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LEMPGES,T.E. Niagara Mohawk Power Corp.
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SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards revised response re 100% volumetric inservice exam of all pipe welds in break exclusion areas,per D Turrell 840921 telcon request.Subj addressed in FSAR Question 210.19.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

October 5, 1984
(NMP2L 0187)

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Schwencer:

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

Enclosed is a revised response requested by Mr. D. Turrell on the 100 percent volumetric in-service examination of all pipe welds in break exclusion areas. This subject is addressed in Final Safety Analysis Report question 210.19.

This information was requested as a result of a conference call on September 21, 1984 between D. Hill, Niagara Mohawk and D. Turrell and M. Haughey, of the Nuclear Regulatory Commission and Stone & Webster representatives.

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

Very truly yours,

T. E. Lempges
Vice President
Nuclear Generation

TEL/DS:ja
Enclosure
xc: Project File (2)

R. Gramm, NRC Resident Inspector

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-410
	)	
(Nine Mile Point Unit 2)	)	

AFFIDAVIT

T. E. Lempges, 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.

T E Lempges

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 5th day of October, 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 AUSTIN
Notary Public in the State of New York
Qualified in Orange Co. No. 4787697
My Commission Expires March 20, 19__

QUESTION F210.19 (3.6.2)

Provide assurance that 100% volumetric inservice examination of all pipe welds in the break exclusion area will be conducted during each inspection interval as defined in IWA-2400, ASME Code, Section XI.

RESPONSE

A 100 percent volumetric preservice and inservice inspection of high-energy fluid system piping welds within the break exclusion area, will be conducted during each inspection interval as defined in IWA 2400, ASME Code Section XI.

b. The following design stress limits are not exceeded for Safety Class 2 piping:

(1) The maximum stress ranges do not exceed 0.8 (1.2 S_h+S_a), as calculated by Equations (9) and (10) in Paragraph NC-3652, ASME Code Section III, considering normal and upset plant conditions (i.e., sustained loads, occasional loads, and thermal expansion) and an OBE event.

(2) The maximum stresses do not exceed 1.8 S , as calculated by Equation (9) in Paragraph NC-3652 under the loadings resulting from a postulated piping failure of fluid system piping beyond these portions of piping.

c. Welded attachments for pipe supports or other purposes, to these portions of piping are avoided, except where detailed stress analysis demonstrates compliance with the limits discussed in Items 2a and 2b.

d. The number of circumferential and longitudinal piping welds and branch connections is minimized.

e. The length of these portions of piping is reduced to the minimum length practicable.

f. The design of pipe anchors or restraints (e.g., connections to containment penetrations and pipe whip restraints) does not require welding directly to the outer surface of the piping (e.g., flued integrally forged pipe fittings are used), except where such welds are capable of 100-percent volumetric inservice inspection. This criterion is also applicable to the portion of piping between the containment and the inside containment isolation valves.

g. For these portions of high energy fluid system piping, preservice and subsequent inservice examinations are performed in accordance with the requirements specified in ASME Section XI. 100-Percent volumetric examination of circumferential and longitudinal pipe welds is required on the portions of high energy fluid system piping in the break exclusion region. Details of containment penetration, identification of pipe welds, and access for inservice inspection points of fixity and discontinuity are provided in Section 3.8.2.

h. Regardless of the fact that all conditions above have been met, a crack is postulated in the main steam or feedwater piping in the main steam tunnel. The crack in the pipe, equal in area to a single-ended pipe rupture, is considered a singular event. Pipe whip and jet impingement are not considered, and a single active failure is not taken as a concurrent event.

3. Balance of Piping Outside the Containment

a. Breaks in ASME Section III, Safety Class 2 and 3 piping and in nonnuclear class piping that is seismically analyzed and supported are postulated at the following locations in each piping and branch run (except those portions of fluid system piping identified in Items 1 and 2):

(1) At terminal ends of the pressurized portions of the runs.

(2) At intermediate locations selected by either of the following criteria:

(a) At each pipe fitting (e.g., elbow, tee, cross, and nonstandard fitting), welded attachment, and valve, or, if the run contains no fittings, at one location at each extreme of the run within the protective structure (a terminal end, if located within a protective structure, may substitute for one intermediate break).