

ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9302240371 DOC. DATE: 93/02/05 NOTARIZED: NO DOCKET # 05000220
 FACIL: 50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Power
 AUTH. NAME: TERRY, C.D. AUTHOR AFFILIATION: Niagara Mohawk Power Corp.
 RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Forwards info requested in NRC 921203 ltr re util 920330
 submittal of rev to second 10-yr interval ISI program plan
 for Unit 1 to complete NRC review. Oversize drawings also
 encl.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 19
 TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

NOTES: *See Drawings*

	RECIPIENT ID CODE/NAME	COPIES LTRR ENCL	RECIPIENT ID CODE/NAME	COPIES LTRR ENCL
	PDI-1 LA	1 0	PDI-1 PD	1 1
	BRINKMAN, D.	2 2		
INTERNAL:	ACRS	6 6	NRR/DE/EMEB 7E	1 1
	NRR/DET/ECMB 9H	1 1	NUDOCS-ABSTRACT	1 1
	OC/LEMB	1 0	OGC/HDS1	1 0
	<u>REG FILE</u> 01	1 1	RES MILLMAN, G	1 1
	RES/DSIR/EIB	1 1		
EXTERNAL:	EG&G BROWN, B	1 1	EG&G RANSOME, C	1 1
	NRC PDR	1 1	NSIC	1 1

*Oversize Drawings
 To Key Files*

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTRR 22 ENCL 19

MA-2



February 5, 1993
NMPIL 0731

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63
TAC No. M83099

Gentlemen:

**SUBJECT: SECOND TEN-YEAR INTERVAL INSERVICE INSPECTION PROGRAM
PLAN**

By letter dated March 30, 1992, Niagara Mohawk submitted a comprehensive revision to the Second Ten-Year Interval Inservice Inspection Program Plan for Nine Mile Point Unit 1 to the Staff for review. By letter dated December 3, 1992, the Staff requested additional information regarding our March 30, 1992, submittal to complete their review. The attachment to this letter provides the requested additional information.

Very truly yours,



C. D. Terry
Vice President
Nuclear Engineering

JMT/mls
003537GG
Attachment

xc: Regional Administrator, Region I
Mr. R. A. Capra, Director, Project Directorate I-1, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. B. W. Brown, EG&G Idaho, Inc.
Records Management

190169
9302240371 930205
PDR ADDCK 05000220
G PDR

A047 - Oversize
1/1 - Drawings
To Reg Files



1000

ATTACHMENT

REQUEST FOR ADDITIONAL INFORMATION

Request 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.

Response A:

Niagara Mohawk's April 1, 1987 letter submitted relief requests ISI-1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15. Additional information concerning relief requests ISI-1, ISI-9 and ISI-10 was provided in our letter dated March 15, 1988. A letter dated December 7, 1987 submitted an additional relief request, ISI-17. ISI-17 was denied by the Staff.

A review of our April 1, 1987 and March 15, 1988 submittals has been conducted. This review resulted in the sixteen (16) outstanding second 10-year relief requests being dispositioned as indicated below.

NMPI reaffirms and resubmits, with altered verbiage, the following four (4) requests for relief:

ISI-3	-	Weld identification changed from 33-FW-RCU-10-2A to 33-WD-036
ISI-6	-	Integral attachment identification changed from:
31-H10A&B	to	31-H10-WD-001 31-H10-WD-002 31-H10-WD-003 31-H10-WD-004
31-H12A&B	to	31-H12-WD-001 31-H12-WD-002 31-H12-WD-003 31-H12-WD-004



11 11 11

11 11 11

11 11 11

11 11 11

11 11 11

11 11 11

11 11 11

11 11 11

11 11 11

11 11 11

11 11 11

31-H5A&B to 31-H5-WD-001
31-H5-WD-002
31-H5-WD-003
31-H5-WD-004

31-H7A&B to 31-H7-WD-001
31-H7-WD-002
31-H7-WD-003
31-H7-WD-004

ISI-9 - The relief request is revised to include 50% of 4 additional peripheral control rod drive housings in keeping with first 10-year interval relief request #1IIRR2 Rev. 1 as indicated in the Commission's Safety Evaluation of August 11, 1989.

