UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 8, 1986

Docket No. 50-410

NOTE TO: Jim McKnight, Document Control

FROM: Mary Haughey, Project Manager for
Nine Mile Point, Unit 2
BWR Project Directorate No. 3
Division of BWR Licensing

SUBJECT: DRAFT INFORMATION PROVIDED TO NIAGARA MOHAWK POWER CORPORATION ON NINE MILE POINT, UNIT 2

The enclosed information was provided to Niagara Mohawk on 9/6/86 to assist them in responding to NRC concerns on Nine Mile Point, Unit 2.

By copy of this note the enclosed information should be placed in the PDR and the LPDR.

Mary Haughey

Mary Haughey, Project Manager
BWR Project Directorate No. 3
Division of BWR Licensing

cc: PDR
LPDR

Noted: E. Adensam
E. Adensam

ENCLOSURE

EICSB RESPONSES

SSER #3 Comments

- Page 7-1

  No change required. SSER #3 is consistent with Feb. 7, 1986 letter from applicant. Also, by letter dated August 22, 1986, the applicant has submitted a proposed revision to the FSAR which incorporates the required information to reflect their commitment.

- Page 7-2

  Requested change made for editorial purposes.

- Page 7-5

  Requested change made for editorial purposes.

- Page 7-8

  Change made as necessary per FSAR page 7.6-2a for clarification; applicant's specific change request was not made since it was not pertinent to the SSER issue (i.e., requested valve number changes were relative to injection valves whereas SSER discussion referenced pertains to inboard check valves).

FSAR Changes submitted by 8/22/86 Letter (NMP2L 0851)

(1) See attached for comments on insert to 7.1-7

(2) Response to 421.36-1

a) no justification provided for deletion of seismic + environmental qual. for Source Rng Flux Level (p. 1 of 18)

b) no justification provided for deviation from R. G. 1.97 on seismic qual. of primary containment isolation VMS. (p. 6 of 18)

c) no justification for deviation from R. G. 1.97 recommendation on containment effluent radioactivity and effluent radioactivity (p. 10 of 18)

d) no justification provided for deviation from R. G. 1.97 for RHR Heat Exchanger Outlet Temp - A and B (p. 13 of 18)

Stevens

NMPC will provide to the NRC, prior to the startup following the first refueling outage, a detailed technical assessment of the methods used to establish protection system setpoints and allowable values supplied by General Electric. The assessment will be based on the generic findings of the Instrument Setpoint Methodology Program currently in process, ~~and being reviewed by the Nuclear Regulatory Commission.~~ NRC

The technical assessment will include the following:

1) The values assigned to each component of the combined channel error allowance (e.g., modeling uncertainties, analytical uncertainties, transient overshoot, response times, trip unit setting accuracy, sensor accuracy, test equipment accuracy, sensor drift, nominal and harsh environmental allowances, trip unit drift), the basis for these values, and the methods used to sum the individual errors. Where zero is assumed for an error, a justification that the error is negligible shall be provided;

2) Confirmation that the setpoints selected for the initiation of protective actions ensure that the reactor core and reactor coolant system are prevented from exceeding the licensing safety limits for the transients and accidents analyzed.

This phrase should be removed to make consistent with Staff SSER #2, Section 7.2.2.3 which does not reflect any continuing review of Setpoint Methodology Program by NRC.

FSAR Changes submitted by 8/15/86 Letter

On Attachment 2 of the applicant's August 15th letter, the applicant proposes modifying the text of page 14.2-5, paragraph 14.2.1.4, second sentence of this paragraph of the FSAR to read, "The initial startup test phase is divided into [seven] testing plateaus: open vessel (including fuel loading), heatup, [test plateaus 1,2,3,4, and warranty run]." The changed wordings are indicated by []. Consistent with the reviewed and approved accelerated power ascension test program for NMP-2, the revised sentence should read, "The initial startup test phase is divided into [eight] testing plateaus: open vessel (including fuel loading), heatup, [test plateaus 1,2,3,5,6, and warranty run]."

FSAR Changes submitted by 8/19/85 Letter (NMP2L 0825)

Unacceptable changes:

Table 6.2-32 — no basis provided; some values deleted.

