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SUBJECT: Responds to NRC request for plant specific implementation plans for facility.

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September 23, 1988
NMP1L 0305

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

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

Gentlemen:

On July 29, 1988, the Nuclear Regulatory Commission Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the SER requests that SQUG member utilities provide to the Nuclear Regulatory Commission, within 60 days, a schedule for implementing the GIP. This letter responds to the Nuclear Regulatory Commission request for our plant-specific implementation plans for Nine Mile Point Unit 1 (NMP-1).

Niagara Mohawk Power Corporation (NMPC) has been an active member of SQUG since its inception in 1982. We have participated in the development of the methodology and its trial implementation. Specifically:

- ° In 1986 and early 1987, NMPC reviewed and participated in the trial use of the SQUG/EPRI relay screening procedures to verify the seismic adequacy of relays at our NMP-1 plant.
- ° In December, 1987, the SQUG trial training seminar for seismic review team members was held at our Nine Mile Point training center. Several NMPC engineers participated in the training. This trial training was also attended by Nuclear Regulatory Commission representatives.
- ° In 1987, NMPC, working with SQUG representatives, developed the preliminary list of NMP1 safe shutdown equipment for resolution of USI A-46.
- ° In January-February of this year, NMPC performed the A-46 seismic review and trial walkdown of NMP-1. This walkdown was the second trial use of the SQUG methodology now embodied in Revision 0 of the GIP. The performance and results of the NMP-1 trial walkdown were reviewed and accepted by Nuclear Regulatory Commission staff representatives as well as the Senior Seismic Review and Advisory Panel (SSRAP). A complete report of the NMP-1 trial walkdown has been submitted to the Nuclear Regulatory Commission by SQUG.

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1. The first part of the report is a general description of the project and its objectives. It includes a brief history of the project and a statement of the problem to be solved.

2. The second part of the report is a description of the methods used in the study. It includes a discussion of the experimental design and the data collection procedures.

3. The third part of the report is a discussion of the results of the study. It includes a summary of the findings and a comparison of the results with previous studies.

- Since completion of the A-46 trial walkdown in early 1988, NMPC has been actively pursuing resolution of open questions resulting from the walkdown. This effort is on-going.
- Currently, we are updating and expanding our seismic safe shutdown equipment walkdown list to include other safe shutdown trains and equipment. The scope of safe shutdown equipment included in the A-46 trial walkdown in early 1988 was the minimum required by the draft GIP at that time.

In response to your request for our plans and schedule for implementation of USI A-46, it is NMPC's intention to complete the ongoing seismic review activities in accordance with the procedures given in the current issue of the GIP and to initiate reviews of areas for which the GIP procedures are still under development (e.g., tanks, heat exchangers, cable and conduit raceways and relays) as they are issued. NMPC has completed much of the work scope contained in Revision 0 of the GIP and plans to complete more walkdowns during the current outage. NMPC will be completed with the work scope contained in Revision 0 of the GIP by the end of the next planned refueling outage. The review of those areas still under development will be completed by the conclusion of our first refueling outage following approval of the GIP procedures and criteria. As part of this effort, we plan to re-review and update, as required, any areas of our review in which the GIP changes significantly.

Considering the developmental and still incomplete nature of the generic methodology of the GIP, our plans and schedule for resolution of A-46 are necessarily contingent upon our present understanding of the overall work scope, requirements, and satisfactory resolution of open issues. If there are significant changes in the GIP approach and criteria which impact our plans and implementation schedule, we will so advise you.

We were pleased to receive your endorsement of the SQUG methodology given in the GIP. We believe the SQUG approach represents a practical and effective method of addressing the seismic qualification issue in operating plants. We plan to continue a lead role in the development and implementation of the SQUG generic methodology for resolution of USI A-46.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



C. D. Terry
Vice President

Nuclear Engineering and Licensing

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