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AUTH.NAME AUTHOR AFFILIATION
DISE,D.P. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
IPPOLITO,T.A. Operating Reactors Branch 3

SUBJECT: Requests extensions for completion of fire protection mods required by 790726 safety evaluation,Affected mods include protection sys,shutdown panel,sprinkler sys & ventilation penetrations.

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NIAGARA MOHAWK

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

December 31, 1980

Mr Thomas A. Ippolito
Chief Operating Reactors Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Dear Mr. Ippolito

On August 7, 1980, Niagara Mohawk requested approval of extensions of completion schedules for certain fire protection modifications for Nine Mile Point Unit 1 as listed in the Nuclear Regulatory Commission's Safety Evaluation Report, dated July 26, 1979. Your letter responding to this request (undated - received by Niagara Mohawk September 16, 1980) indicated that no action would be taken pending completion of the Appendix R rulemaking. Since that time, schedule relief, in addition to that required in our August 7, 1980 letter, is required, as detailed below.

Since final regulations entitled Fire Protection Program for Operating Nuclear Power Plants (including Appendix R) were published on November 19, 1980, consideration by the Nuclear Regulatory Commission of the following SER schedule extensions is now appropriate:

Modification	SER Completion Schedule	Current Completion Schedule
Protection System (SER Item 3.1.1)	1981 Refueling	September 30, 1981
Shutdown Panel (SER Item 3.1.7)	1981 Refueling	September 30, 1981
Sprinkler System (SER Item 3.1.2)	January 1, 1981	May 30, 1981
Ventilation Duct Penetrations (SER Item 3.1.4(5))	January 1, 1981	1981 Refueling

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Justification for these schedule changes are discussed below.

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The amount of engineering required for the development of an adequate detection system was originally underestimated. Testing was first required to determine detector location requirements. These tests, and subsequent acceptance by the American Nuclear Insurers, required approximately four to six weeks. Additionally, since certain components of the detection and control systems are required to be seismically qualified, to prevent damage to adjacent safety-related equipment, longer lead times than originally anticipated were required.

The safe shutdown panel has been designed, however, certain components for the panel are now expected to be long lead items. To comply with the recommended post-Three Mile Island human factor engineering concepts, Niagara Mohawk has attempted to use the same type of controls on the shutdown panel as that used in the main control room panels. Since these control switches are not high demand items, delivery times are long. We have attempted to expedite these deliveries; however, schedules are still uncertain at this time. Equipment requiring plant shutdown for installation will be installed during the spring 1981 refueling outage.

The design of the sprinkler systems to protect cable required more engineering than anticipated. The concept required extensive design review by Niagara Mohawk and the American Nuclear Insurers. A schedule extension through May 30, 1981 will provide the flexibility required to coordinate all Fire Protection and outage modifications. Nine Mile Point Unit 1 will be shutdown for refueling from the beginning of March through the middle of May 1981.

The ventilation duct penetrations are being accomplished, along with ventilation modifications required per Section 4.4.1 - Smoke Removal. The modifications for Section 4.4.1. are not scheduled to be installed until the spring 1981 refueling outage. In August 1980, Niagara Mohawk believed that all the ventilation modifications would be completed by the end of the year. However, delays were experienced in the bid and award period which were beyond our control.

Niagara Mohawk does not believe that the above described extensions pose a threat to public health and safety. In fact, the Nuclear Regulatory Commission has indicated a similar assessment in granting relief to certain licensees from November 1980 to the effective date of the fire protection regulations (Federal Register 71569). The magnitude of the delays requested by Niagara Mohawk are similar to those.granted in that final rule.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

D. P. Dise
Vice President - Engineering

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