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 DISE, D.P. Niagara Mohawk Power Corp.
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 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to NRC 810406 ltr re NUREG-0737, Item II.K.3.27. Util will comply w/NRC position as described in 800805 Tech Spec change request on existing reactor water level instrumentation.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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The first part of the document discusses the importance of maintaining accurate records. It emphasizes that proper record-keeping is essential for ensuring the integrity and reliability of the data collected. This section also touches upon the challenges associated with data management, such as ensuring consistency and preventing data loss.

In the second section, the focus shifts to the methodology used for data collection. The document describes the various techniques employed to gather information, including direct observation, interviews, and the use of specialized equipment. It details how these methods were chosen to best suit the needs of the study and to ensure that the data obtained is as accurate as possible.

The third part of the document addresses the analysis and interpretation of the collected data. It outlines the statistical methods used to process the information and discusses how the results were interpreted in the context of the study's objectives. This section highlights the key findings and their implications for the field of research.

Category	Sub-category	Value	Unit
Group A	Item 1	12.5	g
	Item 2	8.3	g
	Item 3	15.7	g
	Item 4	9.1	g
Group B	Item 1	7.2	g
	Item 2	11.8	g
	Item 3	6.5	g
	Item 4	13.4	g
Group C	Item 1	10.1	g
	Item 2	14.6	g
	Item 3	8.9	g
	Item 4	12.3	g
Group D	Item 1	5.4	g
	Item 2	9.7	g
	Item 3	11.2	g
	Item 4	7.8	g

June 2, 1981

Mr. Darrell 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

Niagara Mohawk has reviewed your letter dated April 6, 1981 to Mr. D.B. Waters, Chairman BWR Owners Group dealing with NUREG-0737 Item, II.K.3.27.

Niagara Mohawk will comply with the Nuclear Regulatory Commission staff's position as described in our Technical Specification change request dated August 5, 1980. This Technical Specification change request references all existing reactor water level instrumentation to a common reference level and will be implemented upon our receipt of approval of our Technical Specification change request.

In addition, a wide range reactor water level instrument is being installed to comply with NUREG 0737 Item II.F.2. This instrument will also be referenced to the same level as the existing reactor water level instrumentation.

As requested in your April 6, 1981 letter the attached information identifies the necessary changes required in documentation, training and operating practices to implement this item.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Donald P. Dise
Donald P. Dise
Vice President Engineering

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NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 1

DOCKET NO. 50-220

DPR-63

Changes Required in Documentation Training and Operating Practices to Implement TMI Action Plan Item II.K.3.2.7 - Common Water Level Reference.

1. The following instrument surveillance procedures must be revised:

- a. ISP No. H1-ISP-RPS-XMTR
- b. ISP No. H1-ISP-RPS-TP
- c. ISP No. H1-IMP-FWC-1
- d. ISP No. H1-ST-DO

2. The following special procedure must be revised:

- a. H1-SP-4
- b. H1-SP-16
- c. H1-SP-24
- d. H1-SP-29
- e. H1-SP-30

3. Training

Approximately ten (10) two (2) hour training sessions will be required to train all of the operators on the new water level scales (each operator will attend one session).



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