

March 20, 1986

Docket No. 50-410

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Mr. B. G. Hooten
Executive Director of Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Hooten:

Subject: Request for Additional Information on Nine Mile Point 2; Generic Letter 83-28, Item 1.1 - Post-Trip Review

By letters dated April 10, 1984 and December 20, 1985 Niagara Mohawk responded to Generic Letter (GL) 83-28, "Required Action Based on Generic Implications of Salem ATWS Events," for Nine Mile Point 2.

In the course of our review of your responses the staff has identified the following significant review item:

1. The response to Action Item 1.1.1 referenced the plant operating procedures and the BWR Owners Group position. These documents need to be provided for our review.
2. The response to Action Item 1.1.6 did not provide adequate criteria for determining the need for independent assessment of the events following an unscheduled reactor trip.
3. The responses to Action Item 1.1 did not address the guidelines and procedures established to ensure that all the physical evidence necessary for an independent assessment of the event is preserved.
4. The responses to Action Item 1.1 did not provide a systematic safety assessment program to assess unscheduled reactor trip.

As noted above, much of the information requested concerning Action Item 1.1 of GL 83-28 has not been provided. Enclosure 1 contains a request for additional information for GL 83-28 Item 1.1. Please provide the information requested in Enclosure 1 within 30 days of the date of this letter.

Enclosure 2 contains review guidelines for GL 83-28, Item 1.1 and is being sent for your information to assist you in your response to Enclosure 1.

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Mr. B. G. Hooten

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The staff would be happy to meet with you to discuss and resolve these issues.

Sincerely,

Mary F. Haughey, Project Manager
BWR Project Directorate No. 3
Division of BWR Licensing

cc: D. Shum
D. Vassallo

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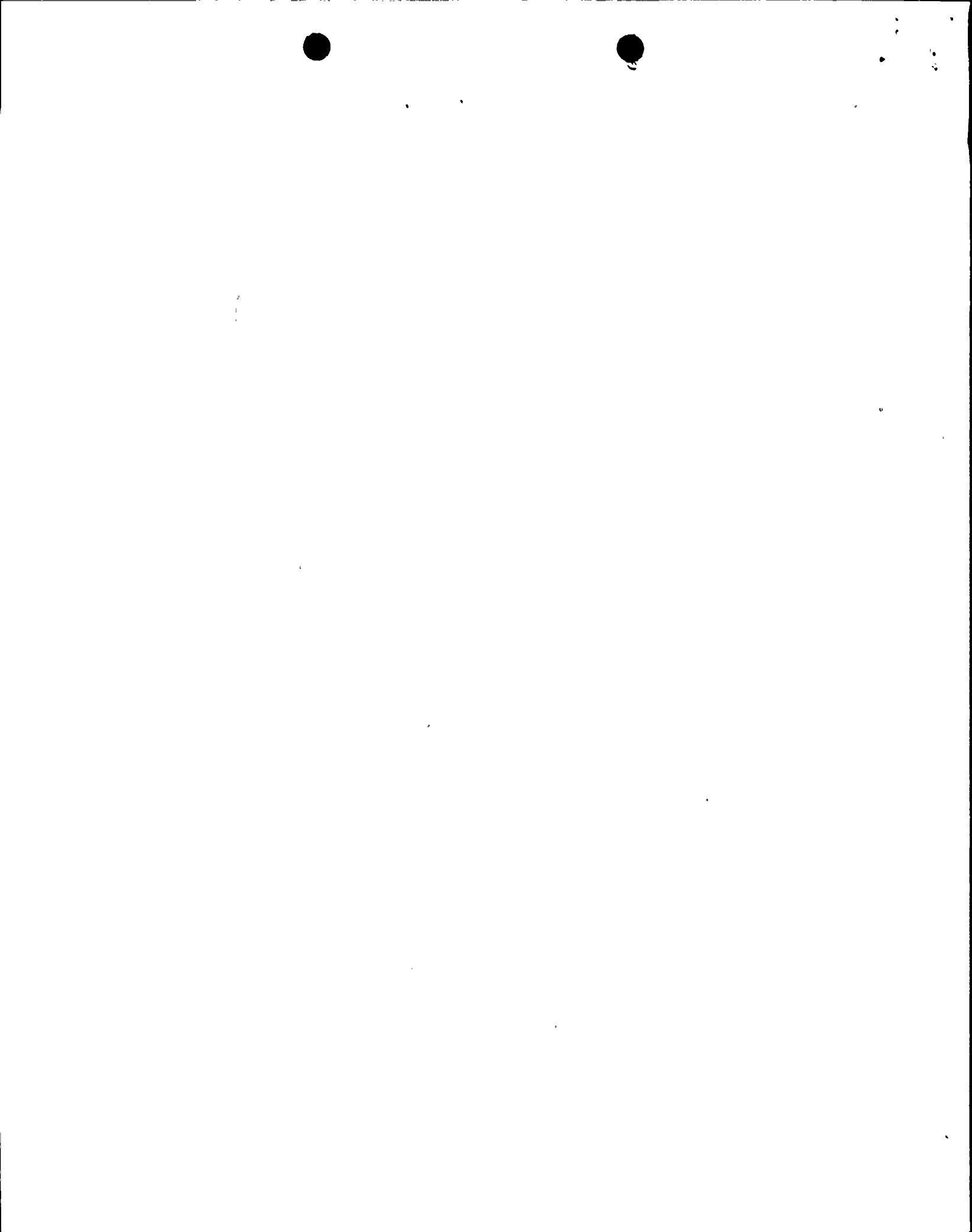
Certified By

