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

SUBJECT: Advises that commitment to Rev 4 to Reg Guide 8.8 changed to Rev 3, per NRC request. Revised Table 1.8-2 re enduring exposure ALARA encl & will be incorporated into FSAR. No Tech Spec change required.

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September 26, 1986
(NMP2L 0889)

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 changes the Nine Mile Point Unit 2 commitment to Regulatory Guide 8.8 as requested by the Nuclear Regulatory Commission staff. Previously, Niagara Mohawk was committed to Regulatory Guide 8.8, Revision 4. In our July 16, 1986 letter we indicated that the Safety Evaluation Report should be modified to reflect this commitment. However, the staff requested that we change our commitment to Revision 3. To satisfy this request, our radiation management personnel compared Revision 3 to Revision 4. The regulatory guide position description is essentially the same since Revision 3 and Revision 4 are similar.

A revised Table 1.8-2 is attached and will be incorporated in the Final Safety Analysis Report in a future update. No changes to the Technical Specifications are required.

Very truly yours,



C. V. Mangan
Senior Vice President

NLR/pns
2090G

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) 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.

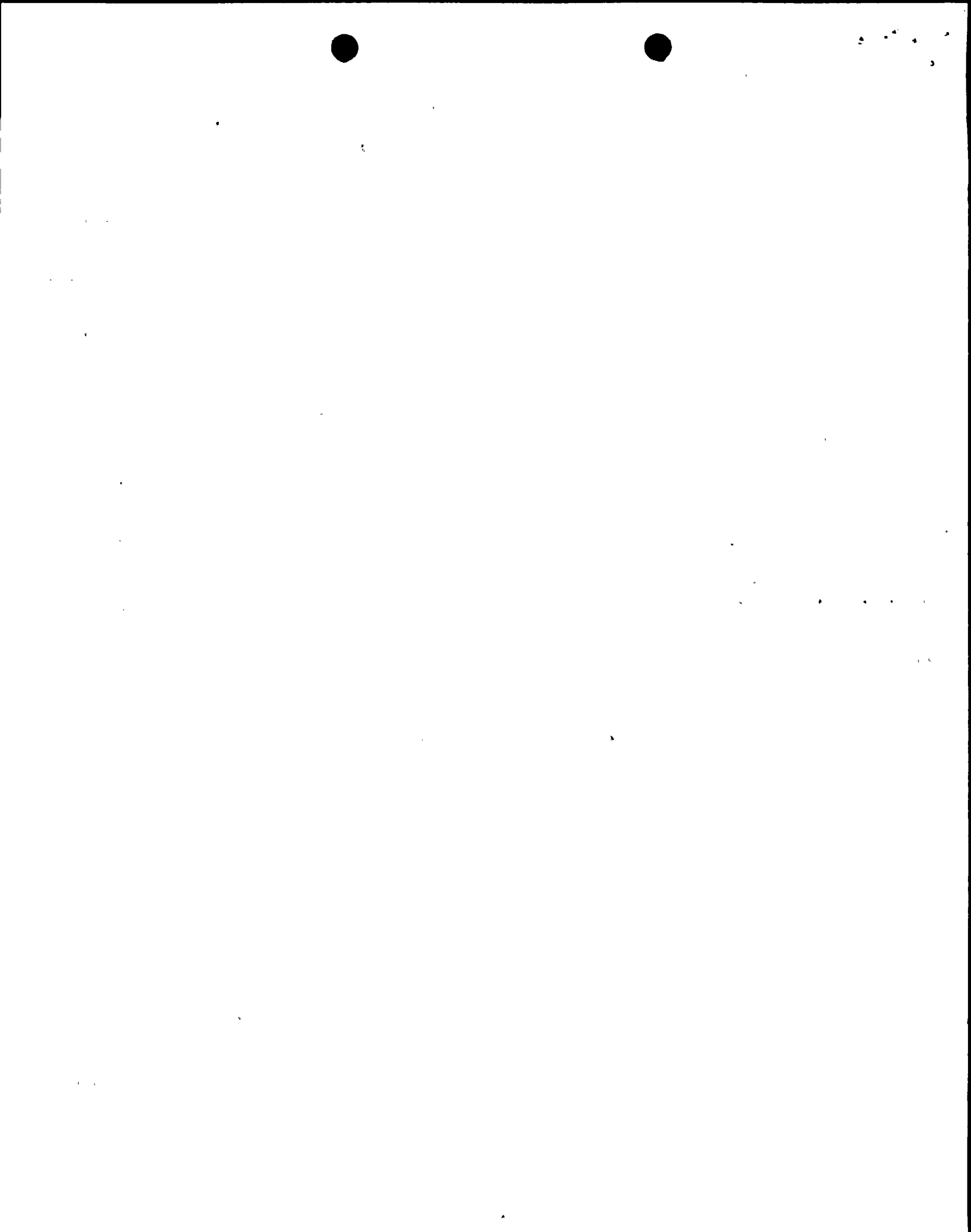
C. V. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 26th 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...



