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SUBJECT: Responds to NRC 861222 request for explanation of how redundant safety sys verified as operable before taking sister safety sys out of svc, per util 861126 request that NRC revise Page 15-2 of SSER 5.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/301 PLAINFIELD ROAD, SYRACUSE, N.Y. 13212/TELEPHONE (315) 474-1511

January 23, 1987
(NMP2L 0978)

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

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

Gentlemen:

Niagara Mohawk letter NMP2L-0943 dated November 26, 1986, requested the Nuclear Regulatory Commission to revise page 15-2 of Supplement 5 to the Nine Mile Point Unit 2 Safety Evaluation Report (SER) to reflect the latest revision of Nine Mile Point Unit 2 Administrative Procedure AP-3.3.1, "Control of Equipment Markups," Revision 2 dated July 10, 1986 (reissue date January 21, 1987). The Safety Evaluation Report referenced an obsolete revision. During the review of this request, on December 22, 1986, the Nuclear Regulatory Commission staff asked Niagara Mohawk to explain how redundant safety systems are verified as operable before taking sister safety systems out of service. This letter responds to that concern.

First, it should be noted that the revision to AP-3.3.1 did not change the Niagara Mohawk position on NUREG-0737, item II.K.1.10, as found on page 1.10-85 of the Nine Mile Point Unit 2 Final Safety Analysis Report (FSAR). Second, the revision is consistent with the Nine Mile Point Unit 2 Technical Specification Bases 4.0.3 found on page B 3/4 0-2. Specifically, paragraph 3.1.1 of AP-3.3.1 states:

> "Whenever there is a requirement to markup or otherwise render one of a redundant set of safety systems inoperable, the Technical Specifications shall be reviewed for required testing of the remaining redundant system prior to placing the markup. For Unit 2, operability requirements may be met using the Bases for Technical Specification 4.0.3."

B001
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Technical Specification Bases 4.0.3 states in part:

> "The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval."

The responsibility of assuring that the above operability requirements are satisfied rests with the Station Shift Supervisor (S.S.S.). His permission must be obtained before a component or system is removed from service. He does this by consulting the appropriate Technical Specifications and the Equipment Status Log which is maintained in the Control Room. The requirement to maintain the Log is contained in Administrative Procedure AP-4.0, Section 5.2. The Station Shift Supervisor determines operability and required actions by review of surveillance history, equipment status and associated Technical Specification Limiting Condition for Operation (LCO). Administrative Procedures AP-3.3.1 and AP-4.0 are used to control the Markup process and equipment operability at Nine Mile Point Unit 2. This process was previously submitted to the Nuclear Regulatory Commission staff and found to satisfy the requirements of NUREG-0737, II.K.1.10 as described in IE Bulletin 79-08. Niagara Mohawk does not believe that revision 2 of AP-3.3.1 affects the earlier staff conclusions.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan
Senior Vice President

PEF/pns
2498G

xc: Regional Administrator, Region I
Ms. E. G. Adensam, Project Director
Mr. W. A. Cook, Resident Inspector
Project File (2)

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 23rd day of January, 1987.

Beth A. Menikheim
Notary Public in and for
Onondaga County, New York

My Commission expires:
BETH A. MENIKHEIM
Notary Public in the State of New York
Qualified in Onondaga County No. 4804074
My Commission Expires August 31, 19[illegible]