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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: Requests change to Tech Spec Figure 6.2.2-1 re site organization & Table 3.6.3-1 re primary containment isolation valves. Proposed draft Tech Specs & affidavit encl.

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THE UNITED STATES OF AMERICA  
 DISTRICT COURT OF THE DISTRICT OF COLUMBIA  
 IN RE: [Illegible Name]  
 Debtor  
 Chapter 11  
 Case No. [Illegible]

I, the undersigned, Clerk of the District Court of the District of Columbia, do hereby certify that the foregoing is a true and correct copy of the [Illegible] filed in the above entitled case.

Dated this [Illegible] day of [Illegible] 19[Illegible].

[Illegible Signature]

Case No.	Debtor Name	Chapter	Case No.	Debtor Name	Chapter	Case No.	Debtor Name	Chapter
1	[Illegible]	11	2	[Illegible]	11	3	[Illegible]	11
4	[Illegible]	11	5	[Illegible]	11	6	[Illegible]	11
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28	[Illegible]	11	29	[Illegible]	11	30	[Illegible]	11

September 5, 1986  
NMP2L 0868

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

As a result of our discussions with your staff regarding Technical Specification changes which we requested in our letters dated August 21, 1986 (NMP2L-0836 & NMP2L-0841), we are providing the enclosed additional information along with the associated Technical Specification change. These changes have been discussed with Mr. Benedict and Mr. Schulten of your staff.

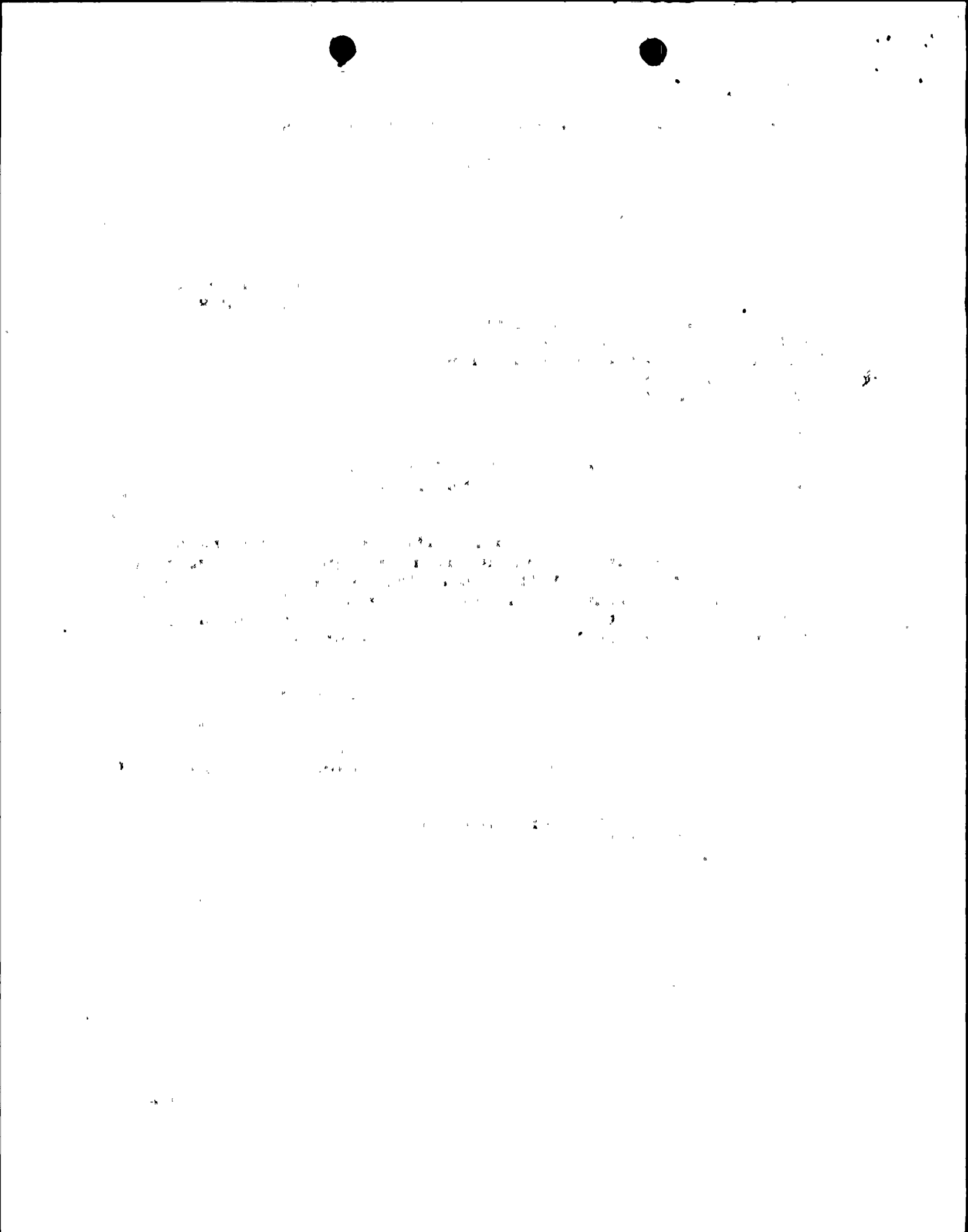
Very truly yours,

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

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 5 day of September, 1986.

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

My Commission expires:

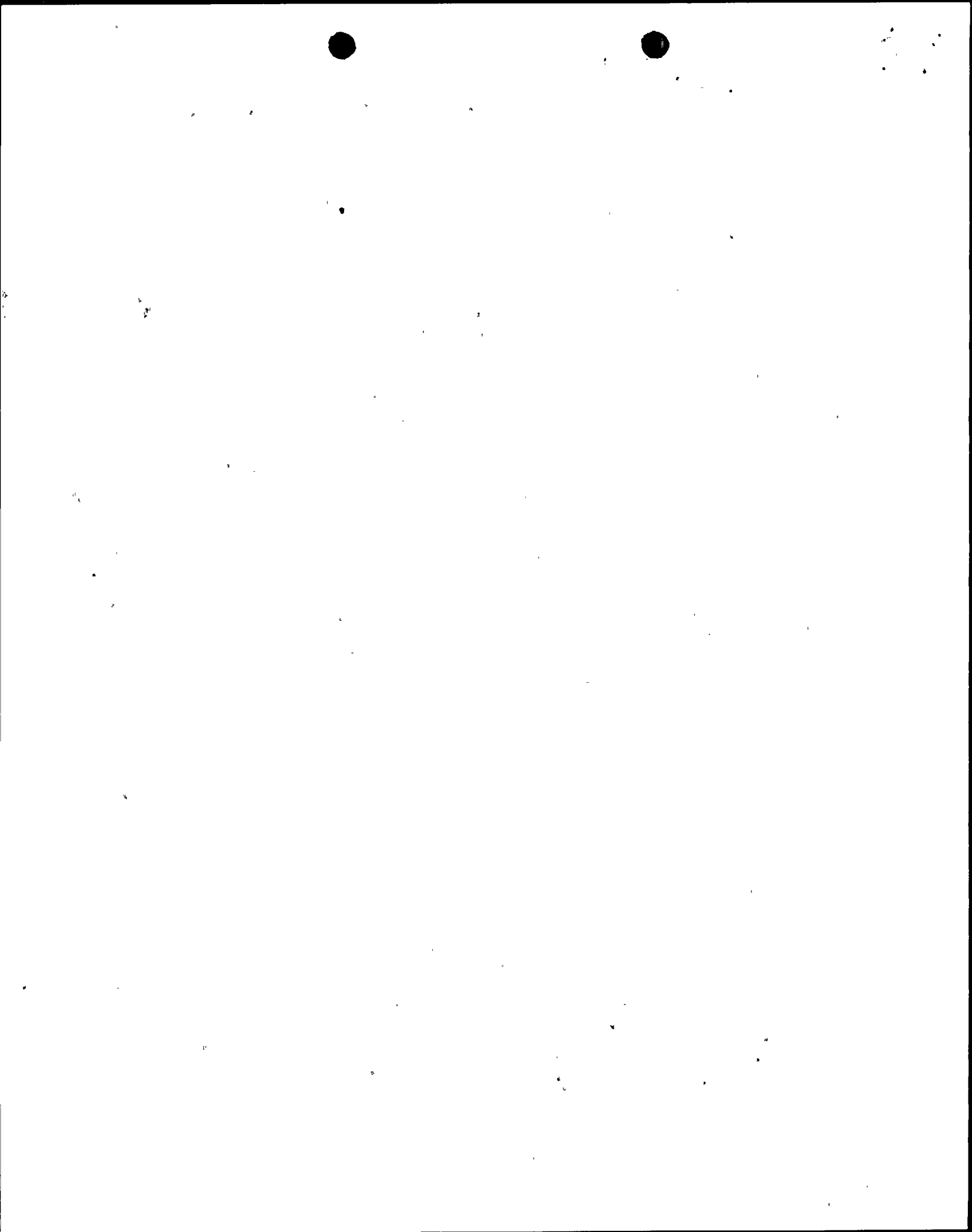
JANIS M. MACRO  
Notary Public in the State of New York  
Qualified in Onondaga County No. 4784555  
My Commission Expires March 30, 1987



