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

December 3, 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 REGARDING THE NINE MILE POINT NUCLEAR STATION UNIT NO. 1 SECOND TEN-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN (TAC NO. M83099)

By letter dated March 30, 1992, Niagara Mohawk Power Corporation (NMPC) submitted a comprehensive revision to the Inservice Inspection Plan for the second ten-year interval for Nine Mile Point 1. The NRC staff, with assistance from its contractor, Idaho National Engineering Laboratory (INEL), has begun reviewing NMPC's submittal. However, we have determined that additional information, as identified in the enclosure, is required for us to complete our review. Therefore, NMPC is requested to respond to this request for additional information within 60 days of receipt of this letter in order for us to complete our review within a timely manner.

In addition, to expedite the review process, please send a copy of NMPC's response to our request for additional information to our contractor, INEL, at the following address:

Boyd W. Brown
EG&G Idaho, Inc.
INEL Research Center
2151 North Boulevard
P.O. Box 1625
Idaho Falls, Idaho 83415-2209

This requirement affects one respondent and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Donald S. Brinkman

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

cc:

Mark J. Wetterhahn, Esquire
Winston & Strawn
1400 L Street, NW
Washington, DC 20005-3502

Supervisor
Town of Scriba
Route 8, Box 382
Oswego, New York 13126

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

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

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

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

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

Mr. David K. Greene
Manager Licensing
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

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

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

ENCLOSURE

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

REQUEST FOR ADDITIONAL INFORMATION

REGARDING SECOND 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN

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 your March 30, 1992, submittal:

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during successive 120-month inspection intervals comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein. The licensee, Niagara Mohawk Power Corporation, has prepared the Nine Mile Point Nuclear Station Unit No. 1 (NMP1), Inservice Inspection (ISI) Program Plan, Component Support Program Plan, and Pressure Testing Program Plan to meet the requirements of the 1983 Edition through Summer 1983 Addenda (83S83) of the ASME Code, Section XI, except that the examination requirements for Code Class 2 piping welds have been determined by ASME Code Case N-408, "Alternative Rules for Examination of Class 2 Piping Section XI, Division 1."

As required by 10 CFR 50.55(g)(5), if the licensee determines that certain Code examination requirements are impractical and relief is requested, the licensee shall submit information to the Nuclear Regulatory Commission (NRC) to support that determination.

The NRC staff has reviewed the available information in the Nine Mile Point Nuclear Station Unit No. 1, Second 10-Year Interval ISI Program Plan, Component Support Program Plan, and Pressure Testing Program Plan (all Revision 0), submitted by letter dated March 30, 1992.

2. Additional Information Required

Based on the above review, the NRC staff has concluded that the following information and/or clarification is required in order to complete its review of the NMPC ISI Program Plan for NMP1:

A. Appendix F of the ISI Program Plan states that ISI relief requests will be added after they are approved by the NRC. The NRC staff considers the relief requests part of the ISI Program Plan. Relief requests should be submitted with the Program Plan for an effective evaluation to be performed. Section 7.0 of the ISI Program Plan implies that relief requests that were granted for the first 10-year interval will be applied to the second 10-year interval. Relief requests granted for the first interval are not automatically approved for subsequent intervals. All relief requests applicable to the second 10-year interval must be submitted and evaluated for that interval. Please submit for review all known relief requests for the second 10-year ISI interval.

B. Provide isometric and/or component drawings showing the welds, components, and supports that Section XI of the ASME Code requires to be examined during the second 10-year interval.

C. Augmented examinations have been established by the NRC when added assurance of structural reliability is deemed necessary. The NMP1 ISI Program Plan addresses numerous augmented inspection requirements. However, the augmented examination requirements of Branch Technical Position MEB 3-1, "High Energy Fluid Systems, Protection Against Postulated Piping Failures in Fluid Systems Outside Containment" (NUREG 0800), do not appear to be included. Please address the degree of compliance with this augmented examination as applicable to the NMP1 Second 10-Year Interval Inservice Inspection Program Plan.

