



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 98 TO FACILITY OPERATING LICENSE NO. DPR-63
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR POWER STATION UNIT NO. 1
DOCKET NO. 50-220

INTRODUCTION

In a letter dated January 29, 1988, the licensee requested the Technical Specification for Nine Mile Point Nuclear Station Unit 1 (NMP-1) be amended to move the footnotes referencing the specific Inservice Inspection (ISI) and Inservice Testing (IST) Programs in effect from Technical Specifications sections 3.2.6 and 4.2.6 to the Bases. Inasmuch as the Bases are not part of the Technical Specifications, moving the reference to the Bases would allow the licensee to update the ISI and IST programs, as required every ten years, without amending the Technical Specifications.

The licensee's letter of January 29, 1988 also requested Technical Specification 4.2.6.a.2 be revised to delete the list of systems containing non-conforming components.

In addition to the above listed changes to the Technical Specifications, the licensee proposed changes to the Bases for sections 3.2.6 and 4.2.6. The Bases will be revised to allow inspectors to be qualified to alternate qualification programs approved by the NRC, as well as to the ASME Boiler and Pressure Vessel Code (hereinafter referred to as the ASME Code) Section XI and the Ultrasonic Testing Operator Training for the Detection of Intergranular Stress Corrosion Cracking (IGSCC) developed by the EPRI Non-Destructive Examination Center. The specific alternate program referenced is ASME Code Case N-409 which previously was proposed for use by IGSCC inspectors in a letter dated December 29, 1986. On April 12, 1988 the staff informed the licensee that due to the unacceptability of the Code Case, it had been deleted from the proposed TS. This change did not alter or affect the action noticed or the staff initial determination published in the Federal Register on March 9, 1988. Additional, editorial changes to the Bases were also proposed and references to the ISI and IST programs in effect were added.

EVALUATION

Moving the footnotes referencing the specific ISI and IST programs in effect to the Bases would permit the references to be revised without submitting a Technical Specification amendment. This would be an administrative convenience and would not alter substance program requirements. 10 CFR 50.55a requires the

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ISI and IST programs to be updated every ten years to the latest ASME Code approved by the Nuclear Regulatory Commission. This regulation further requires that relief from, or alternative requirements to, the Code in effect must be authorized by the NRC. The revised Technical Specification will not alter the requirement that licensee meet code requirements. This proposed change to the Technical Specifications, therefore, would not degrade the requirements associated with the ISI and IST programs, but would allow an administrative convenience in the process of periodically updating these programs as required by 10 CFR 50.55a. This change is, therefore, acceptable to the staff.

The additional change to Technical Specification 4.2.6.a.2 concerned deleting the list of systems containing non-conforming components from the Technical Specification. The revised Technical Specification will state that, "The systems containing nonconforming components shall be identified in the Inservice Inspection Program." As these systems will be identified in the ISI Program, this change to the Technical Specification is acceptable.

The licensee proposed additional changes to the Bases. Although the Bases are not considered part of the Technical Specifications and, therefore, do not require a Technical Specification amendment to modify them, an evaluation of these changes is included in this safety evaluation for convenience.

The most significant revision to the Bases for 3.2.6 and 4.2.6 concerns the use of alternate qualification programs approved by the NRC for inspectors for the augmented inspection program. The referenced alternate program is that defined by ASME Code Case N-409. In a letter dated December 29, 1986 the licensee stated its intention to use ASME Code Case N-409, "Procedure and Personnel Qualification for Ultrasonic Detection and Sizing of Intergranular Stress Corrosion Cracking in Austenitic Piping Welds, Section XI, Division 1." The licensee's December 29, 1986 letter stated that Code Case N-409 would be used as an approved alternate program to the EPRI program for qualifying IGSCC inspectors. The staff has determined that the use of that code case as requested for IGSCC inspectors will not provide a level of quality and safety equivalent to the EPRI program and, therefore, is not acceptable. Consequently, the reference to that code case has been deleted from the revised Bases. This change was discussed with the licensee on April 12, 1988. If the licensee intends to use other alternatives for qualification of inspectors, then the licensee should apply for relief in accordance with 10 CFR 50.55a(a)(3).

Other changes to the Bases include incorporating footnotes specifying the applicable ISI and IST programs and administrative changes. These changes are also acceptable. When the ISI and IST programs are updated in accordance with the requirements of 10 CFR 50.55a, the references to the applicable programs should also be updated.

ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of the facility components located within the restricted areas as defined in 10 CFR 20 and changes surveillance requirements. The staff has determined that this amendment



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involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: May 23, 1988

PRINCIPAL CONTRIBUTOR:

M. Haughey



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