Subject: Justification for changes to Technical Specification Figure 6.2.2-1

A copy of the change to Technical Specification Figure 6.2.2-1 is enclosed. This copy is identical to the marked up final draft version of Figure 6.2.2-1 submitted as page 40 of our letter dated August 21, 1986 (NMP2L 0836). Enclosed are the proposed Final Safety Analysis Report change pages in order to make the Technical Specification and Final Safety Analysis Report consistent with one another. The changes made to the Technical Specifications are the result of our verification program and represent the site organization as it will exist at fuel load. The changes are based upon the following factors:

- 1) Changes are made to reflect the sharing of site support functions for both Unit 1 and Unit 2 in the areas of maintenance, training, chemistry and radiation management, and technical support.
- 2) Changes are made which represent the minor title changes due to the evolution of the corporate structure.
- 3) Changes in the organizational structure of the training, fire protection and instrument/control support function allows better upper management control/direction of subordinate functions related to the daily activities associated with fire fighters, engineers and technicians.
- 4) Changes to the inservice inspection support function represent the elimination of a "senior inservice inspection specialist" position and the consolidation of this function into two subordinate positions that directly report to the "inservice inspection superintendent". The consolidation of these functions enhances the direct management control of inservice inspection activities.
- 5) Changing the supervisor stenographic services to the supervisor radiation records reflects the importance of providing direct management supervision in maintaining radiation personnel exposure records. The stenographic support function still exists under the control of the site supervisor administrative services but is not shown in this organizational chart because of the level of detail associated with this diagram.
- 6) The creation of the "supervisor planning and scheduling" and "supervisor testing" positions represent the continuation of pre-fuel load activities which directly assist the station superintendent of Unit 2 in the successful execution of the startup power ascension testing program and associated planned outages.





- 7) The changes associated with the reporting responsibilities under the "assistant superintendent operations nuclear" for Unit 2 allows direct "station shift supervisor nuclear" control of chief shift and auxillary operators' daily activities. This in turn enhances the "station shift supervisor's nuclear" ability to control activities performed on his unit. A similar change was made to Unit 1 reporting responsibilities associated with the "assistant superintendent operations nuclear" function.

A similar Technical Specification change is presently being formulated for Nine Mile Point 1 and will be submitted to the Nuclear Regulatory Commission. These changes have been discussed with Bob Benedict of your staff.

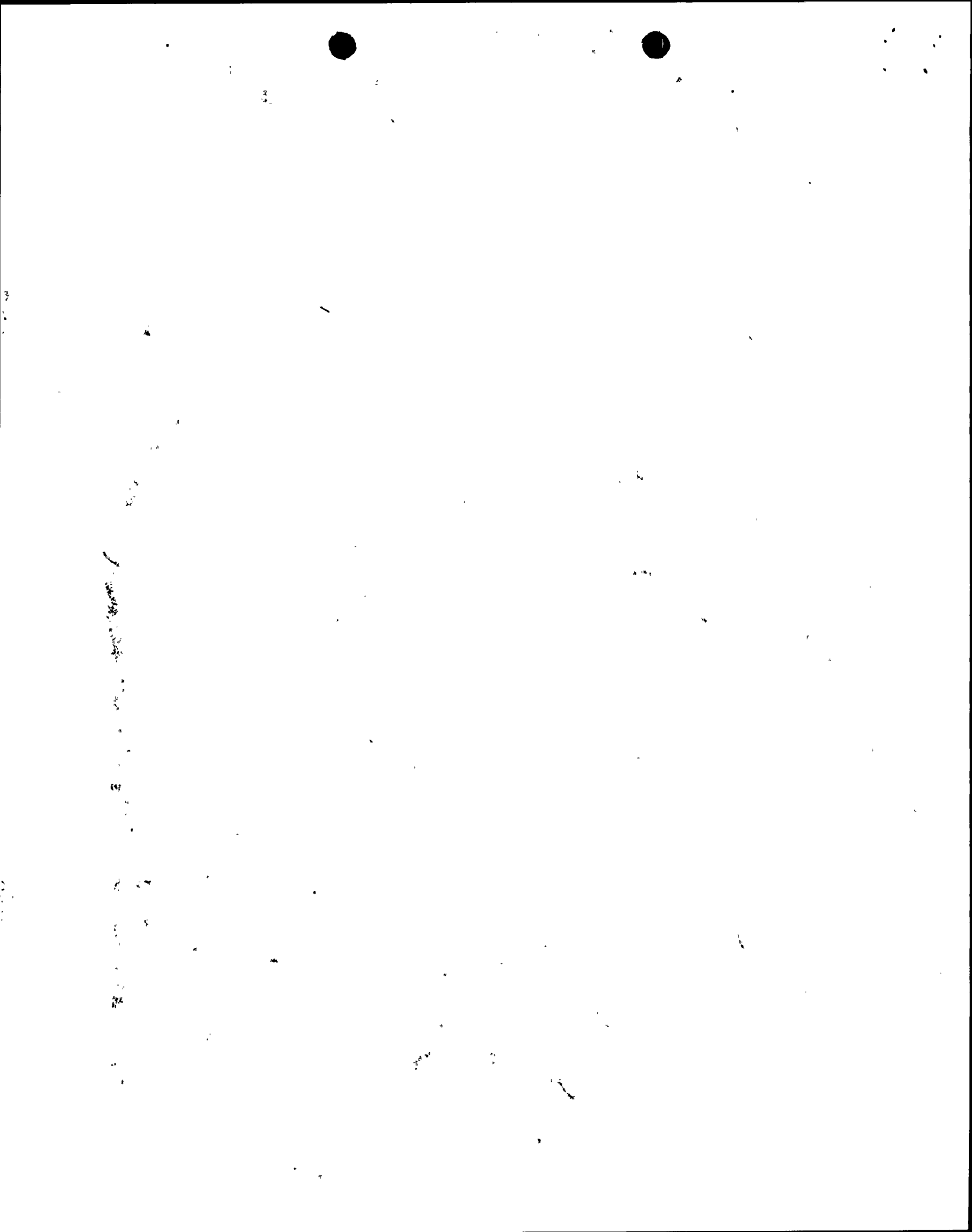
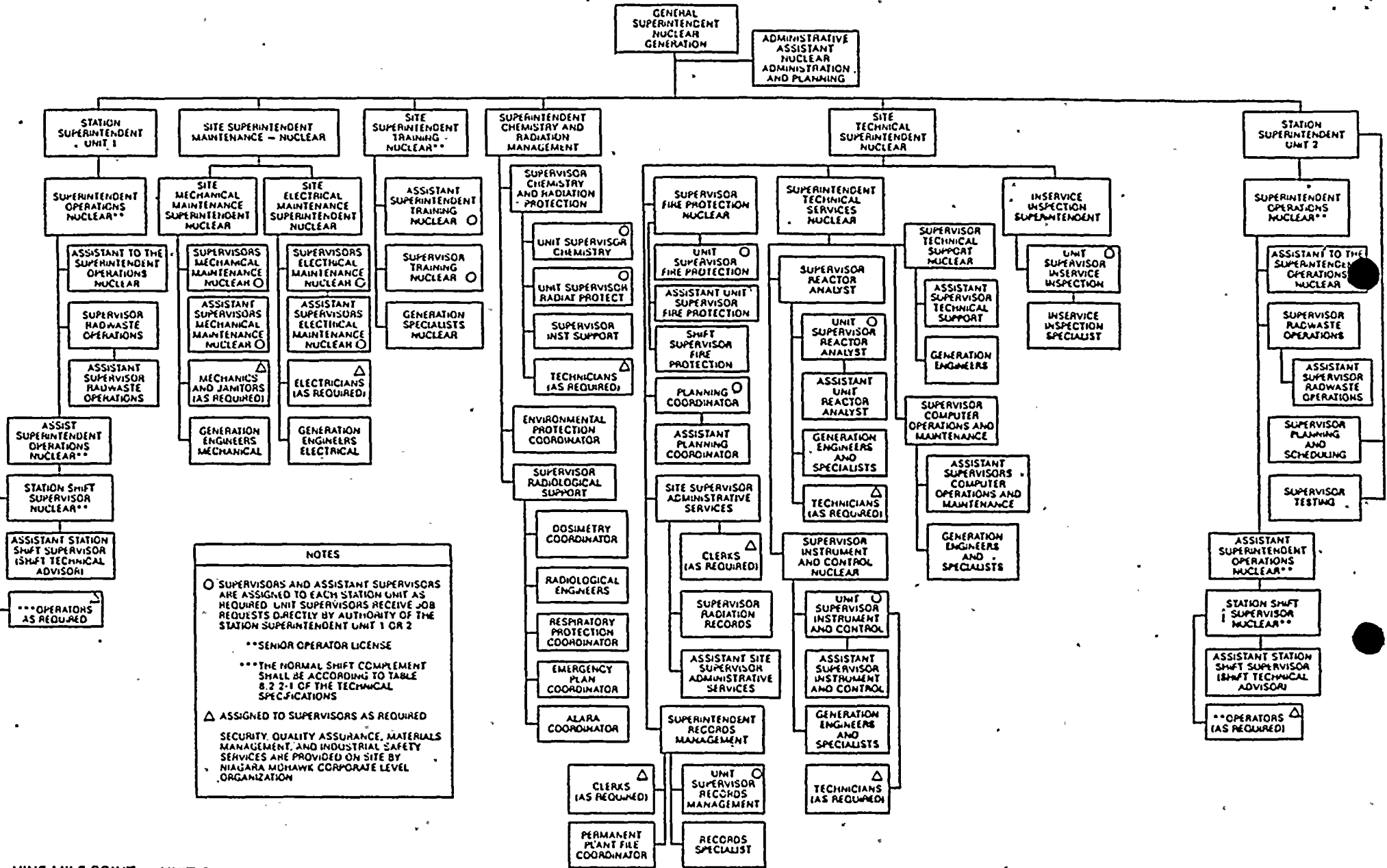


