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SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards charge notice for FSAR Table 3.2.1 & addl. clarification re refueling platform assembly installation requirements.

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

February 25, 1985
(NMP2L 0345)

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Schwencer:

Re: Nine Mile Point Unit 2
Docket No. 50-410

Enclosed please find a change notice for Table 3.2-1 of the Nine Mile Point Unit 2 FSAR. As discussed with the Project Manager, we are providing additional clarification and justification for this change to the FSAR. The justification for the change is provided in Attachment 2. We will be glad to meet and discuss this matter with your staff at your convenience.

Very truly yours,

C. V. Mangan
Vice President
Nuclear Engineering & Licensing

NLR:ja
Attachment
xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

B001
1/1

Attachment 1

TABLE 3.2-1 (Cont)

	Scope of Supply	Location	Electrical Classification	Seismic Category	Quality Group Classification	Quality Assurance Requirement (31,32,33,34)	Tornado Protection	Notes
Refueling Equipment								
Refueling equipment platform assembly	GE	RB	NA	I	NA	I	P	(37)
Refueling bellows	P	RB	NA	NA	NA	NA	P	
Spent fuel pool liner	P	RB	NA	I	NA	I	P	
Storage Equipment								
Fuel storage racks	GE,P	RB	NA	I	NA	I	P	
Fuel storage container	GE	RB	NA	NA	NA	I	P	(9)
Radwaste Management Systems								
Liquid Radwaste System								
Tanks and vessels	P	RB,W	NA	NA	D	NA	P,NR	(10,11)
Heat exchangers	P	W	NA	NA	D	NA	NR	(11)
Piping	P	RB,W	NA	NA	D	NA	P,NR	(11)
Valves	P	RB,W	Non-1E	NA	D	NA	P,NR	(11)
Pumps	P	RB,W	Non-1E	NA	D	NA	P,NR	(11)
Solid Radwaste System								
Tanks and vessels	P	W	NA	NA	D	NA	NR	(11,12)
Heat exchangers	P	W	NA	NA	D	NA	NR	(11,12)
Piping	P	W	NA	NA	D	NA	NR	(11,12)
Valves	P	W	Non-1E	NA	D	NA	NR	(11,12)
Pumps	P	W	Non-1E	NA	D	NA	NR	(11,12)
Off-gas System								
Tanks and vessels	P	T	NA	NA	D	NA	NR	(11)
Heat exchangers	P	T	NA	NA	D	NA	NR	(11)
Piping	P	T	NA	NA	D	NA	NR	(11)
Valves	P	T	Non-1E	NA	D	NA	NR	(11)
Pumps	P	T	Non-1E	NA	D	NA	NR	(11)
Mechanical modules	P	T	NA	NA	D	NA	NR	(11)

ADD:

37. The refueling platform is not necessary to

a) Assure the integrity of the reactor coolant boundary.

b) Assure the capability to shutdown the reactor and maintain it in a safe shutdown condition.

c) Assure the capability to prevent or mitigate the consequences of accidents that could result in potential off site exposure.

The installation of the refueling platform has therefore been done in accordance with QA Category II requirements as defined in Stone & Webster Quality Assurance Program for Nine Mile Point Unit 2.

Attachment 2

We have determined that the refueling platform assembly installation requirements need not be Quality Assurance Category 1. The appropriate category for the installation of the refueling platform assembly is Quality Assurance Category 2 seismic. This category is described in the Nine Mile Point Unit 2 Quality Assurance Program for Construction submitted June 10, 1983. The refueling platform assembly was designed and fabricated in accordance with Quality Assurance Category 1 requirements as required in Specification P800A. However, it is our opinion that this was performed over and above the actual design requirements necessary for the refueling bridge. Therefore, we are modifying the installation criteria for the refueling equipment platform to Quality Assurance Category 2. Table 1 provides a comparison of Category 1 and Category 2 installation requirements for the refueling platform assembly. As can be seen from Table 1, there are minimal differences in the actual measures of quality between Quality Assurance Category 1 program and the Quality Assurance Category 2 program.

This equipment has been designed and fabricated in accordance with Quality Assurance Category 1 requirements. The bridge will retain the installation requirements for seismic category 1 requirements (that is, it will not fail under seismic conditions), the refueling bridge installation requirements for Category 2 are an acceptable approach.

Attachment 2 (cont'd.)

Table 1

Refueling Platform Assembly, Comparison of Quality Assurance Category 1 and Category 2 Installation Requirements

Requirement	Q.A. Cat. 1	Q.A. Cat. 2 (Seismic Cat. 1)
Assembly and installation instructions	Supplied by G.E.	Supplied by G.E.
Welding code	AWS	AWS
Weld procedures	AWS.	AWS
Weld data sheet	Required	Required only if weld requires nondestructive examination other than visual inspection
Fit up	Requirement verified by Field Quality Control 100%	Requirement verified by 100% FQC inspection
Visual inspection	Performed by Field Quality Control	Performed by Field Quality Control
Nondestructive examination (other than visual)	Performed by Field Quality Control	Performed by Field Quality Control
Weld rod requisition	Required and maintained	Required but not maintained
Weld rod material	Required and maintained	Required, not maintained
Weld rod material traceability	Complete traceability available and is filed as part of permanent plant file records	Complete traceability available until the completion of the weld and then not maintained