

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

December 8, 1992

Docket Nos. 50-220 and 50-410

LICENSEE: Niagara Mohawk Power Corporation

FACILITY: Nine Mile Point Nuclear Station Units 1 and 2

SUBJECT:

SUMMARY OF NOVEMBER 18, 1992, MEETING TO DISCUSS CURRENT AND PLANNED LICENSING ISSUES FOR NINE MILE

POINT UNITS NOS. 1 AND 2

A meeting was held in the NRC One White Flint North Office in Rockville, Maryland, with Niagara Mohawk Power Corporation (NMPC) and NRC staff representatives to discuss current and planned licensing issues for Nine Mile Point Unit Nos. 1 and 2. The licensee had requested this meeting. Enclosure 1 is a list of meeting attendees. Enclosure 2 is a copy of the handout material provided by NMPC.

The meeting attendees initially discussed the current licensing issues open on both units. NMPC had requested in related submittals that the NRC staff expeditiously complete reviews of Unit 1 TAC Nos. M84711, M84712, and M84713 to support a proposed delay in the start of the 1993 refueling outage. (NMPC is proposing to delay the start of the Unit 1 refueling outage from January 2, 1993, to February 19, 1993. TAC No. M84711 is associated with a technical specification (TS) change that would extend the current quarterly pump surveillance test interval for Core Spray System 11 from January 10, 1993, until February 20, 1993. TAC No. M84712 is associated with a one-time only schedular exemption from the requirements in 10 CFR Part 50, Appendix J, Section III.D.3, regarding periodic retest schedules for 39 Type C tests. No. 84713 relates to a request for temporary relief from the ASME Section XI requirement to test the Core Spray System 11 pumps on a quarterly basis. The licensee requested relief during the period January. 10, 1993, until February 20, 1993.) The licensee had also requested an expeditious NRC staff review of Unit 1 TAC No. M84544 to support planned refueling outage activities. (TAC No. M84544 is associated with a TS change to reflect the replacement of Reactor Protection System Motor Generator Sets 162 and 172 with Static Uninterruptible Power Supplies.) During the discussion of open licensing issues, the NRC staff reaffirmed that it would attempt to expedite these reviews.

NMPC subsequently briefed the NRC staff on planned licensing submittals. During these discussions, the licensee noted that they planned to submit TS change requests for both units that would increase the surveillance test intervals for certain instrumentation and decrease this interval for the manual scram function. The planned changes would also increase allowable outof-service times for this instrumentation. NMPC explained that the proposed

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TS changes would reduce the potential for inadvertent scrams and engineered safety feature actuations, reduce the number of test cycles on equipment, and provide for better use of plant resources as a result of reduced testing.

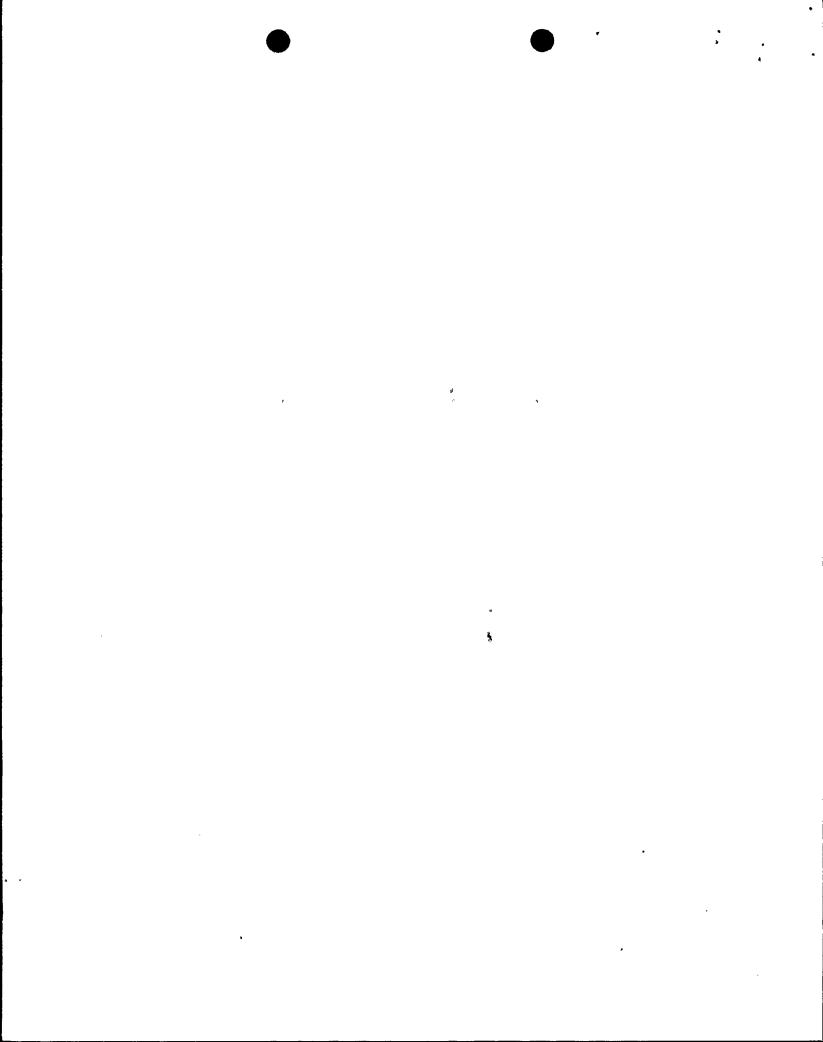
During the final discussions of the meeting, NMPC provided the NRC staff with additional information on the proposed TS changes that would modify surveillance test intervals and out-of-service times for certain instrumentation. The licensee stated that these submittals would be supported by GE Topical Reports with accompanying NRC staff Safety Evaluation Reports. NMPC explained that they have spent considerable effort researching the experience of other licensees with similar submittals to ensure that the NMPC submittals are complete and unambiguous. The licensee stated that they expect to submit the package for Unit 1 soon and hoped that NRC staff review would be completed in time to support implementation during the upcoming refueling outage. The NRC staff advised the licensee that a review could only be completed expeditiously if the submittal does not deviate from the GE Topical Reports. NMPC acknowledged this and indicated that any deviations would be editorial in nature.

John E. Menning, Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

#### Enclosures:

- 1. List of Attendees
- 2. Licensee Handout Material

cc w/enclosures: See next page



Nine Mile Point Nuclear Station Unit Nos. 1 and 2

Niagara Mohawk Power Corporation

cc:

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

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Mr. B. Ralph Sylvia Executive Vice President, Nuclear Niagara Mohawk Power Corporation 301 Plainfield Road Syracuse, New York 13212 Mr. Kim Dahlberg Unit 1 Station Superintendent Nine Mile Point Nuclear Station Post Office Box 32 Lycoming, New York 13093

Mr. Martin J. McCormick Jr. Plant Manager, Unit 2 Nine Mile Point Nuclear Station Post Office Box 32 Lycoming, New York 13093

