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SUBJECT: Clarifies code applications to be utilized during replacement of recirculation sys piping, per Amend 50 to License DPR-63, Procurement in accordance w/Section III of ASME Boiler & Pressure Vessel Code 1980 edition.

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April 6, 1983

Director of Nuclear Reactor Regulation  
Attn: Mr. Dominic B. Vassallo, Chief  
Operating Reactors Branch No. 2  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

Dear Mr. Vassallo:

Your October 15, 1982 letter issued License Amendment 50, covering replacement of the recirculation system piping. The supporting safety evaluation stated that the fabrication, installation (fit-up) and Quality Assurance would be accomplished in accordance with ASME Boiler and Pressure Vessel Code, Section III, 1980 Edition and Addenda through Winter 1980.

However, our letter of August 6, 1982 indicated that the replacement program would be based on the requirements of Section III of the ASME Boiler and Pressure Vessel Code 1977 Edition and various Addenda and other applicable standards. In addition, our letter of September 27, 1982 indicated that the fit-up requirements of the 1980 Edition of the ASME Boiler and Pressure Vessel Code, Section III through winter 1980 addenda would be followed. The purpose of this letter is to clarify our intent regarding Code Applications during the replacement program.

Material procurement (i.e., fabrication of pipe) has been performed per the 1980 Code and Addenda through the Winter of 1980, except as discussed below.

Fit-up, Quality Assurance and other aspects of the installation have been performed in accordance with the 1977 Code and Addenda through the Summer of 1978.

As outlined below, the requirements of these two codes are essentially the same. Therefore, by meeting the 1977 Code, the 1980 Code requirements are essentially met.

#### Procurement

Procurement of the replacement recirculation system piping has been in accordance with Section III of the ASME Boiler and Pressure Vessel Code 1980 Edition and Addenda through Winter of 1980. The reactor vessel safe-ends and two (2) elbows were procured in accordance with the 1977 Edition of the code through Summer of 1977 as part of our original contingency program. Upon initiation of the safe-end removal and replacement program an additional nine (9) elbows were also procured to the 1977 Edition of the Code through Summer of 1977.



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Installation

The requirements for installation (fit-up) in Section III of the ASME Boiler and Pressure Vessel Code 1977 Edition and Addenda through Summer of 1978 and the 1980 Edition and Addenda through Winter 1980 are virtually identical except for minor editorial differences.

Quality Assurance

With two exceptions, the Code Quality Assurance requirements applicable to the recirculation system repair are virtually identical. One exception is Paragraph NCA-4134.17, which contains the requirements for Quality Assurance records. The 1980 Code provides a more detailed breakdown of the quality records which must be retained and categorizes them as either "Lifetime" or "Non-Permanent". Tables NCA-4134.17-1 and NCA-4314.17-2 have been included in the 1980 Code to document the requirements for each type of record. Niagara Mohawk will comply with the requirements of the later code.

The second exception is the additional requirement to the 1980 Code in Paragraph NCA-4134.18, Audits. It requires that the certificate holder's Quality Assurance Plan specify the minimum frequency of audits. This requirement is contained in the Newport News Quality Assurance Program.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

*C. V. Mangan*

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Nuclear Engineering & Licensing

CVM/RJP:bd