ISI-12 - The relief request is altered to reflect twenty (20) of the twenty-three (23) welds in first 10-year interval relief request #1IIRR11 Rev. 5 as indicated in the Commission's Safety Evaluation of April 26, 1990. Additionally, the weldment identifiers change from:

40-FW-16	to	40-WD-050-A
40-FW-16-D	to	40-LW-003
40-FW-30	to	40-WD-010
40-FW-34A	to	40-WD-005
40-FW-30-D	to	40-FW-30-D
40-FW-55	to	40-WD-006
40-SW-37A	to	40-WD-011
40-SW-37A-U	to	40-SW-37A-U (remains the same)
40-FW-46	to	40-WD-051
40-SW-46A-U	to	40-LW-003
P-NES-37-51	(to 37-0075-FW-4)(cut out) to	37-WD-003
39-09R-SW-1	to	"39-09R-SW-1 (OLD EPN)"
39-10R-SW-1	to	39-10R-WD-001
39-SW-34A	to	39-WD-194
38-SW-3A	to	38-WD-007
38-SW-27A	to	38-WD-088
33-FW-RCU-9-2A	to	33-WD-014
33-FW-RCU-10-2A	to	33-WD-036
33-FW-RCU-10-2B	to	33-WD-035
33-FW-RCU-8-3B	to	33-WD-015

NMP1 withdraws the following twelve (12) requests for relief:

ISI-1 - No longer inaccessible; to be examined from interior of vessel using new technology.



10

10

10

10

10

- ISI-2 - No longer inaccessible; to be examined from interior of vessel using new technology.

- ISI-4 - Pursuant to Code Case N-460, as approved for use by NRC in Regulatory Guide 1.147 Rev. 9, dated April, 1992, and as referenced in our letters of February 24, 1989, and November 9, 1989 the 90% Code Required Areas and Volumes achieved by NMPC on this weldment (the former 33-FW-0261-04, now called 33-WD-049) satisfy Code requirements.

- ISI-5 - NMPC has validated a magnetic particle examination technique for Parkerized material.

- ISI-7 - B-L-1 welds reclassified to B-J on all five (5) pump manufacturer shop welds of pump casing to elbow and not selected in accordance with our letter of June 16, 1988.

- ISI-8 - No longer required due to invocation of ASME XI 1989 Edition, No Addenda, (ref. letter, NMPC to NRC of December 11, 1992 on footnote 2 of B-M-2 examinations and NRC response of January 27, 1993).

- ISI-10 - No longer required, as the piping in question (Systems 30 and 51) has been classified non-safety related, as stipulated in paragraph D of this response.

- ISI-11 - No longer required, as the piping in question (Systems 30 and 38) has been classified non-safety related, as stipulated in paragraph D of this response.

- ISI-13 - No longer required with the availability of Code Case N-498.

- ISI-14 - No longer required with the availability of Code Case N-498.

- ISI-15 - No longer required, as the piping in question has been classified non-safety related, as stipulated in paragraph F of this response, as well as the first 10-year interval relief request #1IIRR15 Rev. 2, which was also withdrawn (in our letter of December 23, 1988).

- ISI-16 - No longer required with the availability of Code Case N-498.



NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-3 - Rev. 1

1. COMPONENT IDENTIFICATION

System: Reactor Water Cleanup

Class: 1

Component Description: Pressure Retaining Dissimilar Metal Welds

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-F, Item B5.130 Dissimilar metal butt welds - volumetric and surface examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric and surface examination of dissimilar metal weld 33-WD-036.

4. BASIS FOR RELIEF

This weld is inaccessible inside a containment penetration.

5. ALTERNATE EXAMINATION

No alternate examination is proposed.

6. PLANT QUALITY AND SAFETY

The required leakage, hydrostatic and other pressure tests (as applicable) along with the examination of other B-F welds in the plant provide an acceptable level of assurance of this weld's integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

PHYSICS DEPARTMENT

PHYSICS 311

LECTURE 10

10.1

10.2

10.3

10.4

10.5

10.6

10.7

10.8

10.9

10.10

10.11

10.12

10.13

10.14

NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-6 - Rev. 1

1. COMPONENT IDENTIFICATION

System: Feedwater

Class: 1

Component Description: Integrally Welded Attachments

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-K-1, Item B10.10 Integrally welded attachments - surface examination.

3. RELIEF REQUESTED

Relief is requested from 100% surface examination of the piping integrally welded attachments listed on the attached table.