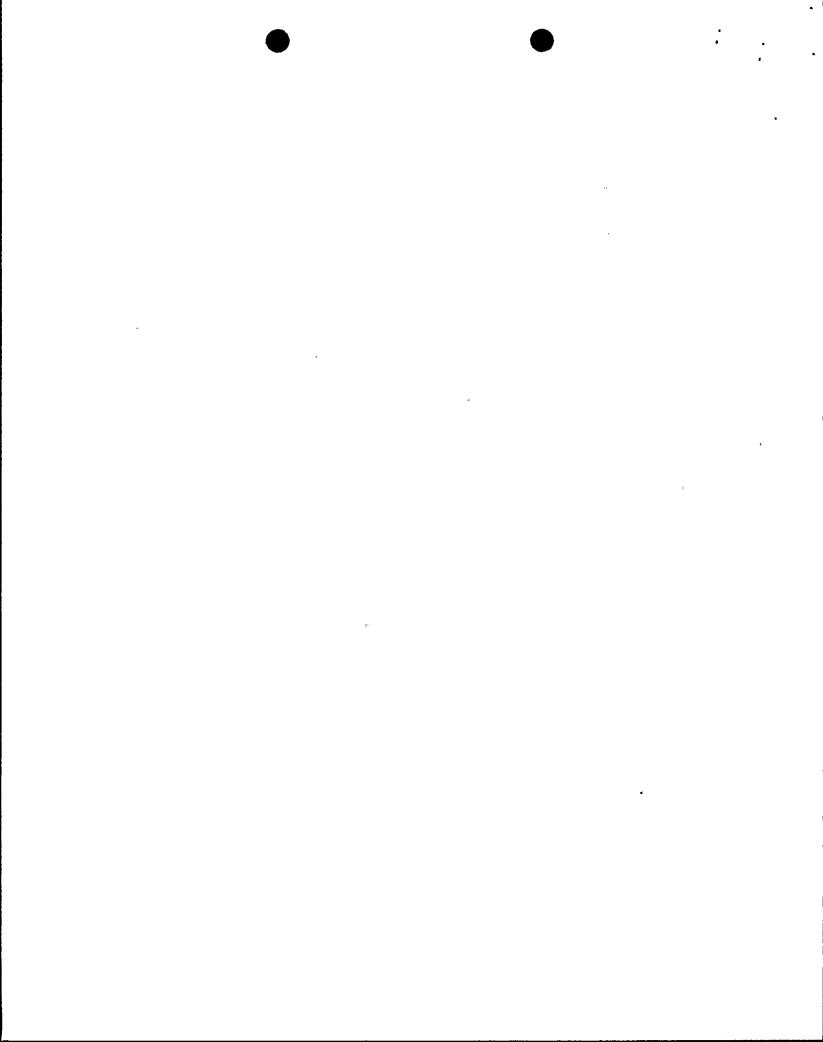
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Mr. Richard Goldsmith Syracuse University College of Law E. I. White Hall Campus Syracuse, New York 12223

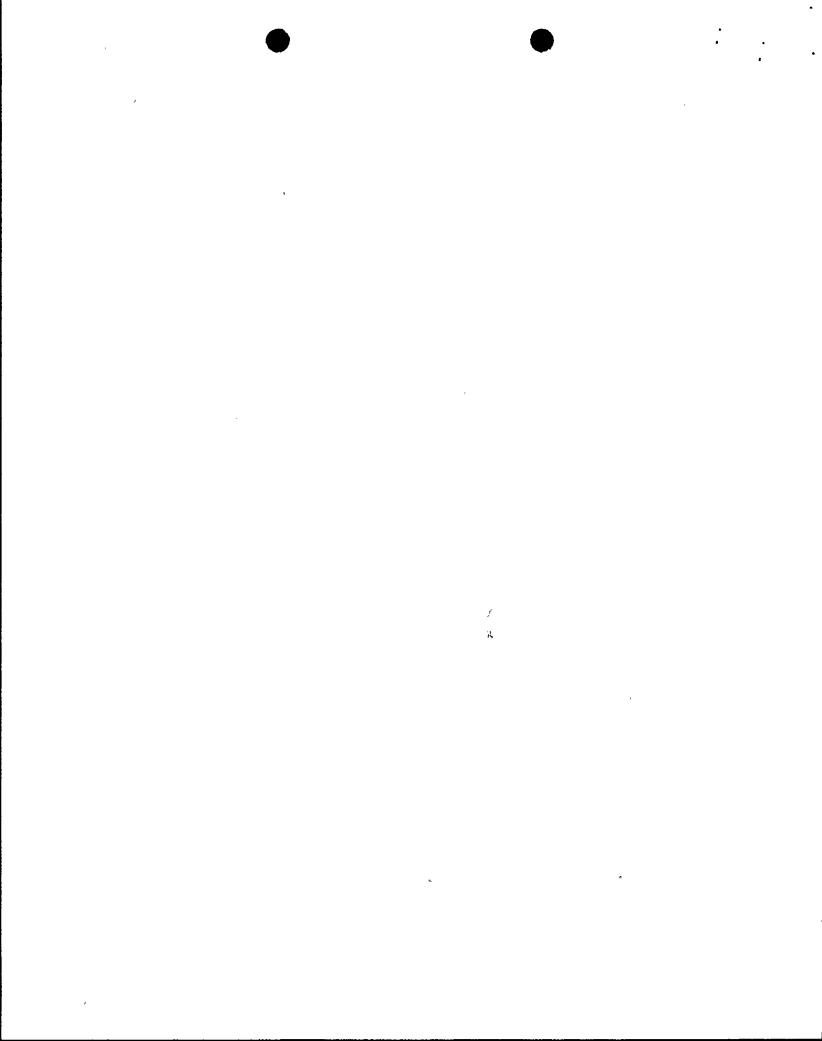
Mr. Richard M. Kessel Chair and Executive Director State Consumer Protection Board 99 Washington Avenue Albany, New York 12210



#### ATTENDANCE LIST

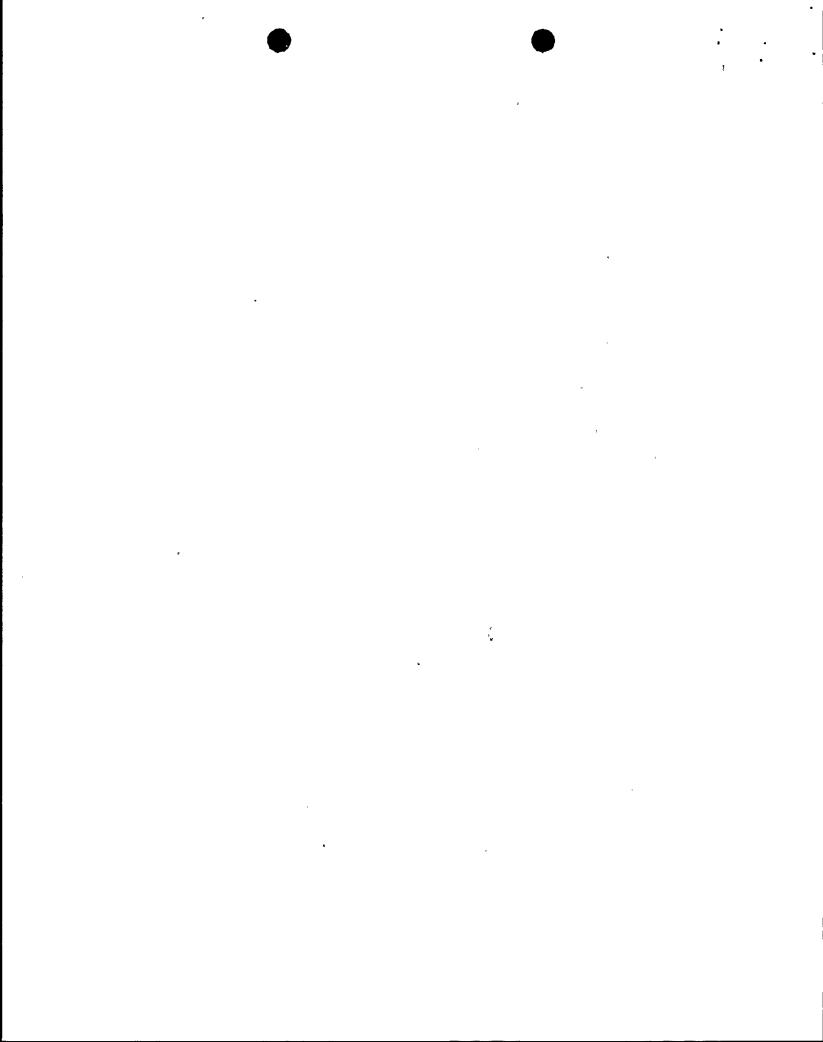
November 18, 1992, Meeting to Discuss Current and Planned Licensing Issues for Nine Mile Point Unit Nos. 1 and 2

