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

SUBJECT: Requests schedular relief from 10CFR50.57(a) re completing electrical hydraulic control sys prior to fuel loading. Sys not required until after opening MSIVs.

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July 2, 1986
(NMP2L 0763)

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's letter of April 7, 1986 identified the Electrical Hydraulic Control System as one of a small number of systems which may not be complete prior to fuel loading. As discussed in detail in Attachment I to this letter, Niagara Mohawk believes that the incomplete status of this system, together with other systems which would not be complete, would not prevent a finding, pursuant to 10 CFR 50.57(a), that construction is substantially complete. Thus, schedular relief under 10 CFR 50.57(b) through the designation of temporary noncompliance for the remaining uncompleted construction activities is warranted and Niagara Mohawk requests such relief.

Nevertheless, the requirements for a schedular exemption pursuant to 10 CFR 50.12(a) are addressed in this letter should the NRC determine that such action is required in this instance. Thus, pursuant to the requirements of Title 10, Code of Federal Regulations (10 CFR), Niagara Mohawk requests in the alternative that, in accordance with the provisions of 10 CFR Section 50.12(a), an exemption be granted to permit the completion of construction, preoperational testing and post-test review for the designated system subsequent to fuel loading as specifically set forth in Attachment I.

Further, the Nuclear Regulatory Commission staff has requested that Niagara Mohawk designate those portions of Title 10, Code of Federal Regulation, and, in particular, General Design Criteria, 10 CFR Part 50, Appendix A, associated with the system for which an exemption is sought. The requested designation is this:

<u>System</u>	<u>Regulations and General Design Criteria</u>
Electrical Hydraulic Control System	GDC 4, 29

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11-11-61

Dear Mr. [Name obscured]

[The following text is extremely faint and largely illegible due to low contrast and scan quality. It appears to be a letter or memorandum.]

[Name obscured]

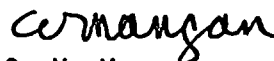
This exemption has been reviewed and found to be authorized by law and consistent with the common defense and security. The attachment to this letter demonstrates that the requested exemption presents no undue risk to the health and safety of the public and that special circumstances are present that justify granting the exemption.

With regard to the "common defense and security" standard, the grant of the requested exemption is consistent with the common defense and security of the United States. The Commission's Statement of Considerations in support of the exemption rule note with approval the explanation of this standard as set forth in Long Island Lighting Company (Shoreham Nuclear Power Station, Unit 1), LBP-84-45, 20 NRC 1343, 1400 (October 29, 1984). There, the term "common defense and security" refers principally to the safeguarding of special nuclear material, the absence of foreign control over the applicant, the protection of Restricted Data, and the availability of special nuclear material for defense needs. The granting of the requested exemption will not affect any of these matters and thus such grants are consistent with the common defense and security.

The proposed exemption has been analyzed and determined not to cause additional construction or operational activities which may significantly affect the environment. It does not result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Impact Statement-Operating License Stage, a significant change in effluents or power levels or a matter not previously reviewed by the Nuclear Regulatory Commission which may have a significant adverse environmental impact.

Niagara Mohawk is ready to meet with the cognizant Nuclear Regulatory Commission personnel to review this matter should you require additional information.

Very truly yours,



C. V. Mangan
Senior Vice President

NLR:ja
1772G

Attachment

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



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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 2nd day of July, 1986.

Christine Austin
Notary Public in and for
Onondaga County, New York

My Commission expires:

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4787687
My Commission Expires March 30, 1987

CHRISTINE ANSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 470787
My Commission Expires March 30, 19__

Electrical Hydraulic Control System

It is requested that a scheduler exemption be granted for the performance of the preoperational test of the Electrical Hydraulic Control System for the turbine generating system.

Electrical Hydraulic Control System

As described in FSAR Sections 1.2.5.3, 7.7.1.5 and 10.2.2, the Electrical Hydraulic Control System is used to maintain and control normal power generation of the turbine generating system and to provide protection for the Nine Mile Point Unit 2 turbine during transient conditions. The pressure regulator maintains control of the turbine, including control of the turbine bypass valves. The turbine generator speed-load controls can initiate rapid closure of the turbine control valves (rapid opening of turbine bypass valves) to prevent turbine overspeed on loss of generator electric load.

The system inherent reliability plus operability requirements ensure that the control system will be available to provide the required overspeed protection to the turbine generator and scram inputs to the Reactor Protection System when required.

The Electrical Hydraulic Control System can only perform its protective functions during Startup or Power Operation after opening the main steam isolation valves. Prior to opening the main steam isolation valves, the turbine cannot be brought to an overspeed condition, nor is reactor power sufficient to require inputs to the Reactor Protection System from any components of the Electrical Hydraulic Control System.

Technical Specifications require that the Electrical Hydraulic Control System, which controls the bypass valves, turbine stop valves and control valves, are tested in accordance with Section 3/4.3.8. This equipment is required for operational conditions 1 and 2. The turbine overspeed protection specification is provided to ensure that turbine overspeed protection system instrumentation and turbine speed control valves are operable and will protect the turbine from excessive overspeed. Therefore, provided that the system is tested prior to opening of the main steam isolation valves, the unit will be in full conformance with the Technical Specifications.

Conclusion

Deferral of the completion of the Electrical Hydraulic Control System preoperational Testing until after opening the mainsteam isolation valves does not present an undue risk to the public health and safety, since this system does not provide any protection function until after the main steam isolation valves have been opened.



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SPECIAL CIRCUMSTANCES ARE PRESENT

Special circumstances are present which warrant issuance of the requested exemption. These special circumstances are discussed in accordance with the classification contained in 10 CFR 50.12(a)(2):

- (ii) Application of the regulation [10 CFR 50.12] in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.

Inasmuch as the Electrical Hydraulic Control System does not play any role in operation of the facility until after opening of the main steam isolation valves, the underlying purpose of the rule may be achieved without it. Thus, special circumstances exist.

- (v) The exemption would provide only temporary relief from the applicable regulation and the licensee or applicant has made good faith efforts to comply with the regulation.

As discussed above, only temporary relief is being sought because the system is not needed until after opening of the main steam isolation valves. Good faith efforts are underway to expedite the testing effort on these systems. Thus, special circumstances are present which warrant the granting of the requested exemption.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent and reliable data collection processes to support effective decision-making.

3. The third part of the document focuses on the role of technology in data management and analysis. It discusses how modern software solutions can streamline data collection, storage, and reporting, thereby improving efficiency and accuracy.

4. The fourth part of the document addresses the challenges associated with data security and privacy. It stresses the importance of implementing robust security measures to protect sensitive information from unauthorized access and breaches.

5. The final part of the document provides a summary of the key findings and recommendations. It concludes that a comprehensive data management strategy is crucial for the organization's long-term success and growth.