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SUBJECT: Forwards response to info requested in 830110 Generic Ltr 83-02 providing guidance on NUREG-0737 items for inclusion in Tech Specs.

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NIAGARA MOHAWK

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

April 25, 1983

Attention: D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Dear Mr. Eisenhut:

Enclosure 1 to your January 10, 1983 letter (Generic Letter 83-02) provided guidance on a number of NUREG 0737 items recommended for inclusion in Technical Specifications. Your letter also requested licensees to review their facility Technical Specifications for consistency with the guidance contained in the enclosure. The attachment to this letter addresses that request.

Sincerely

T. E. Lempges
Vice President Nuclear Generation

TEL/BDW:bd

Attachment

A046

NIAGARA MOHAWK POWER CORPORATION

Response to Information Requested in Generic Letter 83-02:

NUREG 0737 Technical Specifications

1) STA Training (I.A.1.1.3)

Our July 2, 1980, letter provided model Technical Specifications (TSs) for TMI lessons learned Category "A" items. Included were TSs that specified the qualifications, training and on-duty requirements for the Shift Technical Advisors (STA). STA training requirements are under consideration by the Commission. Further guidance will be provided pending decision regarding engineering expertise on shift by the Commission.

Response

The Shift Technical Advisor training program currently in place for Nine Mile Point Unit 1 contains the essential features of the model Technical Specifications provided in your July 2, 1980 letter. Specifically, as described in Technical Specification 6.3.1, the Shift Technical Advisors have a Bachelors Degree in a scientific or engineering discipline and receive training on plant design and response and analysis to transients and accidents. As further Commission guidance becomes available it will be reviewed for incorporation into the program. To avoid potential future revisions, Technical Specifications pertaining to Shift Technical Advisor Training are not being submitted at this time.

2) Limit Overtime (I.A.1.3)

On June 15, 1982 we transmitted to licensees a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In the same letter we also transmitted revised pages to NUREG 0737 (Item I.A.1.3). The administrative section of the Technical Specifications should be revised to require procedures that follow the policy statement guidelines. An acceptable specification would be "the amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12)," or following the model TSs in Enclosure 2.

Response

Our June 7, 1982 letter indicated that administrative procedures had been implemented to limit overtime of key station personnel. Our review indicates that the current version of Administrative Procedure APN-2A, "Control of Operations and Composition and Responsibilities of Station Or Unit Organization" is more restrictive than the guidance provided in your June 15, 1982 letter. Discussions with your staff indicate that implementation of this Administrative Procedure is sufficient to address concerns regarding overtime work by station personnel, provided the procedure is not revised in a less conservative manner. Therefore, Niagara Mohawk does not plan to submit Technical Specifications regarding overtime policies.

3) Dedicated Hydrogen Penetrations (II.E.4.1)

Plants that use external recombiners or purge/repressurization systems for post-accident combustible gas control of the containment atmosphere should provide containment penetrations dedicated to that service. The acceptable alternative is a combined design for use by either external recombiners or purge/repressurization systems and other systems which meet the requirements of Section 50.44 of 10 CFR Part 50. In satisfying this item, some plants may have to add some additonal piping and valves. If so, these valves should be subjected to the requirements of Appendix J, and the TSs should be modified accordingly.

Response

Section 3.3.3 of the existing Nine Mile Point Unit 1 Technical Specifications require leak testing of testable containment isolation valves. Isolation valves in purge/repressurization lines are incorporated into this Technical Specification. Therefore, modification of the existing Technical Specifications is not necessary.

4) Containment Pressure Setpoint (II.E.4.2.5)

The containment pressure setpoint that initiates containment isolation must be reduced to the minimum compatible with normal operating conditions. Most plants provided justification for not changing their setpoint and we approved their justifications by separate correspondence. The remaining plants have submitted a change to the TSs with the lower containment pressure setpoint. No further actions are required.

Response

As indicated above, no action is required.

5) Containment Purge Valves (II.E.4.2.6)

Model TSs are being sent separately to each plant as part of the overall containment purge and vent system review. Technical Specifications will be reviewed separately for each plant. In general, these TSs include the requirement that:

a. Containment purge or vent valves be locked closed if found not qualified for operation during a LOCA, and be verified locked closed at least every 31 days;

b. Containment purge or vent valves be used only when needed for safety related reasons;

c. Containment purge or vent valves with resilient seals be subjected to leakage testing and periodic resilient seal replacement.

Allowable time period in each year for purge/vent operation at each plant will be considered on a case-by-case basis.

5) Response

Niagara Mohawk has not received the model Technical Specifications referred to above. When they are received, they will be reviewed and appropriate actions will be taken.