<u>Position</u>	<u>Organization</u>
Sr. Project Manager Director	NRR/PDI-1 NRR/PDI-1
Project Manager	NRR/PDI-1
Asst. Station Shift Supervisor	NMPĆ
Program Director	NMPC
Manager - Licensing	NMPC
Supervisor - Licensing Support	NMPC
Sr. Licensing Engineer	NMPC
	Sr. Project Manager Director Project Manager Asst. Station Shift Supervisor Program Director Manager - Licensing Supervisor - Licensing



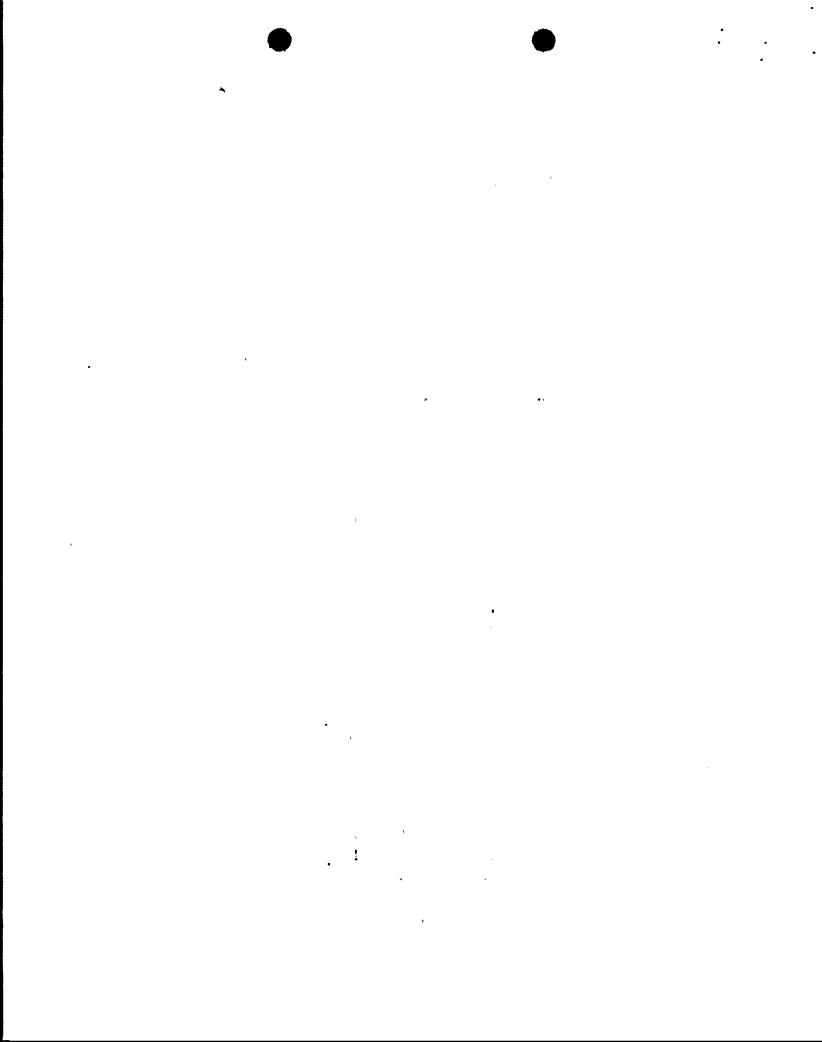
#### AMENDMENT REQUESTS PLANNED BUT NOT SUBMITTED TO NRC

			SUBMITTALS TO BE
<u>NO.</u>	<u>item</u>	STATUS/COMMENTS	COMPLETED BY
1	Revise Rx Building Leakage Rate	Review committed to NRC in LER, scheduled mid-1993	1
2	Out-of-Service Time for Scram Instrumentation	Included within #5	х
3	HPCI, ERV Surveillance Testing	Drafting Bases change - not outage related	Х
4	3D-Monicore	Final proofing	Х
5.	Tech Spec Improvement Instrumentation Topical Reports	Drafted; out for review	х
6	Removal of MSL Rad Monitor and Delete Table 3.6.2 Shutdown Requirements	Committee funded; scheduled for 1st quarter 1993	
7	Delete APRM Downscale	Awaiting DBR; K. Sweet to confirm priority	
8 ,	TSV Testing - Weekly to Monthly	BWROG to complete March 1993; will be deleted; SE not amendment required	
9 ,	Reactor Coolant Sample; Grab Sample Increase from 8 to 24	N. Rademacher to determine need	
10	Remove Plant Manager Approval of Procedures	At SRAB	Х
11	Delete RETS (GL 89-01)	Scheduled for Spring 1993	