D. Section 1, page 2 of 2, of the ISI Program Plan, states that High Pressure Feedwater (Systems 29 and 30), Condensate Pump Inlet (System 49), Reactor Feedwater (System 51), Control Rod Drive (Systems 28 and 44), and Shutdown Cooling (System 38) systems that were originally classified as Class 2 during the first 10-year interval have been reclassified as nonsafety-related for the second 10-year interval. Please discuss the rationale behind this reclassification for each of the listed systems. In addition, please provide P&ID drawings, with classification boundaries highlighted, for all systems at NMP1 that are being "reclassified" during the second 10-year interval.

E. Section 2.1.4, "Weld Selection," of the ISI Program Plan states, "Exam items will be selected as if this were a first interval, but will meet all other requirements for 2nd interval selection." Please clarify this statement. The Code is quite specific about examinations in subsequent inspection intervals. If the requirements of the Code are not being met, written justification supporting the impracticality should be submitted to the NRC staff for approval.

F. Section 3.4 of the Pressure Testing Program Plan states, "Main Steam Piping between the containment isolation valves, up to but not including the stop valves, has been upgraded to Class 2 for ISI weld examination purposes but will not be pressure tested." Regarding the "Main Steam Piping between the containment isolation valves," any part of the reactor coolant pressure boundary up to and including the outermost containment isolation valve would normally be considered Class 1. Please discuss why this section of piping is considered Class 2.

Section 9.0, Paragraph B.2.1 of the Pressure Testing Program Plan states that the Main Steam piping "from the outboard isolation valves up to the turbine stop/control valves, and up to the turbine bypass valves, is designated as non-safety-related." Regulatory Guide 1.26 describes this piping as requiring Group B quality standards. Please provide clarification regarding the NMP1 designation of this system as nonsafety-related.

In both of the cases described above, the decision has been made to not perform Code-required pressure tests. Any request to exclude ASME Section XI examination requirements must be submitted for NRC staff review and supported by appropriate documentation to justify a determination of impracticality (i.e., a relief request). Please clarify that these Code requirements will be completed, or that formal relief will be requested.

G. Section 9.0, Paragraph B.2.2, of the Pressure Testing Program Plan gives Class 2 and 3 exclusions from the Code-required system inservice and functional pressure tests. Decisions to exclude systems or components from ASME Section XI requirements must be supported by justification supporting a determination of impracticality (i.e., a relief request). Please clarify the NMP1 basis for excluding any systems or components from the Code-required examinations.

H. Section 7.2, Pressure Testing Program Plan, states that upon endorsement of Code Case N-498 by the NRC, hydrostatic pressure testing of Class 1 and 2 systems and associated relief requests will be reviewed for applicability. Code Case N-498 has been endorsed by the NRC by reference in Revision 9 of Regulatory Guide 1.147. Please discuss the NMP1 intention regarding this Code Case and, if implemented, how implementation would affect the NMP1 Second 10-Year Pressure Testing and ISI Program Plans. Include in this discussion how previous commitments to hydrostatic tests will be affected (e.g., NMPC's response to Generic Letter 86-01, dated September 17, 1990, which commits to hydrostatic testing of Scram Discharge Volume Piping in lieu of a post-scram walkdown examination).

This requirement affects one respondent and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

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:
See next page

Distribution:

Docket File	OGC
NRC & Local PDRs	JStrosnider, 7/D/4
PDI-1 Reading	TMcLellan, 7/D/4
SVarga	ACRS (10)
JCalvo	Plant File
CVogan	CCowgill, RGN-I
DBrinkman	RACapra

PDI-1:LA	PDI-1:PM	PDI-1:D			
CVogan	DBrinkman:smm	RACapra			
12/2/92	12/2/92	12/3/92	/ /	/ /	/ /

OFFICIAL RECORD COPY
FILENAME: NM183099.LTR