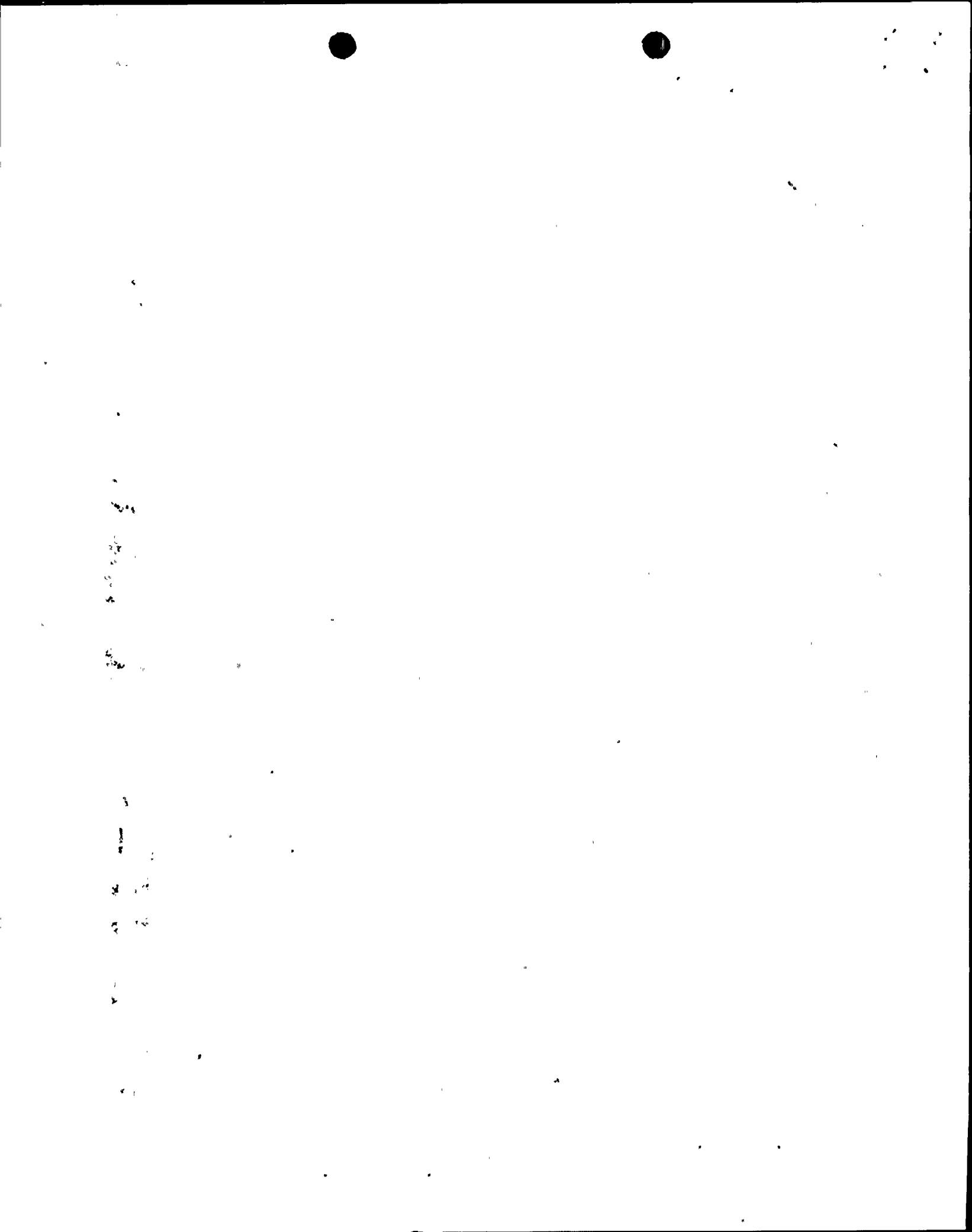
Figure 6.2.2-1  
NINE MILE POINT NUCLEAR SITE ORGANIZATION

