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AUTH.NAME AUTHOR AFFILIATION
LEMPGES,T.E. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Forwards requested completion dates & schedules for implementation of various TMI action items, in response to Generic Ltr 82-10.

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NIAGARA MOHAWK

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

June 7, 1982

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

Your letter of May 5, 1982 (Generic Letter 82-10) requested completion dates and/or schedules for implementation of various TMI action items.

Contained herein is the information you requested.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Thomas E. Lempges

Thomas E. Lempges
Vice President - Nuclear Generation

RJP:ja

A046

State of New York)
ss:
County of Onondaga)

THOMAS E. LEMPGES, being duly sworn says:

I am Vice President - Nuclear Generation of Niagara Mohawk Power Corporation. I have read the letter and the facts contained in the letter and attachment are true to the best of my knowledge, information and belief.

Thomas E. Lempges
Thomas E. Lempges

Sworn to before me on
this 7th day of June, 1982

Cynthia A. Petta
Notary Public

CYNTHIA A. PETTA
Notary Public in the State of New York
Qualified In Onondaga Co. No. 4682225
My Commission Expires March 30, 1984

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II.B.1	RCS	No Reply Needed*
II.B.2.3	Plant Shielding Pt. 3 Environmental Qualification	No Reply Needed*
II.D.1.2	RV & SV Test Program	Not Applicable**
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* Per NRC Generic Letter 82-10

** PWR only

TMI Action Plan Item No. I.A.1.3.1

Limit Overtime

As indicated in our December 17, 1980 letter, a procedure was implemented limiting overtime of key station personnel. That procedure, Administrative Procedure No. APN-2A, "Control of Operations and Composition and Responsibilities of Station or Unit Organization," satisfies the clarification requirements given in NUREG 0737 as indicated by NRC letter dated February 12, 1982.

NRC Generic Letter 82-02, dated February 8, 1982, transmitted revised criteria for NUREG 0737 (Item I.A.1.3). Our preliminary review indicates the existing Administrative Procedure encompasses the revised criteria. The final review and, if appropriate, procedure revisions will be completed prior to startup from the current safe end replacement outage.

[illegible]

[illegible]

[illegible]

TMI Action Plan Item No. I.A.1.3.2

Minimum Shift Crew

As outlined in our letter of March 3, 1981, Niagara Mohawk plans to comply with the minimum SRO staffing requirements set forth on pages 3-9 of NUREG 0737 by obtaining Senior Reactor Operator Licenses for the Assistant Shift Supervisors. The Assistant Shift Supervisor will be the second senior reactor operator at the station and the required shift technical advisor on shift.

During the present safe end replacement outage, the minimum shift crew composition is established by Table 6.2-1 of the station technical specifications which is consistent with pages 3-9 of NUREG 0737 for a unit shutdown. Implementation of the second senior reactor operator on shift will be commensurate with station startup from the existing outage.

TMI Action Item No. I.C.1

Revise Emergency Procedures

By letter dated December 31, 1980, Niagara Mohawk indicated it was participating in the development of Emergency Procedures guidelines through the BWR Owners Group. Upgrading of the emergency procedures and operator training will be completed following NRC staff review and approval of the guidelines for implementation. Based on timely review and approval by the NRC staff, it is expected that the emergency procedures and appropriate operator training can be completed by the end of the first refueling outage after October 1, 1982.

TMI Action No. II.K.3.18

ADS Actuation

As indicated in our letter of March 31, 1982, a description of any proposed modification to the Automatic Depressurization System logic will be submitted by September 30, 1982.

TMI Action Item II.K.30 & 31

Small-Break Loss-of-Coolant-Accident Analysis

As indicated by our December 31, 1981 letter, General Electric's letter of June 26, 1981 transmitted the final program results related to NUREG 0737, Item II.K.3.30. In summary, that letter indicated that the existing General Electric small break Loss of Coolant Accident Model satisfies the concerns of NUREG 0626 and is in compliance with 10 CFR 50 Appendix K. Therefore, no model changes are required. Loss of Coolant Accident analyses for Nine Mile Point Unit 1 are performed with the General Electric model.

TMI Action Item III.A.1.2

Staffing Levels for Emergency Situations

Niagara Mohawk plans for staffing levels during emergency situations is contained in our Nine Mile Point Station Site Emergency Plan. The latest revision of the Emergency Plan was submitted to you on March 12, 1982 and reflects an upgrade of the plan based on our Fall 1981 Emergency Drill. As indicated in our April 1, 1981 letter, our plans do not meet all of your staffing requirements as presented in NRC Generic Letter 81-10, however, we feel they are adequate to respond to potential emergency situations.