4. BASIS FOR RELIEF

The supports listed on the attached were not fully inspected due to limitations of design. These integrally welded support attachment lugs are fillet welded to the piping. The hanger pipe clamp contacts and thus obstructs one edge of the attachment lug on these four (4) supports.

5. ALTERNATE EXAMINATION

No alternate examinations are proposed. Should supports for which relief is requested be dismantled for maintenance during the second inspection interval, the required examination of their welded attachment would be performed then.

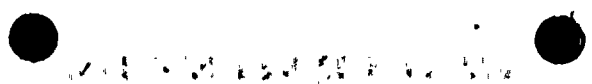
To perform the required surface examination (additional to examinations performed) would result in an undue burden without a compensating increase in assurance of integrally welded attachment or pressure boundary integrity, or plant safety.

6. PLANT QUALITY AND SAFETY

The examinations as proposed, together with the required leakage, hydrostatic, and other pressure tests (as required), provide an acceptable level of assurance of integrity of the integrally welded attachment and pressure retaining boundary.

7. RADIATION CONSIDERATION

Radiation considerations are not a basis for this request for relief.



1954

1954

EXAMINATION AREA	DESCRIPTION	% CRA EXAMINED	LIMITATION
31-H-10-WD-001 31-H-10-WD-002 31-H-10-WD-003 31-H-10-WD-004	Pipe Support, Welded, 4 Lugs	90%	Pipe clamp contacts one side of lug, weld lacks surface preparation.
31-H-12-WD-001 31-H-12-WD-002 31-H-12-WD-003 31-H-12-WD-004	Pipe Support, Welded, 4 Lugs	90%	Pipe clamp contacts one side of lug, weld lacks surface preparation.
31-H-05-WD-001 31-H-05-WD-002 31-H-05-WD-003 31-H-05-WD-004	Pipe Support, Welded, 4 Lugs	90%	Pipe clamp contacts one side of lug, weld lacks surface preparation.
31-H-07-WD-001 31-H-07-WD-002 31-H-07-WD-003 31-H-07-WD-004	Pipe Support, Welded, 4 Lugs	90%	Pipe clamp contacts one side of lug, weld lacks surface preparation.



NINE MILE POINT UNIT 1

Second Interval Inspection Relief Request ISI-9 - Rev. 1

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel

Safety Class: 1

Component Description: Control Rod Drive Housing Welds

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-0, Item B1.18 requires a volumetric examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric examination of all welds in 10% (equal to four (4)) of the peripheral control rod drive housings.

4. BASIS FOR RELIEF

A sector of approximately 180 degrees of each housing circumference is obstructed by adjacent housings and their hydraulic lines.

5. ALTERNATE EXAMINATION

A sector of approximately 180 degrees of 20% (equal to 8) of the peripheral control rod drive housing will be volumetrically examined. This will result in the same weld length being examined thereby meeting the intent of the code requirement. The housings to be examined are: RV-CRD-S1, S3, R1, R5, T3, T7, U2 and U6.

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed hydrostatic pressure tests (as applicable), provide an acceptable level of assurance of Control Rod Drive Housing Weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-12 - Rev. 1

1. COMPONENT IDENTIFICATION

System: Various

Safety Class: Augmented Class 1

Component Description: Nonconforming Service Sensitive Piping Welds

2. AUGMENTED INSERVICE INSPECTION GUIDELINES (NUREG 0313 REVISION 1, JULY 1980, AND NRC GENERIC LETTER 84-11)

Class 1 piping welds required volumetric and surface examination.

3. RELIEF REQUESTED

Relief is requested from performing full volumetric and surface examination of nonconforming service sensitive piping welds. Relief is requested for twenty (20) of the augmented piping welds.

4. BASIS FOR RELIEF

The welds listed on the attached were not fully inspected by ultrasonic and/or surface methods during the first 10-year interval due to limitations of design, geometry, and material of construction.

The dendritic weld structure of the stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In particular, non-parallel surfaces and product form of the material of valves preclude meaningful ultrasonic examination from the valve side.

Three (3) stainless steel welds continue to be limited by configuration, two (2) by permanent attachment to the piping and fifteen (15) by containment penetrations. The percentage of Weld Required Area (WRA) and Weld Required Volume (WRV) that was completely examined is tabulated with the nature of the obstruction on the attached.

5. ALTERNATE EXAMINATION

None. Volumetric and surface examination to be conducted to the extent practical.