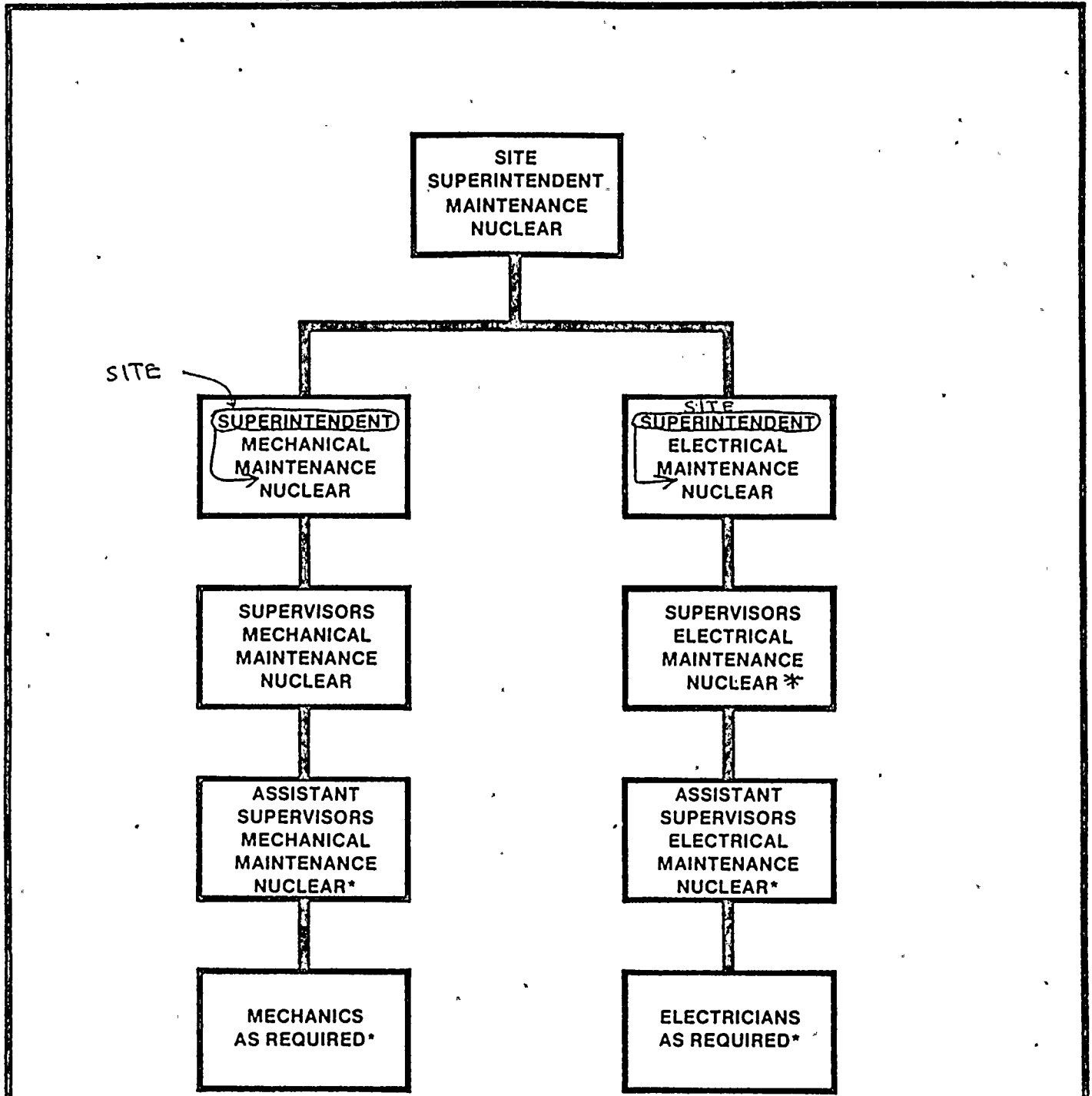


**NOTES**

- SUPERVISORS AND ASSISTANT SUPERVISORS ARE ASSIGNED TO EACH STATION UNIT AS REQUIRED. UNIT SUPERVISORS RECEIVE JOB REQUESTS DIRECTLY BY AUTHORITY OF THE STATION SUPERINTENDENT UNIT 1 OR 2
- \*\* SENIOR OPERATOR LICENSE
- \*\*\* THE NORMAL SHIFT COMPLEMENT SHALL BE ACCORDING TO TABLE 8.2.2-1 OF THE TECHNICAL SPECIFICATIONS
- △ ASSIGNED TO SUPERVISORS AS REQUIRED

SECURITY, QUALITY ASSURANCE, MATERIALS MANAGEMENT, AND INDUSTRIAL SAFETY SERVICES ARE PROVIDED ON SITE BY NIAGARA MOHAWK CORPORATE LEVEL ORGANIZATION





\*PERSONNEL ASSIGNED TO UNIT 1 AND UNIT 2 AS REQUIRED

FIGURE 13.1-6

UNIT 2 SITE ORGANIZATION  
CHART-MAINTENANCE

NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT-UNIT 2  
FINAL SAFETY ANALYSIS REPORT



