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 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Forwards revised responses to FSAR Questions 260, 51, 480, 33 & 480, 37. Encl responses will be included in next FSAR amend.

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Two large black circles are positioned at the top of the page, likely serving as registration marks for scanning or printing. The text in this section is extremely faint and illegible, appearing as scattered dots and light gray marks.

The central portion of the page contains several columns of text that are also very faint and difficult to read. The layout appears to be organized into multiple vertical sections, possibly representing different data points or categories. The text is sparse and lacks clear structure.

The bottom section of the page contains additional faint text, continuing the sparse and illegible content from the upper sections. The overall appearance is that of a document that has been scanned with very low contrast or is a very light print.

October 5, 1984
(NMP2L 0189)

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 revised responses to 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 260.51, 480.33 and 480.37.

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

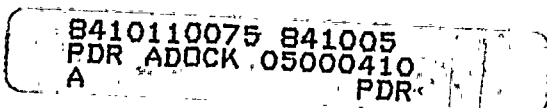
Very truly yours,

T. E. Lempges

T. E. Lempges
Vice President
Nuclear Generation

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

R. Gramm, NRC Resident Inspector



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1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for ensuring the integrity of the financial statements and for providing a clear audit trail.

2. The second part of the document outlines the specific procedures that should be followed when recording transactions. This includes the use of double-entry bookkeeping and the requirement that every entry must be supported by a valid receipt or invoice.

3. The third part of the document discusses the role of the accounting department in ensuring that all transactions are recorded in a timely and accurate manner. It highlights the importance of regular reconciliations and the need to address any discrepancies as soon as they are identified.

4. The fourth part of the document provides a summary of the key points discussed in the previous sections. It reiterates the importance of accuracy and the need for a strong internal control system to prevent errors and fraud.

5. The fifth part of the document concludes with a statement of the author's hope that the information provided in this document will be helpful to all those who are responsible for the financial management of the organization.

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

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

NY Commission Expires March 20, 19--
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CHRISTINE AUSTIN

Nine Mile Point Unit 2 FSAR

- a18. Contamination control is provided for in administrative procedures. The equipment used to perform radioactivity contamination measurement and analysis is portable and is not safety related. (See Note 34)
- a19. See revised Table 3.2-1. (Note 34)
- a20. See revised Table 3.2-1 (Pg. 3a and 13) (Note 29).
- b1. See revised Table 3.2-1

Auxiliary AC Power System

- a) See revised Table 3.2-1 (Pg. 15)
- b) See revised Table 3.2-1 (Pg. 15)
- c) See revised Table 3.2-1 (Pg. 15a)
- d) See revised Table 3.2-1 (Pg. 15a) INSERT A
- e) See revised Table 3.2-1 (Pg. 15a) INSERT B
- f) See revised Table 3.2-1 (Pg. 15a) INSERT C
- g) See revised Table 3.2-1 (Pg. 10) INSERT D
- h) See revised Table 3.2-1 (Pg. 15a)
- i) See revised Table 3.2-1 (Pg. 15a)
- j) See revised Table 3.2-1 (Pg. 5a, 6 For Examples)
- k) See revised Table 3.2-1 (Pg. 10) INSERT E

DC Power System

- a) See revised Table 3.2-1 (Pg. 16)
- b) See revised Table 3.2-1 (Pg. 16) SEE Footnote 31
- c) See revised Table 3.2-1 and (b1(f) Response Above)
- d) See revised Table 3.2-1 and b1 (g) Response Above
- e) See revised Table 3.2-1 (Pg. 16)
- f) See revised Table 3.2-1 (Pg. 7) INSERT F



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- b2. a) The control room HVAC system components are included under HVAC Systems. (Pg. 15)
- b) See revised Table 3.2-1. (Pg. 5)
- c) See revised Table 3.2-1 (Pg. 5, 13) Control room habitability system dampers are included as a part of Ductwork and Accessories, Essential, under the HVAC Systems heading. (Pg. 15)
- b3. RCIC test line bypass leakage will not occur; therefore, this has been categorized QA non-applicable. (Pg. 7)

RPV insulation, reflective and encapsulated, is not capable of excessive debris formation; (See Note 34)

See revised Table 3.2-1.