1950

6. PLANT QUALITY AND SAFETY

Per NUREG-0313, the Core Spray System (40) piping is defined as nonconforming service sensitive; the extent and frequency of examination is 100% of these welds every outage. Other system welds that had been selected for this augmented examination program were also examined each outage and thus had been more frequently inspected than required by NUREG 0313.

The examinations as performed, together with the system pressure tests (as applicable), provide an acceptable level of assurance of nonconforming service sensitive piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



2000

100

100

100

100

100

100

100

100

100

100

100

100

SECOND INTERVAL INSPECTION

REQUEST FOR RELIEF ISI-12 REV. 1

NUREG 0313 AUGMENTED REQUIREMENTS

WELD CLASSIFICATION B-J OR B-F

EXAM AREA	DESCRIPTION	REQUIRED METHOD	EXTENT TO BE EXAMINED	LIMITATION
40-WD-050-A	VALVE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
40-LW-003	PIPE SEAM	UT PT	0	INACCESSIBLE INSIDE PENETRATION
40-WD-010	VALVE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
40-WD-005	PIPE TO ELBOW	UT PT	WRV 58% WRA 86%	PERMANENT HANGER OBSTRUCTION
40-FW-30-D	PIPE TO SEAM	UT PT	0	INACCESSIBLE INSIDE PENETRATION
40-WD-006	PIPE TO PIPE	UT PT	WRV 82%	PERMANENT HANGER INTERFERENCE
40-WD-011	ELBOW TO PIPE	UT PT	WRV 31% WRA 25%	INACCESSIBLE AT PENETRATION
40-SW-37A-U	PIPE SEAM	UT PT	0	INACCESSIBLE INSIDE PENETRATION
40-WD-051	PIPE TO PIPE	UT PT	WRV 50%	INACCESSIBLE AT PENETRATION
40-LW-003	PIPE SEAM	UT PT	0	INACCESSIBLE AT PENETRATION
37-WD-003	REDUCER TO FLANGE	UT PT	WRV 0	FITTING CONFIGURATION
39-09R-SW-1	VALVE TO PENETRATION	UT PT	WRV 0	CONFIGURATION
39-10R-WD-001	VALVE TO PENETRATION	UT PT	WRV 0	CONFIGURATION
39-WD-194	PIPE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
38-WD-007	PIPE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
38-WD-088	PIPE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
33-WD-014	PIPE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
33-WD-036	PIPE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
33-WD-035	VALVE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION
33-WD-015	VALVE TO PIPE	UT PT	0	INACCESSIBLE INSIDE PENETRATION



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

Request 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.

Response B: Enclosed please find the following isometric and/or component drawings:

DRAWING	SHEET	REVISION	DRAWING	SHEET	REVISION
F-45183-C	1	1	F-45183-C	12A	2
F-45183-C	2	1	F-45183-C	13	1
F-45183-C	2A	0	F-45183-C	13A	0
F-45183-C	2B	0	F-45183-C	13B	0
F-45183-C	3	0	F-45183-C	13C	0
F-45183-C	3A	1	F-45183-C	14	0
F-45183-C	4	0	F-45183-C	15	1
F-45183-C	5	0	F-45183-C	15A	1
F-45183-C	5A	2	F-45183-C	15B	1
F-45183-C	6	0	F-45183-C	15C	1
F-45183-C	7	3	F-45183-C	15D	1
F-45183-C	7A	1	F-45183-C	16	0
F-45183-C	7B	0	F-45183-C	16A	0
F-45183-C	7C	0	F-45183-C	16B	0
F-45183-C	7D	0	F-45183-C	16C	0
F-45183-C	8	0	F-45183-C	17	0
F-45183-C	8A	0	F-45183-C	17A	0
F-45183-C	8B	0	F-45183-C	18	1
F-45183-C	8C	0	F-45183-C	19	0
F-45183-C	8D	0	F-45183-C	20	1
F-45183-C	8E	0	F-45183-C	21	0
F-45183-C	8F	1	F-45183-C	22	0
F-45183-C	8G	1	F-45183-C	22A	0
F-45183-C	8H	0	F-45183-C	23	0
F-45183-C	8J	0	F-45183-C	24	0
F-45183-C	9	0	F-45183-C	24A	0
F-45183-C	10	1	F-45183-C	25	0
F-45183-C	10A	1	F-45183-C	25A	0
F-45183-C	11	1	F-45183-C	26	0
F-45183-C	11A	3	F-45183-C	28	0
F-45183-C	11B	0	F-45183-C	28A	0
F-45183-C	12	1			

Vertical text on the left margin, possibly a page number or header.

