



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

SAFETY EVALUATION BY OFFICE OF NUCLEAR REACTOR REGULATION

GENERIC LETTER 86-01 SCRAM DISCHARGE PIPING SYSTEM

NINE MILE POINT UNIT-1

DOCKET NO. 50-220

INTRODUCTION

The Nuclear Regulatory Commission's Generic Letter 86-01 transmitted the staff's Safety Evaluation Report regarding the integrity of BWR scram discharge piping systems. The staff report endorsed the Boiling Water Reactor Owners Group (BWRG) letter (BWRG-8420) regarding periodic visual verification of the scram system piping integrity. BWRG-8420 recommended that licensees of plants with ASME Code Class 2 scram discharge volume piping perform an additional inspection once per refueling cycle consisting of a post-scram walkdown of the piping. BWRG-8420 also recommended that each utility individually evaluate and endorse the group position.

By letter dated December 15, 1986, Niagara Mohawk Power Corporation (the licensee) proposed to replace the post-scram walkdown inspection described in BWRG-8420 by a hydrostatic test in accordance with the ASME Code Section XI 1983 Edition, Summer 1983 Addenda, IWA-5000 and IWC-5000. This hydrostatic test was proposed to be performed during each refueling outage.

EVALUATION

The BWR Owners Group letter stated that each utility would separately evaluate and endorse the group position. Niagara Mohawk does not wish to commit to the post-scram walkdown inspection as described in BWRG-8420 for Nine Mile Point Unit 1. Instead, the licensee proposes to perform a hydrostatic test of the scram discharge volume piping in accordance with the ASME Boiler & Pressure Vessel Code Section XI 1983 Edition, Summer 1983 Addenda, IWA-5000 and IWC-5000. This hydrostatic test will be performed during each refueling outage commencing with the 1988 refueling outage. The proposed hydrostatic test, according to the licensee, provides a level of assurance at least equal to a post-scram walkdown.

The following reasons have been provided by the licensee to justify the performance of a hydrostatic test instead of the post-scram walkdown described in BWRG-8420:

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- The post-scrum walkdown is a visual inspection of the Scram Discharge Volume (SDV) header and instrument volume only. A Section XI hydrostatic test would cover the entire piping system within the ISI boundary. Therefore, the Section XI test covers more piping than the post-scrum walkdown.
- The post-scrum walkdown is a visual inspection to investigate evidence of appreciable leakage below the SDV header and instrument volume. A Section XI hydrostatic test is capable of detecting leakage of much smaller quantities than the post-scrum walkdown inspection.
- BWROG-8420 takes the position that plants which perform Section XI tests with a frequency of once every refueling outage are not required to perform a post-scrum walkdown. Niagara Mohawk is committing to a test frequency similar to these types of plants.

The licensee chose to perform a hydrostatic test including a visual examination (VT-2) of the SDV piping during each refueling outage in lieu of a post-scrum walkdown as a matter of preference. Following a reactor scram, plant personnel often become involved in essential post-scrum activities. The licensee decided that the SDV walkdown and subsequent manpower diversion following a reactor trip was not warranted, because an equivalent test could be performed during an outage.

CONCLUSION

Based on a review of the licensee's submittal of April 2, 1990, the staff concludes that an adequate justification has been provided by the licensee to perform a hydrostatic test during each refueling outage in lieu of a post-scrum walkdown. The proposed hydrostatic test therefore satisfies the staff position in Generic Letter 86-01 regarding the scram system piping integrity.

Dated: September 17, 1990

PRINCIPAL CONTRIBUTION:

J. Rajan



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

September 6, 1990

Docket Nos. 50-220
and 50-410

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

Dear Mr. Burkhardt:

SUBJECT: RESPONSE TO GENERIC LETTER 89-10, "SAFETY-RELATED MOTOR-OPERATED VALVE (MOV) TESTING AND SURVEILLANCE," NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2 (TAC NOS. 75686 AND 75687)

On June 28, 1989, the NRC issued Generic Letter (GL) 89-10 requesting the establishment of a program to ensure the operability of all safety-related MOVs under design basis conditions. The program in GL 89-10 significantly expands the scope of the program outlined in NRC Bulletin 85-03 and its supplement.

