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 WZOLINSKI, J. A. BWR Project Directorate 1

SUBJECT: Withdraws 8660517 & 860114 applications for amend to License
 DPR-63, changing Tech Specs re containment vent & purge
 valves. Items withdrawn involve replacement of valve seals
 every 10 yrs & action taken if valves in series inoperable.

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1. The first part of the document is a list of names and addresses of the members of the committee. The names are listed in alphabetical order, and the addresses are given in full. The list is as follows:

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3. The third part of the document is a list of the names and addresses of the members of the committee who have been elected to the office of the Treasurer. The names are listed in alphabetical order, and the addresses are given in full. The list is as follows:

April 30, 1986

NMP1L 0053

Director of Nuclear Reactor Regulation
Attention: Mr. John A. Zwolinski, Project Director
BWR Project Directorate Number 1
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
.....DPR-63.....

Dear Mr. Zwolinski:

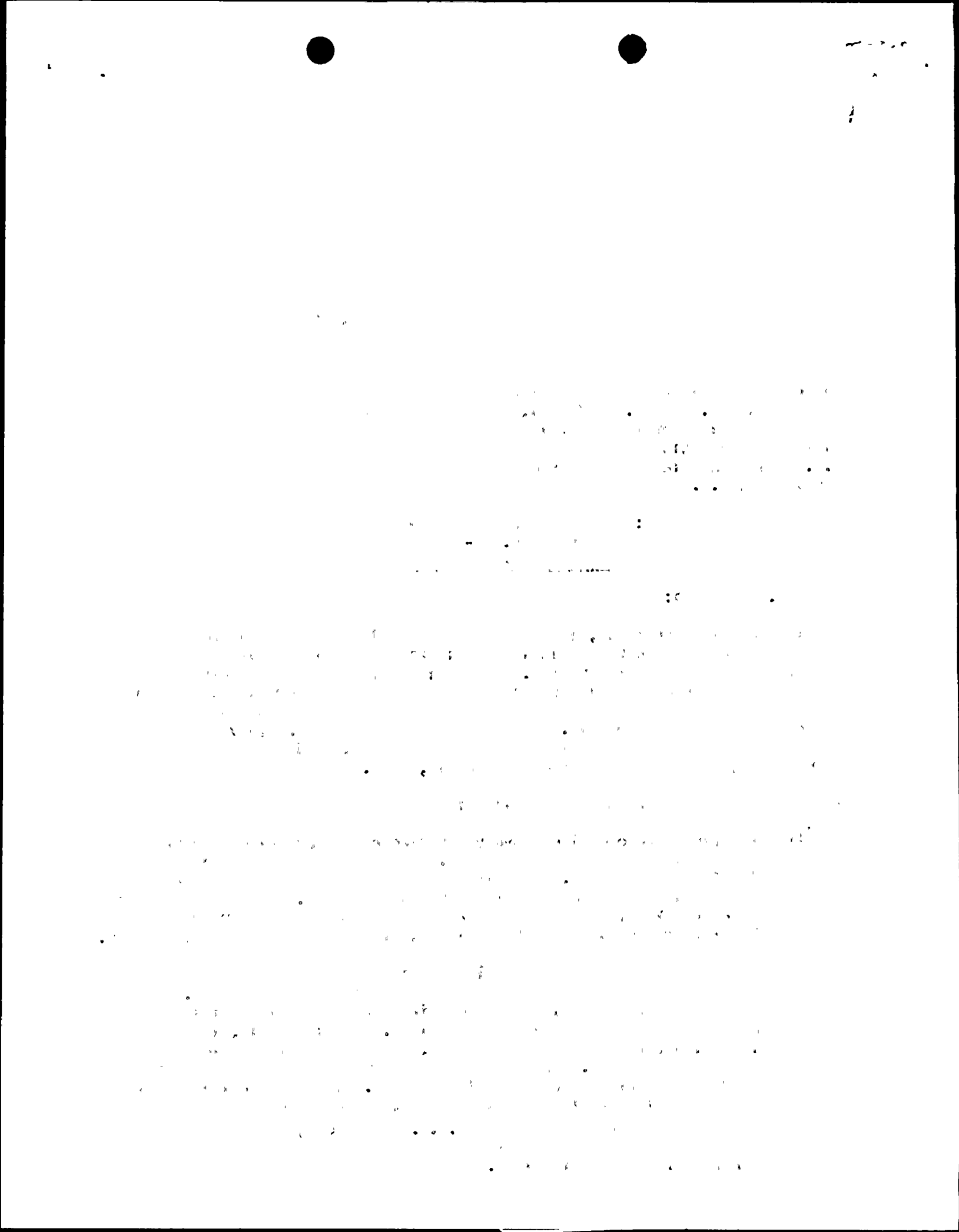
Our letters of February 17, 1982 and January 14, 1986 provided information regarding changes to our Technical Specifications associated with our containment vent and purge valves. Discussions with members of your staff revealed that certain testing requirements and limiting operational conditions would be better managed outside the scope of technical specifications within other administrative controls. Therefore, pursuant to 10CFR2.107, Niagara Mohawk withdraws the request for amendment to Operating License DPR-63 dated February 17, 1982 as supplemented January 14, 1986.

The items being withdrawn are as follows:

- 1) The first proposed item involves replacing the containment vent and purge valve seals every ten years. Given a once an operating cycle local leak rate test, the valve manufacturer has recommended a ten year replacement program for the resilient seals. This program will be appropriately addressed in written procedures in accordance with "Administrative Controls," Section 6, of our Technical Specifications.
- 2) The second proposed item involves action to be taken if one or both of the containment isolation valves in series are inoperable. The proposed actions are inconsistent with our technical specification requirements for other isolation valves. Traditionally, if an isolation valve is found inoperable, immediate action would be taken to fix the problem. If significant time would be required to fix the valve, appropriate actions would be taken. These operational limits addressing inoperable isolation valves, are appropriately addressed in our Technical Specification 3.3.4. Therefore, there is no need for these isolation valves to be addressed in a separate section of our Technical Specifications.

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Additionally, members of your staff requested that we address two other related items. First, the amount of time that these valves are open during normal reactor operations has been addressed in past correspondence including our August 8, 1985 letter. They are opened for only a few activities including the following:

- a) When we inert and deinert at the beginning and end of an outage that requires drywell entry, and
- b) To control containment pressure, during significant atmospheric pressure changes.

Furthermore, our August 8, 1985 letter indicated that we do not plan to use these valves during normal operations for more than 90 hours per year. After discussion with members of your staff, we intend to provide administrative controls to limit use of these valves to 90 hours per year excluding their use for inerting and deinerting during startup and shutdown when drywell entry is required. The plant is allowed to be in the RUN mode while inerting and deinerting in accordance with our Technical Specifications, Section 3.3.1(b).

Second, as indicated in our December 1, 1983 and December 6, 1984 letters, we are installing high radiation trip signals to automatically close these valves. These valves also close on normal containment isolation signals (i.e., high drywell pressure and low-low water level). The Safety Evaluation Report attached to your letter dated August 23, 1983 indicated that these high radiation signals need not be safety related. Considering the additional closing signals and the safety classification of the high radiation isolation signals, we intend to test these signals outside the purview of our Technical Specifications using other administrative controls. Nevertheless, we are preparing a technical specification amendment application to reference the high radiation closure signal for consistency and clarity.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan

C. V. Mangan
Senior Vice President

DAC:bd