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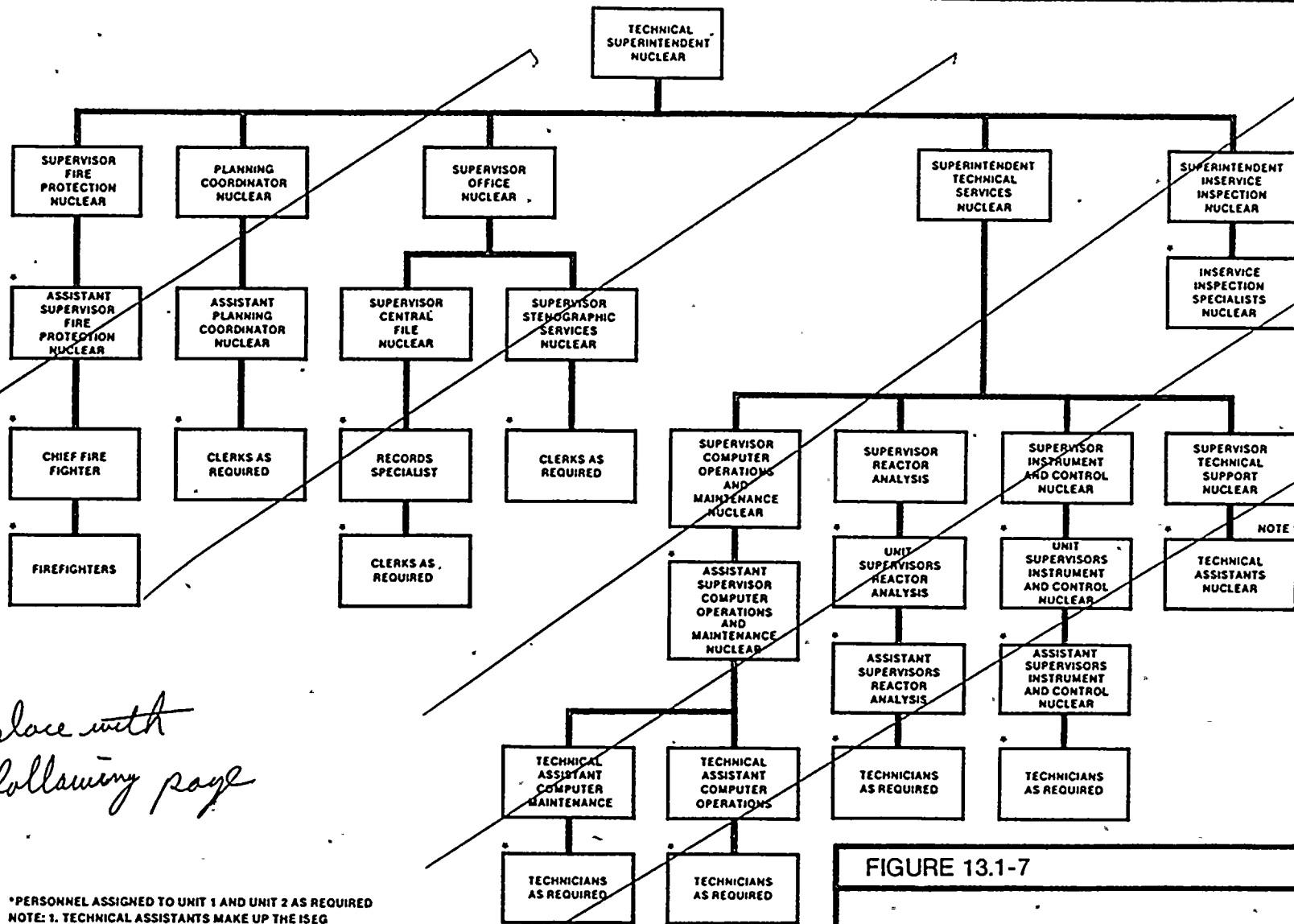
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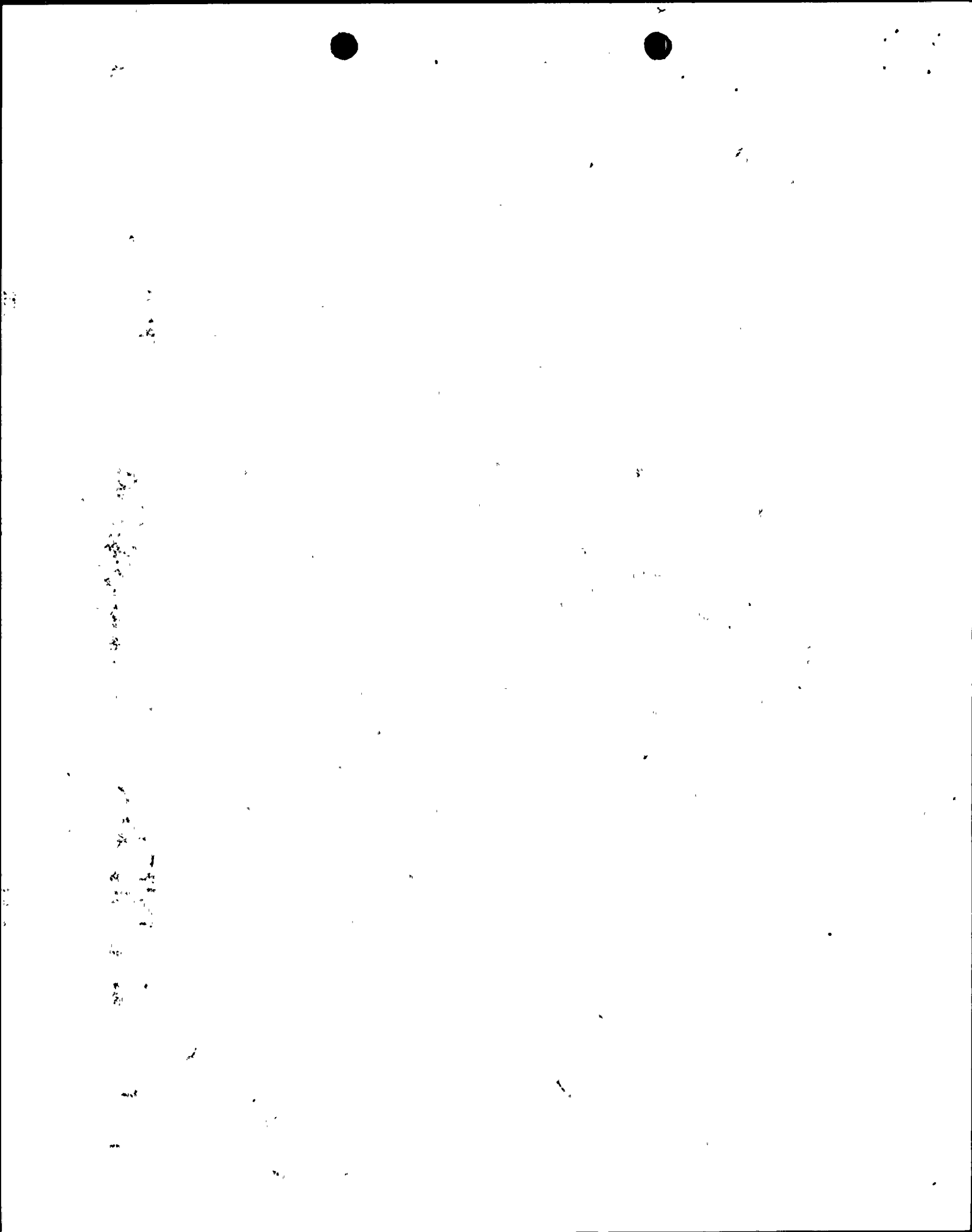
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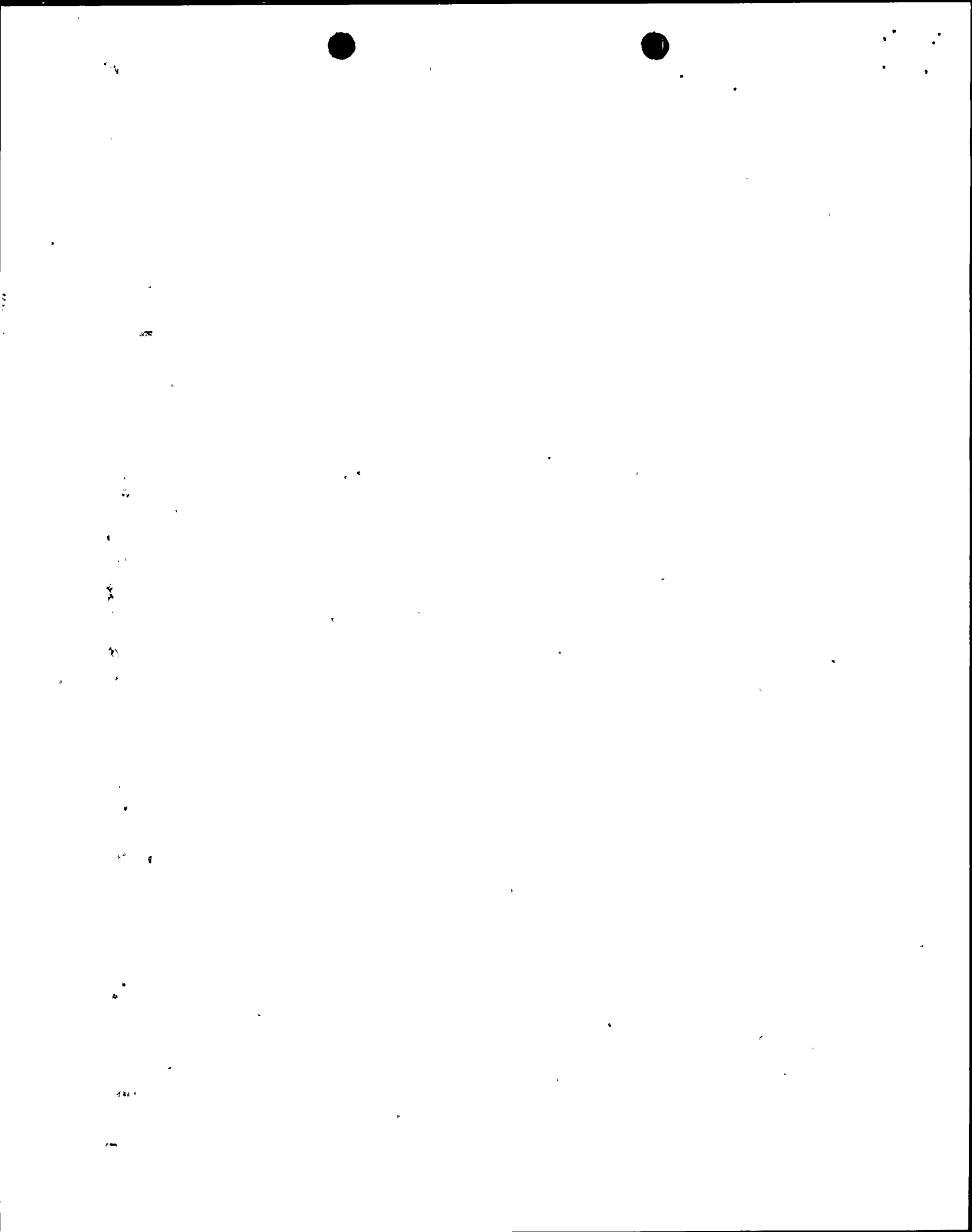
\*PERSONNEL ASSIGNED TO UNIT 1 AND UNIT 2 AS REQUIRED  
 NOTE: 1. TECHNICAL ASSISTANTS MAKE UP THE ISEG

