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SUBJECT: Identifies remaining Reg Guide 1.97 activities for which NRC must agree w/util plans for resolution prior to restart.

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Docket No. 50-220

Niagara Mohawk Power Corporation ATTN: Mr. Lawrence Burkhardt, III Executive Vice President Nuclear Operations 301 Plainfield Road Syracuse, New York 13212

Gentlemen:

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Subject: Post Accident Monitoring Equipment (RG 1.97) Restart Issues For Nine Mile Point Unit 1

The NRC has conducted two inspections at Nine Mile Point, Unit 1 to establish the status of your implementation of Regulatory Guide 1.97 (RG 1.97) issues and to determine the need for corrective actions. The purpose of this letter is to identify those remaining RG 1.97 activities for which the NRC must agree with your plans and schedules for resolution prior to the restart of Unit 1.

Following our first inspection, 88-34, conducted during the period November 14-18, 1988, two meetings were held with your staff to discuss unresolved RG 1.97 issues. Your staff committed to correct related Equipment Qualification and RG 1.97 equipment identification deficiencies prior to restart.

A second inspection, 89-12, was subsequently conducted during the period March 27-31, 1989 to determine if further corrective actions were needed before restart. This second inspection focused on the status of the most important RG 1.97 instruments (i.e. instruments important to the performance of Emergency Operating Procedures (EOPs) and those other instruments subject to Category 1 design criteria). The inspection primarily addressed the redundancy (single failure) separation and isolation deficiencies for this group of instruments and the availability of alternative methods of accomplishing safety functions should the specified monitoring instruments be unavailable.

As a result of inspection 89-12, we identified several significant deficiencies in Category 1 instruments (including the instruments that are important to the operators' implementation of the EOPs). Therefore, we request that you respond to this letter and specifically address the RG 1.97 related restart activities identified in Attachment A to this letter. You should advise the NRC of your plans and schedules to address these issues as soon as possible and provide a written response within 30 days of your receipt of this letter. Your response should indicate an overall RG 1.97 action plan to cover the short term (startup) and long term resolution of the RG 1.97 issues identified in Attachment A.

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Niagara Mohawk Power Corporation

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Your cooperation with us in this matter is appreciated.

Sincerely,

Thomas T. Martin, Director Division of Reactor Safety

04/18/89

Enclosure: Attachment A, Nine Mile 1 RG 1.97 Restart Activities

cc w/encl: J. A. Perry, Vice President, Quality Assurance C. Mangan, Senior Vice President W. Hansen, Manager, Corporate Quality Assurance C. Beckham, Manager, Nuclear Quality Assurance Operations K. Dahlberg, Unit 1 Station Superintendent R. Randall, Unit 1 Superintendent, Operations J. Willis, General Station Superintendent C. Terry, Vice President Nuclear Engineering and Licensing J. F. Warden, New York Consumer Protection Branch Troy B. Conner, Jr., Esquire John W. Keib, Esquire Director, Power Division, Department of Public Service, State of New York State of New York, Department of Law Licensing Project Manager, NRR Public Document Room (PDR) Local Public Document Room (LPDR) Nuclear Safety Information Center (NSIC) NRC Resident Inspector State of New York bcc w/encl: Region I Docket Room (with concurrences) Management-Accistant, -DRMA (W/o-encl)-DRP Section Chief PAO-(2)-Salp-Reports-and-Al-I-Inspect Robert J. Bores, DRSS B. Clayton, EDO E. Collins i SEI OC C. Cowqill, DEP NRR Rac RI:DRS RI/DRS :DRS Capra Anderson Strosnider Martin 4/20/89 4/19/89 4/20/89 4/2\/89 4/20/89 OFFICIAL RECORD COPY ANDERSON4/10/89-1 - 0001.1.0

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ATTACHMENT A

NINE MILE POINT, UNIT 1 RG 1.97 RESTART ACTIVITIES

- 1. Conduct an evaluation of RG 1.97 cable separation deficiencies.
 - a. Identify potential cable separation deficiencies.

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- b. Evaluate the significance of the cable separation deficiencies.
- c. Provide plans for necessary short and long term resolution of the cable separation deficiencies.
- 2. Perform an evaluation of the RG 1.97 isolation deficiencies.
 - a. Evaluate the significance of the isolation deficiencies on the availability of the important RG 1.97 monitoring instruments.
 - b. Provide plans for necessary short and long term correction of the isolation deficiencies.
- 3. Perform a review of the RG 1.97 instrument circuit loading and the adequacy of installed fuses.
 - a. Complete a sample evaluation of two instrument circuits.
 - b. Determine the need and provide a schedule for the further review of the other RG 1.97 instrument circuits.
- 4. Review alternatives to the Category 1 RG 1.97 instruments for which deficiencies exist.
 - a. Identify and document the usefulness of the alternatives to the RG 1.97 instruments for implementing the EOPs.
 - b. Provide operator guidance and training as to when and how the alternative instruments would be used.
- 5. Complete the failure modes and effects analysis for the APRM isolation deficiencies.
 - a. Complete the evaluation of this deficiency and take corrective actions.
 - b. Provide the bases that no other protective functions are compromised by isolation deficiencies.
- 6. Identify RG 1.97 instrument power sources. Provide instrument power source information at the site in a form useful to the control room operators.

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Attachment A

- 7. Evaluate the safety significance of the Reactor Pressure Vessel (RPV) common tap for the fuel zone water level instrument.
 - Evaluate the safety significance of the common tap considering a single passive failure at the common line. Determine the operator's ability to follow the EOPs to assure adequate RPV water level and emergency coolant injection.
 - b. Provide plans for resolution of this issue.
- 8. Document and Docket Nine Mile 1 RG 1.97 restart activities.
 - a. Document the Niagara Mohawk (NM) RG 1.97 evaluation of the parameters important to the EOPs that was performed to support NRC inspection 89-12.
 - b. Document the NM RG 1.97 Hazards Analyses.
 - c. Document planned RG 1.97 modifications. Include scope and schedule. Particular emphasis should be placed on modifications that address lack of redundancy for important parameters (torus pressure, drywell atmosphere temperature, and drywell water level).

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