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SUBJECT: Responds to Generic Ltr 84-23 re water level instrumentation improvements program.

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NIAGARA MOHAWK

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March 10, 1989
NMP1L 0369

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:

Niagara Mohawk's response to Nuclear Regulatory Commission Generic Letter 84-23 dated December 5, 1984, regarding water level instrumentation improvements, contained a commitment to conduct an Additional Improvement Program (TAC No. M41032). You acknowledged our response in your letter dated May 24, 1988. This letter provides the results of our investigation.

The Additional Improvement Program was a commitment to perform additional investigations based on the S. Levy Inc. Report SLI-8211. The first part of this program was to consider the effect of worse case flashing conditions in the water level instrumentation piping and its impact on the reactor vessel indicated water level. The second part of the program was to perform a walkdown of the water level instrument piping in the drywell. The results of these investigations are summarized below.

Worse Case Flashing Conditions

The plant designated as Plant C in SLI-8211 was Nine Mile Point Unit 1. Consequently, the worse case flashing condition is represented by Figures B-4, B-5 and B-6 in SLI-8211. The Nine Mile Point Unit 1 instrument lines do not contain restriction orifices and the curves denoted as "no orifice" in Figures B-4, B-5 and B-6 are applicable. Calculations used to generate these curves used an enveloping instrument line length of 50ft. Since the Nine Mile Point Unit 1 water level instrument lines are less than 25 feet in length, the indicated error identified in Figures B-4, B-5 and B-6 may be reduced by a factor of 2. Figure B-4 Stuck Open Relief Valve (SORV) event shows essentially no error in the water level measurement. Figure B-5 automatic Depressurization System (ADS) event and Figure B-6 Cooling Depressurization indicated maximum errors of about 2 feet (1 foot when halved). As described in our letter of December 5, 1984, Niagara Mohawk has adjusted the low-low-low water level setpoint for automatic initiation of the ADS by twenty (20) inches. This adjustment compensates for water level indication errors caused by high drywell temperatures.

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Walkdown of Water Level Instrument Piping

The second part of the Niagara Mohawk program was to perform a walkdown of the water level instrument piping in the drywell. This was performed during the current outage. This walkdown verified that the water level instrumentation piping between the constant level reservoir and the water level transmitter was horizontal at operating conditions. However, we found that many of the pipe supports for the instrumentation lines were not in conformance with the piping drawings. Nonconformance Reports were processed to document and resolve the discrepancies. While many of the nonconformances were determined to be acceptable (documentation will be changed to reflect the as-built conditions), it was necessary to modify some water level instrumentation piping supports. The piping support problems would not have caused significant water level indication errors. This work will be completed during the current outage. We have determined that no other water level piping modifications are required.

This completes our response to the water level indication concerns raised in NRC Generic Letter 84-23.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

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