Docket No.: 50-410

JAN 2 9 1985

Mr. B.G. Hooten
Executive Director, Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Hooten:

SUBJECT: Nine Mile Point 2 Compliance with TMI Action Item II.K.3.28

On March 29, 1983 in the acceptance review of an OL for Nine Mile Point 2 (NMP-2) we provided an outline of information needed to review NMP-2's compliance with TMI action item II.K.3.28. To date your response has been incomplete in this area. We are providing, as an enclosure to this letter, a more detailed list of the information necessary to complete this review. This list, which was telecopied to you on January 24, 1985, should assist you in preparing a complete and acceptable response to II.K.3.28. Please supply your updated response to II.K.3.28, with the detail requested in the enclosure, by March 25, 1985.

If you have any questions concerning the enclosure please contact the Licensing Project Manager, Mary F. Haughey (301-492-7897).

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

Enclosure: As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Nine Mile Point 2

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REQUEST FOR ADDITIONAL INFORMATION
NINE MILE POINT, UNIT 2

MULTI-PLANT ACTION F-55 OR TMI II.K.3.28
VERIFY QUALIFICATION OF ACCUMULATOR ON ADS VALVES

1) Based on the requirements of NUREG-0737 Item II.K.3.28, it is necessary to demonstrate that the ADS valves, accumulators, and associated equipment and instrumentation meet the requirements specified in the plant FSAR and are capable of performing their functions during and following exposure to hostile environments, taking no credit for non-safety-related equipment or instrumentation. Additionally, air (or nitrogen) leakage through the valves must be accounted for to assure that enough inventory of compressed gas is available to cycle the ADS valves. If this cannot be demonstrated, it must be shown that the accumulator design is still acceptable. Since this system is a part of the emergency core cooling system, it must still perform its function for the long-term period of 100 days following an accident.

   You are requested to address in detail (a) how you meet this long-term capability requirement of 100 days following an accident or (b) the justification as to why a shorter time frame is sufficient long-term capability for your plant, or (c) provide a commitment and schedule for upgrading to the 100 day long-term capability requirement.

2) Define the number of times the ADS pneumatically controlled valve is capable of cycling using only the accumulator inventory at atmospheric pressure and at a specified percent (i.e., 70%) of drywell pressure, and the length of time these accumulators are capable of performing their function following an accident.

3) Describe the ADS accumulator system design and operation (e.g., trains, air supply, capacity, alarms and instrumentation and their location, etc.)

4) Define the basis for the allowable leakage criteria for the ADS accumulator system (e.g., boundary conditions, environmental and seismic parameters, operator interface, margin, etc.).

5) What margin is in the allowable leakage criteria to account for possible increase in leakage in the ADS accumulator system resulting from effects of a harsh environment and/or a-seismic event?

6) A statement that test and/or analysis performed verified that a harsh environment and/or seismic event would not increase the leakage rate in the ADS accumulator system.

7) A statement that verifies that no credit was taken for non-safety-related equipment and instrumentation when establishing the allowable leakage criteria for the ADS accumulator system.

REQUEST FOR ADDITIONAL INFORMATION (CONT'D.)

8) Provide a concise description of the tests performed on the ADS accumulator system, and backup, and their frequency.

9) Provide a concise description of the surveillance performed, and how frequent, on alarms and instrumentation associated with the ADS accumulator system and backup system.

10) Provide a statement that confirms that the ADS accumulator system, backup system, and associated equipment and control circuitry, are seismically qualified.

11) Provide a statement that confirms that the ADS accumulator system, backup system, and associated equipment and control circuitry are environmentally qualified for conditions associated with normal operation, maintenance, testing, and postulated accidents.

12) Provide a statement verifying that the ADS valves, accumulators, backup system, associated equipment and instrumentation are capable of performing their function during and following an accident situation while taking no credit for non-safety-related equipment and instrumentation.

13) Excerpts from the plants technical specification verifying that they specify the following:

- ADS leak test frequency
- Allowable leakage rate
- Actions to be taken, in a specified time frame, should the leakage rate be exceeded.

14) Provide a concise descrition of the design and operation of the backup system and confirm that it will meet the overall requirement of the ADS system following an accident.