

May 3, 1985
(NMP2L 0400)

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

Safety Evaluation Report Section 6.2 requested Niagara Mohawk to vent (but not drain) the control rod drive system during a Type A test in order to provide leakage monitoring of the control rod drive insert and withdrawal lines. Since these lines are vital to the functioning of the Unit 2 scram system, it is our position that these lines should remain filled in order to preclude the possibly deleterious intrusion of air or other contaminants into the control rod drive system. Venting the control rod drive system hydraulic lines may result in draining or partially draining these lines depending on the location selected for venting. For these reasons, we request a meeting with your staff to further discuss the safety implications of venting the control rod drives during Type A testing.

Very truly yours,

C. V. Mangan

C. V. Mangan
Vice President
Nuclear Engineering & Licensing

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

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