

September 5, 1986
(NMP2L 0864)

Mr. W. Kane, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Reactor Projects
631 Park Avenue
King of Prussia, PA 19406

Re: Nine Mile Point Unit 2
Docket No. 50-410

Dear Mr. Kane:

Enclosed is our detailed response to the Notice of Deviation dated August 5, 1986 and accompanying Inspection Report 86-33.

Very truly yours,

C. V. Mangan

C. V. Mangan
Senior Vice President

CVM/GG/cia
(1763H)

Enclosure

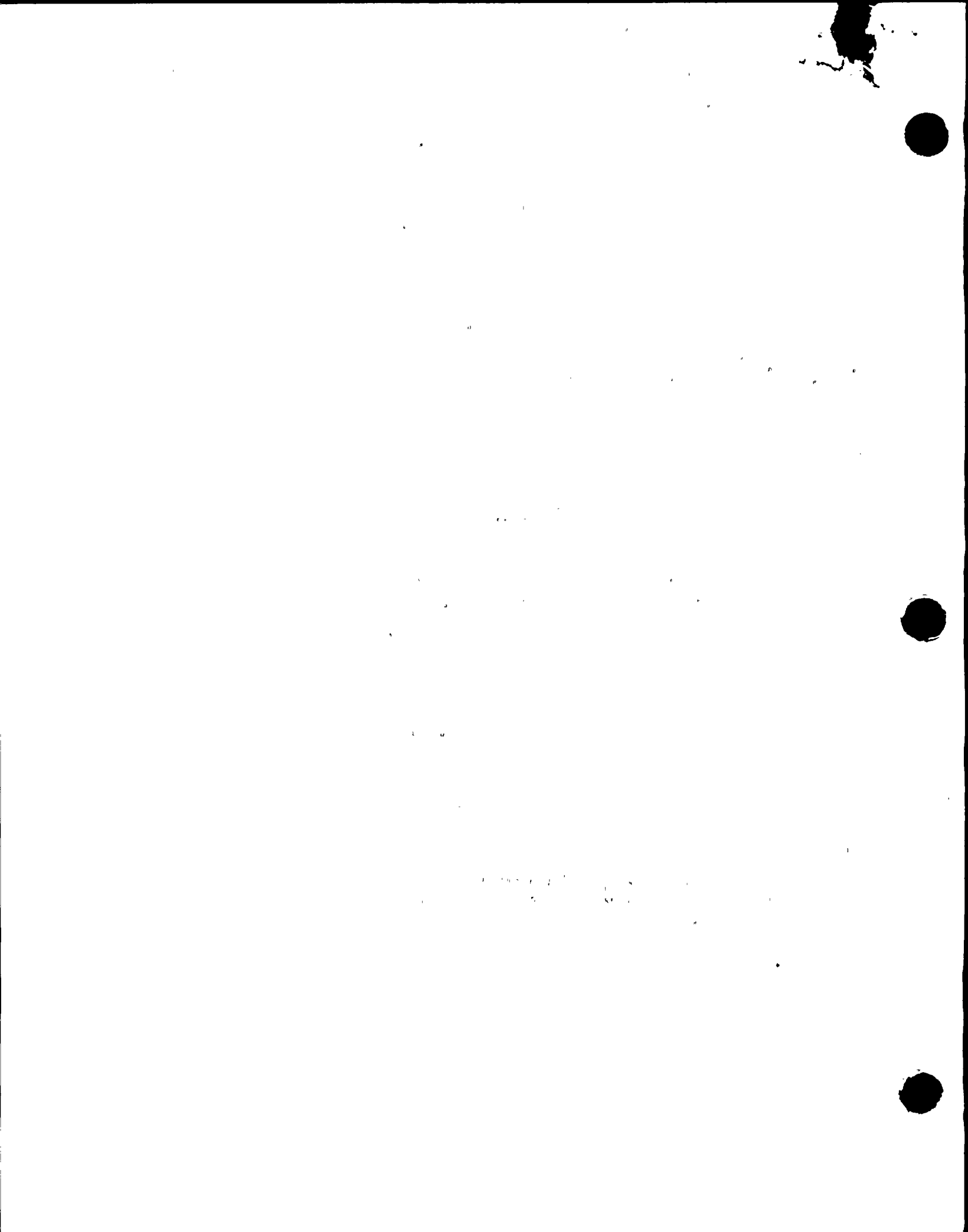
xc: Director of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

W. A. Cook, NRC Senior Resident Inspector
NMPC Project File

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NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT - UNIT 2
DOCKET NO. 50-410

Notice of Deviation
Inspection Report No. 50-410/86-33

Deviation:

As a result of the inspection conducted on June 30 - July 11, 1986, the following deviation from a commitment to the NRC, contained in the Nine Mile Point Unit 2 FSAR, was identified.

Section 1.8, Table 1.8-1, of the Nine Mile Point Unit 2 FSAR and Section 14.2.7 commit to compliance with Regulatory Guide (RG) 1.108, Revision 1, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants". RG 1.108, Section C.2(9) requires reliability testing to be demonstrated by 69 consecutive valid tests (per plant) during the pre-operational test program. Nine Mile Point Unit 2 FSAR section 14.2.4.1, Preliminary Testing, states that test results obtained during preliminary testing may be used in place of testing during preoperational testing provided the preliminary test and its results are approved by the Joint Test Group (JTG).

Contrary to the above, it was found during this inspection that diesel generator pre-operational testing (N2-POT-100A-1 and 2) had been JTG approved; however, the results of preliminary test MD.0100.A03, Revision 0, used to test the reliability of standby diesel generators 1 and 3, had not been reviewed and approved by the licensee's JTG.

Response:

In the Final Safety Analysis Report, Niagara Mohawk committed to have the Joint Test Group review and approve the results of Preliminary Tests required to satisfy any Acceptance Criteria of a Preoperation Test Procedure. Likewise, Niagara Mohawk committed to meet the requirement of Regulatory Guide 1.108, Revision 1, 1977, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants."

The reliability test of 69 consecutive starts per Regulatory Guide 1.108 was performed as a Preliminary Test. Even though this Preliminary Test was performed during the Preoperation Test Program, the results of the Preliminary Test were not made a requirement to satisfy the acceptance criteria of the Preoperation Test Procedure for the emergency diesel generators. The Niagara Mohawk procedures, therefore, did not require the Joint Test Group review and approval of the results for this Preliminary Test, which action is consistent with the Final Safety Analysis Report commitment.

Corrective Action:

Due to the importance of reliability of the emergency diesel generators, however, the results of Preliminary Test MD.0100.A03, Revision 0, have been reviewed and approved by the Joint Test Group.

Preventive Action:

Since the diesel generator preoperational and reliability testing has been completed and the Commission's concerns have been addressed by the corrective actions as stated above, Niagara Mohawk believes that no additional action is required.

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