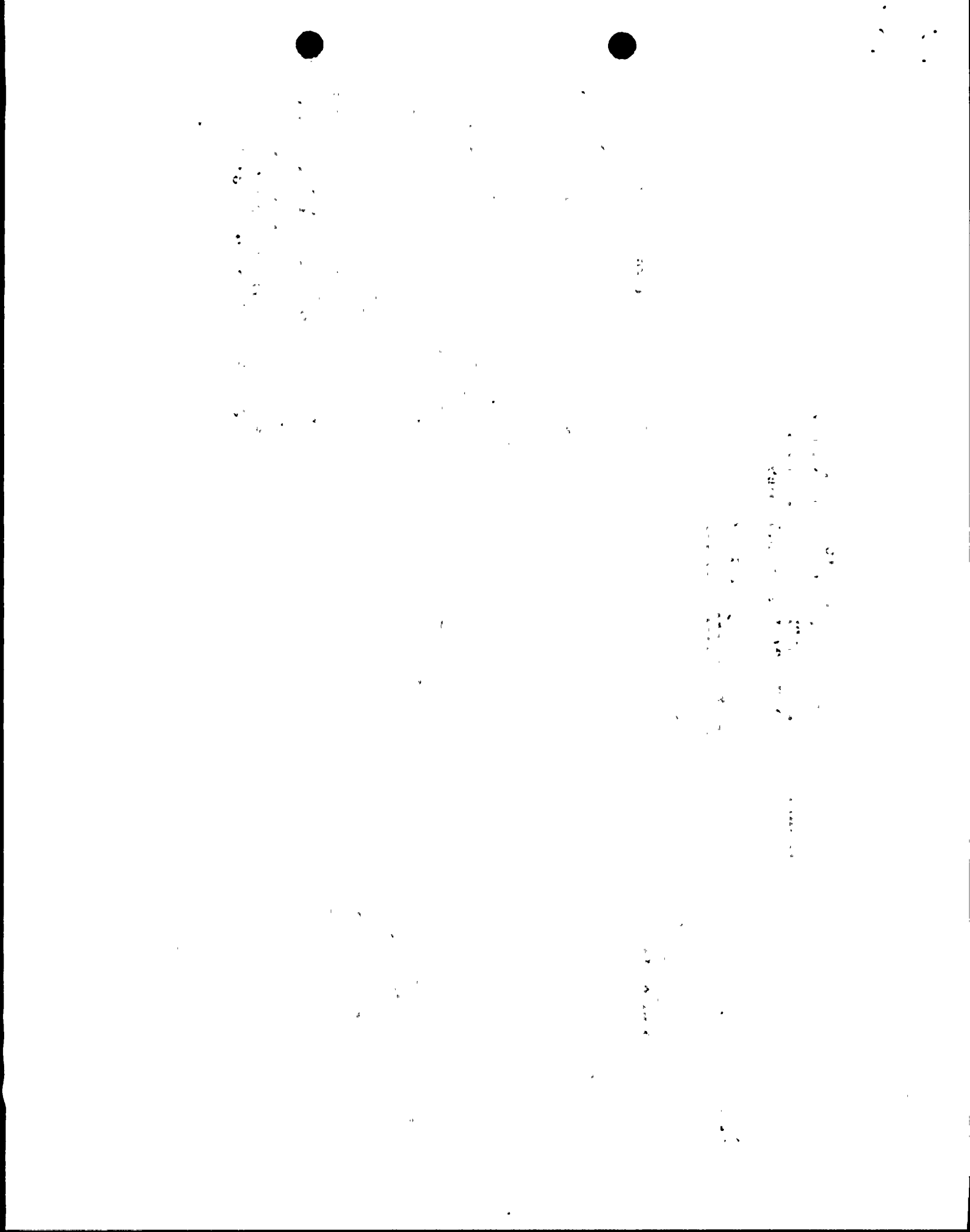


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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.28	Study and Verify Qualification of Accumulators on ADS Valves	January 1, 1982	This item is indicated as being applicable to boiling water reactors. However, it is not applicable to Nine Mile Point Unit 1, since its design includes electromatic relief valves (ADS) and not air or nitrogen operated valves for ADS.
II.K.3.29	Study to Demonstrate Performance of Isolation Condensers with Non- Condensables	April 1, 1981	Niagara Mohawk, in response to short-term lessons learned requirements, proposed rerouting the Nine Mile Point Unit 1 emergency condenser vent to provide the capability to vent the tube side of the condensers to the torus under accident conditions. Therefore, by April 1, 1981, Niagara Mohawk will either perform the study to demonstrate the performance of our emergency condensers with non-condensables or complete the proposed modification of the vent.
II.K.3.30	Revise Small Break LOCA Methods to Show Compliance with 10CFR50, Appendix K	January 1, 1982	Niagara Mohawk's NSSS vendor and fuel supplier, General Electric, will work directly with the Nuclear Regulatory Commission staff to address the conclusions and recommendations regarding revising their small break LOCA analysis methods for compliance with Appendix K to 10CFR50.

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<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.31	Plant Specific Calculations to Show Compliance in 10CFR50.46	January 1, 1983 or one year after staff approval of LOCA analysis model	Niagara Mohawk will submit plant specific calculations by the required date, if determined necessary based on the Nuclear Regulatory Commission's staff review of Item II.k.3.30.
II.K.3.44	Evaluation of Anticipated Transients with Single Failure to Verify No Fuel Damage	January 1, 1981	A generic evaluation of anticipated transients combined with the worst single failure and assuming proper operator actions will be performed under the BWR Owner's Group and submitted by January 1, 1981.
II.K.3.45	Evaluation of Depressurization with Other Than ADS	January 1, 1981	Niagara Mohawk will fund with other utilities a generic evaluation to be performed by General Electric to analyze depressurization modes other than full actuation of the automatic depressurization system. The dedication of resources may not be available to complete the study and submit the results for staff review by January 1, 1981.

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NINE MILE POINT UNIT 1 COMMITMENT  
TO MEET THE FIVE ADDITIONAL TMI-2 REQUIREMENTS  
CONTAINED IN MR. D.G. EISENHUT'S MAY 7, 1980 LETTER  
TO ALL OPERATING REACTOR LICENSEES

<u>Item</u>	<u>Title</u>	<u>Nuclear Regulatory Commission Requested Implementation Schedule</u>	<u>Niagara Mohawk's Position</u>
II.K.3.46	Response to List of Concerns from ACRS Consultant	July 1, 1980	Niagara Mohawk will assess the applicability and adequacy of General Electric's February 21, 1980 response to the Michelson's concerns as they apply to Nine Mile Point Unit 1. The results of this evaluation will be submitted to the Nuclear Regulatory Commission by August 1, 1980.
II.K.3.57	Identify Water Sources Prior to Activation of ADS	October 1, 1980	All of the procedures at Nine Mile Point Unit 1 which instruct the operator to manually initiate automatic depressurization currently contain instructions for the operators to verify a source of low pressure cooling water prior to manual initiation. Therefore, no further action on this item is required for Nine Mile Point Unit 1.
III.D.3.4	Control Room Habitability	Review: January, 1981 Modify: January, 1983	Niagara Mohawk will assure that control room operators are adequately protected against the effects of accidental releases of toxic and radioactive gases by reviewing our facility for conformance with Sections 2.2.1, 2.2.2, 2.2.3 and 6.4 of the Standard Review Plan. The results of the evaluation and schedule for completion of any required modifications will be submitted to the Nuclear Regulatory Commission by January 1, 1981.



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