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VASSALLO,D.B. Operating Reactors Branch 2

SUBJECT: Informs of intention to install manual inhibit switch in automatic depressurization sys logic & emergency procedure guidelines to avoid premature sys actuation complicating operator action.Implementation of mod scheduled for 1986.

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NIAGARA MOHAWK

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

November 27, 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:

Our March 6, 1984 letter indicated Niagara Mohawk's intention not to implement either of the two modifications recommended in your June 3, 1983 letter. The results of the 10CFR50.59 safety evaluation attached to the March 6, 1984 letter concluded that the elimination of the high drywell pressure signal from the Automatic Depressurization System logic could increase the severity of a loss of feedwater transient by unnecessarily actuating the system. The safety evaluation also concluded that this modification could also negate the recently installed Appendix R logic modifications for the remote shutdown system by eliminating the driving force required for natural circulation.

Discussions with your staff indicated general agreement with our position, except for a request for us to consider implementation of a manual inhibit switch in the Automatic Depressurization System logic. The manual inhibit switch will be used to facilitate operator response in accordance with the Boiling Water Reactor Emergency Procedures Guidelines during various events including the Anticipated Transient Without Scram event.

The SCHEDULE FOR BOILING WATER REACTOR OWNERS GROUP COMPLIANCE WITH NUREG-0737, ITEM II.K.3.18 and the evaluation of the Relationship Between Emergency Procedures Guidelines and Proposed ADS Logic Design Modifications was transmitted to you by letter dated February 5, 1982. This evaluation indicated two conditions where the operator would be required to reset the Automatic Depressurization System every two minutes (if the high drywell signal is received, removed or bypassed) to avoid premature actuation of the system.

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These two conditions are:

1. Level Restoration Contingency - where Reactor Pressure Vessel water level is below the Automatic Depressurization System setpoint and above the top of active fuel under certain non-Loss-of-Coolant-Accident conditions.

   The duration for operation under these conditions can be for an extended period of time.

2. Power (Reactivity) Control - where preservation of containment integrity is of paramount importance during a high power scram-failure with isolation.

   The duration for operation with the Reactor Pressure Vessel water level below the Automatic Depressurization System setpoint (but above the top of active fuel) is up to 30 minutes for scram-failure conditions.

Under these conditions described above, the requirement to reset the existing Automatic Depressurization System logic at least every two minutes to avoid a premature system actuation complicates operator action.

Therefore, Niagara Mohawk intends to install a manual inhibit switch in the Automatic Depressurization System logic. The inhibit switch will facilitate in the development of the symptom-based Emergency Procedure Guidelines, detailing appropriate operator actions for various levels of degradation and plant conditions. Implementation of this modification is tentatively scheduled for the 1986 refueling outage.

Very truly yours,

TE Lempges

T. E. Lempges
Vice President
Nuclear Generation

TEL/EEY/djm