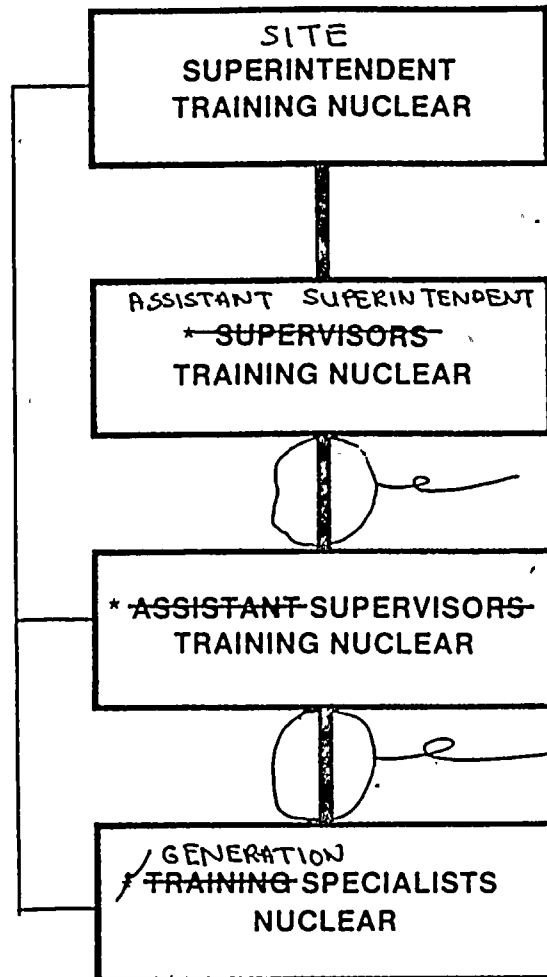
FIGURE 13.1-7  
 TECHNICAL ORGANIZATION  
 NIAGARA MOHAWK POWER CORPORATION  
 NINE MILE POINT-UNIT 2  
 FINAL SAFETY ANALYSIS REPORT