During the present safe end replacement outage, personnel who do not normally work on shift are working non-normal hours to provide extended coverage. As a result, the on-shift complement as specified in our Station Emergency Plan will be implemented commensurate with station startup from the existing outage.

[illegible]

[illegible]

TMI Action Item III:A:1:2

Upgrade Emergency Support Facilities

Our letters of December 31, 1979, March 31, 1981, April 1, 1981, June 1, 1981, August 3, 1981 and March 12, 1982 (which transmitted the latest revision of the Nine Mile Point Emergency Plan) provided descriptions of the Emergency Response Facilities. Our current plans and schedules for meeting the long term requirements of these emergency response facilities are as follows:

Technical Support Center (TSC)

The TSC is located in the Training Room in the Administration Building at elevation 277 feet. The layout of the TSC and its proximity to the control room is shown in the attached figure. The TSC will be habitable to the same degree as the control room for postulated accident conditions. The TSC size is somewhat less than the minimum size criteria outlined in NUREG-0696, "Functional Criteria for Emergency Response Facilities," however, sufficient space is provided for the TSC staff to perform technical support activities.

The task functions of the individuals required to report to the TSC upon activation are outlined in the site emergency plan.

Plant parameters will be provided to the TSC through output from the plant process computer and a color camera with focus, zoom, pan and tilt control installed in the control room. The information provided by the plant process computer will be the same as that provided in the control room process computer terminal. Information can also be displayed on demand by the members of the TSC staff.

A new plant process computer was installed at Nine Mile Point Unit 1 during the spring 1981 refueling and maintenance outage. This computer is a Honeywell 4400 system with both hard copy and colorgraphics video display capability.

In addition to the plant parameter data supplied to the TSC, meteorological information will also be provided to perform dose assessment calculations prior to activation of the Emergency Operations Facilities (EOF).

The TSC instrumentation (i.e., plant process computer data display system, color camera monitor, etc.) will have a backup power source.

The document control facility is located in close proximity to the TSC (see attached figure). This facility can provide any permanent plant record, as described in ANSI N45.2.9-1974, including as built drawings. The TSC and/or the document control facility have copies of the Nine Mile Point Nuclear Station Emergency Plan and Implementing Procedures, Final Safety Analysis Report, Technical Specifications, Administrative Procedures, Operating Procedures and other documents which would be required during an emergency.

The communication systems to be installed between the TSC and control room are outlined in the site emergency plan. In any event, since the TSC is located in close proximity to the control room, face to face communication between TSC and control room personnel can be relied upon as an ultimate communications link.

Emergency Operations Facility (EOF)

The EOF is located in the Nine Mile Point Energy Information Center. Special provisions for protection factors or ventilation protection will not be provided for this nearsite EOF. However, a backup EOF will be provided at a distance of approximately 14 miles from the Nine Mile Point site. This back-up site will be activated in the event the nearsite facility is uninhabitable.

Plant parameters will be provided to the EOF through output from the plant process computer. The information provided by the plant process computer will be the same as that provided in the control room process computer terminal. Information can also be displayed on demand by the members of the EOF staff. Meteorological information will also be provided to perform dose assessment calculations upon activation of the EOF.

The EOF will not be supplied with a backup power source.

