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ACCESSION NBR: 8610290311 DDC DATE: 86/10/24 NOTARIZED: YES DOCKET #  
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410  
 AUTH. NAME MANGAN, C. V. AUTHDR AFFILIATION Niagara Mohawk Power Corp.  
 RECIP. NAME DENTON, H. R. RECIPIENT AFFILIATION Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Certifies that w/exception of items on encl list of SER/Tech Spec/FSAR differences, final draft Tech Specs reflect as-built configuration of plant, FSAR through Amend 27, SER through Suppl 4 & all subsequent changes as of 861024.

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|           | BWR FOB                   | 1      | 1    | BWR PD3 LA                | 1      | 1    |
|           | BWR PD3 PD                | 1      | 1    | HAUGHEY, M 01             | 2      | 2    |
|           | BWR PSB                   | 1      | 1    | BWR RSB                   | 1      | 1    |
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|           | IE/DEPER/EPB 36           | 1      | 1    | IE/DGAVT/QAB 21           | 1      | 1    |
|           | NRR BWR ADTS              | 1      | 0    | NRR PWR-B ADTS            | 1      | 0    |
|           | NRR ROE, M. L             | 1      | 1    | NRR/DHFT/MTB              | 1      | 1    |
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October 24, 1986  
(NMP2L 0926)

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

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

Your letters of September 10, 1986 through September 29, 1986 forwarded certain revised pages to the Nine Mile Point Unit 2 Final Draft Technical Specifications for Niagara Mohawk Power Corporation review and certification. This letter provides our response and the basis of our certification.

You had previously submitted the Final Draft Technical Specification for our review and certification on June 27, 1986. Our letter dated August 22, 1986 indicated that certification was dependent on resolution of comments submitted. This certification takes into account these changes incorporated into the Final Draft Technical Specifications based on our comments.

Niagara Mohawk has utilized a team approach for the development of the Unit 2 Technical Specifications. The Technical Specification development process, coordinated and controlled by Niagara Mohawk's Licensing Group, consists of input from the Niagara Mohawk plant operations, site technical departments, corporate engineering, and startup and power ascension test groups, as well as Stone & Webster Engineering Corporation and General Electric Company licensing and engineering personnel. In addition to the plant specific input, other sources of input such as the Final Safety Analysis Report as amended, and Safety Evaluation Report as supplemented, were reviewed and evaluated on a continuing basis for input into the Technical Specifications.

The Proof and Review version of the Technical Specifications, issued in November 1985, was extensively reviewed by the above-mentioned Niagara Mohawk personnel, as well as Stone & Webster, General Electric, and the Nuclear Regulatory Commission staff. Resulting comments, as well as comments generated by Nuclear Regulatory Commission staff review, were discussed and resolved with the respective Nuclear Regulatory Commission technical review branches and the technical specification reviewer.

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The Final Draft Technical Specifications have also undergone extensive review. Stone & Webster and General Electric have reviewed those portions of the Final Draft Technical Specifications for which they have provided input in order to ensure that this document accurately reflected design documents and the Final Safety Analysis Report.

