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

SUBJECT: Responds to NRC comment on 860815 changes to Chapter 14 of FSAR. Page 14.2-5 will not be revised as stated. Encl marked-up Page 14.2-31 will be changed to clarify difference between test plateaus & conditions.

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September 18, 1986
(NMP2L 0873)

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

The NRC staff forwarded a comment to Niagara Mohawk related to changes to Chapter 14 of the Final Safety Analysis Report which were submitted by our letter dated August 15, 1986 (NMP2L 0817). This letter responds to that comment.

Final Safety Analysis Report page 14.2-5, paragraph 14.2.1.4, second sentence, was requested to be revised from "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" to "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."

Based upon further review and subsequent discussion with Mr. R. Becker of your staff, Page 14.2-5 will not be revised as noted above. Instead, enclosed is a marked-up page 14.2-31 to the Final Safety Analysis Report which will clarify the difference between test plateaus and test conditions. This marked-up page will be incorporated in a subsequent Final Safety Analysis Report update.

Very truly yours,

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

LL/ps
2057G
Enclosure

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

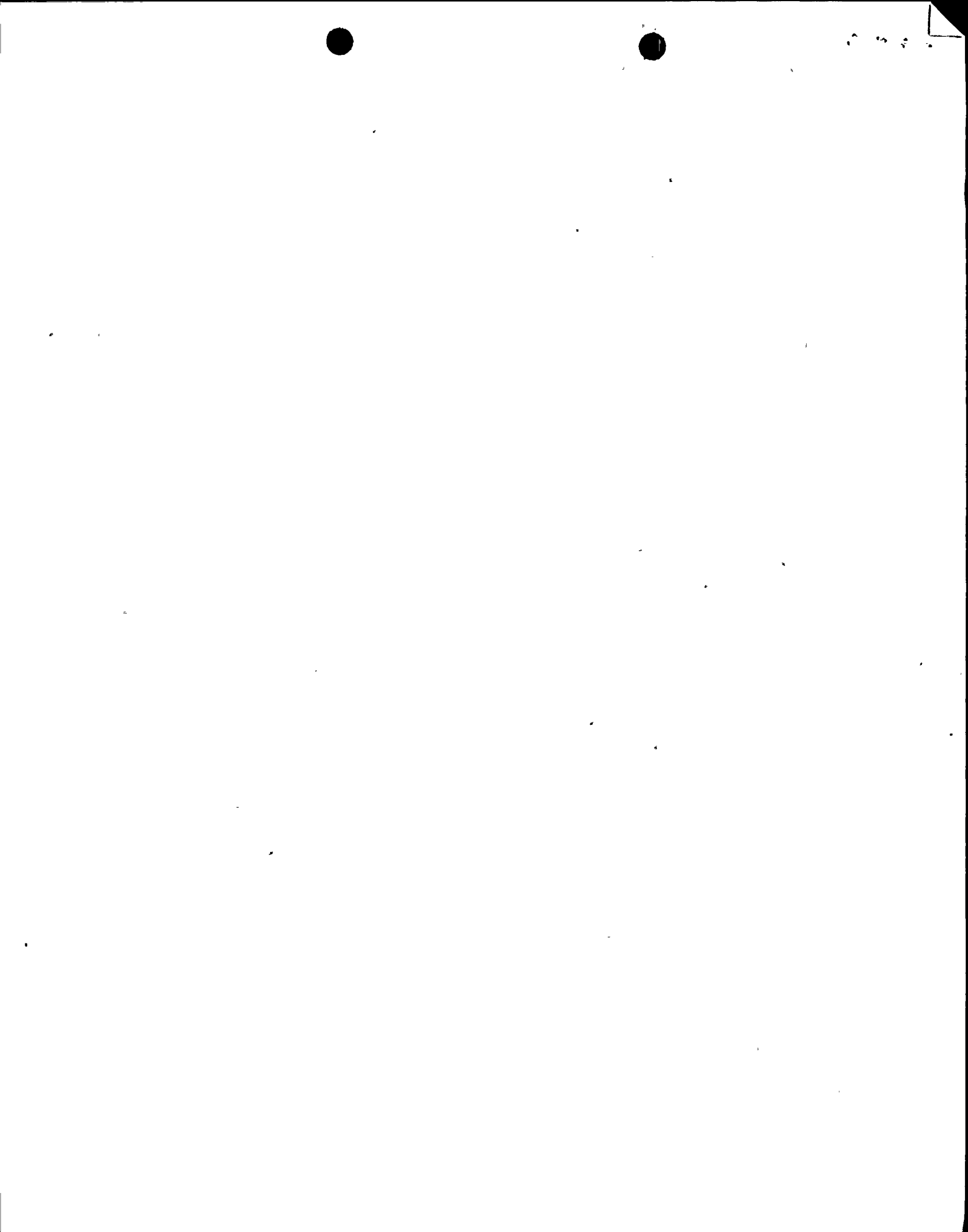
Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 18 day of September, 1986.

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~~



use a combination of both methods. A description and summary of plant procedures and a schedule for their development are given in Section 13.5.

14.2.9.1 Interim Operating Procedures (IOPs)

IOPs are utilized to trial test the station operating procedures and to allow operation of systems in nonstandard configurations during the test program due to incomplete testing or construction. IOPs are reviewed, approved, and revised in accordance with the SAPs.

14.2.10 Initial Fuel Loading and Initial Criticality

14.2.10.1 Fuel Loading and Shutdown Power Level Tests

Fuel loading and initial criticality are conducted in accordance with written procedures after the applicable prerequisite tests have been satisfactorily completed and an operating license has been issued. In the actual sequence for performing startup tests (SUTs) the tests are grouped into plateaus. All tests within a plateau will be completed, or justification given for exceptions, before proceeding to the next plateau (Sections 14.2.4.3 and 14.2.5.3). The test plateaus are defined as follows:

→ SEE INSERT ←

The normal sequence of tests within the program is as follows:

1. Core performance analysis.
2. Steady-state testing.
3. Control system tuning.
4. Major trips.

The actual testing sequence can vary from the recommended test sequence because of equipment problems and other considerations. Prior to approving fuel loading, certain actions must be verified by the steps in the following sections, which are performed at the completion of most of the preoperational testing.

14.2.10.1.1 Loss of Power Demonstration - Standby Core Cooling Required (Table 14.2-129)

This test demonstrates the capability of the emergency diesel generators to start automatically and assume all of the emergency core cooling loads in a loss of normal

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100.

- Test Plateau OV - covers preparation for fuel loading, fuel loading, and open vessel testing below 1% rated core thermal power.
- Test Plateau HU - covers all testing during the initial nuclear heatup to rated temperature and pressure (1-5% power).
- Test Plateau 1 - covers all testing at test condition 1 (5-20% power).
- Test Plateau 2 - covers all testing at test condition 2 (between the 50 and 75% load lines).
- Test Plateau 3 - covers all testing at test condition 3 (between the 50 and 75% load lines).
- Test Plateau 4 - covers all testing at test conditions 5 and 6 (between the 95 and 100% load lines except during natural circulation testing).
- Test Plateau WR - covers the 100 hour nuclear steam supply system warranty demonstration which may be performed concurrently or sequentially with Test Plateau 4.

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