- b4. All safety-related instrumentation and controls (I&C) described in FSAR Sections 7.1 through 7.6 and other safety-related I&C for safety-related systems meet the quality assurance requirements of 10CFR50, Appendix B. These safety-related I&C are listed in Table 3.2-1, as, for example, "electrical modules with safety function," or "instrument modules with safety function." In Table 3.2-1, the designation "I" indicates that these safety-related I&C meet the quality assurance requirements of 10CFR50, Appendix B, as described in Chapter 17 (see Note 31).
- c1. The safety relief valves (SRVs) perform the function of reactor coolant system vents and are identified in Table 3.2-1 under Nuclear Boiler System.
- c2. See revised Table 3.2-1. (Note 28)
- c3. See revised Table 3.2-1. (Note 34)

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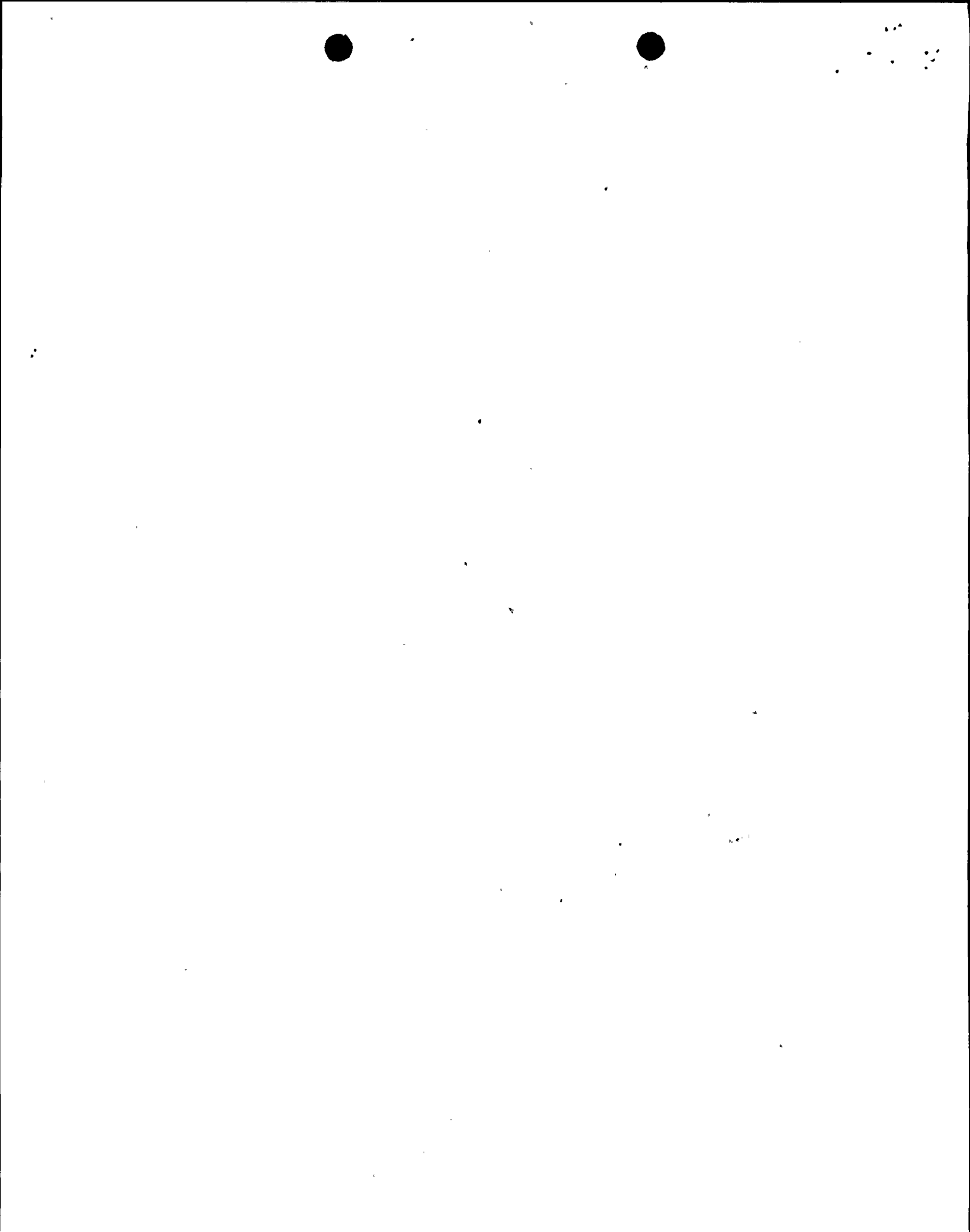