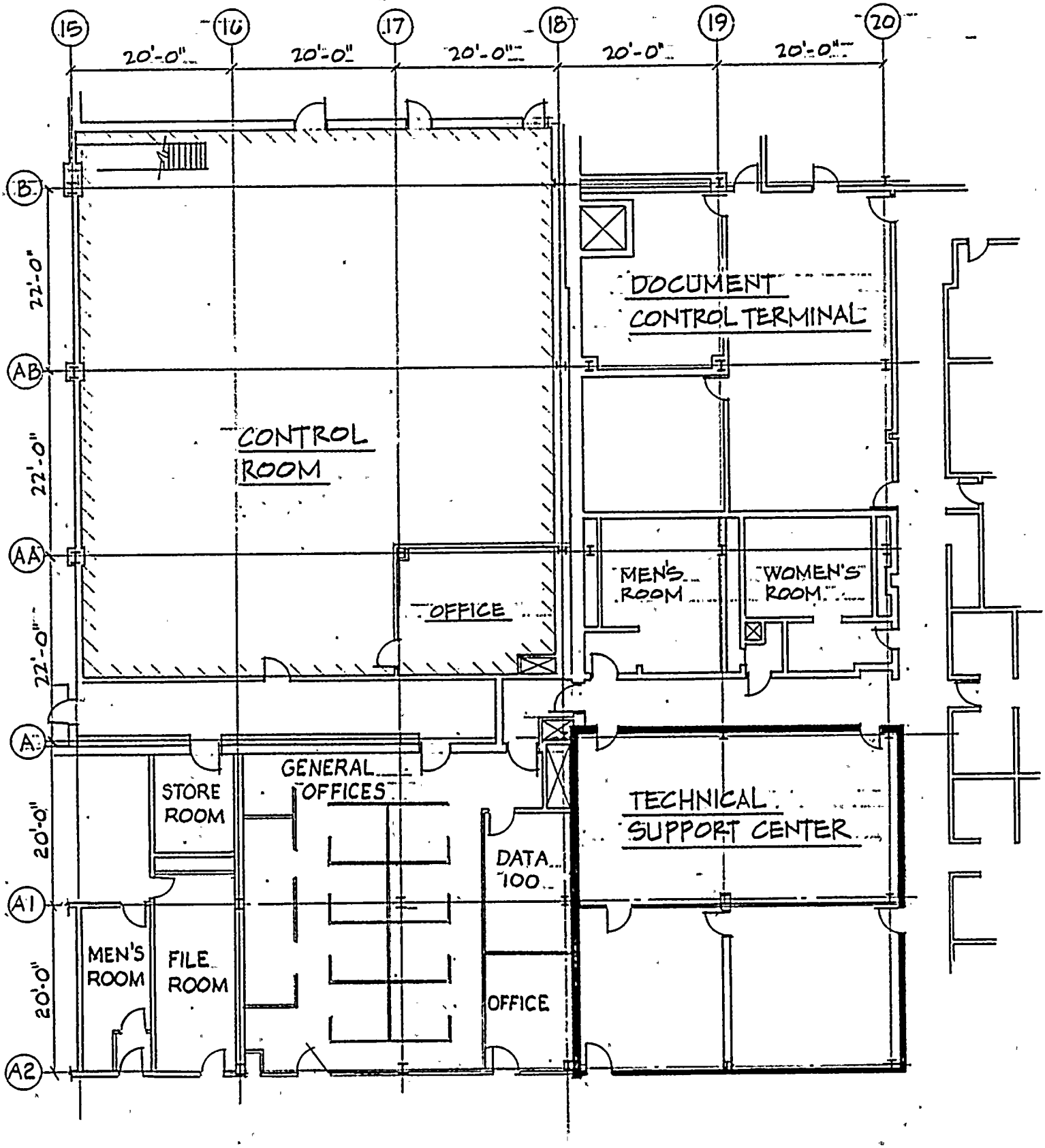
The task functions of the individuals required to report to the EOF upon activation are outlined in the site emergency plan.

Alternate (Offsite) Emergency Operations Facility (AEOF)

The Niagara Mohawk Service Center located in the Town of Volney, Oswego County, which is normally an electrical maintenance service center, has been designated as the Alternate Emergency Operations Facility. This location will be used in lieu of the Niagara Mohawk Service Center in Oswego which currently acts as the AEOF. The change is being made in order to locate the AEOF outside a ten-mile radius from Nine Mile Point and closer to the Oswego County Emergency Operation Center (OCEOC). The OCEOC is located in the Office of Emergency Preparedness, County Branch Building, Fulton, New York, approximately two miles from the new AEOF.

In the event the EOF is deemed uninhabitable, the AEOF will be activated. The AEOF serves the same function as the EOF and will have essentially the same emergency communications systems as discussed in our Nine Mile Point Station Site Emergency Plan. In addition, meteorological information will also be provided to perform dose assessment calculations. Data from the Control Room or Technical Support Center to the AEOF concerning plant parameters will be transmitted verbally.

The upgraded facilities as described above shall be operational by October 1, 1982.



NORTH

FLOOR PLAN @ EL. 277'-0"

SCALE 1/16" = 1'-0"

REV. 1 - INCREASED BOUNDARY OF TSC 6-4-82

ORIGINAL SUBMITTAL DATE 12-21-79

TMI Action Item III.A.2.2

Meteorological Data

Our June 30, 1981 letter provided a description of the upgraded meteorological system for Nine Mile Point Unit 1 and our letter of April 1, 1982 provided our current schedule for implementation. As indicated by our April 1, 1982 letter, the anticipated operational schedule for the upgraded system is September 30, 1982. A site specific modeling system, including data from an inland tower, will be operational January 1, 1983. In the interim, until completion of the system, an alternate system as described in our April 1, 1982 letter will be implemented by July 1, 1982.

[illegible]

[illegible]

[illegible]

TMI-Action-Item-III.D.3.4

Control-Room-Habitability

As indicated in our December 31, 1980 letter, the control room of Nine Mile Point Unit 1 is adequately protected against accidents involving toxic or radioactive releases in the vicinity of the plant. Therefore, no modifications were proposed to the habitability systems of the control room.