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 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
 AUTH. NAME AUTHOR AFFILIATION
 MANGAN, C. V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Application for amend to CPPR-112 & rev to SER Section
 3.5.1.3.8, Tech Spec 4.3.8.2 re surveillance requirements for
 demonstrating operability of turbine overspeed protection
 sys. Proposed Tech Spec encl.

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**NV NIAGARA
NM MOHAWK**

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

June 17, 1986
(NMP2L 0752)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

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

Niagara Mohawk Power Corporation requests changes to the Nine Mile Point Unit 2 draft Technical Specification Surveillance Requirements 4.3.8.2 and Safety Evaluation Report Section 3.5.1.3.8. The proposed Technical Specification changes, as well as justification for these changes, are attached.

Very truly yours,

C. V. Mangan
C. V. Mangan
Senior Vice President

KWK:ja
1688G

Attachment

xc: R. A. Gramm, NRC Resident Inspector
C. Schulten, NRR
Project File (2)

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 Department of the Interior, Bureau of Land Management, on
 the subject of the above-captioned tract of land.
 The tract of land described in the above-captioned
 instrument is situated in the County of _____,
 State of _____, and is more particularly
 described as follows:

INSTRUMENTATION

3/4.3.8 TURBINE OVERSPEED PROTECTION SYSTEM

LIMITING CONDITIONS FOR OPERATION

3.3.8 At least one turbine overspeed protection system shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

ACTION:

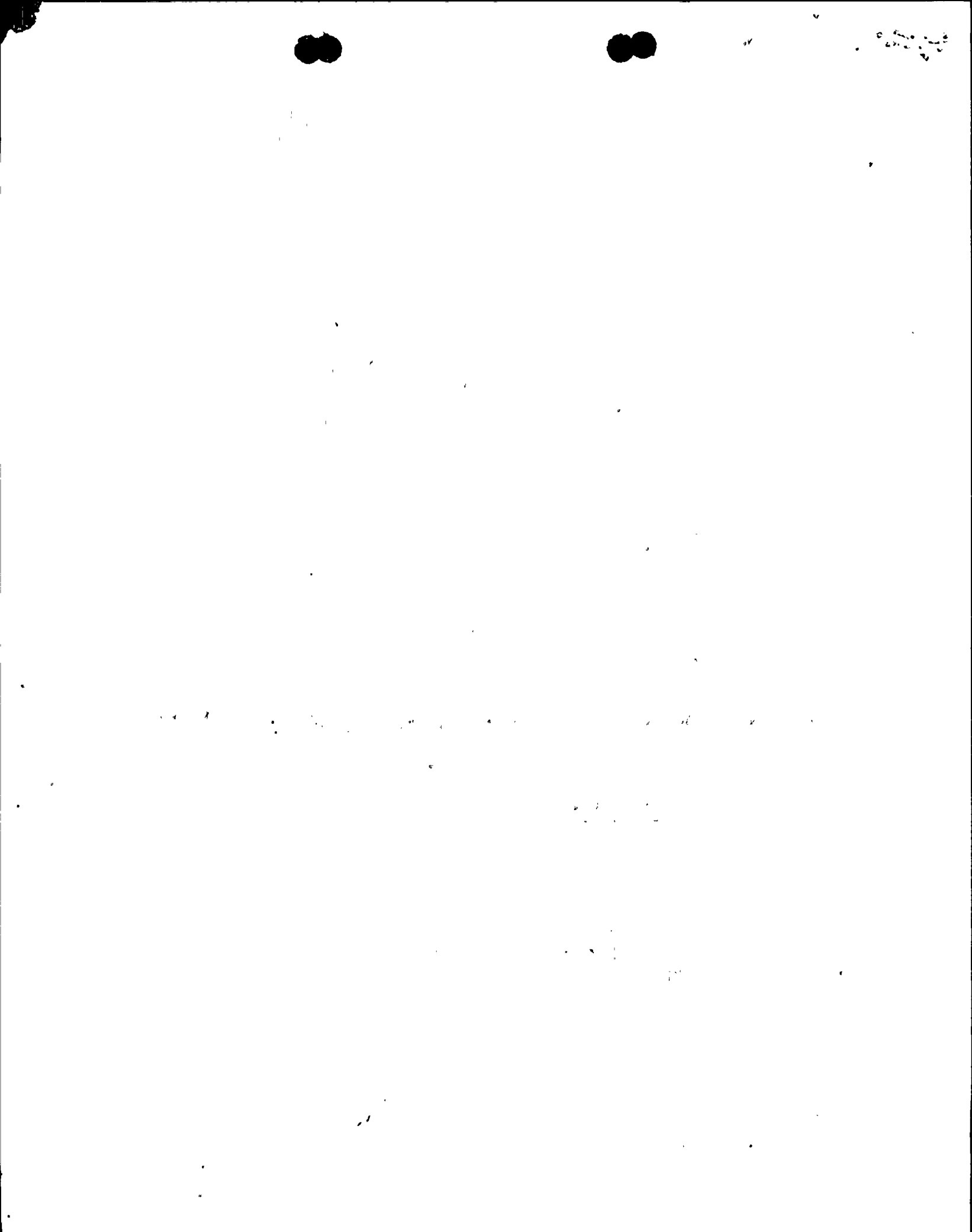
- a.. With one turbine control valve, one turbine throttle stop valve or one turbine reheat stop valve per high-pressure turbine steam lead inoperable and/or with one turbine interceptor valve per low-pressure turbine steam lead inoperable, restore the inoperable valve(s) to OPERABLE status within 72 hours or close at least one valve in the affected steam lead(s) or isolate the turbine from the steam supply within the next 6 hours.
- b. With the above required turbine overspeed protection system otherwise inoperable, within 6 hours isolate the turbine from the steam supply.

