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 MANGAN, C. V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Forwards responses to FSAR questions to aid in review of facility license application. Info includes responses to Questions 410.2 & 440.40 re pipe breaks & actions to mitigate small break LOCA, respectively.

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September 28, 1984
(NMP2L 0176)

Mr. A. Schwencer, Chief
Licensing Branch No. 2
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Nine Mile Point Unit 2
Docket No. 50-410

Dear Mr. Schwencer:

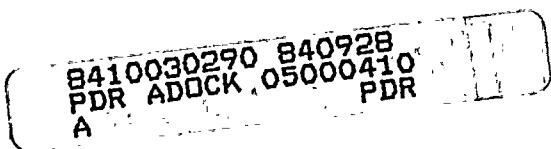
Enclosed for your use and information are the Nine Mile Point Unit 2 responses to several Nuclear Regulatory Commission's Final Safety Analysis Report questions. This information has been previously discussed with your staff and is submitted to aid your review of the Unit 2 license application for the resolution of these questions. This information includes responses to questions 410.2, 440.40.

The enclosed will be included in the next Final Safety Analysis Report Amendment.

Very truly yours,

C. V. Mangan
C. V. Mangan
Vice President
Nuclear Engineering & Licensing

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Enclosure
xc: Project File (2)



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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Niagara Mohawk Power Corporation)
(Nine Mile Point Unit 2))

Docket No. 50-410

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 28th day of September 1984.

Christine Austin
Notary Public in and for
Onondaga County, New York

My Commission expires:

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4787687
My Commission Expires March 30, 1985

CHRISTINE ANSTIN
History Public in the State of New York
Qualified in Onondaga Co. No. 418737
My Commission Expires March 30, 19__

Nine Mile Point Unit 2 FSAR

QUESTION F410.2

The information missing in Tables 3.6A-4 to 3.6A-60 is to be provided in an amendment. Provide this information or a schedule indicating when this information will be submitted. Table 3.6A, Pipe Breaks, should also reference Branch Technical Position ASB 3-1.

RESPONSE

TABLES 3.6A-2 THROUGH 3.6A-71 HAVE BEEN INCORPORATED IN THE FSAR

Table 3.6A-1, "Comparison of Pipe Rupture Criteria," refers to Branch Technical Positions MEB 3-1 and APCS 3-1. Table 3.6A-1 is an excerpt from a letter sent by NMPC to the NRC dated July 31, 1978. Differences from Revision 1 of ASB 3-1 and MEB 3-1 are contained in Section 3.6.1A.



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QUESTION F440.40 (6.3)

Response to the following TMI action items is required to complete the review of Section 6.3.

(a) II.K.1 IE bulletins on measures to mitigate small break LOCA's and Loss-of Feedwater Accidents.

(i) II.K.1.5 Review of ESE Valves

FSAR Section 1.10 does not address this item. The staff position is given below:

NRC Position

Review all safety-related valve positions, positioning requirements and positive controls to assure that valves remain positioned (open or closed) in a manner to ensure the proper operation of engineered safety features. Also review related procedures, such as those for maintenance, testing, plant and system startup, and supervisory periodic (e.g., daily/shift checks) surveillance to ensure that such valves are returned to their correct positions following necessary manipulations and are maintained in their proper positions during all operational modes.

Confirm that Nine Mile Point Unit 2 performed or will perform the review described above.

(ii) II.K.1.10 Operability Status

FSAR Section 1.10 does not address this item. The staff position is given below:

NRC Position

Review and modify as necessary your maintenance and test procedures to ensure that they require:

- a. Verification, by test or inspection, of the operability of redundant safety-related systems prior to the removal of any safety-related system from service.
- b. Verification of the operability of all safety-related systems when they are returned to service following maintenance or testing.
- c. Explicit notification of involved reactor operational personnel whenever a safety-



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related system is removed from and returned to service.

Confirm that Nine Mile Point Unit 2 performed or will perform the review described above.

(b) II.K.3 Final Recommendations of Bulletins and Orders Task Force

- (i) II.K.3.17 We require a commitment from the applicant that they report ECCS outages via LERs and report summary of outages via annual reports.

FSAR Section 1.10 does not address this item. The staff completed its evaluation of the BWR Owners Group generic response to Item II.K.3.18. Provide the plant specific response based on the staff evaluation report.

RESPONSE

See revised Section 1.10.

The results of the containment isolation dependability study, Item II.E.4.2, are provided in Section 1.10. Information regarding Item II.K.3-18, ADS Actuation Logic, is provided in Section 1.10.



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II.K.3.18 ADS ACTUATION LOGIC

FSAR Cross Reference

Sections 6.3, 7.3

NUREG-0737 Position

The automatic depressurization system (ADS) actuation logic should be modified to eliminate the need for manual actuation to assure adequate core cooling. A feasibility and risk assessment study is required to determine the optimum approach. One possible scheme that should be considered is ADS actuation on low reactor vessel water level provided no high pressure coolant injection (HPCI) or high pressure core spray (HPCS) system flow exists and a low pressure emergency core cooling system (ECCS) is running. This logic would complement, not replace, the existing ADS actuation logic.

Nine Mile Point Unit 2 Position

Niagara Mohawk Power Corporation has participated in the BWR Owner's Group evaluation of logic modifications to simplify ADS actuation.

Based on the BWR Owner's Group design modifications found to be acceptable by the NRC staff, NMPC will remove the high drywell pressure trip in conjunction with the addition of a manual switch to inhibit ADS actuation. (OPTION 2, NEDE-30045).



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