



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

November 30, 1992

Docket No. 50-220

Mr. B. Ralph Sylvia
Executive Vice President, Nuclear
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Dear Mr. Sylvia:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING PROPOSED TECHNICAL SPECIFICATION CHANGES RELATED TO REACTOR COOLANT SYSTEM AND CONTAINMENT ISOLATION VALVE LISTINGS AND CONTAINMENT LEAKAGE RATE TESTS (TAC NO. M79135)

By letter dated February 7, 1992, which superseded a letter dated November 28, 1990, Niagara Mohawk Power Corporation (NMPC) submitted a request for a license amendment. The proposed license amendment would revise the technical specifications for Nine Mile Point Nuclear Station Unit No. 1 to update the reactor coolant system and primary containment isolation valve tables and the containment leakage rate tests to reflect the NRC staff's conclusions as described in our safety evaluation dated May 6, 1988, regarding compliance with the requirements of 10 CFR Part 50, Appendix J at Nine Mile Point 1.

The NRC staff has begun its review of your submittal; however, we have determined that additional information is required for us to complete our review. The enclosed Request for Additional Information identifies the information we need to continue our evaluation. Please provide this information within 60 days of receipt of this letter so that we can complete our review in a timely manner.

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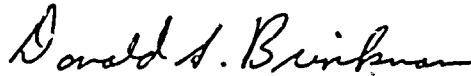
Mr. B. Ralph Sylvia

- 2 -

November 30, 1992

The request for additional information affects one respondent and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,



Donald S. Brinkman, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Additional Information

cc w/enclosure:
See next page



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Niagara Mohawk Power Corporation

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED TECHNICAL SPECIFICATION CHANGES
RELATED TO REACTOR COOLANT SYSTEM AND CONTAINMENT
ISOLATION VALVE TABLES AND CONTAINMENT LEAKAGE RATE TESTS
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT NO. 1
DOCKET NO. 50-220

The following information is requested to continue our review of the proposed technical specification changes.

1. A new footnote 7 has been added to proposed TS Table 3.2.7 (page 119b). This footnote would be applicable to valves in (a) Emergency Cooling High Point Vent To Main Steam (one line), (b) Emergency Cooling Steam Line Drain to Main Steam (two lines), and (c) Emergency Cooling High Point Vent Line (two lines) systems. In accordance with the proposed footnote, these valves would not be tested in accordance with 10 CFR Part 50, Appendix J. Since a specific exemption has not been granted for not testing these valves, please provide justification for not testing these valves or modify footnote 7 accordingly.
2. An automatic initiating signal (reactor water level low-low or high reactor pressure) for opening the emergency condenser condensate return to reactor valves following a LOCA has been added (Table 3.2.7, page 118a). However, proposed TS Table 3.2.7 also indicates that these valves will close upon receipt of the initiating signal (high system flow) from the protection system. Please provide clarification for this apparent discrepancy.
3. A new footnote 4 has been added to proposed TS Table 3.2.7 (page 119b). This footnote is applicable to valves in the Core Spray Injection (two lines) and Core Spray High Point Vent (two lines) systems. The second portion of this footnote states that the outside core spray injection isolation valves are electrically locked open with their breakers locked in the off position, and therefore, these isolation valves do not have to be tested under the IST or Appendix J leakage program. Based on its review, the NRC staff finds that these remote-manually actuated core spray injection isolation valves are needed to provide containment isolation in the event of a break in these lines. Please provide justification for not testing these valves or modify footnote 4 accordingly:



4. A new footnote 5 has been added to proposed TS Table 3.2.7 (page 119b). This footnote is applicable to the Post Accident Reactor Sampling penetration. The footnote states that the self-actuating check valve will be tested in accordance with TS 4.3.4(c) and that this valve does not require testing in accordance with Appendix J. TS 4.3.4(c) requires only an operability test once per operating cycle. Based on its review, the NRC staff finds that this footnote does not conform to the requirements of Appendix J which require Type C testing of this valve. Please provide justification for not Type C testing this valve or modify footnote 5 accordingly.
5. Proposed TS 4.3.3.a(3) specifies the following:

If the leakage rate exceeds the acceptance criterion, corrective action shall be required. If, during the performance of a Type A test, excessive leakage occurs through locally testable penetrations or isolation valves that are not in their proper configuration, to the extent that it would interfere with satisfactory completion of the test, these leakage paths may be isolated and the Type A test continued until completion. A local leakage test shall be performed at P_t before and after the repair of each isolated leakage path. The sum of the post repaired local leakage rates and the UCL shall be less than 75 percent of the maximum allowable leakage rates, L_t (at 22 psig). Local leakage rates shall not be subtracted from the Type A test results to determine the acceptability of the test. The as found and as left leakage data values of excessive leakage areas beyond acceptance criteria shall be provided to NRC.

This proposed TS would be acceptable provided that the cited Type A test would be considered as a failed test in accordance with the staff's conclusion described in the SER, dated May 6, 1988, and the Appendix J requirements. Therefore, revise the proposed TS accordingly.