SURVEILLANCE REQUIREMENTS

4.3.8.1 The provisions of Specification 4.0.4 are not applicable.

4.3.8.2 The above required turbine overspeed protection system shall be demonstrated OPERABLE:

- a. At least once per 7 days by cycling each of the following valves through at least one complete cycle from the running position, *verifying proper operation by observation of remote valve position indication.*
 - 1. Four high-pressure turbine stop valves,
 - 2. Four high-pressure turbine control valves, and
 - 3. Six low-pressure turbine combined stop and intercept valves.
- b. At least once per ^{18 months}~~31 days~~ by direct observation of the movement of each of the above valves through at least one complete cycle from the running position.
- c. At least once per 18 months by performance of a CHANNEL CALIBRATION of the turbine overspeed protection system.
- d. At least once per 40 months by disassembling at least one of each of the above valves and performing a visual and surface inspection of all valve seats, disks, and stems and verifying no unacceptable flaws or excessive corrosion. If unacceptable flaws or excessive corrosion are found, all other valves of that type shall be inspected.



JUSTIFICATION FOR CHANGES TO
TECHNICAL SPECIFICATION SURVEILLANCE 4.3.8.2

Section 3.5.1.3.8 of the Safety Evaluation Report states the following:

"Main steam stop and control, reheat stop and intercept valves, and turbine overspeed trip mechanism will be exercised at least once a week closing each valve or performing the overspeed trip test and observing the valve position indicator, that the valves move smoothly to a fully closed position. This observation will be made in accordance with Technical Specification requirements by actually watching the valve motion."

The Safety Evaluation Report requires a direct local visual inspection be done every seven days to verify proper operation of specified turbine valves. This is in addition to Technical Specification surveillance 4.3.8.2.a which requires remote monitoring (using control room analog position indication driven by linear variable differential transformers) of the same valves every seven days for proper operation.

