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 AUTH. NAME AUTHOR AFFILIATION
 MANGAN, C. V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Responds to NRC review comment on util 860716 ltr re SER
 SSERs 1 & 2. Automatic load following capability disconnected
 by simple wiring change, preventing master controller from
 switching to auto mode, per util 860711 ltr.

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August 29, 1986
(NMP2L 0858)

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

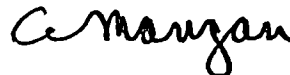
Dear Ms. Adensam:

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

This letter responds to Nuclear Regulatory Commission staff review comments on the Niagara Mohawk Power Corporation letter dated July 16, 1986. That letter provided comments on the Nine Mile Point Unit 2 Safety Evaluation Report and Supplements 1 and 2.

Enclosure 1 responds to the staff comments.

Very truly yours,



C. V. Mangan
Senior Vice President

NLR/pns
2013G

Enclosures

xc: W. A. Cook, 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 29th day of August, 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

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Enclosure 1

3.5.1.3 Turbine Missiles

Comment: The staff concludes that the load control in the existing SER is valid unless proven otherwise.

Response: The Automatic Load Following Capability has been disconnected. Nine Mile Point Unit 2 does not intend to use this design feature. The change has been made by a simple wiring change which prevents the master controller from switching to the auto mode. Any decision to alter the circuit requires a plant modification and safety evaluation prior to implementation. This response has been provided by our letter dated July 11, 1986 (NMP2L 0781).

12.5.3 Personal Dosimeter

Comment: FSAR, Section 15.5.3.3.7, first sentence states that, "Plant employees, contractors, and visitors are required to wear film badges a TLD, and a personal dosimeter when in the restricted area, in accordance with 10CFR20." Therefore, based on the FSAR, all three are required; a film badge is not a substitute for the other two personal monitors.

Response: We have enclosed a revised Final Safety Analysis Report page and suggested Safety Evaluation Report changes.

Title 10 of Code of Federal Regulation Part 20.202 requires the use of certain personnel monitoring equipment. It specifies that radiation dose must be monitored.. Section 202 indicates that "personnel monitoring equipment means devices designed to be worn or carried by an individual for the purpose of measuring the dose received (e.g. film badges, pocket chambers, pocket dosimeters, film rings, etc.)". It does not require several different monitoring equipment be used all at the same time.

However, the types of monitoring equipment required is determined by procedures which are used to control restricted areas.

Niagara Mohawk would like the flexibility to use different types of monitoring equipment as determined by procedures for each restricted area depending on the need for monitoring.



Nine Mile Point Unit 2 FSAR

test is performed to assure proper fitting of face masks. The fitting is tested by a challenge gas and takes into account special problems such as unusual facial features, head movements, and facial movements when talking. Radiation protection procedures prohibit anything that inhibit a good seal of face masks such as eyeglasses and facial hair.

12.5.3.3.5 Bioassay and Whole-Body Counting

Bioassay and/or whole-body counting of permanent station personnel is performed on a schedule determined by the work environment of each individual. Personnel who have had extensive use of respiratory equipment in contaminated areas or who have had potential exposure to airborne radioactivity are monitored by the Radiation Protection staff and are given whole-body counts. Follow up bioassays and/or whole-body counting are performed at threshold levels required by procedure or when deemed necessary by the Superintendent, Chemistry and Radiation Management.

