

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



OCT 5 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: Safety-Related Instrument Tubing and Supports Program for

Nine Mile Point Nuclear Station Unit 2

On April 18, 1983, you submitted a proposal to use the Gulf States Utilities Company Safety-Related Instrument Tubing and Supports Program for the River Bend Station at Nine Mile Point Unit 2 with the following differences:

- At Nine Mile Point Unit 2 Quality Assurance inspection would be performed by the subcontractor performing the installation who is an N Certificate Holder.
- With respect to the third-party inspection, the Architect/Engineer (Stone & Webster Engineering Corporation), Field Quality Control would perform the third-party surveillance.

The staff has completed its review of the Niagara Mohawk Power Corporation (NMPC) request for approval of an instrument tubing and supports program for application in safety-related systems of the Nine Mile Point Nuclear Station Unit 2 (NMP-2) as identified in the NMPC letter dated April 18, 1983 and in FSAR Table 3.9A-15. Excluded from this program is the instrument line from the root valve to the process line which is three-quarter inch piping.

The instrument tubing and supports program proposed by NMPC is similar to the program approved for the River Bend Station and applies to ASME Section III, Class 2 and Class 3 instrument lines outside the drywell extending from a root valve to the sensing instrumentation. The tubing used is one-half inch stainless steel. NMPC will apply ASME Code Case N-127, "Alternate Rules for Examination of Welds in Piping, Section III, Class 1 and 2 Construction", except for the documentation of activities such as material certification, inspection, and final certification which will be in accordance with the NMPC Category I Quality Assurance Program for NMPC which is in compliance with 10 CFR 50, Appendix B. In this respect, NMPC should verify that the manufacturing of fabricated supports, such as Unistrut, has been carried out in accordance with a Quality Assurance Program meeting the applicable portions of 10 CFR 50, Appendix B.

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The instrument tubing and supports program proposed by NMPC differs from the River Bend program as noted above. The use of the subcontractor who will perform the installation of the instrumentation and support program to also perform the Quality Assurance inspection is acceptable. However, we require that third-party inspection be performed by an authorized inspection agency as defined in Article NCA-5000 of Section III of the ASME Boiler and Pressure Vessel Code.

We conclude that the instrument tubing and supports program as described in the NMPC submittal of April 18, 1983 and in FSAR Table 3.9A-15 is acceptable provided that: (1) the fabricated supports are in accordance with a Quality Assurance Program that is in compliance with 10 CFR 50, Appendix B, and (2) the program is modified to require that third-party inspection is in accordance with Article NCA-5000 of Section III of the ASME Boiler and Pressure Vessel Code. The FSAR should be revised accordingly. Compliance with these requirements provides a quality level that is commensurate with the importance of the safety functions of the attached fluid systems.

Sincerely,

Original signed by

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

cc: See next page

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