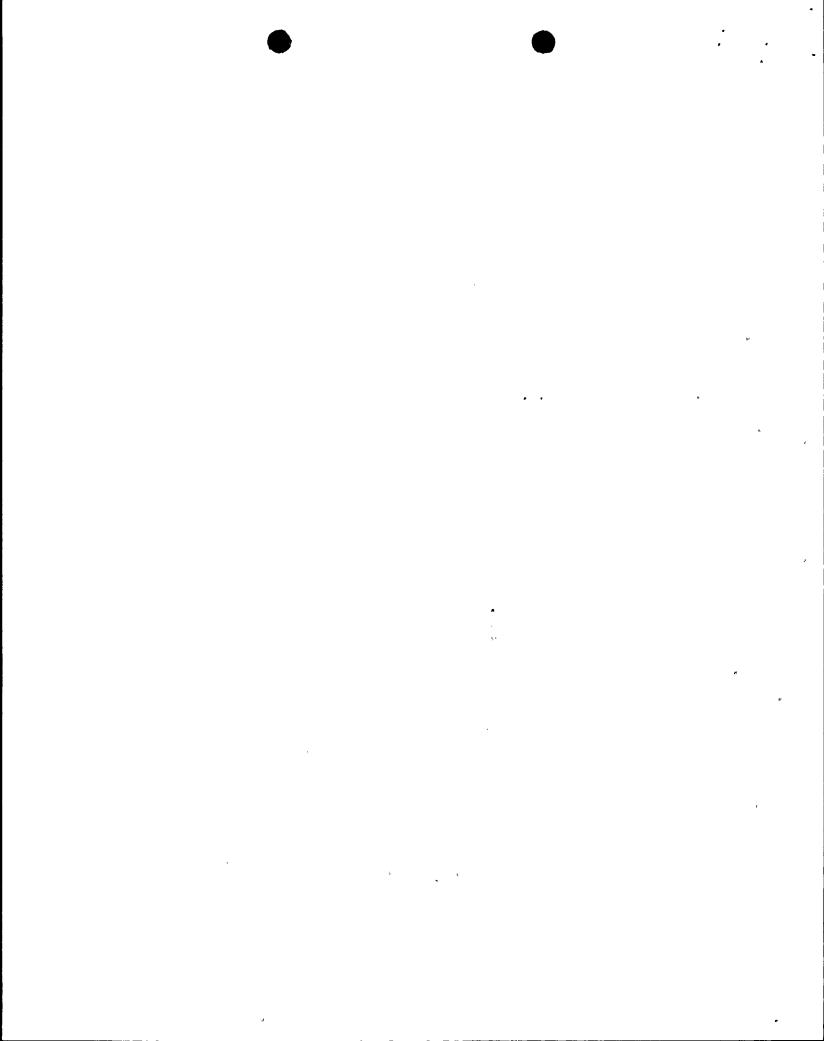


#### AMENDMENT REQUESTS PLANNED BUT NOT SUBMITTED TO NRC (Cont'd)

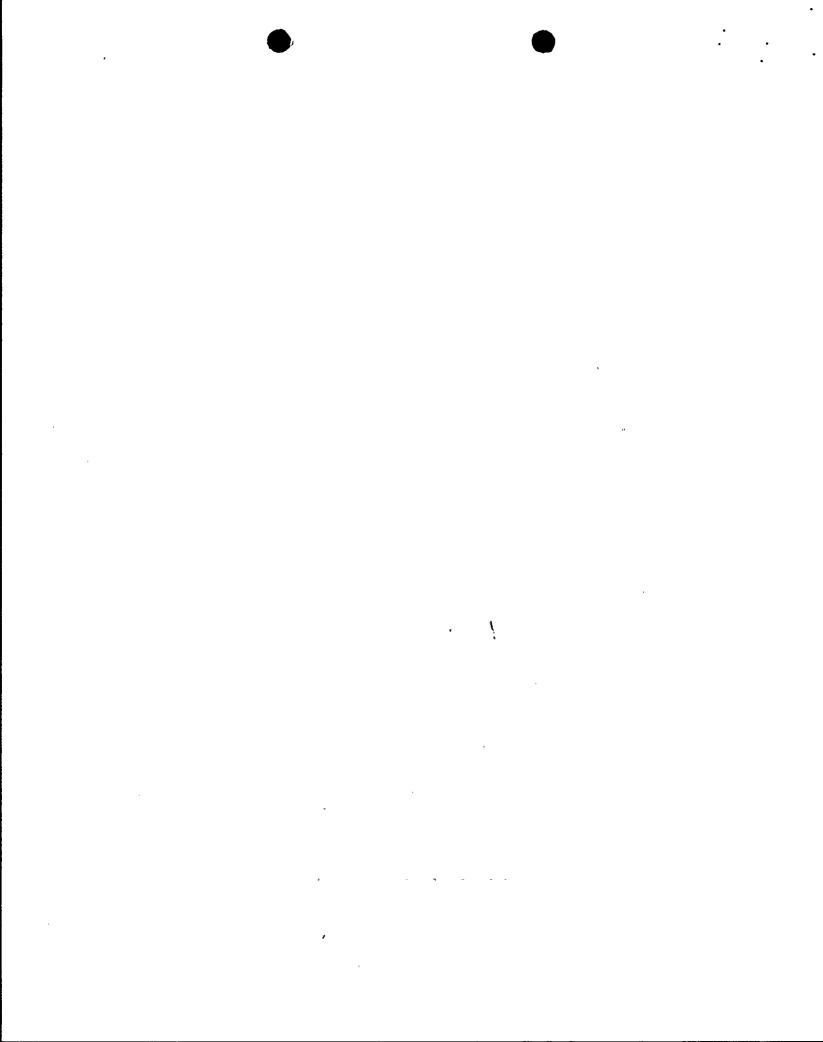
NO.	ITEM	<u>STATUS/COMMENTS</u>	SUBMITTAL TO BE COMPLETED BY 12/1/92
12	Revise SRAB Requirements	At SRAB	, х
13	Revise SORC Composition	Included with #12, at SRAB	x
14	Spent Fuel Storage Capacity	Drafting, needed for 1996-97 outage	x
15	LLW Waste	Dependent on rulemaking; Facilities open until 1994	
16	Revise STA/SSS T.S. Requirements	To be included with #17	x
17	STA/SSS Normal Working Hours (8- 12 hr. Shift); ASSS to Control Room supervisor	Drafting	х
18	T.S. 6.4.1 Update - Delete Ref. to Appendix A	Being drafted into SORC Amendment (#12)	х



#### (Page 1 of 2) Amendment Requests Planned but not Submitted to NRC SUBMITTALS TO BE NO. **ITEM COMPLETED BY 12/31/92** STATUS/COMMENTS X Power Uprate SRAB approved Dry Storage of Shoreham Fuel On hold 3 Leak Detection X SORC approved (GL 88-01 Commitment) Control Rod Withdrawal During X 4 Final review Hot Shutdown 5 X Allow Fuel Movements with One Outage related - drafting; Improved Tech **SGTS Running** Spec item Revise 24-Hour DG Test Outage related - Improved Tech Spec item 6 7 Delete CRD Accumulator Check Outage related - Improved Tech Spec Valve Test 8 Testing of Redundant EDG Drafting; Improved Tech Spec item 9 Filtered APRM Signal Improved Tech Spec item Delete SLC Mode 5 Requirements 10 Hydro Test Above 200°F in Mode 4 Improved Tech Spec item 11 Mock EDSFI finding Revise Minimum Battery Voltage 12 Drawdown TS Submittal NRC presentation completed; drafting 13 X Included in #5 - Margaration X TS Amendment - GEXL 14

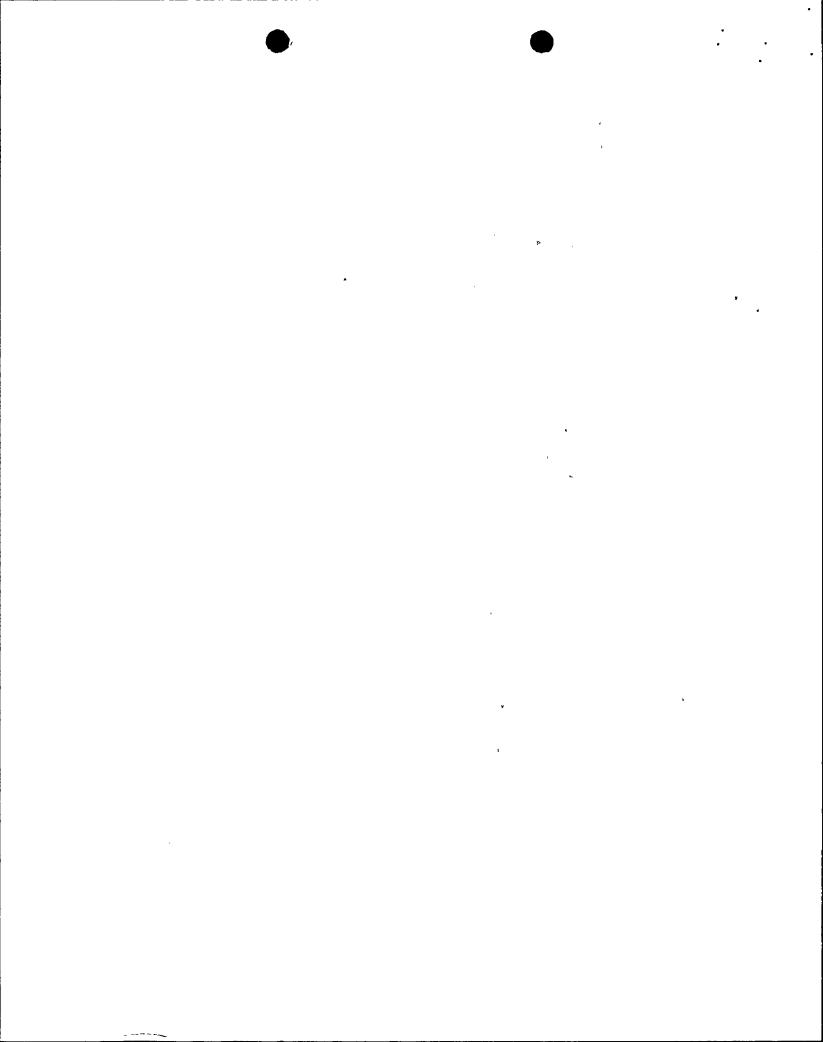


#### (Page 2 of 2) Amendment Requests Planned but not Submitted to NRC SUBMITTALS TO BE NO. **ITEM COMPLETED BY 12/31/92** STATUS/COMMENTS 15 Improved TS Topical Reports X Draft our for review - outage related At SRAB Remove Plant Manager Approval of X 16 **Procedures Drafting** 17 Shift Work X Revise SRAB QUORM Requirements X At SRAB 18 Revise SORC Composition Included with #18; at SRAB X . 19



