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FACIL:50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220
AUTH.NAME AUTHOR AFFILIATION
MANGAN,C.V. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
VASSALLO,D.B. Operating Reactors Branch 2

SUBJECT: Requests extension until 841130 to complete equipment qualification program on six pieces of electrical equipment. Delay due to potential test complications & installation problems.

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NIAGARA MOHAWK

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

December 13, 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:

Niagara Mohawk Power Corporation is actively involved in the environmental qualification of electric equipment at Nine Mile Point Unit 1. To date, over 521 pieces of equipment have either been qualified or replaced. However, there are 6 pieces of equipment for which documented evidence of qualification may not be available by March 31, 1985 in accordance with 10CFR50.49(g). They are as follows:

1. Limitorque Valve Actuators on Emergency Condenser Isolation Valves

   These four (4) replacement actuators were not available for replacement during the Spring 1984 refueling and maintenance outage. They can be replaced during operation. However, removal of the existing valve actuators and installation of the replacement actuators presents a difficult task due to limited clearance in the area of the valves. In addition, high ambient temperatures exist in this area (130F-140F), which will require area cooling for worker protection.

   It is our intention to complete the replacement of these actuators prior to March 31, 1985, however, contingencies involved with special rigging, prevention of steam leakage during changeout, special ventilation and personnel safety considerations could cause delay of the replacement beyond this date. A justification for continued operation was part of our May 31, 1984 letter. An additional copy is attached to this letter.

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[illegible]

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[illegible]

2. Shutdown Supervisory Panels

These two (2) relay panels were installed during the Spring 1984 refueling and maintenance outage per Appendix R requirements. Environmentally qualified relays were not available. However, relays with a high degree of reliability were installed and a qualification program was initiated. This program is currently underway. Age testing of these relays is complete. Radiation, seismic and high energy line break environmental testing will be completed in December 1984, January 1985 and February 1985, respectively. The final report, however, will not be issued until after March 1985. This report will require review and approval by our Equipment Qualification staff. However, when the testing is complete, both the test data and a letter report on the individual test phases will be available and a determination will be made as to the success of the environmental qualification at that time. Due to delays beyond our control, however, the test program could extend past March 1985. A justification for continued operation has been prepared and is included as an attachment for your information.

Therefore, for the reasons of potential test complications and installation problems discussed above, Niagara Mohawk in accordance with 10CFR50.49(g) requests an extension from March 1985 to November 30, 1985 for completing the Equipment Qualification Program on these six pieces of equipment.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

MGM/bd

UNITED STATES

NUCLEAR REGULATORY COMMISSION

In the Matter of Niagara Mohawk Power Corporation (Nine Mile Point Unit 1)	Docket No. 220

AFFIDAVIT:

C. V. Mangan, being duly sworn, deposes and says:

I am Vice President, Nuclear Engineering and Licensing of Niagara Mohawk Power Corporation, duly authorized to act on the Corporation's behalf; as such, I have read the documents attached hereto and find that the statements made therein are true to the best of my knowledge, information and belief.

C. V. Mangan
Vice President
Nuclear Engineering and Licensing
Niagara Mohawk Power Corporation

Subscribed, acknowledged and sworn to before me on this 13th day of December, 1984.

Christine Austin
Notary Public

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 Onondaga Co. No. 4787627
My Commission Expires March 20, 19__

NINE MILE POINT UNIT 1
COMPONENT REVIEW SUMMARY SHEET

Equipment: Valve actuators outside containment

FRC Equipment Item No.: 1, 4, 5, 6, 8, 9, 73, 74, 76, 77, 78

Manufacturer: Limitorque

Model: SMBO, 000, 3/SB1, 2

Safety Function: Actuate valves for isolation and emergency core cooling system operation

Qualification Deficiency: Documentation deficiencies exist.

Justification for Continued Operation:

The motor operated valves listed below are either containment isolation valves or are safety system valves with accident mitigating functions:

PLANT ID NO.	MODEL NO.	SYSTEM
BV05-05	SMB000	Emergency condenser vent to torus
BV05-07	SMB000	Emergency condenser vent to torus
BV93-25	SMBO	Containment spray raw water line
BV93-26	SMBO	Containment spray raw water line
BV93-27	SMBO	Containment spray raw water line
BV93-28	SMBO	Containment spray raw water line
IV201-31	SMB000	N_2 fill and vent
IV33-04	SB1	Reactor clean-up
IV39-07	SB2	Emergency cooling steam line
IV39-08	SB2	Emergency cooling steam line
IV39-09	SB2	Emergency cooling steam line
IV39-10	SB2	Emergency cooling steam line
IV110-128	SMB000	Reactor coolant sample line
IV201-07	SMB000	Torus vent and purge
IV201-09	SMB000	Drywell vent and purge
IV201-17	SMB000	Torus vent and purge
IV34-01	SMB000	Head spray line

PLANT ID NO.	MODEL NO.	SYSTEM
IV38-02	SMB3	Shutdown cooling
IV40-05	SMB00	Core spray test line
IV40-06	SMB00	Core spray test line
IV80-01	SMB00	Containment spray suction
IV80-02	SMB00	Containment spray suction
IV80-114	SMB000	Containment spray drain Line
IV80-115	SMB000	Containment spray drain Line
IV80-21	SMB00	Containment spray suction
IV80-22	SMB00	Containment spray suction
IV81-01	SMB00	Core spray suction
IV81-02	SMB00	Core spray suction
IV81-21	SMB00	Core spray suction
IV81-22	SMB000	Core spray suction

In the case of the containment isolation valves, they will close at the start of an accident. In addition, they are also backed up by a redundant isolation valve, often a check-valve or air-operated valve located on the other side of the containment boundary (i.e. not exposed to the same environment).

In the case of the safety system valves, these valves are either normally - open/remain open valves (i.e. core spray suctions, containment spray suctions, emergency cooling steam lines, control road drive hydraulic return lines) or are normally shut/remain shut valves (i.e. core spray test line, drywell vent and purge, head spray) or function at the start of an accident (i.e. emergency condenser vent to torus, sample line).

Limitorque operators have been extensively tested throughout the industry and there is substantial evidence that they will not only perform a short-term accident function but will remain operable long-term. There is even evidence that these operators will survive an accident environment without an absolute seal. Any qualification deficiencies which remain outstanding are believed to be documentation problems.

Therefore, justification for the continued safe operation of the plant is demonstrated.

NINE MILE POINT UNIT 1

COMPONENT REVIEW SUMMARY SHEET

Equipment:	Auxiliary relays located in SS No. 1 and SS No. 2 control cabinets, reactor building, elevation 281 feet.
FRC Equipment Item No.:	Not Applicable
Manufacturer:	ASEA
Model:	RXMA1
Safety Function:	Isolation for line breaks - They provide the 1/2 signal for automatic isolation in the one-out-of-two-twice logic for each condenser loop.
Qualification Deficiency:	Documentation deficiencies exist.

Justification for Continued Operation:

The original logic was one-out-of-two energize to operate. A duplicate set of (confirmatory) logic was added to prevent spurious operation. This new logic is one-out-of-two de-energize to activate. The combination is one-out-of-two-twice logic. The relays are located in the two south corners of the reactor building at elevation 281 feet. These units automatically perform their safety function within seconds at the start of an accident. They fail safe on de-energize relay failure or on loss of power. Any qualification deficiencies which exist are believed to be documentation problems since documented evidence of qualification is currently not available. Therefore, justification for continued safe operation of the plant is demonstrated.