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 FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
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 MANGAN,C,V, Niagara Mohawk Power Corp.
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 SCHWENCER,A, Licensing Branch 2

SUBJECT: Clarifies 850225 ltr re classification of refueling
 platform.Comparison of QA Category I requirements & QA
 activities actually employed on refueling platform provided
 in encl Table 1.

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April 10, 1985
(NMP2L 0383)

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

On February 25, 1985, Niagara Mohawk submitted a letter regarding the classification of the refueling platform. As a result of subsequent conversations with the resident inspector, it appears that the letter could be confusing as to what we have done. This letter, therefore, supersedes our previous communication and provides a clarification of the status and justification for the quality classification of the refueling platform.

The equipment for the refueling platform was originally designed and fabricated by the vendor in accordance with QA Category I requirements. We subsequently determined that the refueling platform is not safety related since it is not required 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 offsite exposure.

Therefore, the refueling platform has been installed in accordance with QA Category II requirements; however, the structural design meets seismic Category I requirements. FSAR Table 3.2-1 was revised in Amendment 18 to indicate the refueling platform is QA Category II.

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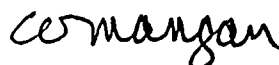
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For your information, we have attached Table 1 which gives a comparison of QA Category I requirements to the QA activities actually employed on the refueling platform.

This letter should address your concerns on the classification of the refueling platform. However, 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

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

1. The first part of the report is a general
description of the project and its objectives.

2. The second part of the report is a detailed
description of the methodology used in the study.

3. The third part of the report is a summary of the results.

4. The fourth part of the report is a discussion of the results and their implications.

5. The fifth part of the report is a conclusion and a list of references.

Table 1

Comparison of Quality Assurance
Category I versus Category II Installation Requirements
for Refueling Platform

<u>Requirement</u>	<u>Q.A. Cat. I</u>	<u>Refueling Platform Requirements</u>
Assembly and installation instructions	Supplied by G.E.	Supplied by G.E.
Welding Code	AWS	AWS
Weld procedures	AWS	AWS
Fit up for welding	Requirement verified by Field Quality Control 50%	Requirement verified by Contractor 100%
Visual inspection for welding	Performed by Field Quality Control 100%	Performed by Field Quality Control 100%
Weld rod requisition	Required and maintained	Required and maintained
Weld rod material traceability	Complete traceability required and is filed as part of permanent plant file records	Complete traceability available and is filed as part of permanent plant file records

1. The first part of the report is a summary of the work done during the year.

2. The second part of the report is a detailed account of the work done during the year.

3. The third part of the report is a summary of the work done during the year.

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