On December 28, 1989, you submitted a letter in response to GL 89-10 for Nine Mile Point Units 1 and 2. Therein, you state that the BWR Owners' Group (BWROG) is developing a generic position for meeting the provisions of the GL. The NRC staff was informed that the BWROG was undertaking the task of developing a generic BWR position for implementing GL 89-10 in a letter dated October 30, 1989, from S. D. Floyd, Chairman of the BWROG. The efforts of the BWROG were acknowledged in a letter dated January 3, 1990, from F. J. Miraglia, Jr., NRC, to S. D. Floyd. During a telephone conversation on February 14, 1990, with S. D. Floyd, the staff learned that the scope of the efforts by the BWROG is limited to assisting utilities in determining the design-basis conditions for motor-operated valves at BWR plants. Consequently, the staff does not expect changes regarding your commitment to the GL will be necessary as a result of efforts by the BWROG.

In your submittal you have requested an extension until six months after issuance of the NRC's appraisal of that generic position (currently scheduled for November 1990) to submit a response to the generic letter. The staff believes that the safety significance of this issue warrants a timely response to the GL, hence your request for deferral relying on the limited BWROG effort is denied.

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As discussed in the reporting requirements of GL 89-10, pursuant to 10 CFR 50.54(f), you are required to advise the NRC, in writing, whether the recommendations and schedule outlined in the generic letter will be met. You are requested to submit your response (originally requested by December 28, 1989) within thirty days of receipt of this letter.

The schedule provided in the generic letter requested that a description of your MOV program be available for review by June 28, 1990, or the first refueling outage after December 28, 1989, whichever was later. Due to delays in issuing Supplement 1 of the generic letter, the staff has decided to delay inspections until at least January 1, 1991. Therefore a description of your MOV program should be available for review on site by January 1, 1991, for Unit 1 and by January 1, 1991, or by the end of the first refueling outage, whichever is later, for Unit 2. Information that should be contained in your program description was discussed during the workshops held in September 1989. Staff positions on questions presented during the workshops are currently available as Supplement 1 to the generic letter. As your MOV program is developed, justification for any differences between your program and the GL, as clarified by Supplement 1, should be incorporated into your program description.

Your program description should be retained on-site for possible further NRC staff review.

Sincerely,

ORIGINAL SIGNED BY:

Robert E. Martin, Senior Project Manager
Project Director I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. Lawrence Burkhardt
Niagara Mohawk Power Corporation

Nine Mile Point 1/2

cc:

Mr. Mark J. Wetterhahn, Esquire
Bishop, Cook, Purcell & Reynolds
1400 L. Street, N.W.
Washington, D. C. 20005-3502

Mr. Kim Dahlberg
Unit 1 Station Superintendent
Nine Mile Point Nuclear Station
Post Office Box 32
Lycoming, New York 13093

Supervisor
Town of Scriba
R. D. #4
Oswego, New York 13126

Mr. Richard Abbott
Unit 2 Station Superintendent
Nine Mile Point Nuclear Station
Post Office Box 32
Lycoming, New York 13093

Mr. Joseph F. Firlit
General Supt.-Nuclear Generation
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
Post Office Box 32
Lycoming, New York 13093

Charlie Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, New York 10271

Resident Inspector
U. S. Nuclear Regulatory Commission
Post Office Box 126
Lycoming, New York 13093

Mr. Paul D. Eddy
State of New York Department of
Public Service
Power Division, System Operations
3 Empire State Plaza
Albany, New York 12223

Mr. Gary D. Wilson, Esquire
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Mr. Peter E. Francisco, Licensing
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Regional Administrator, Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Mr. Richard Goldsmith
Syracuse University
College of Law
E. I. White Halle Campus
Syracuse, New York 12223

Ms. Donna Ross
New York State Energy Office
2 Empire State Plaza
16th Floor
Albany, New York 12223

Mr. Richard M. Kessel
Chair and Executive Director
State Consumer Protection Board
99 Washington Avenue
Albany, New York 12210

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