Main body of the document containing faint, illegible text and two large black circular marks at the top.

Request 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.

Response C:

Niagara Mohawk recognizes the augmented examination requirements of Branch Technical Position MEB 3-1 to be contained solely in paragraph B.1.b(7) of that document which reads, "A 100% volumetric inservice examination of all pipe welds should be conducted during each inspection interval as defined in IWA-2400, ASME Code, Section XI." This paragraph is applicable only to high energy fluid systems piping in containment penetration areas, and then, only when NMP1 engineering has decided that "breaks and cracks need not be postulated in those portions of piping from containment wall to and including the inboard or outboard isolation valves."

Accordingly, this augmented examination becomes applicable to NMP1 only in the event that NMP1 chooses to invoke it in lieu of postulation of a pipe break when addressing General Design Criteria 4 of Appendix A to 10 CFR Part 50 for nuclear power plant structures and components. NMP1 did not invoke this augmented examination during postulation of breaks in Amendment 1 to our Application for a Full Term Operating License. As such, this augmented examination is not applicable to NMP1.

Coincidental to this discussion, it is worth noting that NMP1 has followed the standard selection criteria of ASME XI in including all terminal end welds (high stress) in the selection of Code Examination Category B-J, Items no. B9.11 & B9.12, and C-F, items C5.21 & C5.22 thus providing for a virtual 100% volumetric inservice examination of all ASME XI Class 1 & 2 welds equal to or greater than 4" NPS (Class 1) and greater than 1/2" nominal wall thickness (Class 2) at these locations (penetrations).

Request 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 non safety-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.



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

Response D:

**CONTROL ROD DRIVE, CONDENSATE PUMP INLET, AND
HIGH PRESSURE & REACTOR FEEDWATER SYSTEMS**

The original safety classification of systems for NMP1 classified the control rod drive (CRD) hydraulic and high pressure coolant injection (HPCI) systems as safety-related as they were identified in the FSAR as high pressure systems relied upon to mitigate the consequences of a small break LOCA. However, in later accident analysis, no credit is (or can be) taken for the CRD hydraulic or the HPCI systems to mitigate the consequences of a LOCA.

Therefore, the portions of the CRD hydraulic and the HPCI systems, including the condensate pump inlet, outside the second isolation valve are not required to assure: 1) the integrity of the reactor coolant pressure boundary, 2) the capability to shut down the reactor and maintain it in a safe shutdown condition, or 3) the capability to prevent or mitigate the consequences of an accident which could result in potential offsite exposures in excess of 10 CFR Part 100 guidelines.

As such, the HPCI/feedwater system outside the second isolation valve and the components for the CRD high pressure injection need not be considered safety related.

REACTOR SHUTDOWN COOLING SYSTEM

This system is designed to cool reactor water to temperatures and pressures below which the main condenser is capable following reactor shutdown. Once the reactor water has been cooled to about 350°F by the main condenser, the system is used to cool the reactor water down to 125°F and maintain it at this temperature by removing fission-product decay heat absorbed by the reactor water.

Niagara Mohawk has determined that the shutdown cooling system beyond the containment isolation valves does not perform a safety function and can be designated non-safety related. This determination was based, in part, on the following information:

- The Nine Mile Point Unit 1 "Petition to Increase Power Level" dated April 1970, Section X.a, states that the Shutdown Cooling "...design basis was conservatively formulated from a basic intention of establishing shutdown conditions suitable for maintenance and refueling work at an early time following shutdown, there being no specific safety requirements involved."
- The Shutdown Cooling System connects directly to the Reactor Coolant System (RCS) and is provided with automatic isolation on a lo-lo reactor level or a high area temperature. RCS boundary conditions are maintained by the automatic isolation valves.



Vertical text on the left margin, possibly a page number or header.

Main body of text, mostly illegible due to low contrast and noise.

- The system is manually initiated after temperature is below 350°. This implies the plant is already in a safe shutdown condition.
- No credit was taken for the system in the plant Safety Analysis (FSAR Section XV).
- During accident conditions, the Emergency Condensers, ADS and Core Spray are capable of establishing and maintaining safe shutdown automatically without the use of shutdown cooling.

