REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8507090134 DOC.DATE: 85/07/02 NOTARIZED: NO DOCKET #
FACIL:50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220
AUTH.NAME AUTHOR AFFILIATION
LEMPGES,T.E. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
VASSALLO,D.B. Operating Reactors Branch 2

SUBJECT: Forwards addl info re Generic Ltr 83-28,Items 2.1,2.2,3.1.3, 3.2.3 & 4.5.3,in response to NRC 850423 request.

DISTRIBUTION CODE: A055D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 17
TITLE: OR/Licensing Submittal: Salem ATWS Events GL-83-28

NOTES: 05000220
OL:08/22/69

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	NRR ORB2 BC 01	3	3			
INTERNAL:	ACRS	6	6	ADM/LFMB	1	0
	ELD/HDS3	1	0	IE/DI	1	1
	IE/DQAVT	1	1	NRR/DE/EQB	1	1
	NRR/DE/MEB	1	1	NRR/DHFS/HFEB	1	1
	NRR/DHFS/LQB	1	1	NRR/DL DIR	1	1
	NRR/DL/ORAB	1	1	NRR/DL/SSPB	1	1
	NRR/DL/TAPMG	1	1	NRR/DSI/ASB	1	1
	NRR/DSI/ICSB	2	2	~~NRR/DSI~~/PSB	1	1
	NRR/DSI/RSB	1	1	REG FILE 04	1	1
	RGN1	1	1			
EXTERNAL:	24X	1	1	LPDR 03	1	1
	NRC PDR 02	1	1	NSIC 05	1	1

TOTAL NUMBER OF COPIES REQUIRED: LTTR 32 ENCL 30

NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

July 2, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactor Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Dear Mr. Vassallo:

Your letter of April 23, 1985 requested additional information with respect to Generic Letter 83-28. In particular, you required further clarification for Items 2.1, 2.2, 3.1.3, 3.2.3 and 4.5.3. Attached are our responses as they relate to Nine Mile Point Unit 1.

In addition, schedule information is provided for Items 3.1 and 3.2.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

T. E. Lempges
Vice President
Nuclear Generation

TEL/PAM:bd

A055
1/1

Niagara Mohawk Power Corporation Response

to

Request for Additional Information

on

Generic Letter 83-28

Items 2.1, 2.2, 3.1.3, 3.2.3 and 4.5.3

Item 2.1 (Part 1) - Equipment Classification and Vendor Interface (Reactor Trip System Components)

Request: Licensee needs to submit his new Q-list when complete. Has licensee committed to assuring that RTS components are identified as safety-related on all drawings, documents and in information-handling systems?

Response: The present Nine Mile Point Unit 1 Q-list identifies those structures, systems and components to which the Quality Assurance Program applies. This list is included in our Engineering Procedure. The new Q-list, presently under development, will provide a more comprehensive definition of systems and their respective safety classification. Niagara Mohawk does not plan to formally submit the new Q-list. Once completed and approved, the new Q-list will be available for inspection at the Nine Mile Point Site or in the Syracuse, NY offices.

As for a commitment to assure that reactor trip system components are identified as safety-related on all drawings, documents and in information-handling systems, our position is the same as stated in our November 8, 1983 letter. The safety classification of components is not listed on every drawing or document which identifies a reactor trip system component. Any test, maintenance or modification is administratively controlled to assure that the Q-list is reviewed for safety classification. The utilization of one document, i.e. Q-list, provides adequate assurance that safety-related components will be handled appropriately. Therefore, the need to review all drawings, documents and information-handling systems for safety classification of reactor trip system components is inappropriate.

Item 2.2 - Equipment Classification and Vendor Interface (Programs for All Safety-Related Components)

Request: Licensee needs to present his evaluation of the NUTAC program and describe how it will be implemented at Nine Mile Point Unit 1. The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility[1]. Accordingly, the licensee will need to supplement his reponse to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet the elements of this concern.

Response: Our letter of September 4, 1984 presented the program being utilized to address the concerns of vendor interface at Nine Mile Point Unit 1. This program utilizes the normal utility/vendor and utility/regulator interchanges as well as the Significant Event Evaluation and Information Network (SEE-IN) and Nuclear Plant Reliability Data System (NPRDS) to evaluate potential problems that may arise in the industry. Administratively, the Operations Assessment Program coordinates these information sources and provides the evaluations. Niagara Mohawk views this program as meeting the intent of Item 2.2 and requests the NRC to reevaluate our previous response and your request for additional information.

1 Letter dated March 20, 1985, H. Thompson (NRC) to S. Rosen (INPO)

Item 3.1.3 - Post-Maintenance Testing (Reactor Trip System Components)

Request: Licensee needs to state if he has found any post-maintenance testing requirements for RTS components that may degrade safety. If any such requirements are identified, the licensee shall describe actions to be taken including submitting needed Technical Specification changes.

Response: Our evaluation of Nine Mile Point Unit 1 Technical Specifications with respect to post-maintenance testing requirements which may degrade safety is not complete at this time. As stated in our November 30, 1984 letter, Niagara Mohawk has an internal program to improve technical specifications. Included in this program is an evaluation as to whether existing post-maintenance testing requirements may degrade safety. The results of this evaluation will be submitted when finalized.

Item 3.2.3 - Post-Maintenance Testing (All Other Safety-Related Components)

Request: Licensee needs to submit same type of information for safety-related components other than RTS that was required for Item 3.1.3.

Response: As stated above, the results of our evaluation will be submitted when finalized.

Item 4.5.3 - Reactor Trip System Reliability (System Functional Testing)

Request: The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the Technical Specification surveillance requirements. The licensee needs to address this conclusion.

Regarding the scram pilot valves (including all initiating circuitry), the licensee needs to provide the results of a review of existing or proposed intervals for on-line testing considering the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter. The response shall show how these intervals result in high reactor trip system availability and present proposed Technical Specification changes for staff review.

The staff has just received the BWR Owners Group response to Item 4.5.3 (NEDC-30844). If the licensee intends to formally endorse the Owners Group response, the licensee should delay his plant-specific response to Item 4.5.3 until after the staff completes its review of the Owners Group review.

Response: Our December 31, 1984 letter committed to perform a qualitative test of the backup scram valves during each refueling outage. Administrative controls will ensure that the test is performed. Niagara Mohawk considers this control adequate and does not plan to incorporate backup scram valve testing in the technical specifications.

As for on-line testing intervals for the scram pilot valves, Niagara Mohawk is also currently reviewing the Boiling Water Reactor Owners Group response to Item 4.5.3 (NEDC-30844). In addition, Niagara Mohawk has recently received two related documents from General Electric regarding plant specific analyses. Therefore, at this time we cannot formally endorse NEDC-30844 as being applicable to Nine Mile Point Unit 1. However, we will make our best effort to evaluate the three documents and provide a response consistent with your schedule, i.e. within 90 days after the NRC issues its evaluation of NEDC-30844.

Items 3.1 - Post-Maintenance Testing (Reactor Trip System Components) and
3.2 - Post-Maintenance Testing (All Other Safety-Related Components)

Schedule Update

Our letter of November 30, 1984 stated that the review of maintenance procedures would be completed by November 1985. Since that time, the Nine Mile Point Unit 1 Maintenance Department has been inspected by the NRC Region I. Results of this inspection indicated that improvements in the procedures could be achieved. In order to avoid duplication of effort, Niagara Mohawk proposes to address the concerns of Generic Letter 83-28 Items 3.1 and 3.2 and the inspection findings concurrently. Therefore, the schedule for completing Item 3.1 and 3.2 has been expanded one year until November 1986.