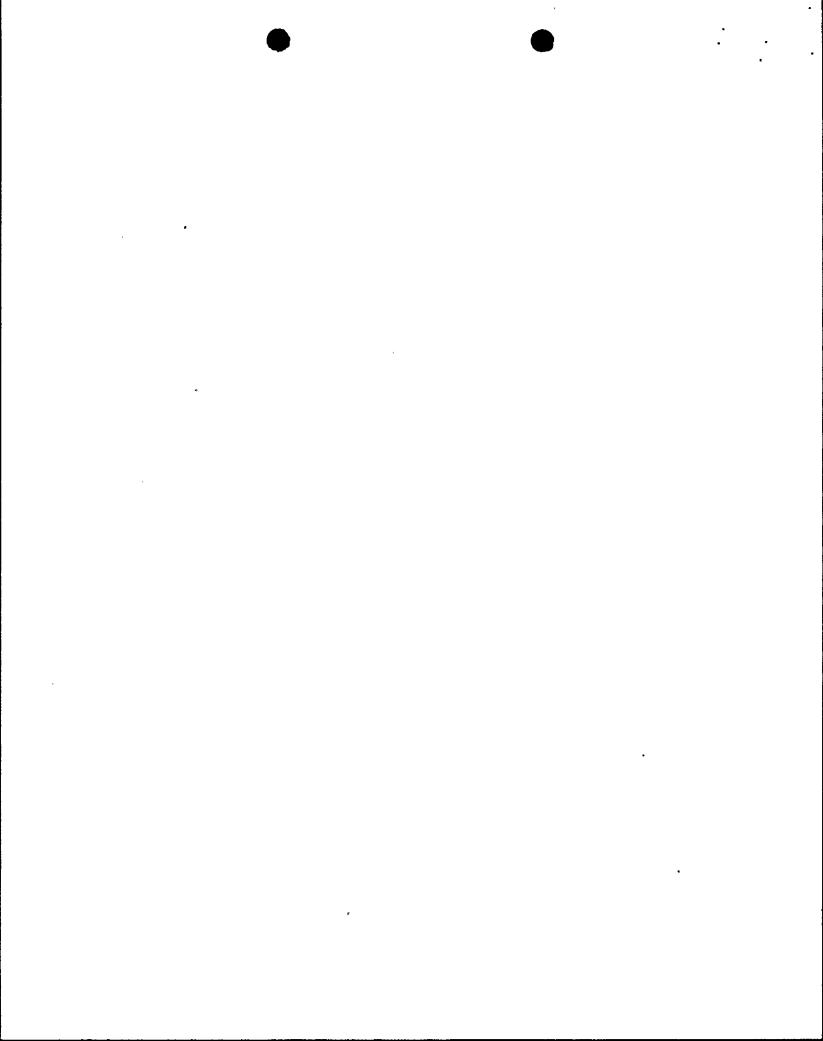
### TECHNICAL SPECIFICATION PROPOSAL

- ♦ INCREASE SURVEILLANCE TEST INTERVALS (STIs)
  FOR SPECIFIED INSTRUMENTATION AND
  DECREASE STI FOR MANUAL SCRAM
  - RPS (SCRAM)
  - ISOLATION
  - ECCS
  - ROD BLOCK
  - RCIC (UNIT 2 ONLY)
  - SELECTED (ATWS, RPT, RADIATION MONITORING, PLANT SYSTEMS, SAFETY/RELIEF VALVE ACOUSTIC MONITORING, POST-ACCIDENT MONITORING)



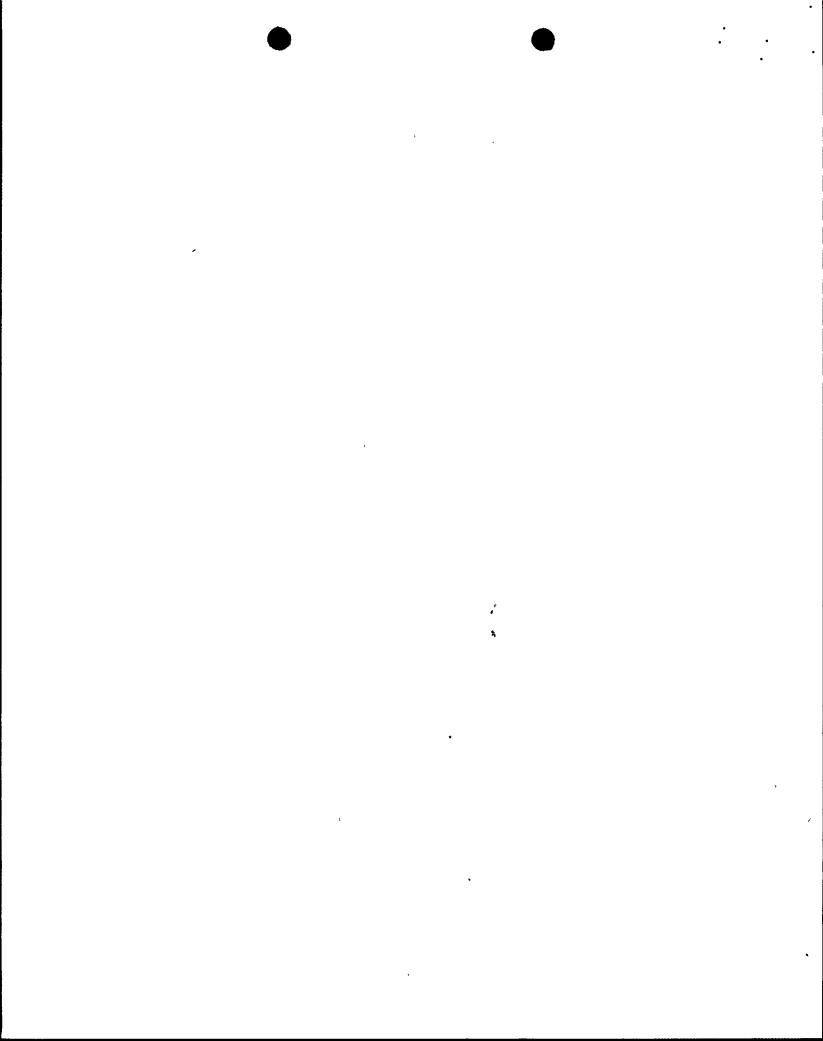
# TECHNICAL SPECIFICATION PROPOSAL

- ♦ INCREASE/ADD ALLOWABLE OUT-OF-SERVICE TIMES (AOTs)
  - INCREASE FROM 2 HRS TO 6 HRS FOR REQUIRED SURVEILLANCE TESTING
  - ADD 12 HRS REPAIR TIME FOR RPS (SCRAM) INSTRUMENTATION
  - ADD 24 HRS REPAIR TIME FOR INSTRUMENTATION NOT COMMON TO RPS (SCRAM).



