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VASSLLO,D.B. Operating Reactors Branch 2

SUBJECT: Forwards addl info on Generic Ltr 83-28 re Salem ATWS. Section 2.1 re equipment classification & vendor interface & Section 3.1 re post-maint testing (reactor trip sys components) discussed.

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NIAGARA MOHAWK

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November 30, 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 letter of April 30, 1984 provided information and schedules related to the generic implications of the Salem Anticipated Transient Without Scram events (Generic Letter 83-28). Attached is information regarding Sections 2.1, 3.1 and 3.2 of your Generic Letter for Nine Mile Point Unit 1.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

PM/bd

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ADDITIONAL INFORMATION REGARDING GENERIC LETTER 83-28

I. Equipment Classification and Vendor Interface (Reactor Trip System) - Section 2.1

A. NMPC Equipment Classification Program

Niagara Mohawk has initiated a program to review the Nine Mile Point Unit 1 structure, systems and components with respect to our present equipment classification list (Q-list). The present Q-list delineates the applicable quality requirements on a system basis with updates for individual components. Our program will convert the present Q-list to a list which more clearly defines those major components within a system that are subject to the requirements of 10CFR50 Appendix B.. This list, when completed, will include the mechanical, structural, instrumentation and control, and structural portions of Nine Mile Point Unit 1. The criteria being used for the component classification are those listed in the Nine Mile Point Unit 1 Final Safety Analysis Report, dated June 1967, and its second supplement, dated October 1968. Additional guidance is being utilized from ANSI/ANS 52.1-1983, "Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants," and appropriate industry codes and standards (i.e. ASME, IEEE, etc.). This project will provide a clear definition to those structures and components subject to the requirements of our Quality Assurance program and consistent with General Electric's criteria and the Nine Mile Point Unit 1 licensing basis.

Our original schedule indicated that this project would be completed by December 1984. However, additional time is required. Based on our experiences to date, completion of the new Q-list is expected by August 30, 1985.

B. Procedure Review for Safety Classification

Niagara Mohawk's April 30, 1984 letter stated that the Nine Mile Point Unit 1 maintenance procedures would be revised with respect to equipment classification information. In particular, the review would determine if information regarding an equipment's safety classification was present and, if so, check to ensure the statements were correct. This review has been completed. With the exception of two procedures which require minor revision, the review found that those statements referring to safety classification were correct. As an additional safeguard, each time a work request is written for a maintenance activity the safety classification is reviewed by a technical and quality assurance supervisor. Therefore, upon approval of the two revised procedures, this item will be considered complete.

[illegible]

II. Post Maintenance Testing (Reactor Trip System Components) -- Section 3.1

A. Review of Instrument & Control Procedures

Our April 30, 1984 letter stated that a review of the Instrumentation and Control Department procedures would be performed with respect to post maintenance testing requirements. This review has been completed with the following results. Most Instrument & Control procedures are used to perform test functions and require "before-test" as well as "after test" measurements to ensure the equipment is functioning as expected. Those Instrument & Control procedures which are used for maintenance activities, where applicable, presently contain instructions to perform surveillance test(s) as part of the "Return to Service" section. Also as a result of this review, four Instrument & Control maintenance procedures have been identified as requiring minor revision. Therefore, with the exception of four procedures, the I&C Department procedures presently adequately address post maintenance testing.

B. Review of Maintenance Procedures

The review of the Maintenance Department procedures with respect to post maintenance testing of reactor trip system components has been rescheduled to November 1985 to be consistent with item III.B.

C. Review of Technical Specifications

Niagara Mohawk had also committed to performing a review of Nine Mile Point Unit 1 technical specifications with respect to post maintenance testing. This review is complete and has concluded that the technical specifications adequately address the requirements for post maintenance testing and safety related components, including those performing the reactor trip function. While a specific requirement delineating the need for post maintenance testing is not stated, it is inherent in the Limiting Condition for Operation requirements for operable components and the definitions of Operable and Operability Requirements. As a backup to these requirements, the administrative controls require the review of operations by the Site Operations Review Committee and the Safety Review and Audit Board.

Absent from this evaluation of the technical specifications, but requested in Generic Letter 83-28, was a review of whether any requirements could degrade any safety related systems. This was not included since the necessary tools for a thorough review are not available at this time. This evaluation will, however, be included in Niagara Mohawk's internal program for technical specification improvement.

[illegible]

III. Post Maintenance Testing (Other Safety Related Components) -- Section 3.2

A. Review of I&C Procedures

See item II.A above.

B. Review of Maintenance Procedures

Our February 29, 1984 letter indicated that this item would be completed by November 1985. Subsequent correspondences inadvertently revised the schedule to November 1984. It is our intention to complete this item in accordance with the November 1985 schedule.

C. Review of Technical Specifications

See item II.C above.