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 MANGAN, C. V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Application to amend License NPF-54, revising Tech Spec. Table 3.6.3-1, "Primary Containment Isolation Valves," to clarify Type C testing. Rev will be incorporated into full power license.

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 TITLE: OR Submittal: Append J Containment Leak Rate Testing

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February 3, 1987
(NMP2L 0994)U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555Re: Nine Mile Point Unit 2
Docket No. 50-410

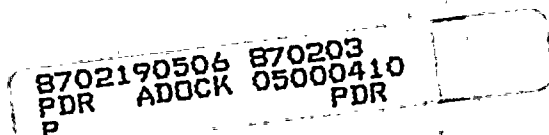
Gentlemen:

The purpose of this letter is to state to the Office of Nuclear Reactor Regulation Niagara Mohawk's position of a footnote in the Nine Mile Point Unit 2 Technical Specifications dealing with leak rate testing of four 3/4" globe valves and to request a change to the full power Technical Specifications.

Table 3.6.3-1 of the Nine Mile Point Unit 2 Technical Specifications, Primary Containment Isolation Valves, pages 3/4 6-28 and 3/4 6-35 (footnote (n)) states that 2MSS*SOV97 A, B, C and D are Type C tested in the reverse direction. Such testing is consistent with 10CFR50, Appendix J, Section III.C.1 and contained in the Final Safety Analysis Report response to Question F480.37. The four solenoid valves are 3/4" globe drain valves on the main steam line system depicted on FSAR Figure 10.1-3e. The purpose of footnote (n) on page 3/4 6-35 of the Technical Specifications was to allow Type C testing of these valves in a direction opposite to the post-accident direction, which is permitted by 10CFR50, Appendix J, Section III.C.1.

The footnote was requested due to the lack of a test connection to allow testing in the post-accident direction. Attempts to test these valves in the reverse direction have not been successful. This is due to the pressure being applied under the seat which overcomes the force of the actuator spring and lifts the plug off the seat. Modifications are being made to allow testing of 2MSS*SOV97 A, B, C and D in the post-accident direction.

This matter was discussed with W. A. Cook and John Linville of Region I. They indicated that given the circumstances, Niagara Mohawk should bring its position on this matter to the attention of the Office of Nuclear Reactor Regulation.

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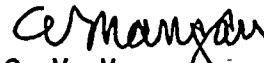
10-1-19

It is Niagara Mohawk's position that footnote (n) on page 3/4 6-35 of the Technical Specifications is a permissive statement permitting testing of the valves in the reverse direction. Therefore, a 10CFR50, Appendix J, Section III.C.1 test in the post-accident direction is permitted and preferred by the regulations and is consistent with footnote (n) on page 3/4 6-35.

Niagara Mohawk requests that the attached change on page 3/4 6-35 to Table 3.6.3-1, which clarifies the Type C testing of these valves, be incorporated into the full power license when it is issued.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



C. V. Mangar

Senior Vice President

KWK/pns
2561G
Attachment

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



10-11-72

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 3rd day of February, 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, 1988

MEMORANDUM FOR THE RECORD
SUBJECT: [Illegible]