Table 6.2-59D — zinc primer number is not accurate

FSAR Changes submitted by 8/22/86 Letter (NMP2L 0851)

- pg. 9A3-42. Changes need clarification, references for which were unavailable, and addressing of watertight and tornado protected doors in the event of a fire.
- pg. 9A.3-44. Applicant needs to show how water, from manual fire fighting activities, will be controlled and removed.
- Table 9B.8-2 pg. 1. Needs clarification of fire zones and areas.
- Table 14.2-63 pg 1&2, pgs 9.5-5&6, and pg 9A.3-53. Needs clarification because of inconsistencies in carbon dioxide systems that comply with NEPA Standard 12.

The above changes are open items.

~~In addition~~
~~pg. 9.5-5 + 6~~

The Niagara Mohawk letter of August 21, 1986 requested that the words, "on an interim basis," be removed from SSER-3, Section 13.3.2.8, regarding the NMP-2 emergency response facilities. The reference for the comment was given as NRC Inspection Report IR 86-23. IR 86-23 is the report of the findings of the onsite emergency preparedness implementation appraisal and while some aspects of the NMP-2 emergency response facilities (ERFs) were evaluated, it is not the post-implementation review referred to in SSER-3.

As stated in the SER and SSER-3, final staff evaluation of the operational capability of the ERFs will be conducted as part of the post-implementation review of emergency response capabilities in accordance with the requirements in Supplement 1 to NUREG-0737. The schedule for the post-implementation appraisal of the final ERFs will be established by agreement between Niagara Mohawk and the NRC. In summary, SSER-3, Section 13.3.2.8, provides an acceptable basis for our reasonable assurance finding and there is no need to address the issue further in a supplement to the SER.

FSAR needs to be revised to be consistent w/ T.S.

c. Performing a CHANNEL CALIBRATION of the accumulator backup compressed gas system low pressure alarm system and verifying a low alarm setpoint of 163.5 ±2.5 psig decreasing pressure. 25

d. Perform a leak rate test for ADS SRV pneumatic operators by pressurizing each ADS accumulator at 178 psig (supply header high pressure alarm) up to its supply header isolation check valve with the SRV in the open position. Total leakage rate for each SRV shall not exceed 0.5 scfh for the SRV actuated by either of the ADS solenoids.

e. Perform a leak rate test for the safety-related ADS accumulator pneumatic supply system (including special emergency tube trailer supply piping) up to SRV actuators/operators. With the SRVs actuated by either of the ADS solenoids and with ADS accumulators at 178 psig and with ADS nitrogen receiving tanks at 385 psig (high pressure alarm), the leakage rates shall not exceed the following limits:

(1) For the ADS SRV actuators, supply header, and accumulators, and the nitrogen receiving tank for the SRVs 2MSS*PSV125, 131, and 136, maximum allowable leakage is 3 scfh.

(2) For the ADS SRV actuators, supply header, and accumulators, and the nitrogen receiving tank for the SRVs 2MSS*PSV129, 130, 134, and 137, maximum allowable leakage is 4 scfh.

Action

a. For ECCS Divisions 1 and 2, provided that ECCS Division 3 is OPERABLE and Divisions 1 and 2 are otherwise OPERABLE:

(1) With one of the above required ADS valves inoperable, restore the inoperable ADS valve to OPERABLE status within 14 days or be in at least HOT SHUTDOWN within the next 12 hr and reduce reactor steam dome pressure to ≤ (100) psig within the next 24 hr.

[redacted]

Applicant must show how water from manual fire fighting activities will be controlled and removed/disposed of in areas without floor and equipment drains.

TABLE 14.2-63

[redacted]

Test Procedure pg. 9.5-5
Acceptance Criteria pg. 9.5-6

Both of these sections state that testing will be performed "on total flooding systems as defined (unless otherwise noted) in Section 9.5.1.2.9 in accordance with NFPA-12-1985: Carbon Dioxide Systems."

Section 9.5.1.2.9 states only that
"Carbon Dioxide systems comply with NFPA Standard 12," and
"Additional details are included in Appendix 9A."

Appendix 9A states that
"CO_2 systems comply with NFPA Standard 12, and the requirements of BTP CMEB 9.5-1 Section C.6.e."

Either provide a listing of all total flooding systems that do not comply with NFPA Standard 12, or delete phase, "(unless otherwise noted)."