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 FACIL: 50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Power 05000220
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 MANGAN, C.V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 VASSALLO, D.B. Operating Reactors Branch 2

SUBJECT: Forwards results of safety evaluation of NUREG-0737, Item II.K.3.18 concluding that eliminating high drywell pressure permissive could increase severity of loss of feedwater transient by actuating automatic depressurization sys.

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 TITLE: OR Submittal: TMI Action Plan Rgmt NUREG-0737 & NUREG-0660

NOTES:

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1. The purpose of this document is to provide a comprehensive overview of the current status of the project. It is intended for the use of management and other stakeholders who are involved in the project's execution.

2. The project has been progressing well since the last report. All major milestones have been met, and the team is on track to complete the project by the end of the quarter.

3. There are no significant risks or issues at this time. The team is maintaining a high level of communication and collaboration to ensure the project's success.

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Item	Description	Status	Priority	Owner	Due Date
1	Project Planning	Complete	High	J. Smith	2023-10-15
2	Resource Allocation	In Progress	Medium	A. Jones	2023-10-20
3	Task Delegation	Complete	Low	M. Brown	2023-10-10
4	Progress Monitoring	In Progress	High	D. White	2023-10-25
5	Reporting	Complete	Low	S. Green	2023-10-12
6	Communication	In Progress	Medium	K. Black	2023-10-18
7	Documentation	Complete	Low	L. Gray	2023-10-08
8	Quality Assurance	In Progress	High	P. Blue	2023-10-22
9	Final Review	Complete	High	R. Yellow	2023-10-14
10	Project Closure	In Progress	Medium	T. Purple	2023-10-28

March 6, 1984

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

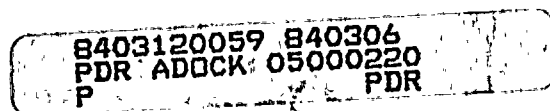
Re: Nine Mile Point Unit 1
Docket No. 50-220
.....DPR-63.....

Dear Mr. Vassallo:

Your June 3, 1983 letter provided the results of the Nuclear Regulatory Commission staff evaluation of the Boiling Water Reactor Owners Group study of NUREG 0737, Item II.K.3.18, ADS Logic Modifications. Your letter concluded that two of the seven alternatives (provided by the Owners Group study) were acceptable, and that one of them should be implemented at Nine Mile Point Unit 1.

Our July 28, 1983 letter stated our intention to implement option 1, elimination of the high drywell pressure permissive and addition of a manual inhibit switch, by the end of the 1984 refueling outage.

Recently we conducted a 10CFR50.59 safety evaluation for this modification. The safety evaluation concluded that eliminating the high drywell pressure permissive could increase the severity of a loss of feedwater transient by unnecessarily actuating the Automatic Depressurization System. The results of our evaluation are provided in the attachment to this letter.



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Therefore, Niagara Mohawk intends not to implement elimination of the high drywell pressure permissive and addition of a manual inhibit switch as stated in our July 28, 1983 letter. However, we do plan to implement the alternative provided by the Boiling Water Reactor Owners Group study which addressed keeping the current design and developing Emergency Procedure Guidelines which specify appropriate operator actions for various levels of degradation and plant conditions.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION



C. V. Mangan
Vice President

Nuclear Engineering and Licensing

CVM/MTG:djm
Attachment

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NIAGARA MOHAWK POWER CORPORATION
DOCKET NO. 50-220

TECHNICAL JUSTIFICATION FOR NOT ELIMINATING
ADS HIGH DRYWELL PRESSURE PERMISSIVE

A qualitative evaluation of the loss of feedwater transient performed by General Electric (NEDO-24708A), a reactor water level analysis performed by Niagara Mohawk for Appendix R (which expanded on the General Electric analysis) and the current reactor vessel water level setpoints concluded there could be an undesirable actuation of the Automatic Depressurization System upon elimination of the high drywell pressure permissive. The following sequence of events was the bases for the evaluation.

1. Loss of feedwater
2. Scram on low reactor water level
3. Vessel isolation on low-low reactor water level
4. Emergency condenser initiation on low-low reactor water level (ten second delay)
5. Actuation of the Automatic Depressurization System on low-low-low reactor water level after initiation of the emergency condenser (assuming high drywell pressure permissive was removed).

Our 10CFR50 Appendix R analysis used as its limiting event the loss of feedwater transient. It proposed alternate shutdown capability (Appendix R III.G.3) for the control complex based on the requirement for the emergency condensers to initiate automatically on low-low reactor water level and maintain the reactor water level above the top of active fuel for eight hours. The alternate shutdown capability also included modifications to the Automatic Depressurization System initiation logic to assure spurious actuation would not occur. During a control complex fire, actuation of the Automatic Depressurization System is not desirable since diesel generators may not be available to power the core spray pumps. By removing the high drywell pressure permissive, thereby potentially introducing unnecessary actuation of the Automatic Depressurization System, our Appendix R III.G.3 modifications for the control complex are rendered ineffective. The Automatic Depressurization System would initiate on low-low-low reactor water level (see loss of feedwater transient sequence of events discussed above), depressurize the reactor vessel thus resulting in the potential loss of the emergency condensers as a hot shutdown system. Flow to the emergency condensers is maintained by natural circulation. Therefore, loss of pressure in the reactor vessel could reduce the effectiveness of the emergency condensers.