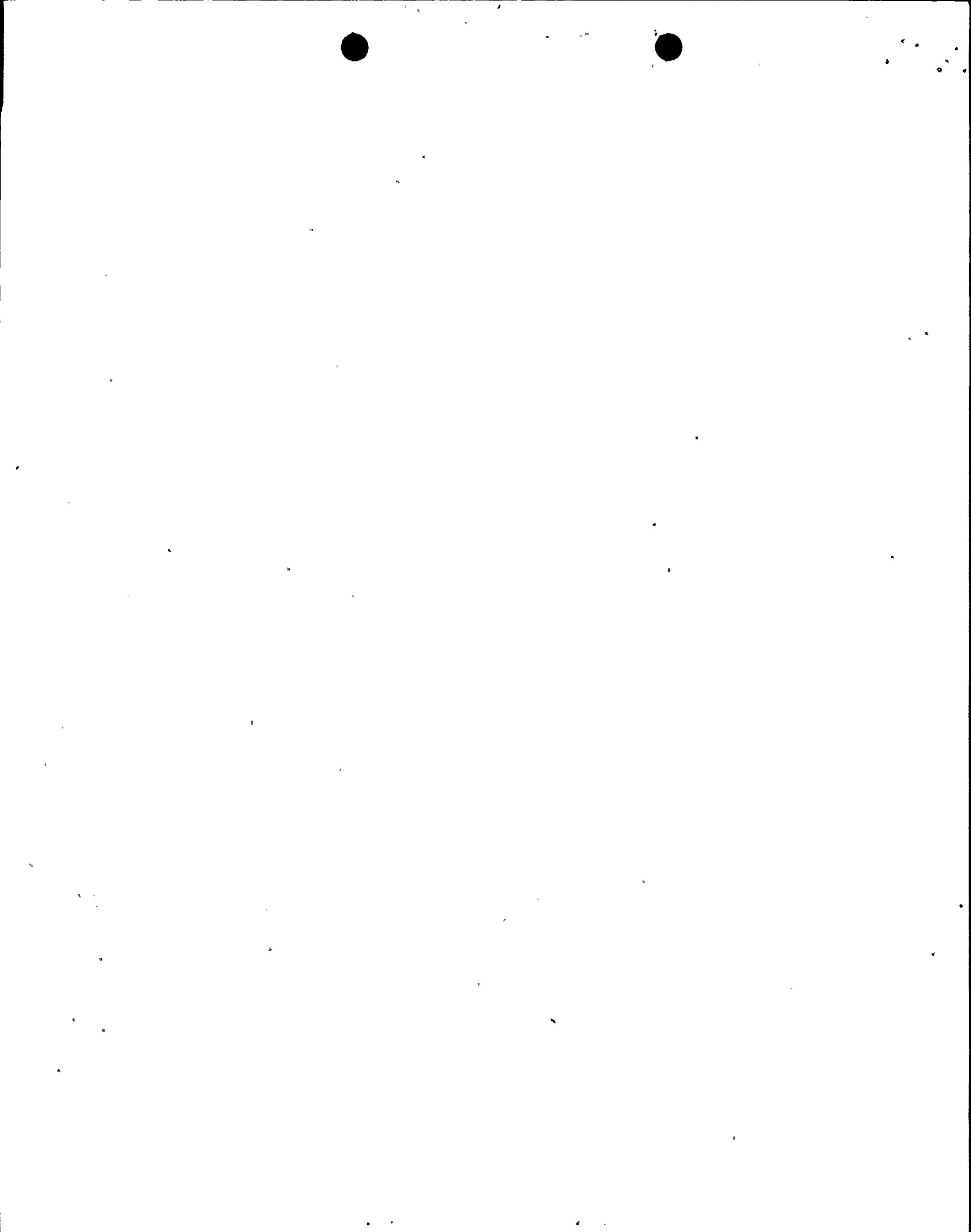
An independent consistency verification review of the Technical Specifications, Final Safety Analysis Report and Safety Evaluation Report was also performed by United Energy Services Company. This review was a second effort performed in addition to General Electric's review of these documents. The review by United Energy Services and General Electric consisted of both the nuclear steam supply system and balance of plant areas.

Technical Specification changes which were submitted represent the considerable experience that Niagara Mohawk has acquired in the operation of Nine Mile Point Unit 1 for over 15 years. Senior level personnel at the site were extensively involved in the development process of the Technical Specifications. Some of the personnel within Niagara Mohawk who contributed heavily to the effort are the Reactor Analysts, Shift Technical Advisors, Superintendent of Chemistry and Radiation Management, Technical Superintendent Nuclear Generation, Supervisor of Fire Protection and Station Shift Supervisors. Some of the individuals involved hold licenses on both Units 1 and 2, and/or held a license at James A. Fitzpatrick.

The Nuclear Training Department has been kept apprised of Technical Specification revisions to ensure proper operator training. Operators have utilized the draft Technical Specifications during their training on the simulator. Feedback from the operators during their licensing training has been utilized in the development process of the Technical Specifications.