Concerning the Staff's request for P&ID drawings with classification boundaries highlights for systems being "reclassified," enclosed please find the following ASME SECTION XI BOUNDARY DIAGRAM DRAWINGS:

F-63006-C, SHEET 1, REVISION 1 for systems 30, 44 and 38,
F-63005-C, SHEET 2, REVISION 1 for systems 29 and 51,
F-63016-C, SHEET 1, REVISION 1 for systems 28, and
F-63003-C, REVISION 1 for system 49.

Request E:

Section 2.1.4, "Weld Section," 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.

Response E:

The first interval program plan was extensively revised after the end of the interval effectively backfit and "as-built." Many welds were examined, (de facto "selected") in excess of Code requirements. Many welds which had been scheduled for examination were never examined, in many cases, because they were inaccessible. In those instances similar weldments were inspected in lieu of the program mandated welds. This resulted in an aggregate number of inspections far in excess of the First Interval requirements. Therefore, the first interval is not completely acceptable as a base for second interval inspections. In a sense, it is as if this were a first interval selection. That is what is meant by Section 2.1.4. All Code requirements are being met.



[The page contains extremely faint and illegible text, likely bleed-through from the reverse side of the document. The text is scattered across the page and is not readable.]

Request 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 non-safety-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.

Response F:

Concerning verbiage in Section 3.4 of the Pressure Testing Program Plan, NMPC has categorized the main steam piping as ASME Code Class 1 from the RPV up to and including the outboard isolation valve. The Program Plan reference to "containment isolation valves" is a reference to the two outboard main steam isolation valves. As such, the "Main Steam Piping between the containment isolation valves, up to but not including the stop valve" is a reference to the same piping identified in paragraph C.1.c of USNRC Regulatory Guide 1.26, Revision 3, dated February, 1976 (the piping extending from the outermost isolation valve up to but not including the turbine stop valves).

Section 9.0 of the Pressure Testing Program Plan for the original design classified the subject piping as non-safety-related. On August 22, 1969, a Provisional Operating License was granted by NRC based on that design 32 months before the promulgation of the Reg. Guide 1.26 prototype, "Safety Guide 26." In July of 1972 those decisions were scrutinized in retrospect with an eye towards the ramifications of such a decision as regards "specific plans for inservice inspection of main steam lines beyond the second isolation valves." NMPC retained the original classification, but did commit to an enumeration of surveillances to be performed on these lines in Table 4.2.6 of the NMP1 1974 Full Term Operating License Technical Specifications. The Table stated that all accessible circumferential welds greater than 4 inches in diameter would be ultrasonically inspected on a frequency which would cover each accessible weld at

1

2

3

4

5

6

7

8

9

10



least once every eight years of operation. NRC found this acceptable (without any commitment to pressure testing).

As previously discussed, "both of the cases described above" pertain to the same runs of piping. Those runs have been classified as non-safety related, as Regulatory Guide 1.26 does not require NMPC to apply Group B Quality Standards to them. For NMP1, there are no Code requirements relevant to these runs of piping. Therefore, no formal relief is required, nor will any be requested.

Request G:

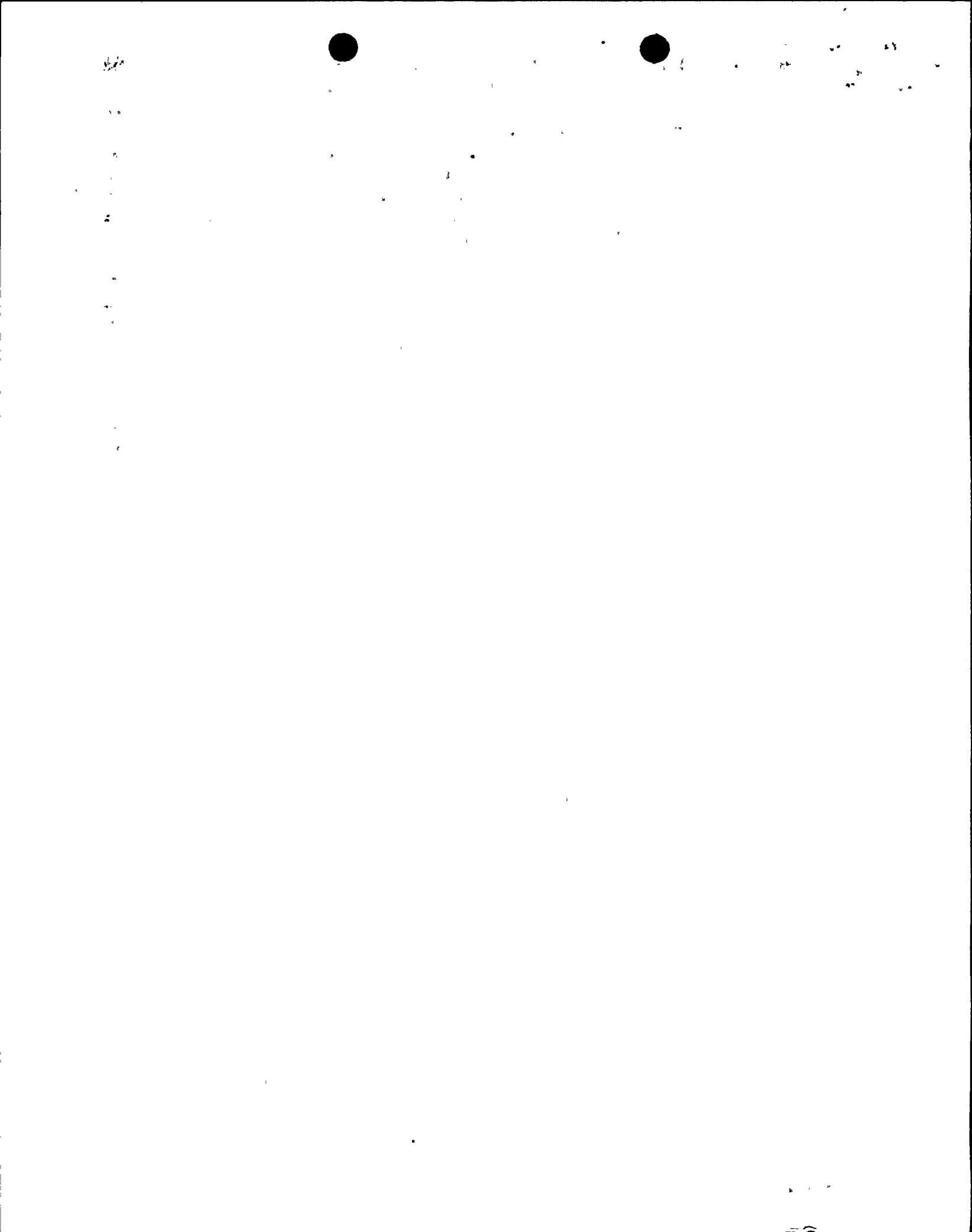
Section 9.0, Paragraph B.2.2, of the Pressure Testing Program Plan gives Class 2 and 3 exclusions from the Code-required system inservice and functional pressure tests. Decisions to exclude systems or components from ASME Section XI requirements must be supported by justification supporting a determination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

Response G:

Although the paragraph referenced in the Pressure Testing Program is entitled "Exclusions/Exceptions," no portion of Class 2 or 3 systems is being excluded from Code-required system inservice and functional pressure tests by NMP1. The title of this paragraph is intended to restate and clarify Code intent, as well as identify those portions of systems which will, in fact, not experience (be excluded from) pressurization during Code-required system inservice and functional pressure tests. In other words, the title identifies those portions of Class 2 systems which do not experience pressure under the test mode required during the performance of a periodic functional test, and those portions of Class 3 systems which do not experience pressure during normal system service. This is as stated in Code paragraphs IWA-5222 and IWA-5223 entitled "System Functional Test Boundary" and "System Inservice Test Boundary" respectively.

Request 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-scrum walkdown examination).



Response H:

It is NMP1's intention to implement this Code Case via an NMP1 (internal) Change Request to the Program Plan. The Pressure Testing Plan will be revised to allow the alternate test in those systems or portions thereof where pressurization above nominal operating pressures would be required by a hydrostatic test (IWA-5211(d)). The revision will be made in a timeframe which supports performances of these tests at, or near the end, of the interval. Since NMP1 promulgates the Pressure Testing Plan separate from the ISI Program Plan, there would be no affect on the ISI Program Plan. In general, there would be no affect on previous commitments, as the proper use of the Code Case would be relevant to the ASME XI mandated 10-year hydrostatic pressure tests only. Concerning Niagara Mohawk's response to Generic Letter 86-01, we are currently planning to perform a post-scrum walkdown versus a hydrostatic test.



125

125