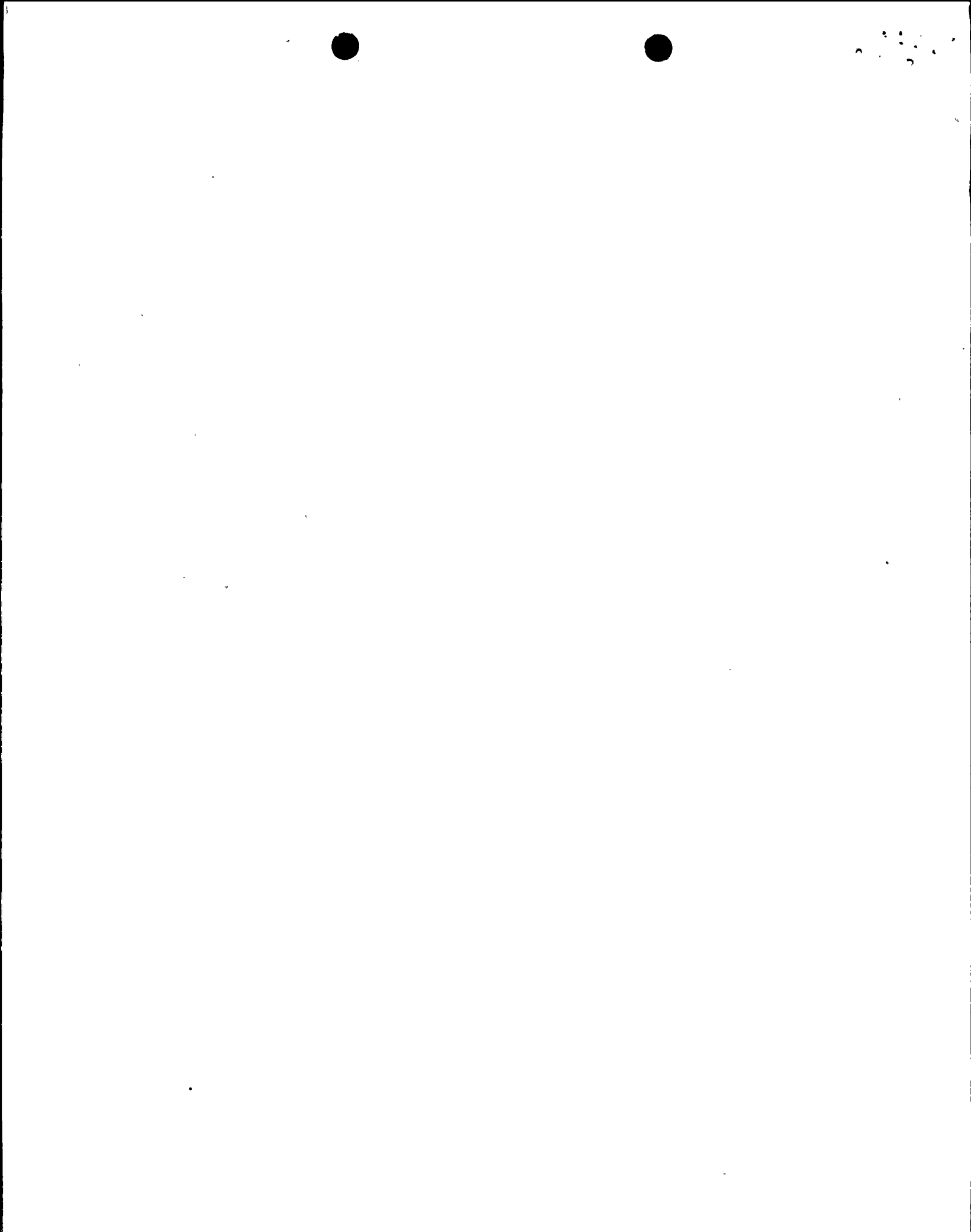
Bioassay and/or whole-body counting of a contractor or temporary employee is performed for personnel working in applicable areas prior to initial station entry, final exit from the station, and on a schedule determined by the individual's work environment. Instruction to workers and notifications and reports to individuals will be accomplished in accordance with 10CFR19.12 and 13.

12.5.3.3.6 Post-Operation Review

The site ALARA Coordinator, under the supervision of the Supervisor Radiological Support, is responsible for review of requested and completed RWPs and man-Rem reports to identify those activities that would benefit from an ALARA review. The ALARA Coordinator is responsible for reviewing specific activities and investigating a means for reducing occupational radiation exposure for that activity.

12.5.3.3.7 Personnel Dosimetry

Plant employees, contractors, and visitors are required to wear a film badge, and/or a TLD, and a personal dosimeter when in the restricted area, in accordance with 10CFR20. Only those individuals who have successfully completed the Radiation Protection Training Program (Section 12.5.3.6) are authorized to enter the restricted area unescorted. Those individuals who do not successfully complete the Radiation Protection Training Program must, at all times, be escorted within the restricted area. In any case, personnel will be



radioiodine concentrations by using portable air samplers with silver zeolite as a sample medium. If entrapped noble gases interfere with the radioiodine analysis, air sampler filters will be flushed with clean air or nitrogen. Low background counting facilities for postaccident analysis are available.

The postaccident radioiodine sampling and analysis provisions described for NMP-2 satisfactorily conform to the staff's position as outlined in NUREG-0737, and are acceptable.

12.5.3 Procedures

All station personnel entering controlled radiation areas will be assigned a film badge, and/or a thermoluminescent dosimeter (TLD) badge and a pocket dosimeter. Special neutron surveys will be provided when plant personnel enter neutron areas when required by 10 CFR 20. Whole-body counts of all plant personnel will be conducted on a scheduled basis, and other bioassays will be provided when deemed necessary by the station's health physics staff, using the guidance of RGs 8.9, "Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program," and 8.26, "Applications of Bioassay for Fission and Activation Products." All radiation exposure information will be processed and recorded in accordance with 10 CFR 20.

Maintenance, repair, surveillance, and refueling procedures and methods used by the applicant will be reviewed to ensure that all plant radiation protection procedures, practices, and criteria have been considered and to ensure that occupational radiation exposures will be ALARA. Procedures also will be developed to satisfy the requirements of RG 1.33, "Quality Assurance Program Requirements (Operation)."

On the basis of the information presented in the FSAR and the applicant's responses to the staff's questions, the staff concludes that the applicant intends to implement a radiation protection program that will maintain inplant radiation exposures within the applicable limits of 10 CFR 20 and will maintain exposures ALARA in accordance with RG 8.8.



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