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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: Submits exceptions to BWR owners scram discharge sys
 criteria. Mods will be performed during Spring 1981 refueling
 outage.

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THE UNITED STATES OF AMERICA
 DISTRICT COURT OF THE DISTRICT OF COLUMBIA
 IN RE: [Illegible Name]
 DEBTOR.
 CHAPTER 11 REORGANIZATION.

Case No. [Illegible]

The undersigned, being duly qualified, do hereby certify that the following is a true and correct copy of the [Illegible] filed in the above entitled case.

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

January 30, 1981

Director of Licensing
Attn.: Mr. Darrell Eisenhut, Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Dear Mr. Eisenhut:

Niagara Mohawk has completed its review of the scram discharge system criteria developed by the BWR Owner's Sub-group and the means acceptable to the NRC staff for compliance with the criteria, as outlined in the staff's Generic Safety Evaluation Report transmitted with your December 9, 1980 letter. Modifications will be made to the Nine Mile Point Unit 1 scram discharge system during the Spring, 1981 refueling outage which will establish acceptable compliance with the Owner's Sub-group criteria, with the following exceptions as discussed below.

Design Criterion 3: Instrumentation taps shall be provided on the vertical instrument volume and not on the connected piping.

The modified system does not include attachment of all instrument taps to the vertical portion of the instrument volume. Specifically, the upper instrument taps will be connected to the top of ten inch pipe which will be used to connect the scram discharge headers to the instrument volume. One of the lower instrument taps will be connected to an eight inch vertical extension of the instrument volume. The remaining lower instrument tap will be connected to the top of the horizontal portion of the instrument volume.

It is Niagara Mohawk's understanding that this criterion was provided to reduce the likelihood of damage to the instrument floats from hydrodynamic forces. A review of plant records, required by I.E. Bulletin 80-14, did not identify any instances of scram discharge volume level switch

APR 5, 1981

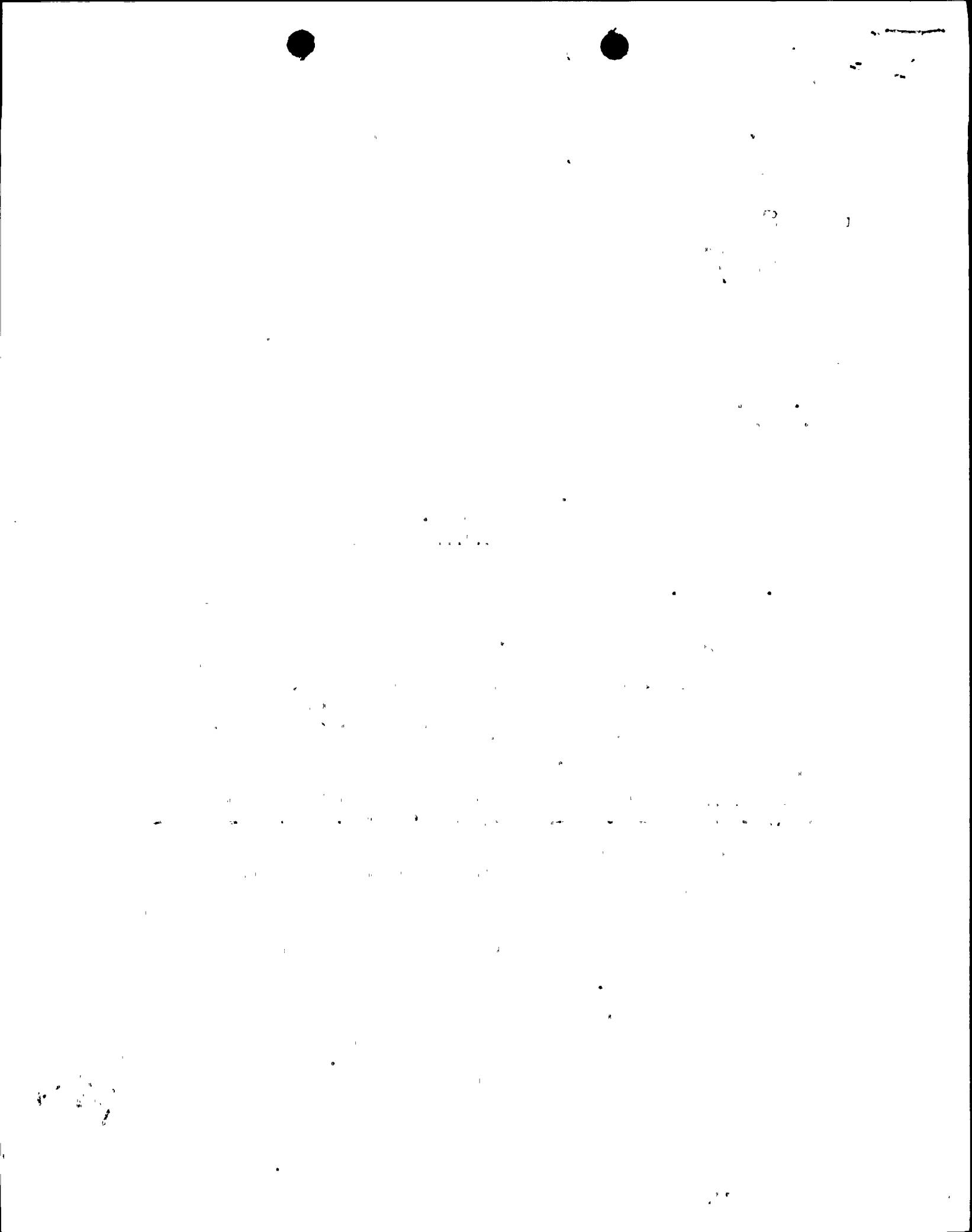
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WASHINGTON, D.C. 20555



degradation caused by damaged or bent float assemblies, indicating the adequacy of the present configuration. The modified instrument tap arrangement is similar to the existing configuration, the only difference being the diameter of the pipes to which the instrument taps are connected (eight inch and ten inch as compared to the original two inch design). Connecting the instrument taps to the larger piping will further reduce the likelihood of damage to the instrument floats from hydrodynamic forces, thereby meeting the intent of the criterion. Procedures requiring a functional test of the instrument floats following a scram will remain in effect.

Surveillance Criterion 3: The operability of the entire system as an integrated whole shall be demonstrated periodically and during each operating cycle, by demonstrating scram instrument response and valve function at pressure and temperature at approximately 50% control rod density.

Nine Mile Point Unit 1 Procedures require a review of data pertinent to operation of the scram discharge system. This data includes scram discharge vent and drain valve closing times and time to drain the system to a repeatable reference level. This information, along with level instrument response, is available from the process computer and will be obtained following automatic scrams. Comparison of new data with previous data will be used to ensure that operability of the system as an integrated whole is maintained.

Safety Criterion 3: The scram discharge system instrumentation shall be designed to provide redundancy, to operate reliably under all conditions, and shall not be adversely affected by hydrodynamic forces or flow characteristics.

Niagara Mohawk supports the BWR Owner's Sub-group position on diverse level monitoring instrumentation. Protection from common cause failure of the instrument floats is provided by existing procedures which require a functional test of float operability following scram. These procedures, in conjunction with the surveillance requirements of the Technical Specifications, eliminate the need for diverse level monitoring instrumentation.

As outlined above, the modifications to the scram discharge system will be performed during the Spring, 1981 refueling outage. Therefore, Niagara Mohawk should be informed immediately if the methods used to meet Design Criterion 3, Safety Criterion 3, and Surveillance Criterion 3 are unacceptable.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



D. P. Dise
Vice President Engineering

