SEP 2 0 1983

Docket No.: 50-410

Mr. Gerald K. Rhode
Senior Vice President
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Rhode:

Subject: Nine Mile Point OL Safety Review - Request for Additional Information

We have completed our initial review of FSAR Sections 13.5.2 and 15.8, as well as items I.C.7 and I.C.8 of FSAR Section 1.10. Enclosure 1 identifies additional information required for our review of these areas. Consistent with the licensing review schedule for Nine Mile Point Unit 2, responses to this request for additional information should be submitted as changes to the FSAR by October 27, 1983.

If you have any questions concerning the enclosed request for additional information, please call the licensing project manager, Mary F. Haughey, at (301) 492-7897.

Sincerely,

Original signed by:

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

Enclosure:
As stated

cc w/ enclosure:
See next page

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Nine Mile Point 2

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REQUEST FOR ADDITIONAL INFORMATION
NINE MILE POINT NUCLEAR STATION, UNIT 2
OPERATING AND MAINTENANCE PROCEDURES AND ATWS

640.36 Section 13.5 of the FSAR for Nine Mile Point, Unit 2 (NMP-2) indicates that Niagara Mohawk Power Corporation (NMPC) will conform to Regulatory Guide 1.33, but does not indicate the applicable revision number. A commitment is also made to ANSI 18.7-1972. The revisions to these documents that are referenced in NUREG-0800 "Standard Review Plan" are Regulatory Guide 1.33, Rev. 2 (February 1978) and ANSI/ANS 3.2-1981 (Draft). Modify Sections 13.5 and 13.5.1.1 of the FSAR to commit to these revisions or provide justification for this deviation from the Standard Review Plan. A commitment to conform to ANSI/ANS-3.2 (1982) would also be acceptable, although this version of the standard has not been formally endorsed by the NRC staff.

640.37 Section 13.5.2 of the FSAR includes a category entitled "Special Operating Procedures," along with a statement that these procedures are "directed towards plant conditions." Provide a complete list or description of the specific plant conditions or events covered by this category of procedures.

640.38 There are inconsistencies in the titles used in Tables 13.5-1, 13.5-1a, 13.5-3, and 13.5-4. Table 13.5-1 contains the titles "Operation Procedures" and "Special Procedures." Table 13.5-1a contains the titles "Special Operating Procedures" and "Emergency Operating Procedures." Table 13.5-3 contains the title "Special or Emergency Operation." Table 13.5-4 contains the titles "Operating" and "Special Emergency." Section 13.5.2.1.2 states that the format and content of "Special Operating Procedures" are given in Table 13.5-4. However, Table 13.5-4 does not include this specific title.

The above inconsistencies should be resolved. Also, the relationship between special and emergency procedures should be clarified and a subsection added to Section 13.5.2 to discuss Emergency Operating Procedures, if a category labelled as such is to be used.

640.39 Expand Section 13.5.2.2 "Other Operating and Maintenance Procedures" to address modification procedures. The general objectives and characteristics of modification procedures should be described. A list of titles of modification procedures is not required.

640.40 Section 13.5.2.1.1, "Operating Procedures," provides several examples of operating procedures. Section 13.5.2.1.2, "Special Operating Procedures," lists typical events included in NMPC's special operating procedures category. Modify these sections to list all procedures in each category, not just examples. Coverage for the following procedures, from Appendix A to Regulatory Guide 1.33, Rev. 2, is not evident and should be incorporated into Section 13.5.2 under the appropriate categories:

NOTE: Coverage for the procedures must be assured. However, the actual titles or combinations of procedures are NMPC's option.

(1) General Plant Operating Procedures

Recovery from Reactor Trip
Operation at Hot Standby
Turbine Startup and Synchronization of Generator
Changing Load and Load Follow (if applicable)
Power Operation and Process Monitoring
Power Operation with less than Full Reactor Coolant Flow
Preparation for Refueling and Refueling Equipment Operation
Refueling and Core Alterations

(2) Procedures for Startup, Operation, and Shutdown of Safety-Related BWR Systems

NOTE: Provide a list of titles of the procedures in which instructions for the Starup, various modes of operation and shutdown of the following systems will be included.

Nuclear Steam Supply System (Vessel and Recirculating System)
Reactor Cleanup System
Liquid Poison System (Standby Liquid Control System)
High Pressure Coolant Injection
Reactor Core Isolation Cooling System
Emergency Core Cooling Systems
Closed Cooling Water System
Containment
  (1) Maintaining Integrity
  (2) Containment Ventilation System
  (3) Inerting and deinerting
Fuel Storage Pool Purification and Cooling System
Main Steam System (reactor vessel to turbine)
Turbine-Generator System
Makeup System (filtration, purification, and water transfer)

Service Water System
Reactor Building Heating and Ventilation Systems
Control Room Heating and Ventilation Systems
Radwaste Building Heating and Ventilation Systems
Standby Gas Treatment System
Instrument Air System
Electrical System
  (1) Offsite (access circuits)
  (2) Onsite
    (a) Emergency Power Sources (e.g., diesel generator, batteries)
    (b) A.C. System
    (c) D.C. System
Nuclear Instrument System
  (1) Source Range
  (2) Intermediate Range
  (3) Power Range
  (4) TIP System
Reactor Protection System
Rod Worth Minimizer

(3) Procedures for Combating Emergencies and Other Significant Events

Loss of Instrument Air
Loss of Electrical Power (and/or degraded power sources)
Loss of Core Coolant Flow
Loss of Condenser Vacuum
Loss of Containment Integrity
Loss of Service Water
Loss of Shutdown Cooling
Loss of Component Cooling System and Cooling to Individual Components
Loss of Feedwater or Feedwater System Failure
Loss of Protective System Channel
Mispositioned Control Rod or Rods (and rod drops)
Inability to Drive Control Rods
Conditions Requiring Use of Emergency Boration or Standby Liquid Control System
Fuel Cladding Failure or High Activity in Reactor Coolant or Offgas
Fire in Control Room or Forced Evacuation of Control Room
Turbine and Generator Trips
Other Expected Transients that may be Applicable
Malfunction of Automatic Reactivity Control System

Malfunction of Pressure Control System
Reactor Trip
Plant Fires
Irradiated Fuel Damage While Refueling
Abnormal Releases of Radioactivity
Intrusion of Demineralizer Resin Into Primary System (BWR Plants)

640.41 In an April 14, 1983 letter from C. V. Mangran to Darrell G. Eisenhut, NMPC committed to provide a procedures generation package (PGP). The PGP is required by Supplement 1 to NUREG-0737. In view of this commitment, and the membership of an NSSS vendor representative on the Joint Task Group (Section 14.2.2.4.1), the staff considers TMI-2 Task Action Items I.C.7 and I.C.8 resolved. Action Item I.C.7 is resolved because NMPC has committed (in Section 1.10 of the FSAR) to develop the PGP based on NRC-approved BWR Owners Group Emergency Procedure Guidelines. Therefore, an additional NSSS vendor review of the procedures is not necessary. Action Item I.C.8 is resolved because of NMPC's commitment to submit a PGP. Revise FSAR Section 1.10 to provide a brief explanation of how Task Action Items I.C.7 and I.C.8 have been resolved, as described above. Suitable cross-reference between Sections 1.10 and 13.5.2 should be provided. Because the PGP will provide information necessary for the staff to complete its review of Section 13.5.2, the PGP should be sent to NRC as an FSAR amendment.