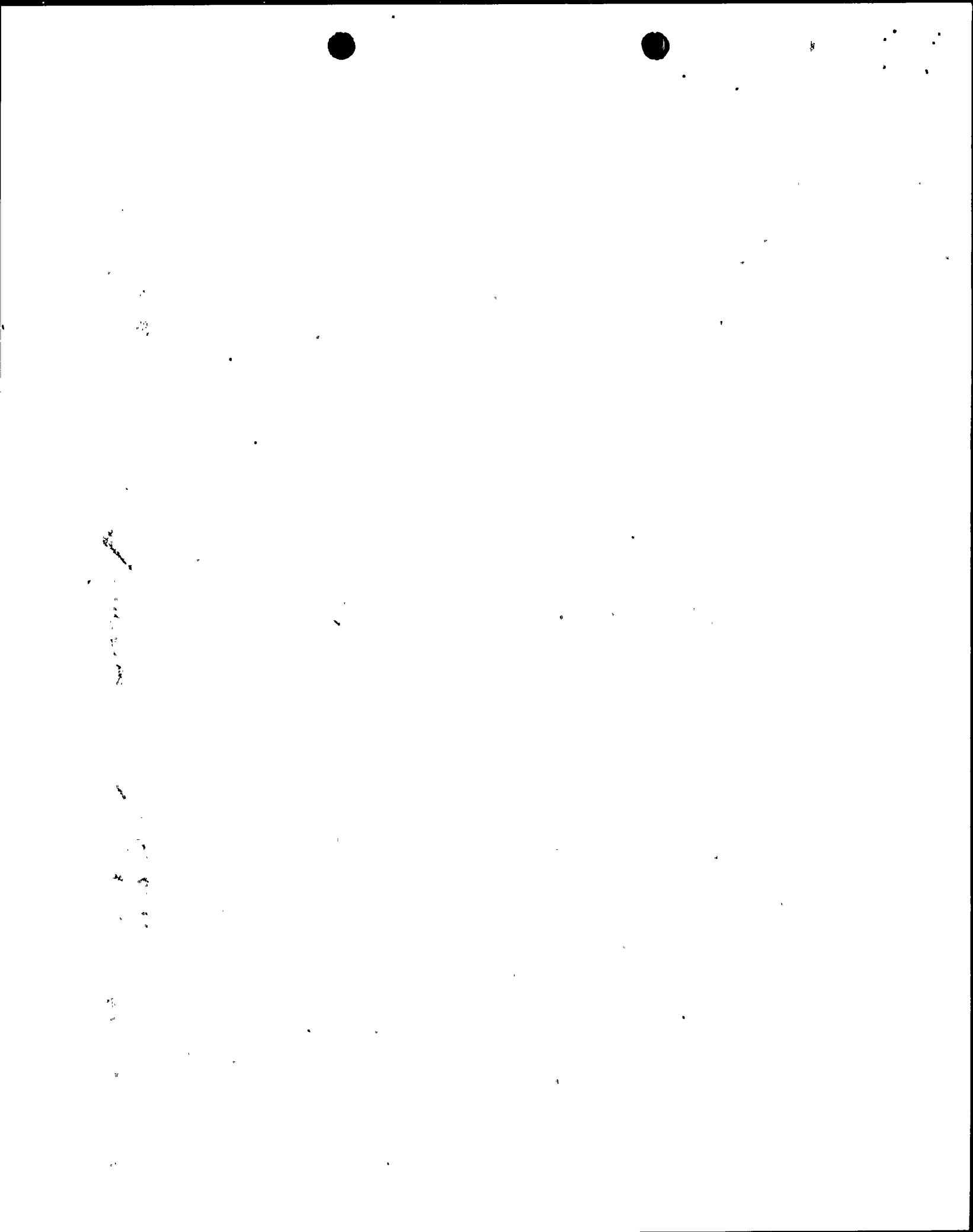


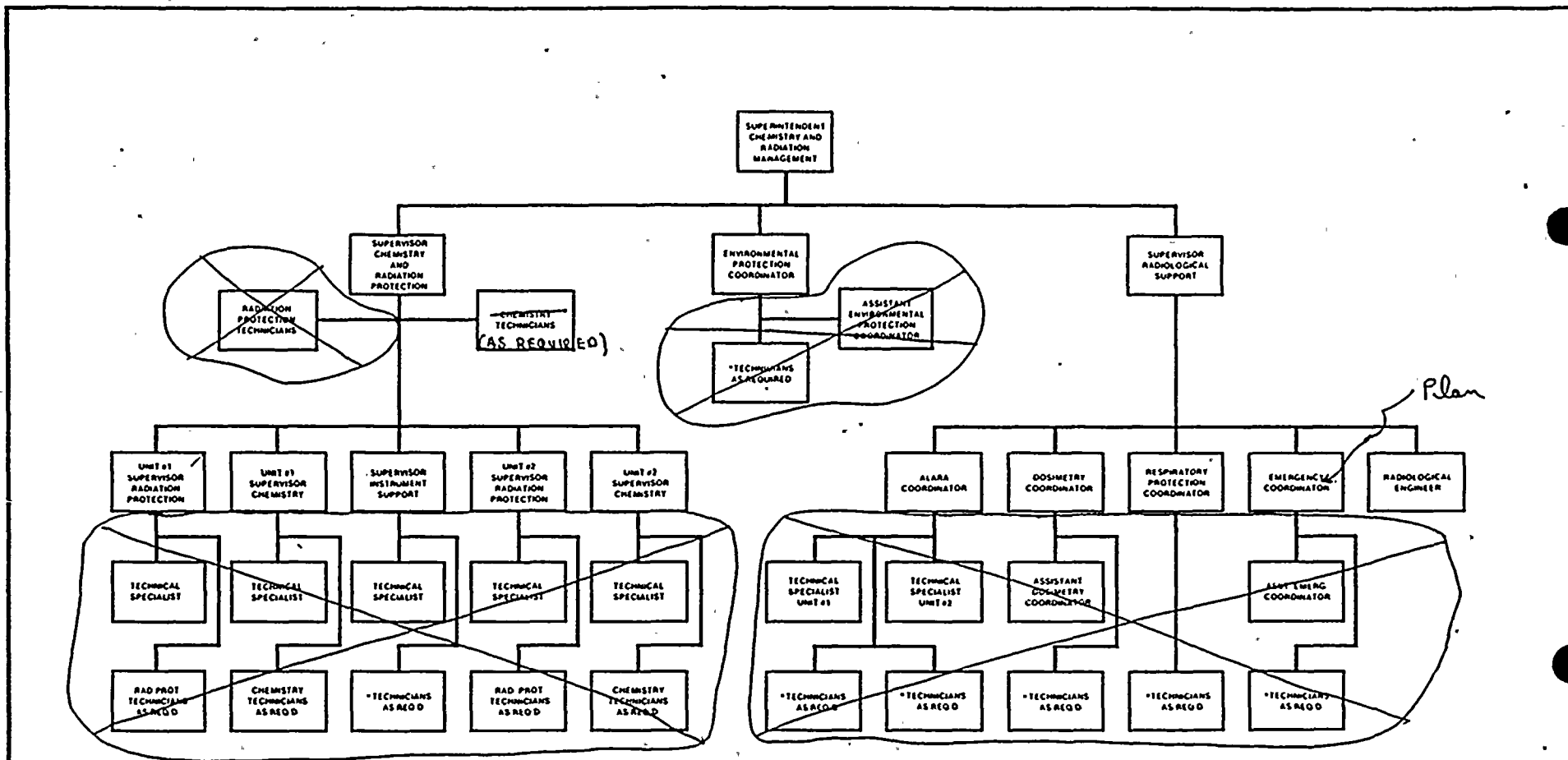
\* PERSONNEL ASSIGNED TO UNIT 1 AND UNIT 2 AS REQUIRED.

FIGURE 13.1-8

UNIT 2 SITE ORGANIZATION  
CHART-TRAINING

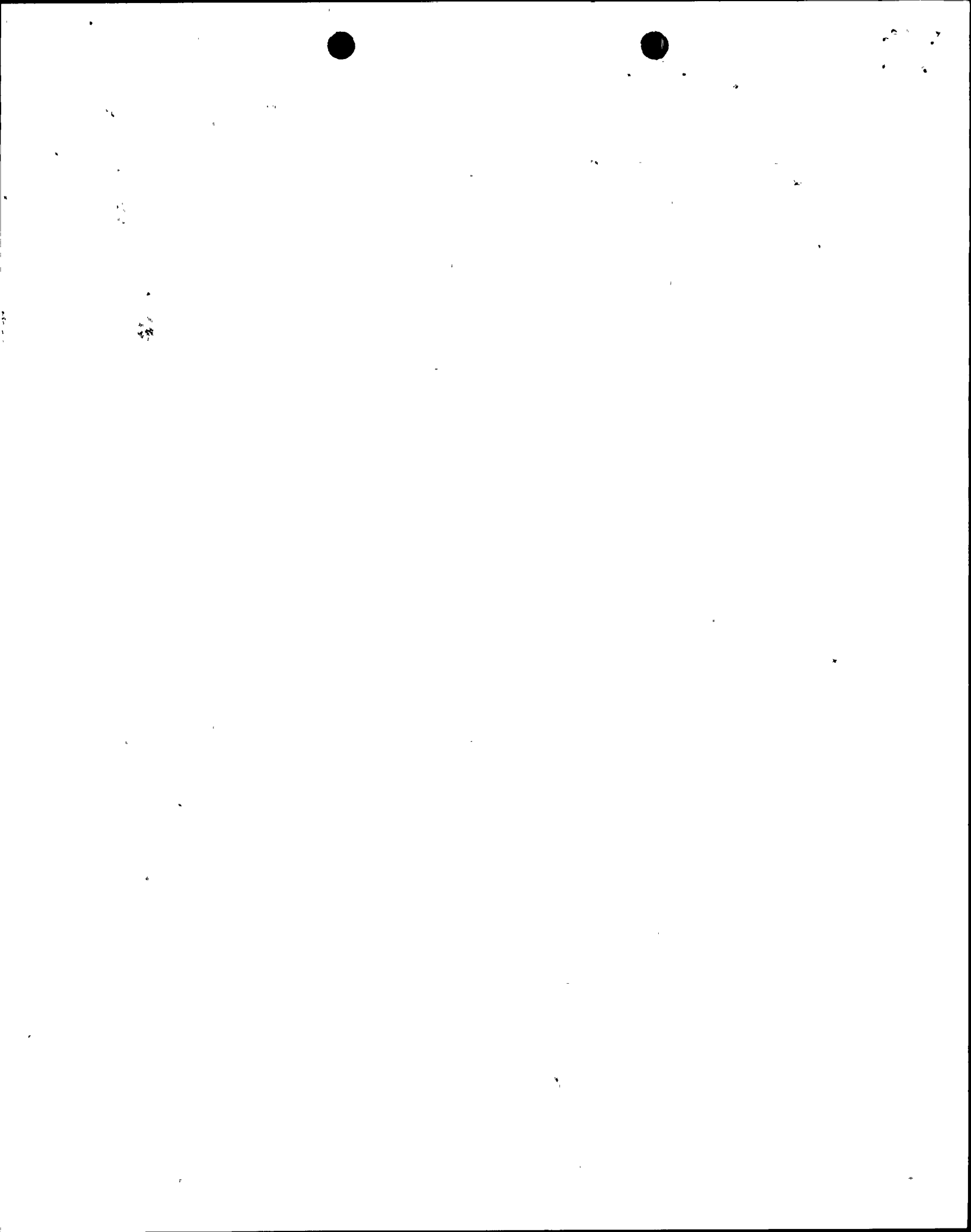
NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT-UNIT 2  
FINAL SAFETY ANALYSIS REPORT





\*TECHNICIANS WILL BE ASSIGNED BY THE SUPERVISOR CHEMISTRY AND RADIATION PROTECTION AS REQUIRED

FIGURE 13.1-9  
 CHEMISTRY AND RADIATION  
 PROTECTION ORGANIZATION  
 NIAGARA MOHAWK POWER CORPORATION  
 NINE MILE POINT-UNIT 2  
 FINAL SAFETY ANALYSIS REPORT



Subject: Justification for changes to Technical Specification Table 3.6.3-1

The requested changes are enclosed. These changes are identical to those submitted in our letter dated August 21, 1986 (NMP2L 0841). The change being requested is that 2MSS\*SOV97A, B, C and D are "not primary containment penetration isolation valves". This change is requested in order to make the Technical Specification Table 3.6.3-1 consistent with Final Safety Analysis Report Table 421.36-1 and proposed changes to this FSAR Table in our letter dated August 22, 1986 (NMP2L 0851). The SOV's are not the primary containment isolation valves for penetrations Z-1A, 1B, 1C and 1D. These valves are listed on FSAR Table 6.2-56, Sheet 1, because they are much closer to primary containment than the actual isolation valve, 2MSS\*MOV208, for these penetrations. The SOV's do not have Regulatory Guide 1.97 indication. The SOV's are not powered from a Class 1E supply. The phrase "not primary containment isolation penetration isolation valve" is being added to the SOV's because these valves should not be interpreted as covered by item 15 of Technical Specification Table 3.3.7.5-1, "Primary Containment Isolation Valve Position Indication".