6) Radiation Signal on Purge Valves (II.E.4.2.7)

NUREG 0737 requires that containment purge and vent isolation valves must close on a high radiation signal to reduce the amount of radiation released outside containment following a release of radioactive materials to containment. The BWR Owners' Group has taken exception to this requirement and submitted their evaluation to NRC. NRC is currently reviewing the latest submittal of the Owners' Group. Technical Specifications for this item will be established after the technical resolution of this issue is completed.

Response

Niagara Mohawk is monitoring the Owners' Group efforts discussed above. As indicated above, Nuclear Regulatory Commission technical resolution is necessary before Technical Specifications can be developed.

7) Reporting SV and RV Failures and Challenges (II.K.3.3)

NUREG 0660 stated that safety and relief valve failures be reported promptly and challenges be reported annually. The sections of your TSs that discuss reporting requirements should be accordingly changed; model TSs are given in Enclosure 2. Note that an acceptable alternative would be to report challenges monthly.

Response

As discussed in our June 20, 1980, December 17, 1980 and December 31, 1980 letters, safety valve and relief valve failures and challenges are reported pursuant to Technical Specification 6.9.2. Implementation of this reporting requirement is further assured by Section 4.8 of Administrative Procedure APN-21 "Procedure for Reporting Variations from Normal Plant Operations, Defects, and Noncompliance". Therefore, Niagara Mohawk does not believe additional Technical Specifications pertaining to reporting safety valve and relief valve failures and challenges are necessary.

8) RCIC Restart and RCIC Suction (II.K.3.13, II.K.3.22)

The design of RCIC should be modified such that:

1) The system will restart on subsequent low water level after it has been terminated by a high water level signal;

2) RCIC system suction will automatically switchover from the condensate storage tank to the suppression pool when the condensate storage tank level is low.

8) RCIC Restart and RCIC Suction (II.K.3.13, II.K.3.22) (cont'd)

Provide technical specifications for both of the above modifications. It could be included with other technical specifications for the RCIC system. Typical acceptable limiting conditions for operation (LCO) and surveillance requirements, for instrumentation and system operational capability, are given in Enclosure 2.

Response

Nine Mile Point Unit 1 does not have RCIC system. Therefore, this item is not applicable.

9) Isolation of HPCI and RCIC Modification (~~III.~~II.K.3.15)

The pipe break-detection circuitry should be modified so that pressure spikes resulting from HPCI and RCIC system initiation will not cause inadvertent system isolation. The plants using a time delay relay for this modification should change their Technical Specification to include the time delay added by the relay in the isolation system instrumentation response time. The minimum and maximum expected response time should be provided as discussed in the sample TSs (in Enclosure 2).

The minimum expected response time is a plant specific value. The maximum expected response time should not be higher than seven seconds unless the licensee provides proper justification for selecting a higher response time. The plants which don't have isolation system response time in their Technical Specifications, should include the setpoint and the surveillance requirements on the time delay relay in the TSs.

Response

As indicated in our April 16, 1982 letter, this item pertains to plants with a steam-driven HPCI and RCIC system. Nine Mile Point Unit 1 does not have a RCIC system and utilizes a motor-driven feedwater pump for the HPCI system. Therefore, this item is not applicable to Nine Mile Point Unit 1.

10) Interlock on Recirculation Pump Loops (II.K.3.19)

Interlocks are required on nonjet pump plants (other than Humboldt Bay) to assure that at least two recirculation loops are open for recirculation flow for modes other than cold shutdown. This is to assure that the level measurements in the downcomer region are representative of the level in the core region.

Since there are very few plants affected by this modification and the change may be plant specific, we advise these plants to develop the Technical Specification and submit to the staff. The Technical Specification should include some surveillance requirements on the instrumentations and the corrective actions to be taken in case of instrumentation malfunction or failure.

10) Response

As discussed in a Safety Evaluation transmitted to Niagara Mohawk on February 12, 1982, the alternate means proposed by Niagara Mohawk to ensure measurement of core water level has been accepted by the Nuclear Regulatory Commission. The alternate method precludes installation of recirculation pump interlocks. Therefore, Technical Specifications as discussed above are not required.

11) Common Reference Level (II.K.3.27)

All level instruments should be referenced to the same point. If a figure defining reactor vessel water levels is included in the Technical Specification of your plant, it should be changed to reflect the common reference level established by this Action Plan Item. A sample figure is given in Enclosure 2.

Response

As indicated in our April 16, 1982 letter, the existing Nine Mile Point Unit 1 Technical Specifications reflect the use of a common reference level. The existing Technical Specifications do not contain figures depicting vessel level measurement configurations. Therefore, no changes to the Technical Specifications are necessary.

12) Manual Depressurization (II.K.3.45)

Technical resolution of this Action Plan Item has just been completed. The staff will not require any modifications in plant design and operation. Therefore no changes to Technical Specifications will be required.

Response

As noted above, Technical Specification changes are not required.