Our Nuclear Compliance & Verification group has established a program for the verification of the Final Draft Technical Specification and the Final Safety Analysis Report. The verification effort consists of annotating both these licensing documents to controlling plant documents such as drawings, procedures, specifications and calculations. This is an ongoing program and annotation data will be maintained.

Based on the foregoing, on behalf of Niagara Mohawk Power Corporation, I certify to the best of my knowledge and belief with the exception of the attached items that the Final Draft Technical Specifications reflect the as-built configuration of the plant, the Final Safety Analysis Report through Amendment 27, the Safety Evaluation Report through Supplement 4, and all subsequent proposed changes submitted to the Nuclear Regulatory Commission as of October 24, 1986. An affidavit relating to this certification accompanies this letter.



Within 30 days of receipt of Supplement 5 of the Safety Evaluation Report, we will complete our review and recertify the Technical Specifications are consistent with the Final Safety Analysis Report and Supplement 5 of the Safety Evaluation Report.

This letter will also confirm that Nine Mile Point Unit 2 has been designed, constructed and tested in substantial agreement with docketed commitments and applicable regulatory requirements including 10 CFR 50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants."

Very truly yours,

  
C. V. Mangan  
Senior Vice President

NLR:ar  
2145G

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 24<sup>th</sup> day of October, 1986.

Christine Austin  
Notary Public in and for  
Onondaga County, New York

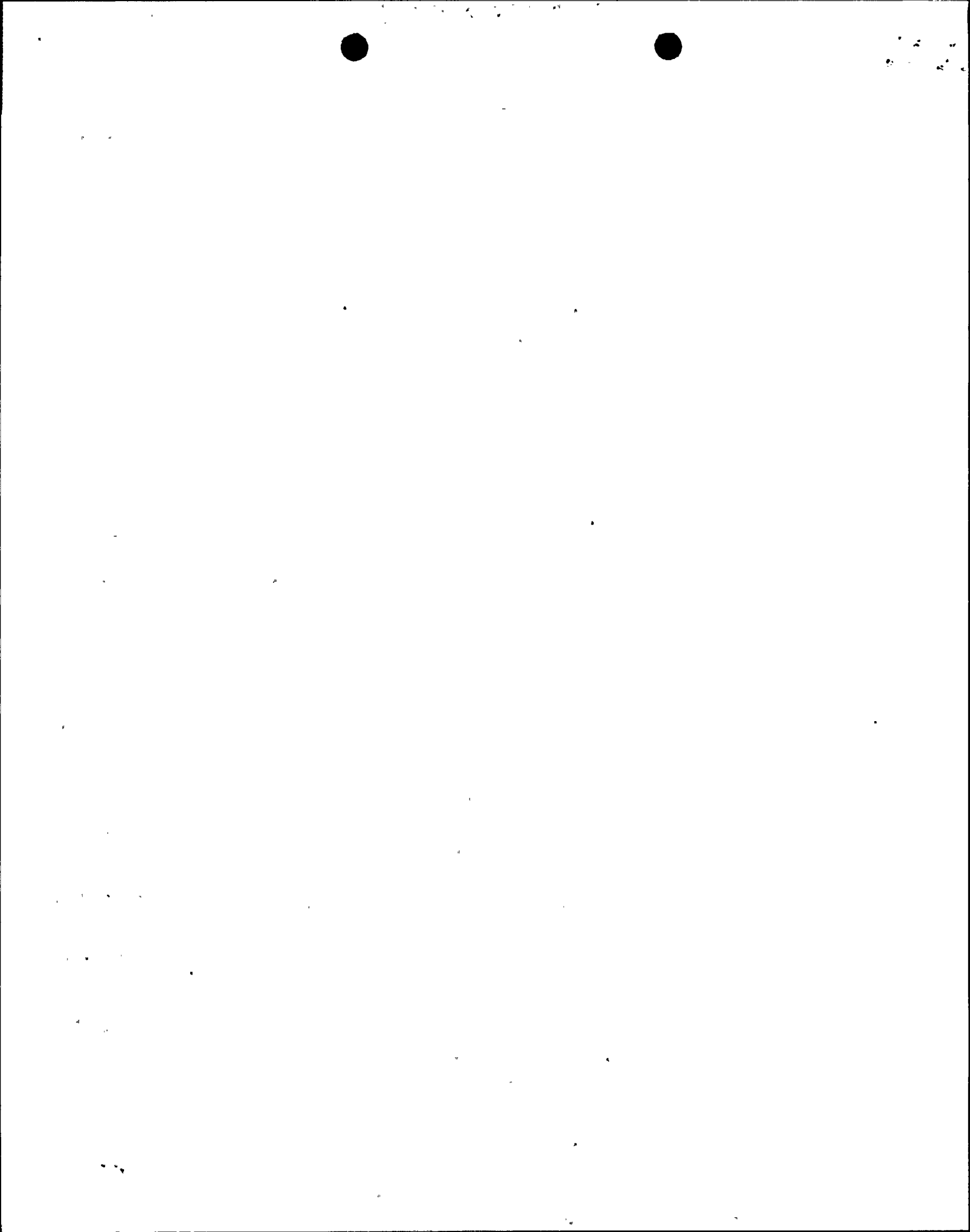
My Commission expires:

**CHRISTINE AUSTIN**  
Notary Public in the State of New York  
Qualified in Onondaga Co. No. 4787687  
My Commission Expires March 30, 1987

CHRISTINE AUSTIN  
Notary Public in the State of New York  
Qualified in Onondaga Co. No. 478783  
My Commission Expires March 30, 1977

LIST OF  
SAFETY EVALUATION REPORT/TECHNICAL SPECIFICATION/FINAL SAFETY ANALYSIS REPORT  
DIFFERENCES

1. Niagara Mohawk Power Corporation submitted a revision to Final Safety Analysis Report Table 480.37-1, "Reverse Tested Containment Isolation Valves," by letter dated July 3, 1986 (NMP2L 0768). Three valves were added to this table. Safety Evaluation Report Supplement 3, contains Table 6.6, which also lists reverse tested containment isolation valves. This table will require revision to match the Final Safety Analysis Report and Technical Specifications.
2. The Final Safety Analysis Report for Nine Mile Point Unit 2 contains Table 11.5-1, "Process and Effluent Radiation Monitoring Systems." Table 11.5 of the Safety Evaluation Report, "Continuous Monitors," corresponds with the Final Safety Analysis Report table. Due to changes to the Final Safety Analysis Report table in Amendment 23, the Safety Evaluation Report requires revision:
3. Based upon Final Safety Analysis Report and Technical Specification changes enclosed in a letter dated August 21, 1986 (NMP2L 0836, Pages 13 through 19), the Standby Gas Treatment System flow rate has been revised from 3500 cfm to 4000 cfm. In addition, Amendment 23 revised the secondary containment design leakage from 3160 cfm to 3190 cfm (Final Safety Analysis Report Section 6.2.3.4). Safety Evaluation Report section 6.2.3 currently reflects a flow rate of 3500 cfm and design leakage of 3160 cfm. Supplement 4 of the Safety Evaluation Report, Section 15.6.5, Page 15-5, needs to be revised to reflect this final data.



4. Niagara Mohawk Power Corporation submitted changes to the Final Safety Analysis Report figures 13.1-6, 13.1-7, 13.1-8 and 13.1-9 and Technical Specification figures 6.2.1-1 and 6.6.2-1 in letters dated August 21, 1986 (NMP2L 0836) and September 5, 1986 (NMP2L 0868). All these figures address the Niagara Mohawk management organization structure. The corresponding figures in Chapter 13 of the Safety Evaluation Report need to be revised to reflect the changes made to the Final Safety Analysis Report and the Technical Specifications.
  
5. The isolation signals on Table 6.4, Page 6-28, in Supplement 3 of the Safety Evaluation Report do not agree with Technical Specification Table 3.3.2-4, Page 3/4 3-23, and the Safety Evaluation Report needs to be revised to reflect the Technical Specifications.

NOTE: Items 1 through 4, inclusive, were identified in our letter dated August 21, 1986 (NMP2L 0836).



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