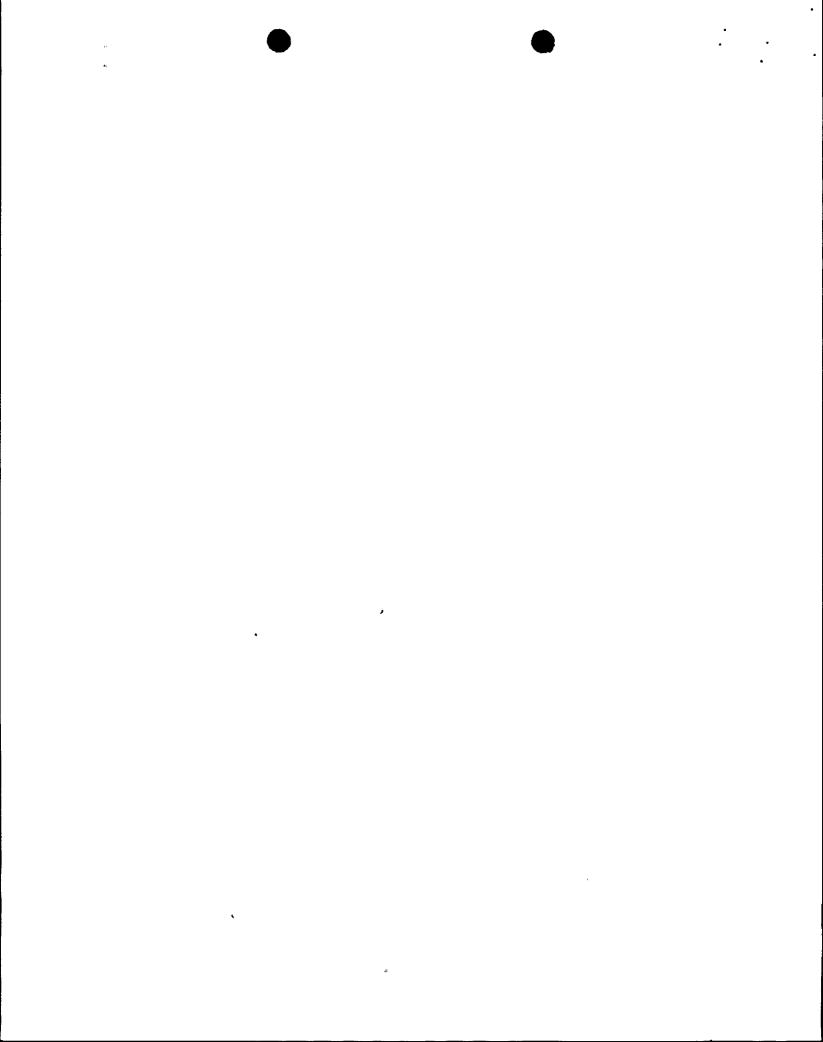
## TECHNICAL SPECIFICATION PROPOSAL

- ♦ EDITORIAL CHANGES (UNIT 1 ONLY)
  - ADD "UPSCALE" IN IRM TRIP PARAMETER SECTION
  - ADD ENGINEERING UNITS (°F) FOR RX CLEAN-UP ISOLATION PARAMETERS
  - DELETE OUTDATED FOOTNOTE WHICH APPLIED TO A ONE-TIME-ONLY LICENSE CONDITION IN 1986



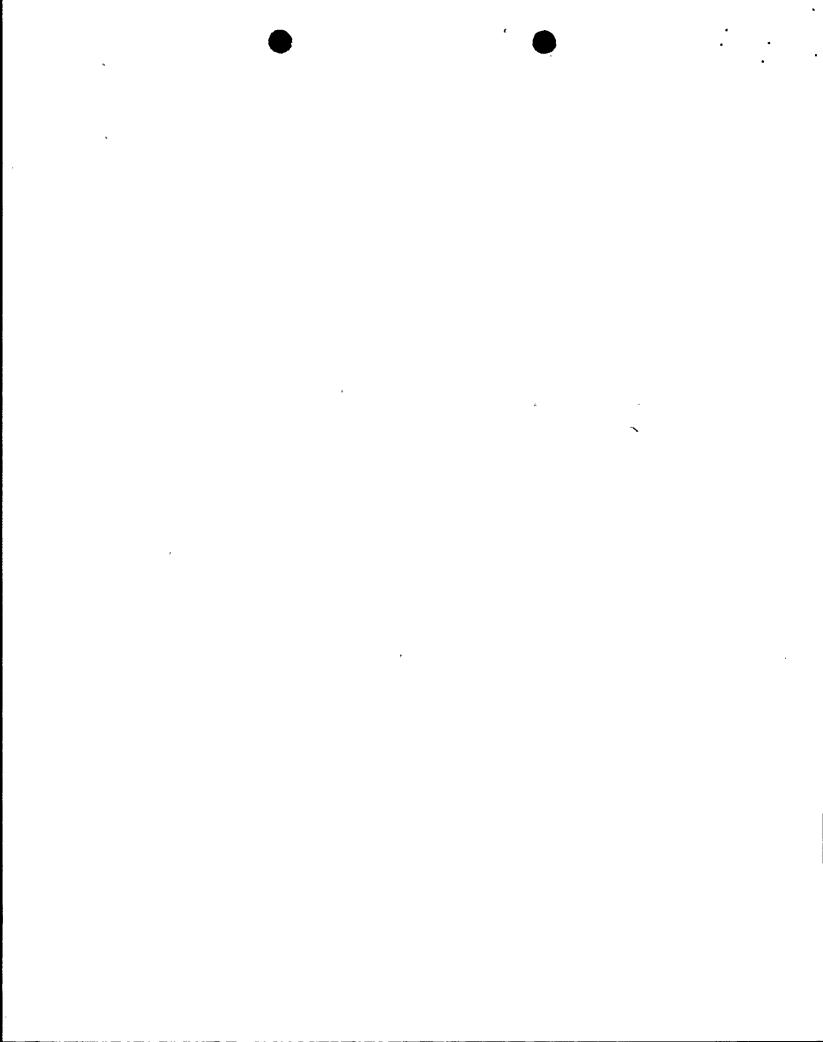
### OPERATIONAL SAFETY BENEFITS

- ♦ REDUCED POTENTIAL INADVERTENT PLANT SCRAMS/ESF ACTUATIONS
  - REDUCTION OF TIME THE PROTECTIVE INSTRUMENT LOGIC IS IN A HALF-SCRAM/TRIP CONDITION
  - ELIMINATION OF HURRIED ATMOSPHERE DURING REPAIRS AND TESTS WHICH COULD CAUSE AN INCREASED RISK OF ERROR
  - DECREASE OF COMPONENT FAILURES DUE TO-LESS WEAR
  - ENHANCEMENT OF BOP PREDICTIVE MAINTENANCE PROGRAM