Angela Henry

M Haughey
BWD#3
MHaughey/ah
3/19/86

LA: BWD#3
EHyton
3/19/86

EB/ah
D: BWD#3
EAdensam
3/19/86



Mr. B. G. Hooten
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit 2

cc:

Mr. Troy B. Conner, Jr., Esq.
Conner & Wetterhahn
Suite 1050
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

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

Mr. Paul D. Eddy
New York State Public Service
Commission
Nine Mile Point Nuclear Station -
Unit II
Post Office Box 63
Lycoming, New York 13093

Ezra I. Bialik
Assistant Attorney General
Environmental Protection Bureau
New York State Department of Law
2 World Trade Center
New York, New York 10047

Don Hill
Niagara Mohawk Power Corporation
Suite 550
4520 East West Highway
Bethesda, Maryland 20814

Resident Inspector
Nine Mile Point Nuclear Power Station
P. O. Box 99
Lycoming, New York 13093

Mr. John W. Keib, Esq.
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

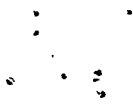
Mr. James Linville
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Norman Rademacher,
Licensing
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202



REQUEST FOR ADDITIONAL INFORMATION FOR GENERIC LETTER 83-28,
ITEM 1.1 - POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE
NINE MILE POINT NUCLEAR STATION, UNIT 2
DOCKET NO. 50-410

1. In the response to Action Item 1.1.1 of Generic Letter 83-28, you indicated that Nine Mile Point, Unit 2's criteria for determining the acceptability of restart are contained in the Interim Operating Procedure (N2-IOP-101A) which will be upgraded to a permanent operating procedure by startup. In addition, you indicated that Nine Mile Point, Unit 2 endorses the BWR Owners Group position with regard to Action Item 1.1.1. However, you have not provided this Interim Operating Procedure and the BWR Owners Group position for our review. We request that you provide the applicable portion of the Operating Procedure and the BWR Owners Group position with regard to Action Item 1.1.1 for our review. We will evaluate these criteria against the review guidelines developed as described in Section A of the attached Review Guidelines related to Generic Letter 83-28.
2. The response to Action Item 1.1.6 of Generic Letter 83-28 with regard to criteria for determining the need for independent assessment of the event following an unscheduled reactor trip is inadequate. We recommend that if any of the review guidelines (as described in Section A of the attached Review Guidelines related to Generic Letter 83-28) are not met, an independent assessment of the event should be performed by the Site Operations Review Committee or a group with similar authority and experience. Therefore, provide a revised response to reflect this recommendation.
3. Describe the guidelines and procedures established to ensure that all the physical evidence necessary for an independent assessment of the event is preserved.
4. You have not provided response to Action Item 1.1.7 of Generic Letter 83-28 which requires an applicant/licensee to provide for our review a systematic safety assessment program to assess unscheduled reactor trips. We recommend that you develop systematic safety assessment procedures in accordance with the review guidelines (as described in Section E of the attached Review Guidelines related to Generic Letter 83-28) to handle unscheduled reactor trips and provide these procedures for our review.



REVIEW GUIDELINES FOR GENERIC LETTER 83-28, ITEM 1.1 -

POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE)

The following review guidelines were developed after initial evaluation of the various utility responses to Item 1.1 of Generic Letter 83-28 and incorporate the best features of these submittals. As such, these review guidelines in effect represent a "good practices" approach to post-trip review. We have reviewed the applicant's/licensee's responses to Item 1.1 against these guidelines:

- A. The licensee or applicant should have systematic safety assessment procedures established that will ensure that the following restart criteria are met before restart is authorized.
- The post-trip review team has determined the root cause and sequence of events resulting in the plant trip.
 - Near term corrective actions have been taken to remedy the cause of the trip.
 - The post-trip review team has performed an analysis and determined that the major safety systems responded to the event within specified limits of the primary system parameters.
 - The post-trip review has not resulted in the discovery of a potential safety concern (e.g., the root cause of the event occurs with a frequency significantly larger than expected).
 - If any of the above restart criteria are not met, then an independent assessment of the event is performed by the Plant Operations Review Committee (PORC), or another designated group with similar authority and experience.
- B. The responsibilities and authorities of the personnel who will perform the review and analysis should be well defined.
- The post-trip review team leader should be a member of plant management at the shift supervisor level or above and should hold or should have held an SRO license on the plant. The team leader should be charged with overall responsibility for directing the post-trip review, including data gathering and data assessment and he/she should have the necessary authority to obtain all personnel and data needed for the post-trip review.
 - A second person on the review team should be an STA or should hold a relevant engineering degree with special transient analysis training.
 - The team leader and the STA (engineer) should be responsible to concur on a decision/recommendation to restart the plant. A nonconcurrency from either of these persons should be sufficient to prevent restart until the trip has been reviewed by the PORC or equivalent organization.



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- C. The licensee or applicant should indicate that the plant response to the trip event will be evaluated and a determination made as to whether the plant response was within acceptable limits. The evaluation should include:
- A verification of the proper operation of plant systems and equipment by comparison of the pertinent data obtained during the post-trip review to the applicable data provided in the FSAR.
 - An analysis of the sequence of events to verify the proper functioning of safety-related and other important equipment. Where possible, comparisons with previous similar events should be made.
- D. The licensee or applicant should have procedures to ensure that all physical evidence necessary for an independent assessment is preserved.
- E. Each licensee or applicant should provide in its submittal, copies of the plant procedures which contain the information required in Items A through D. As a minimum, these should include the following:
- The criteria for determining the acceptability of restart.
 - The qualifications, responsibilities and authorities of key personnel involved in the post-trip review process.
 - The methods and criteria for determining whether the plant variables and system responses were within the limits as described in the FSAR.
 - The criteria for determining the need for an independent review.



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