6. The proposed revision to TS 4.3.3.a(5) specifies a test duration of a minimum of 8 hours after stabilization. Clarify that this test duration is limited to the use of the "Total-Time" method for calculating the leakage rates in conjunction with the Type A tests conducted in accordance with Bechtel Topical Report, BN-TOP-1, Revision 1. Otherwise, a minimum test duration of 24 hours is required to comply with the requirements of Section III.A.3(a) of Appendix J. Therefore, please clarify TS 4.3.3.a(5) accordingly.
7. Proposed TS 4.3.3.c(1) specifies a test frequency of three Type A tests during each 10-year service interval at approximately equal intervals. Please modify this TS to be consistent with Section III.D.1 of Appendix J which further requires that the third test of each set shall be conducted when the plant is shutdown for the 10-year plant inservice inspections.



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8. Proposed TS 4.3.3.c(2)(a) specifies in Part that if a Type A test fails to meet the acceptance criteria of TS 4.3.3.b(1), a Type A test that meets the requirements of TS 4.3.3.a(3) is required prior to startup. Please revise proposed TS 4.3.3.c(2)(a) to specify that the requirements of TS 4.3.3.b(2) shall also be satisfied prior to plant start-up.
9. Please revise proposed TS 4.3.3.c(2)(c)(i) to include the following NRC staff comments:
 - a. Acceptance criteria of proposed TS 4.3.3.b(2) should be included for establishing the retest schedule.
 - b. The phrase "... at each refueling outage unless alternative leak test requirements are acceptable to the NRC." should be revised to read "...at each refueling outage or every 18 months, whichever occurs first, unless alternative leak test requirements are accepted by the NRC by means of specific exemption from Appendix J per 10 CFR 50.12."
 - c. Reference to proposed TS 4.3.3.c(2)(b) near the end of proposed TS 4.3.3.c(2)(c)(i) should be revised to proposed TS 4.3.3.c(1).
10. Proposed TS 4.3.3.c(2)(c)(ii) would permit development and submittal to the NRC for review and approval, a Corrective Action Plan for increased testing frequency of Type B and C penetrations in lieu of the additional Type A tests required by proposed TS 4.3.3.c(2)(i) if a Type A test fails solely due to a specifically identified and subsequently corrected Type B or C tested leak path. The proposed TS deviates from the requirements of 10 CFR Part 50, Appendix J. Therefore, please delete this proposed TS.
11. Proposed TS 4.3.3.d(3)(c) would require that air locks be tested every 6 months following a refueling or maintenance outage at a test pressure of 35 psig. In accordance with 10 CFR Part 50, Appendix J, air locks are required to be tested at 6-month intervals at an internal pressure not less than P_a regardless of whether or not it follows a refueling/maintenance outage. Also, the proposed TS does not include acceptance criteria for air lock testing as required by 10 CFR Part 50, Appendix J. Therefore, please revise this proposed TS accordingly. (It should be noted that for airlock doors having testable seals, Appendix J allows testing the seals to fulfill the 3-day test requirements. In the event that a lower pressure other than P_a is used for this 3-day interval seal test, Appendix J requires the test pressure (typically 10 psig) be stated in the TS.)
12. Proposed TS Table 3.3.4 would change the maximum operating time for the drywell and suppression chamber vent and purge valves from 60 seconds to 15 and 30 seconds for the Pn/DC solenoid (air) and motor-operated valves respectively. As a part of MPA Item B-24, the NRC staff evaluated the radiological consequences of a LOCA during containment purging at NMP-1. Based on the reduction of the purge isolation valve closure time from the



evaluation dated December 8, 1983, concluded that the radiological consequences of a LOCA during purging at NMP-1 to be within the 10 CFR Part 100 dose guideline values. The staff further stated that, "The staff will, therefore, require NMP-1 to reduce the technical specification limit on purge/vent valves isolation system response time to 15 seconds or less." Therefore, the NRC staff finds the above proposed TS change regarding drywell and suppression chamber purge/vent motor-operated isolation valve closure time (30 seconds) not acceptable and requests NMPC to revise proposed TS Table 3.3.4 accordingly.

13. A new footnote 2 has been added to proposed TS Table 3.3.4 (page 148b). This footnote indicates that the outside core spray injection isolation valves are electrically locked open with their breakers locked in the off position; therefore, these isolation valves do not have to be tested under the IST or Appendix J leakage test program. Based on its review, the NRC staff finds that these remote-manually actuated core spray injection isolation valves are needed to provide containment isolation in the event of a break in these lines. Therefore, please provide justification for not testing these valves or modify footnote 2 accordingly.
14. A new footnote 4 has been added to proposed TS Table 3.3.4 (page 148b). This footnote indicates that the isolation valves for the Traversing Incore Probe (four lines), Recirculation Pump Cooling Water, and Drywell Cooler Water do not require testing under Appendix J. Based on its review, the NRC staff does not agree with NMPC that these isolation valves do not require testing under Appendix J. Section III, "Leakage Testing Requirements," of 10 CFR Part 50, Appendix J requires that Type A, B, and C tests be developed for leak testing the systems and components penetrating primary containment pressure boundary. Therefore, please provide justification for not testing these valves or modify footnote 4 accordingly.



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Mr. B. Ralph Sylvia

- 2 -

November 30, 1992

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Sincerely,

Original Signed By:

Donald S. Brinkman, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Additional Information

cc w/enclosure:
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