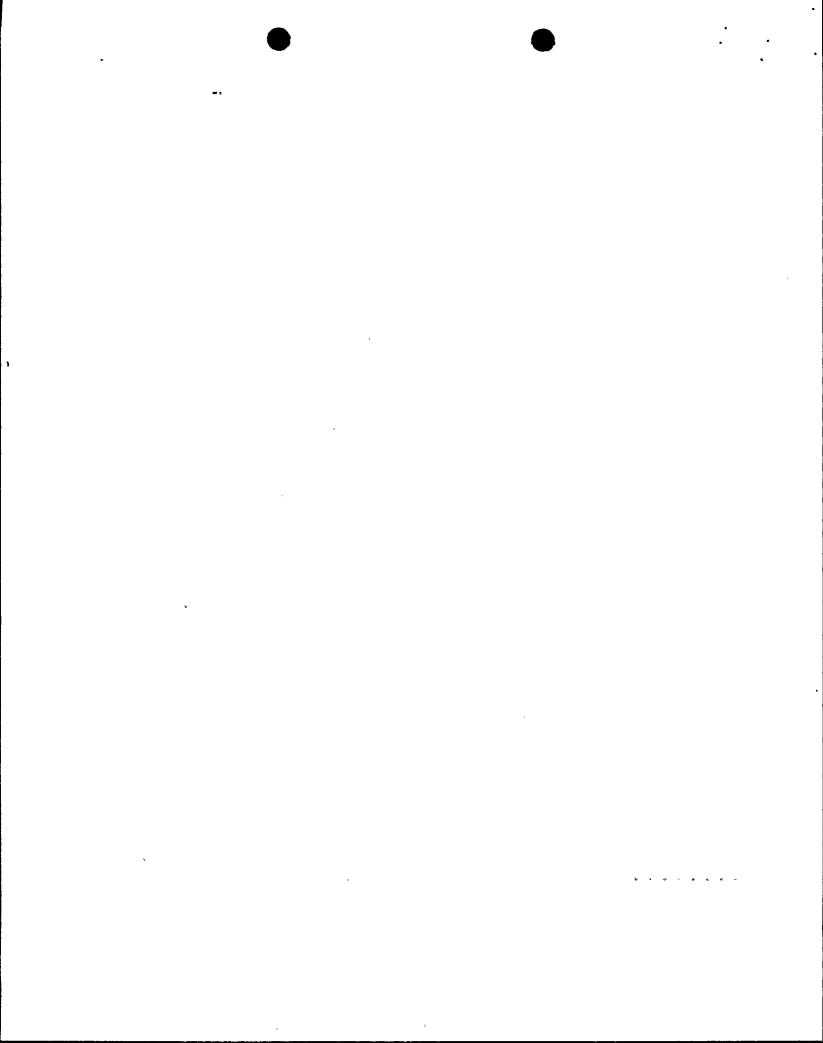
# OPERATIONAL SAFETY BENEFITS

- **♦ REDUCED TEST CYCLES ON EQUIPMENT (UNIT 2)** 
  - REDUCTION OF APPROX. 640 TEST CYCLES PER YEAR ON 2,560 RPS COMPONENTS
  - REDUCTION OF APPROX. 984 TEST CYCLES
     PER YEAR ON 1,968 ISOLATION COMPONENTS
  - REDUCTION OF APPROX. 713 TEST CYCLES
     PER YEAR ON 1,426 ECCS COMPONENTS
  - REDUCTION OF APPROX. 696 TEST CYCLES PER YEAR ON 1,392 OTHER COMPONENTS
  - TOTAL REDUCTION OF APPROX. 3,033 TEST CYCLES PER YEAR ON 7,346 COMPONENTS



# OPERATIONAL SAFETY BENEFITS

- ♦ BETTER USE OF PLANT RESOURCES AS THE RESULT OF REDUCED TESTING
  - REDUCTION OF I&C WR BACKLOG
  - ENHANCEMENT OF BOP PROGRAMS (PREDICTIVE MAINTENANCE -THERMOGRAPHY, VIBRATION MONITORING)



# SUPPORTING GE TOPICA REPORTS (APPROVED WITH NRC SERS)

♦ NEDC-3085-1P-A

RPS, SCRAM INSTRUMENTATION

♦ NEDC-30851P-A SUPPL 2 NEDC-31677P-A ISOLATION INSTRUMENTATION

♦ NEDC-30936P-A (PARTS 1 AND 2) **ECCS INSTRUMENTATION** 

**♦** *GENE-770-06-2 (UNIT 2 ONLY)* 

RCIC INSTRUMENTATION

♦ NEDC-30851P-A SUPPL 1

ROD BLOCK
INSTRUMENTATION

**♦** GENE-770-06-1

SELECTED INSTRUMENTATION

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### REQUIRED PLANT SPECIFIC REPORTS

**♦** *MDE-78-0485* 

UNIT 2 RPS INSTRUMENTATION

**♦** MDE-77-0485

UNIT 1 SCRAM INSTRUMENTATION

♦ RE-026

UNIT 2 ECCS INSTRUMENTATION

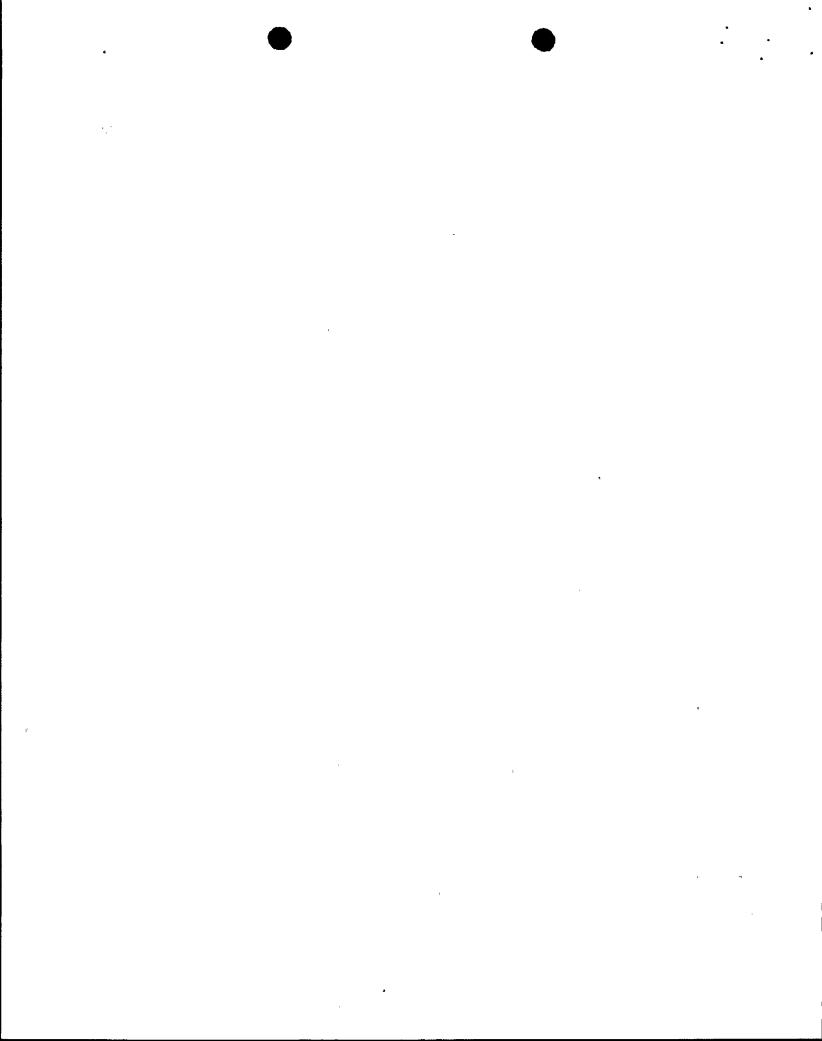
♦ RE-003

UNIT 1 ECCS INSTRUMENTATION

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### DEVINTIONS FROM GE POPICALS