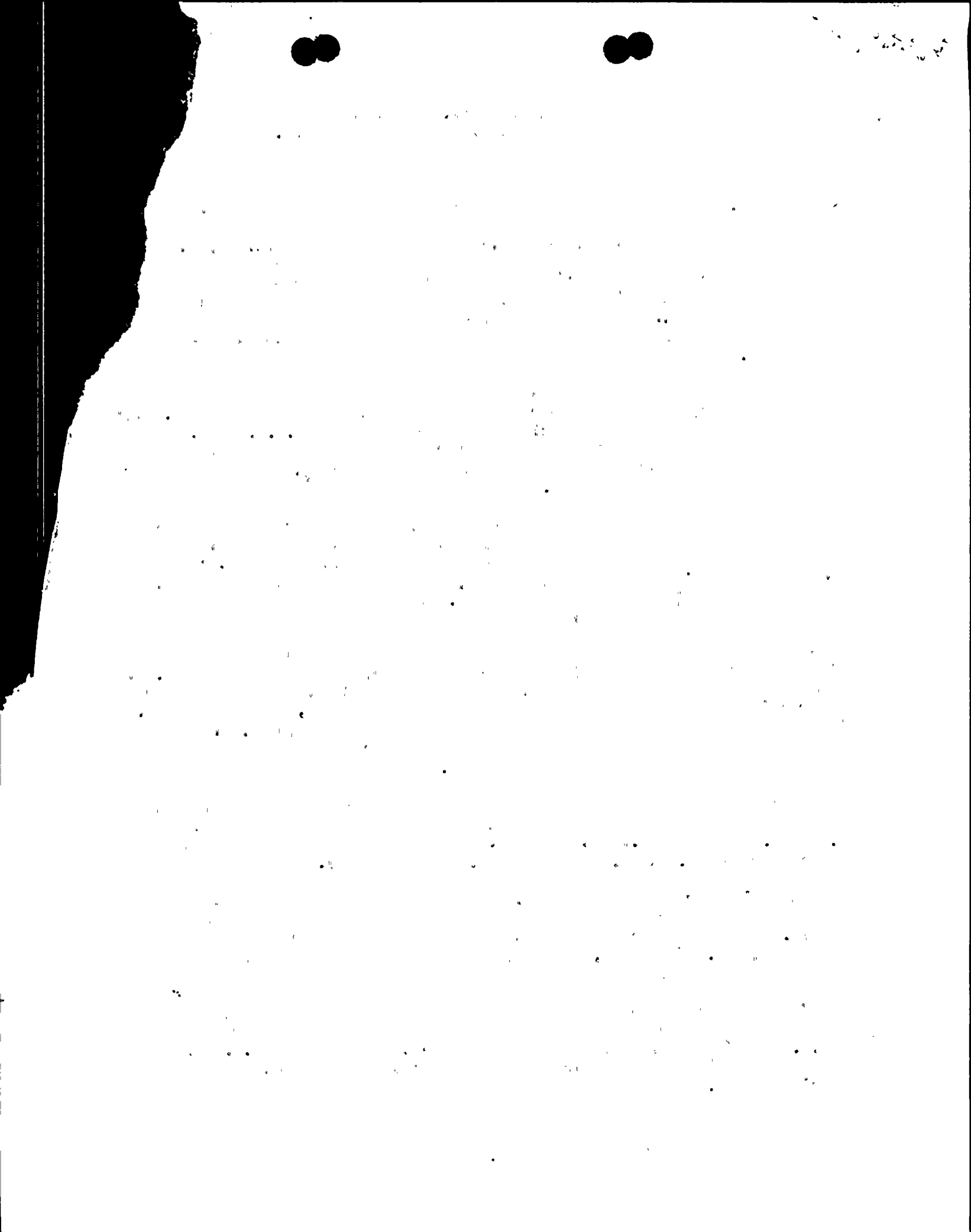
The local monitoring of valve movement would involve the presence of at least one operator in the area of the Turbine Stop Valves and Turbine Control Valves (TCVs) for approximately 10 to 15 minutes, and at least one operator in the area of the Combined Intermediate Valves, adjacent the low pressure turbine hoods, for approximately 10 to 15 minutes. These time estimates are based on simulation of the above testing at the Unit 2 simulator.

An inspection of these areas revealed that the operator would have to be within a few feet of the applicable valve to properly monitor the stroke. The Combined Intermediate Valves might require two operators. When a Combined Intermediate Valve is tested, one pushbutton is depressed, causing both valves (one, then the other) to travel from fully open to fully closed. These valves are operated from above and below a common valve body, making it difficult to observe both motions from any one position.

The design values for the contact dose rates at the Turbine Stop Valve/Turbine Control Valve chest and the Combined Intermediate Valves are estimated at 3.6 R/hr. and 1.3 R/hr., respectively. These numbers are two times the expected rates (1.8 R/hr. and 650 mR/hr., respectively).

An inspection for 15 minutes in each area would result in an appreciable dose (based on expected rates, approximately 450 mRem and 160 mRem, or 610 mRem total). This is probably conservative (a maximum possible) as the dose rates are on contact. There are, however, other radioactive sources (for direct shine) in each area.

Based upon As Low As Reasonably Achievable (ALARA) considerations, NMPC is requesting the Technical Specification changes (attached) for surveillance 4.3.8.2 on 3/4 3-108. A change is also requested for section 3.5.1.3.8 of the Safety Evaluation Report in order to make it consistent with Technical Specifications.



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Niagara Mohawk Power Corporation)
(Nine Mile Point Unit 2))

Docket No. 50-410

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C. V. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 17th day of June, 1986.

Janis M. Macro
Notary Public in and for
Onondaga County, New York

My Commission expires:
JANIS M. MACRO

Notary Public in the State of New York
Qualified in Onondaga County No. 4784555
My Commission expires March 30, 1987



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