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TABLE 3.2-1 (Cont)

	<u>Scope of Supply</u>	<u>Location</u>	<u>Electrical Classification</u>	<u>Seismic Category</u>	<u>Quality Group Classification</u>	<u>Quality Assurance Requirement</u> (31, 32, 33, 34)	<u>Tornado Protection Notes</u>	
<u>125-V DC Power System</u>								
d racks	125-V dc emergency batteries	P	M,C, RB	1E	I	NA	I	P
	125-V dc emergency battery chargers	P	M,C, RB	1E	I	NA	I	P
	125-V dc emergency switchgear	P	M,C, RB	1E	I	NA	I	P
	125-V dc motor control centers	P	M,C, RB	1E	I	NA	I	P
	125-V dc emergency distribution panels	P	M,C, RB	1E	I	NA	I	P
	Emergency cables	P	M,C, RB	1E	I	NA	I	P
	Emergency cable trays, conduits, and fabricated supports	P	M,C, RB	1E	I	NA	I	P
	Containment penetrations	P	RB	1E	I	NA	I	P
<u>Miscellaneous Components</u>								
	Reactor building polar crane	P	RB	Non-1E	I	NA	I	(22)
<u>Civil Structures</u>								
	Primary containment	NA	RB	NA	I	NA	I	P (29)
	Reactor building, including fuel storage facilities and auxiliary bays	NA	RB	NA	I	NA	I	T (28) (29) (36) :
	Radwaste building	NA	W	NA	I	NA	NA	NR (20)
	Control building	NA	C	NA	I	NA	I	T
	Diesel generator building	NA	S	NA	I	NA	I	T
	Turbine building, including heater bay	NA	T	NA	NA	NA	NA	NR
	Main steam tunnel portion of turbine building	NA	T	NA	I	NA	I	T
	Service building, including foam room	NA	S	NA	NA	NA	NA	NR
	Screenwell service water pumphouse	NA	P	NA	I	NA	I	T
	Screenwell building, superstructure	NA	M	NA	NA	NA	NA	NR
	Intake structures and tunnels	NA	O	NA	I	NA	I	T



Nine Mile Point Unit 2 FSAR

TABLE 3.2-1 (Cont)

	<u>Scope of Supply</u>	<u>Location</u>	<u>Electrical Classification</u>	<u>Seismic Category</u>	<u>Quality Group Classification</u>	<u>Quality Assurance (31, 32, Tornado Requirement 33, 34) Protection</u>	<u>Notes</u>
decontamination facilities	P	Tb,W,d	NA	NA	NA	NA	NR (34)
respiratory protection equipment	P	M	NA	NA	NA	NA	NR (34)
decontamination control equipment	P	M	Non-1E	NA	NA	NA	NR (34)
plant I ₂ monitoring equipment (NUREG-0737, Item III.D.3.3)	P	M	Non-1E	NA	NA	NA	NR (34)



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TABLE 3.2-1 (Cont)

	<u>Scope of Supply</u>	<u>Location</u>	<u>Electrical Classification</u>	<u>Seismic Category</u>	<u>Quality Group Classification</u>	<u>Quality Assurance (31, 32, Requirement 33, 34)</u>	<u>Tornado Protection</u>	<u>Notes</u>
Oilroad access lock	NA	M	NA	I	NA	I	T	
Oilroad passage to turbine building	NA	M	NA	NA	NA	NA	NR	
Electrical bay	NA	M	NA	NA	NA	NA	NR	
Condensate storage tank building	NA	M	NA	NA	NA	NA	NR	
Access passageway, Unit 2 turbine building to administration building	NA	M	NA	NA	NA	NA	NR	
Chilling tower and flume regeneration and condensate demineralizer rooms	NA	O	NA	NA	NA	NA	NR	
Auxiliary service building, substructure	NA	M	NA	I	NA	I	T	
Auxiliary service building, superstructure	NA	M	NA	NA	NA	NA	NR	
Demineralized water storage and waste neutralizing tank building	NA	M	NA	NA	NA	NA	NR	
Shorefront revetment ditch	NA	O	NA	NA (23)	NA	I	NR	
MP exterior flood protection berms	NA	O	NA	NA	NA	I	NR	
Roof and storm drainage systems	P	EB, S, T, W, C, H, P, M, C	NA	NA	NA	NA	NR	(34)
Septic fuel pool	NA	PB	NA	I	NA	I	T	(29)
<u>Miscellaneous Radiation Protection Equipment and Programs</u>								
Portable radioactivity monitoring equipment	P	M	Non-1E	NA	NA	NA	NR	(34)
Radioactivity sampling equipment	P	M	Non-1E	NA	NA	NA	NR	(34)
Radioactivity contamination measurement and analysis equipment	P	M	Non-1E	NA	NA	NA	NR	(34)
Personnel monitoring equipment	P	M	Non-1E	NA	NA	NA	NR	(34)
Instrument storage, calibration, and maintenance program	P	M	NA	NA	NA	NA	NR	(34)