- ♦ USED MOST RECENT APPROVED BWR OWNERS' GROUP CLARIFICA-TIONS FOR RPS (SCRAM), ISOLATION, AND ECCS (UNIT 2 ONLY) ALLOWABLE OUT-OF-SERVICE TIMES (AOTs)
- ♦ UNIT 1 ONLY (EDITORIAL DOES NOT ALTER MEANING)
  - USED THE WORD "PARAMETER" INSTEAD OF "TRIP FUNCTION" IN AOT WORDING
  - USED THE WORD "SCRAM" INSTEAD OF "RPS" IN AOT WORDING
  - USED THE WORDS "MINIMUM NO. OF OPERABLE INSTRUMENT CHANNELS," INSTEAD OF "MINIMUM NO. OF CHANNELS" IN AOT WORDING



### LESSONS RARNED FROM OTHER UTILITIES

- ◆ USE MOST RECENT APPROVED BWR OWNERS' GROUP AOTs CLARIFICATIONS (PERRY)
- ♦ REVISE FOOTNOTES PROPERLY (HOPE CREEK)
- ♦ DEVIATIONS FROM TOPICAL REQUIREMENTS (MONTICELLO)
- ♠ REVIEW PLANT SPECIFIC REPORTS (WASHINGTON POWER)
- ♦ IMPLEMENT TOPICALS ALL AT ONCE (HOPE CREEK, GRAND GULF, FERMI-2)
- ♦ PERFORM EXTENSIVE PROOF AND REVIEW TO ASSURE A ONE-TIME-ONLY SUBMITTAL AND REVIEW (ALL)
- ♦ PERFORM A GE REVIEW OF SUBMITTAL BY AUTHORS OF THE TOPICALS TO ADD ASSURANCE THAT STIS AND AOTS WERE PROPERLY APPLIED IN THE TECHNICAL SPECIFICATION.

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#### **SUMMARY**

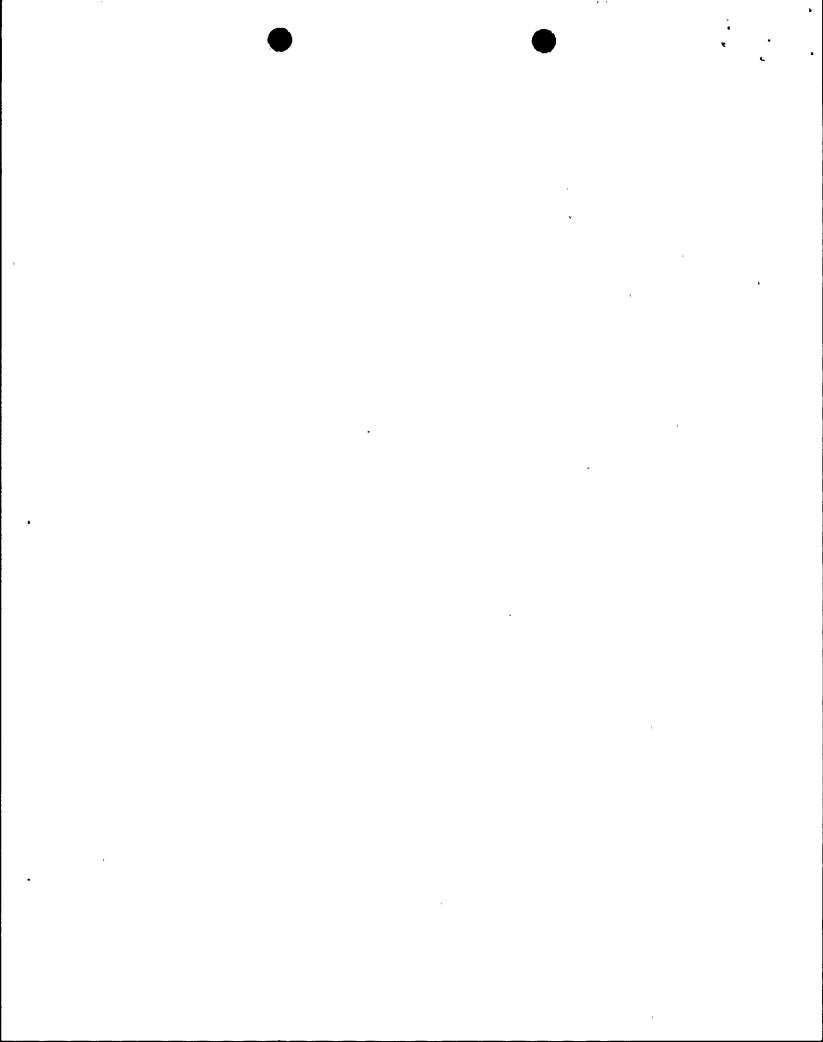
◆ THIS TECHNICAL SPECIFICATION CHANGE IS BEING PROPOSED AS A CATEGORY 2 ITEM 4 AMENDMENT, WHICH IS CONSIDERED NOT TO INVOLVE A SIGNIFICANT HAZARD CONSIDERATION.

ITEM 4 INVOLVES A RELIEF GRANTED UPON DEMONSTRATION OF ACCEPTABLE OPERATION FROM AN OPERATING RESTRICTION THAT WAS IMPOSED BECAUSE ACCEPTABLE OPERATION WAS NOT YET DEMONSTRATED.

THIS ASSUMES THAT THE OPERATING RESTRICTION AND THE CRITERIA TO BE APPLIED TO A REQUEST FOR RELIEF HAVE BEEN ESTABLISHED IN A PRIOR REVIEW AND THAT IT IS JUSTIFIED IN A SATISFACTORY WAY THAT THE CRITERIA HAVE BEEN MET.

SINCE THESE CHANGES AFFECT OPERATING RESTRICTIONS WHICH SIMPLY REFLECT NRC-APPROVED, GENERIC CHANGES CONTAINED IN THE LTRs, A DETAILED NRC BRANCH OR SPECIALIST REVIEW SHOULD NOT BE REQUIRED.

♦ WILL BENEFIT UPCOMING OUTAGES BY ELIMINATING UNNECESSARY FUNCTIONAL TESTING AS PART OF THE OUTAGE SCOPE.



TS changes would reduce the potential for inadvertent scrams and engineered safety feature actuations, reduce the number of test cycles on equipment, and provide for better use of plant resources as a result of reduced testing.

During the final discussions of the meeting, NMPC provided the NRC staff with additional information on the proposed TS changes that would modify surveillance test intervals and out-of-service times for certain instrumentation. The licensee stated that these submittals would be supported by GE Topical Reports with accompanying NRC staff Safety Evaluation Reports. NMPC explained that they have spent considerable effort researching the experience of other licensees with similar submittals to ensure that the NMPC submittals are complete and unambiguous. The licensee stated that they expect to submit the package for Unit 1 soon and hoped that NRC staff review would be completed in time to support implementation during the upcoming refueling outage. The NRC staff advised the licensee that a review could only be completed expeditiously if the submittal does not deviate from the GE Topical Reports. NMPC acknowledged this and indicated that any deviations would be editorial in nature.

Original Signed By: John E. Menning, Project Manager Project Directorate "I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

#### Enclosures:

1. List of Attendees

2. Licensee Handout Material

cc w/enclosures:

See next page

Distribution:

Docket File

NRC & Local PDRs

PDI-1 Reading

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R. A. Capra

C. Vogan

J. Menning

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ACRS (10)

V. McCree, 17/G/21

C. Cowgill, RGN-I

PDI-1:LA	PDI-1:PM	PDI-1:PM	PDI-1:D ,		
CVogan W	JMenning: sign	DBrinkman 46	RACapra RACapra		
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