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 RECIP. NAME RECIPIENT AFFILIATION
 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Forwards list of comments on SSER 4, reflecting differences between SER & suppl. FSAR through Amend 27 & subsequent ltr updates. Comments do not address status of open items or affect Tech Specs. Affidavit encl.

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NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

October 21, 1986
(NMP2L 0919)

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

Enclosed is a list of Niagara Mohawk's comments on the Safety Evaluation Report Supplement 4. Our comments reflect differences between the Safety Evaluation Report and Supplements, the Final Safety Analysis Report through Amendment 27, and subsequent letter updates. Generally, the comments do not address the status of open issues.

None of the comments affect the Technical Specifications.

Very truly yours,


C. V. Mangan
Senior Vice President

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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. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of (Onondaga), this 21 day of (October), 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



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

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9-7	Last paragraph 11th Line: Delete the sentence, "In addition, an approved flame-retardant coating has been applied to the cables that traverse the 20-ft. zone to reduce the potential for fire propagation along the cables." During the Nuclear Regulatory Commission's Appendix R audit at the Nine Mile Point Unit 2 Site in October, 1985, it was noted that the flame-retardant coating had not yet been applied to the cables traversing the 20-ft. zone. The Nuclear Regulatory Commission reviewer at that time agreed that since the cables meet the standard of IEEE 383-1974 flame test (see FSAR Section 9A.3.5.5.5, Page 9A.3-46), application of a flame-retardant coating to the cables was not necessary. FSAR Section 9A.3.1.2.5.10 (Page 9A.3-23) was subsequently revised to delete reference to the coating.	FSAR Page 9A.3-23 and 9A.3-46
9-12, 9-13, and 9-15	Page 9-12 Third Paragraph 8th Line, Page 9-13 Fifth Paragraph 1st Line, and Page 9-15 Section 9.5.1.7 Item 12: change "three" to "seven." There are seven (not three) non-safety related locations that CO ₂ fire suppression system are not being used in the interim. These locations are identified in FSAR FSAR Figures 9A.3-4, 9A.3-5, and 9A.3-6. They are the normal switchgear building rooms (Zones 601XL and 602XL in Figure 9A.3-4; Zones 612XL and 613XL in Figure 9A.3-5), turbine building switchgear rooms (Zones 726XL and 740XL in Figure 9A.3-6) and radwaste building switchgear room (Zone 395XL in Figure 9A.3-6). (Note the zone number designation -XL means that the zone is CO ₂ protected. See the legend on Figure 9A.3-2.) As discussed in SSER 4 Page 9-12, our letter dated June 25, 1986 (NMP2L 0758) has discussed the reasons for not providing CO ₂ fire suppression system to these seven locations and also the alternate means of fire protection.	FSAR Pages 9.5-5 and 9.5-6 FSAR Figures 9A.3-4, 9A.3-5, 9A.3-6



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Sixth Paragraph Fourth Line: Delete the phrase, "and (4) the drywell air coolers condensate flow rate monitoring system." This monitoring system is not part of the Nine Mile Point Unit 2 reactor coolant pressure boundary (RCPB) leak detection system as indicated in FSAR Page 5.2-44. Regulatory Guide 1.45, position C.3 recommended at least three separate detection methods: (1) sump level and flow monitoring, (2) airborne particulate radioactivity monitoring, and (3) monitoring of condensate flow rate from air flow cooler or monitoring of airborne gaseous radioactivity. Nine Mile Point Unit 2 RCPB leak detection system satisfied position C.3 by (1) sump level and flow monitoring, (2) airborne particulate radioactivity monitoring, and (3) monitoring of airborne gaseous radioactivity.

FSAR Page 5.2-44



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