Nine Mile Point Unit 2 FSAR

TABLE 1.8-2 (Cont)

Regulatory Guide 8.8, Revision ^{3 June 1978} ~~(March 1979 draft)~~

Information Relevant to Ensuring That Occupational
Radiation Exposure at Nuclear Power Stations Will
Be as Low as is Reasonably Achievable

FSAR Sections 11, 12, and 13

Position

The Unit 2 project complies with this guide with the following clarifications:

Regarding Position C.2, the recommendations stated in this section of the regulatory guide were considered during the development of the design for Unit 2. The implementation of these recommended ALARA improvements is evidenced in the FSAR and plant drawings.

As part of the ongoing ALARA program, procedure(s) addressing the guidance of Position C.2 will be implemented.

Regulatory Position C.2.g.1 recommends that a radiation monitoring readout be available at the main access control point. The Unit 2 digital radiation monitoring system has a complete console readout in the radiation protection office. The purpose of this readout is for radiation protection personnel only to monitor radiation levels and respond to unusual occurrences. There is also readout capability in the Technical Support Center for monitoring during accident conditions.

The radiation protection office is located on elevation 306' at the main access point. Radiation protection personnel in the office could alert personnel entering the restricted area if radiologic conditions warranted.

Regulatory Position C.3.a.8.e recommends that the work permit state an estimated exposure time required to complete a task and the estimated dose anticipated from the exposure. ^A ~~Site procedure titled Incorporating ALARA Requirements Into Work Planning and Initiation~~ requires that this information be documented on the Radiation Work Permit Request form.

Regulatory Guide C.4.a.2 recommends that the counting room facility be equipped with a low-background alpha-beta proportional counter. The Unit 2 counting room will utilize an Nuclear Measurements Corporation PC-5 counter or its equivalent. This equipment is a gas flow proportional

TABLE 1.8-2 (Cont)

counter. It provides adequate sensitivity for nuclear power reactor applications. A description of the instrument is in Table 12.5-1. Calibration of the instrument is described in Section 12.5.2.2.1.

Regulatory Position C.4.b.2 recommends that portable high-range (0.1-500 R/hr) ion chambers be provided. Unit 2 will utilize 0-50 R/hr ion chambers (Eberline RO-2A or equivalent). An electronically quenched Geiger-Muller detector will be used for radiation fields up to 1,000 R/hr.

Regulatory Position C.4.c.2 recommends the use of a 0-200 mR personnel pocket dosimeter. Unit 2 will utilize 0-500 mR pocket dosimeters.

Regulatory Position C.4.c.5 recommends hand and foot monitors be used. Unit 2 will use Geiger-Muller type probes for personnel monitoring; however, these probes will not be in a fixed hand and foot configuration.

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