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FOOTNOTE 32

Those structures, components and equipment described by Regulatory Guide 1.29 Section C2 and C3 are described in FSAR Sections 3.5.1.1.4, 3.7 and 3.8. The pertinent provisions of the operational Quality Assurance Program apply.

FOOTNOTE 33

All containment Isolation valves not specifically listed in the table are Seismic and Quality Assurance Category I. See table 6.2-56 for additional information on these valves.

FOOTNOTE 34

Pertinent provisions of the Operational Quality Assurance Program apply to:

1. Portable radioactive monitoring equipment used for emergency purposes.
2. Air and liquid sampling equipment for emergency purposes.
3. Portable equipment which is used to perform radioactivity contamination measurement and analysis.
4. Personnel monitoring and decontamination equipment including TLD's, whole body counter.
5. Instrumentation storage, calibration and maintenance for instruments used during emergencies.
6. Respiratory protection equipment including testing.
7. Modifications to roof and site drainage systems and grading used for handling the Probable Maximum Precipitation.
8. Reactor vessel steam dryer and steam separator and miscellaneous hardware.
9. Post Accident Sampling System.
10. Emergency plans and related equipment/components/structure described in the Emergency Procedures.
11. Conduit and cable tray which are not Class IE but whose failure could affect safety related equipment.
12. Reactor Pressure Vessel Insulation.
13. Inplant Post Accident I₂ Monitoring Equipment (NUREG-0737, Item III.D.3.3)



Nine Mile Point Unit : PSAR

QUESTION F480.33 (6.2.4)

As a result of the numerous reports on unsatisfactory performance of the resilient seats for the isolation valves in containment purge and vent lines (addressed in OIE Circular 77-11, dated September 6, 1977), Generic Issue B-20, "Containment Leakage Due to Seal Deterioration," was established to evaluate the matter and establish an appropriate testing frequency for the isolation valves. Excessive leakage past the resilient seats of isolation valves in purge/vent lines is typically caused by severe environmental conditions and/or wear due to frequent use. Consequently, the leakage test frequency for these valves should be keyed to the occurrence of severe environmental conditions and the use of the valves, rather than the current requirements of 10CFR50, Appendix J.

The staff recommends that the following provisions be added to the Technical Specifications for the leak testing of purge/vent line isolation valves:

"Leakage integrity test shall be performed on the containment isolation valves with resilient material seals in (a) active purge/vent systems (i.e., those which may be operated during plant operating Modes 1 through 4) at least once every three months and (b) passive purge systems (i.e., those which must be administratively controlled closed during reactor operating Modes 1 through 4) at least once every six months."

In light of this, state your intention to test these butterfly valves in this manner.

RESPONSE

The Unit 2 technical specifications will include a requirement that the purge/vent isolation valves will be leak tested once every 92 days in operational conditions 1, 2 and 3 (power operation, startup, and hot shutdown). There is no requirement to test the valves once every 92 days during operational condition 4 (cold shutdown). Additionally, the valves will be tested in accordance with 10CFR50 Appendix J once every refueling outage.



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Nine Mile Point Unit 2 FSAR

QUESTION F480.37 (6.2.6)

Appendix J, Section III.C.1 prescribes methods for conducting the containment isolation valve leak rate tests. These requirements state that containment isolation valves should normally be leak tested with the test pressure applied in the same direction the valve must function to preclude leakage in an accident condition. Reverse direction testing is permitted only if it can be demonstrated that such testing yields results which are equivalent or more conservative than those obtained using same direction as post accident flow testing. List the containment isolation valves for which Type 4C leak testing with reverse flow is used. For each justify by means of test data or valve design arguments that this testing is equivalent or more conservative than "same direction as post accident flow" testing.

RESPONSE

A listing of valves and justification for reverse flow testing will be provided in the Type C test procedure and will be submitted to the NRC for review and approval 6 months prior to testing.



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