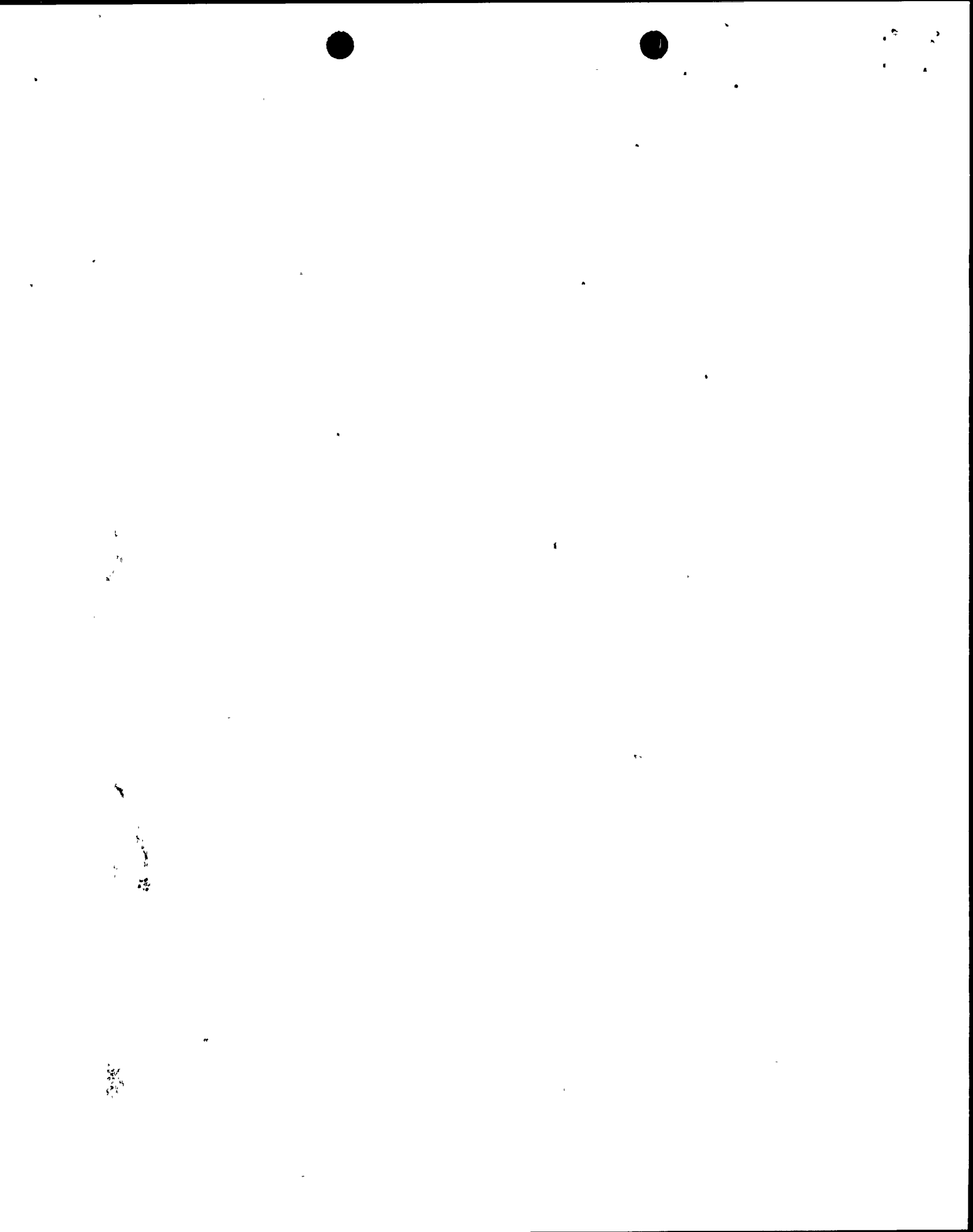




TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

ISOLATION VALVE NO.	VALVE FUNCTION	VALVE GROUP	ISOLATION SIGNAL(a)	MAXIMUM CLOSING TIME (SECONDS)
2ICS*MOV122(n)	ICS turbine exhaust to SP Outside IV	12	RM	NA
2ICS*MOV126	ICS to RPV Outside IV	12	RM	NA
2NMS*VEX1 A, B, C, D, E(d)	Traversing Incore Probe Shear Outside IVs	12	RM	NA
2FWS*MOV21 A,B	Feedwater to RPV Outside IVs	12	RM	NA
2WCS*MOV200	WCS to RPV Outside IV	12	RM	NA
2RHS*MOV26 A,B(c)	RHS HX vent Inboard IVs	12	RM	NA
2RHS*MOV27 A,B(c)	RHS HX vent Outboard IVs	12	RM	NA
2MSS*S0V97 A,B,C, D(n) (o)	Main Steam Line Drains	12	RM	NA
2SLS*MOV5 A,B(g)	SLS to RPV Outside IV	12	RM	NA
<u>C. Manual</u>				
2SAS*HCV160	SAS to Drywell Outside IV			
2SAS*HCV161	SAS to Drywell Outside IV			
2SAS*HCV162	SAS to Drywell Inside IV			
2SAS*HCV163	SAS to Drywell Inside IV			
2AAS*HCV134	AAS to Drywell Outside IV			
2AAS*HCV135	AAS to Drywell Outside IV			
2AAS*HCV136	AAS to Drywell Inside IV			
2AAS*HCV137	AAS to Drywell Inside IV			
2RHS*V192	RCIC/RHS Vacuum Breaker Outside IV			
2SFC*V203	Inner Refuel Seal Leakoff Outboard IV			
2SFC*V204	Inner Refuel Seal Leakoff Inboard IV			

FINAL DRAFT



PRIMARY CONTAINMENT ISOLATION VALVES

TABLE NOTATION

\* Isolates on injection signal, not primary containment isolation signal.

- (a) See Specification 3.3.2, Table 3.3.2-4, for valve groups operated by isolation signal(s).
- (b) Deleted.
- (c) These valves are the RHR heat exchangers vent lines isolation valves. The vent line connects to the RHR safety relief valves (SRVs) Discharge Header before it penetrates the primary containment. The position indicators for these valves are provided in the Control Room for remote manual isolation.
- (d) Type C leakage tests not required.
- (e) The associated instrument lines shall not be isolated during Type A testing. Type C testing is not required. These valves shall be tested in accordance with Surveillance Requirement 4.6.3.4.
- (f) These valves are check valves, located on the vacuum breaker lines for RHR SRVs discharge headers. The SRV discharge header terminates under pool water and therefore has no containment isolation valves other than those on lines feeding into it.
- (g) 2SLS\*MOV5A and B are globe stop check valves. These valves close upon reverse flow. The motor operator is provided to remote manually close the valve from the control room.
- (h) These valves are testable check valves. They close upon reverse flow. The air operator on each valve is provided only for periodic testing of the valve. These valves can only be tested against a zero d/p.
- (i) Valves are maintained closed, and the <sup>FPW</sup> lines are capped. Valves are Type C tested.
- (j) Not primary containment penetration isolation valves. These valves close on an isolation signal to provide integrity of "A" and "B" LPCI loops.
- (k) Valves close on a SCRAM signal; not part of primary containment isolation system but are included here for Type C testing per Specification 3.6.1.2. These valves are not required to be OPERABLE per this specification but are required to be OPERABLE per Specification 3.1.3.1.
- (l) Not subject to Type A or Type C leak test because of constant monitoring under constant 1800 psig pressure and the possible detrimental effects of shutdown.
- (m) Not subject to Type C test per 10 CFR 50, Appendix J. A hydrostatic test is performed in accordance with Specification 4.6.1.2.d.3.
- (n) These valves are Type C tested in the reverse direction.
- (o) *These valves are Type C tested in the reverse direction. Not primary containment isolation valves.*

