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

SUBJECT: Forwards rev to 860507 request for schedular exemption for performance of preoperational testing of offgas sys, modifying wording re main steam line isolation valves, per NRC request.

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NIAGARA MOHAWK

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

August 29, 1986
(NMP2L 0861)

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

My letter of May 7, 1986 (NMP2L 0707), had attached a request that exemption be granted, in accordance with the requirements of 10CFR50.12(a), to permit the completion of construction, pre-operational testing and post test review for those portions of, among other systems, the Offgas System that were incomplete at fuel loading. (See Attachment II of NMP2L 0707.)

In the request for schedular exemption of the Offgas System, the following sentence appeared:

"Therefore, these Technical Specifications are not applicable in this case, as the system will be tested and operable prior to opening the main steam isolation valves after initial startup."

In the "Application for Schedular Exemption Related to Further Analysis of and Possible Modification to Main Steam Isolation Valves" submitted with my letter of August 28, 1986 (NMP2L 0857), a requested exemption to permit fuel loading and performance of those startup tests which can be conducted within the Technical Specifications Operational Conditions 4 and 5, the commitment was made that, "At least one isolation valve in each line will be kept closed and deactivated at all times."

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The staff has asked that we modify the request for the schedular exemption for the Offgas System to make the wording in it regarding the main steam line isolation valves consistent with that directly above. We are complying with that request, and the attachment to this letter is the revised request. A line appears in the margin to indicate the revision.

Very truly yours,

CVMangan

C. V. Mangan
Senior Vice President

RAC/pns
2025G

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-410
(Nine Mile Point Unit 2)	)	

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. 4787697
My Commission Expires March 30, 1987

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4797637
My Commission Expires March 30, 19__

ATTACHMENT II

Offgas Systems

It is requested that a schedular exemption be granted for the performance of the Preoperational test of the Offgas System (Test 42) discussed in FSAR Table 14.2-60.

Offgas System

As described in FSAR Section 11.3.2.1, the Offgas System provides a means to process main condenser air removed by the air ejectors during normal operation. This action maintains the condenser essentially free of gases during operation. The system processes all noncondensible gases entering through the turbine seals, condensate, feedwater and steam systems, and the noncondensibles that are generated in the reactor by disassociation of water.

The operability requirements for Offgas System ensure that the system will be available for use whenever gaseous effluents require treatment prior to release to the environment. Prior to entering operational condition (mode) 1, no radioactive gaseous effluents can be generated. Therefore, the Offgas System is not needed, nor is it required to be tested until prior to the initiation of power generation and radioactive effluents are available to be processed. At that time, the system will be operable in accordance with Technical Specifications.

Prior to the first plant startup, the Offgas System performs no function, as there is no offgas to process. Therefore, the above test completion schedule has no effect on plant safety.

Specifications 3.11.2.4, 3.11.2.6 and 3.11.2.7 describe the Technical Specification requirements for the Offgas System. All Technical Specifications relate to operability requirements when there is radioactivity being released. Therefore, these Technical Specifications are not applicable in this case, as at least one isolation valve in each main steam line will be kept closed and deactivated until the system is tested and operable.

Conclusion

Deferal of the completion of Offgas Systems preoperational testing until the main steam isolation valves are opened does not present an undue risk to the public health and safety since no radioactive noncondensible gas is present in the main condenser. In addition, the Unit 2 Technical Specifications are not affected by this deferal.

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 Offgas systems does not play any role in operation of the facility until radioactive gases are produced and present in the condenser 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 the main steam isolation valves are opened. Good faith attempts have been made to comply with the regulation by scheduling completion of the Offgas System preoperational testing at the first criticality that primary containment is required in order that an intensive effort could be concentrated on completing those systems which are necessary to be operable prior to fuel load. Thus special circumstances are present which warrant the granting of the requested exemption.