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 FACIL: 50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe      05000220  
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 MANGAN, C. V.      Niagara Mohawk Power Corp.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 ZWOLINSKI, J. A.      BWR Project Directorate 1

SUBJECT: Advises that util does not wish to commit to post-scrum  
 walkdown insp as described in BWR00-8420 for facility.  
 Proposes to perform hydro test of scram discharge vol piping  
 in accordance w/ASME Code Section XI 1983 Edition.

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MEMORANDUM FOR THE DIRECTOR, FBI  
SUBJECT: [Illegible]

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December 15, 1986  
NMP1L 0118

Director of Nuclear Reactor Regulation  
Attention: Mr. John A. Zwolinski, Project Director  
BWR Project Directorate Number 1  
Division of BWR Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Nine Mile Point Unit 1  
Docket No. 50-220  
DPR-63

Dear Mr. Zwolinski:

The Nuclear Regulatory Commission's Generic Letter 86-01 transmitted the staff's Safety Evaluation Report regarding the integrity of BWR scram discharge piping systems. The staff report concluded that the revised Boiling Water Reactor Owners Group Emergency Procedure Guidelines for Secondary Containment Control (NEDO-24934), together with normal plant procedures and the proposed periodic visual verification of the scram system piping integrity (BWROG-8420) provides sufficient measures for detecting and mitigating the consequences of leakage that may occur in the scram discharge volume piping system. The Boiling Water Reactor Owners Group proposed in letter BWROG-8420 that plants with Class 2 scram discharge volume piping perform an additional inspection once per refueling cycle consisting of a post-scram walkdown of the piping. This post-scram walkdown of the scram discharge volume piping would be conducted within 30 minutes following scram reset to visually observe evidence of leakage from the piping.

The Owners Group letter stated that each utility would separately evaluate and endorse the group position. Niagara Mohawk does not wish to commit to the post-scram walkdown inspection as described in BWROG-8420 for Nine Mile Point Unit 1. Instead, we propose to perform a hydro test of the scram discharge volume piping in accordance with the ASME Code Section XI 1983 Edition, Summer 1983 Addenda, IWA 5000 and IWC 5000. This hydro test will be performed during each refueling outage commencing with the 1988 refueling outage. The proposed hydro test provides a level of assurance at least equal to a post-scram walkdown.

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The first part of the document  
 discusses the general principles  
 of the system and its  
 objectives. It also outlines  
 the scope of the project and  
 the roles of the various  
 participants. The second part  
 describes the methodology used  
 in the study, including the  
 data collection and analysis  
 techniques. The third part  
 presents the results of the  
 study and discusses their  
 implications. Finally, the  
 document concludes with a  
 summary of the findings and  
 recommendations for future  
 research.

Mr. John A. Zwolinski, Project Director  
December 15, 1986  
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The scram discharge volume piping was hydro tested as described above during the 1986 refueling and maintenance outage. The Nine Mile Point Unit 1 scram discharge piping is ASME Class 2 and is inspected at regular intervals in accordance with the Inservice Inspection Plan per the criterion for such pipes contained in the ASME Code, Section XI. The additional test frequency will be incorporated into the Inservice Inspection Plan.

Very truly yours,



C. V. Mangan  
Senior Vice President

LW:pns  
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