August 23, 1983

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Docket No. 50-220

Nr. G. K. Rhode Senior Vice President Hiagara Mohawk Power Corporation 300 Erie Boulevard Hest Syracuse, New York 13202

Dear Mr. Rhode:

SUBJECT: REVIEW OF NUREG-0737 ITEM II.K.3.17, REPORT ON OUTAGES OF ECC SYSTEMS

Re: Nine Mile Point Nuclear Station, Unit 1

NUREG-0737 Item II.K.3.17 required that licensees submit a report detailing outage dates and length of outages for all emergency core cooling systems for the last five years of operation. We have completed our review of your submittal and a copy of our Safety Evaluation is enclosed for your information.

We have concluded that the requirements of NUREG-0737, Item II.K.3.17 have been met. Therefore, this completes our review of Item II.K.3.17 for your facility.

Sincerely,

Original signed by R. Hermann for:

Domenic B. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing

Enclosure: Safety Evaluation

PDR

cc w/enclosure: See next page

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Mr. G. K. Rhode Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station, Unit No. 1

cc:

Troy B. Conner, Jr., Esq. Conner & Wetterhahn Suite 1050 1747 Pennsylvania Avenue, N. W. Washington, D. C. 20006

Mr. Robert P. Jones, Supervisor Town of Scriba R. D. #4 Oswego, New York 13126

Niagara Mohawk Power Corporation ATTN: Mr. Thomas Perkins Plant Superintendent Nine Mile Point Nuclear Station Post Office Box 32 Lycoming, New York 13093

U. S. Environmental Protection Agency Region II Office Regional Radiation Representative 26 Federal Plaza New York, New York 10007

Resident Inspector U. S. Nuclear Regulatory Commission Post Office Box 126 Lycoming, New York 13093

John W. Keib, Esquire Niagara Mohawk Power Corporation 300 Erie Boulevard West Syracuse, New York 13202 Thomas A. Murley Regional Administrator Region I Office U.AS. Nuclear Regulatory Commission 632 Park Avenue King of Prussia, Pennsylvania 19406

Mr. Jay Dunkleberger Division of Policy Analysis and Planning New York State Energy Office Agency Building 2, Empire State Plaza Albany, New York 12223

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

NINE MILE POINT NUCLEAR STATION, UNIT 1

NUREG-0737 ITEM II.K.3.17

REPORT ON OUTAGES OF EMERGENCY CORE COOLING (ECC) SYSTEMS

Introduction

NUREG-0737 Item II.K.3.17 states that the licensees (of all light water reactors) should submit a report detailing outage dates and lengths of outages for all ECC systems for the last five years of operation. The report should also include the causes of the outages. The clarification of this requirement states that the information provided will be used by the staff to determine if a need exists for cumulative outage time requirements in the technical specifications, and also states that licensees should propose technical specifications or changes to improve availability of ECCS equipment if needed.

Evaluation

The licensee's report has been reviewed by our consultant, Franklin Research Center (FRC), under a technical assistance contract. FRC has compared the licensee's historical unavailability of ECCS equipment with performance throughout the industry. A copy of FRC's Technical Evaluation Report is enclosed. Based on the reports from all light water reactors, FRC has developed a characterization of ECC system unavailability for the entire industry. FRC then compared the ECC system unavailability for individual plants with the average for all plants. FRC has concluded that this licensee has met the requirements of Item II.K.3.17. We agree with this conclusion.

We have considered the results of the FRC review in order to determine the need for cumulative outage time technical specifications. We have not determined definitely whether there is need for a cumulative outage time requirement in the technical specifications. The determination of any need for modification of allowed ECCS equipment outage periods should be most rationally based on the risk reduction produced by a change to allowed ECCS equipment outage periods in the technical specifications, together with the impacts produced by the change. These considerations are part of a generic technical activity (B-61) and will be pursued separately by the NRC staff.

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However, we have attempted to determine, on an interim basis, whether there is a need for a cumulative outage time requirement, by comparing the ECCS unavailability of a particular plant to the average of that of all plants. If the ECCS unavailability of a particular plant did not significantly exceed the average, then we considered it acceptable, and did not require modifications to the technical specifications. If, on the other hand, a plant exhibited a cumulative ECCS outage time appreciably in excess of the average, it was looked at more closely.

Conclusion

We conclude that for this plant the requirements of NUREG-0737 Item II.K.3.17 have been met. We further conclude that for this plant there is no need for cumulative outage time technical specifications at this time.

Principal Contributor: E. Chow

Enclosure: Technical Evaluation Report

Dated: August 23, 1983

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