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ACCESSION NBR: 8606180367 DOC. DATE: 86/06/13 NOTARIZED: YES DOCKET #
FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
AUTH. NAME AUTHOR AFFILIATION
MANGAN, C. V. Niagara Mohawk Power Corp.
RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Identifies preoperational tests util plans to defer beyond fuel load, tests requiring & not requiring exemptions from 10CFR50.12(a). Affidavit & supporting documentation, encl.

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NIAGARA MOHAWK

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

June 13, 1986
(NMP2L 0750)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

Re: Nine Mile Point Unit 2
Docket No. 50-410

The Niagara Mohawk letter from C. V. Mangan to E. G. Adensam dated April 7, 1986 identified ten systems whose preoperational tests were planned to be deferred until after fuel load and forwarded pertinent information relative to each system. A subsequent letter from C. V. Mangan to E. G. Adensam dated May 7, 1986 requested schedular relief under 10 CFR 50.57(b) and also requested exemption from the requirements of 10 CFR Section 50.12(a) for portions of the Automatic Depressurization System, Containment Leakage Monitoring System, Offgas System and Containment Monitoring System.

The purpose of this letter is to explicitly identify those preoperational tests which we are planning to defer beyond fuel load, those which require exemptions, and those which do not require exemption from the requirements of 10 CFR 50.12(a). These systems, as discussed in previous correspondence and meetings on this subject, are listed below. Responses to Nuclear Regulatory Commission staff requests from a May 12, 1986 Status Review meeting and Nuclear Regulatory Commission Project Manager's site meeting of June 3, 1986 have been included in this correspondence.

Test/System No.	System	Exemption Required
Final Safety Analysis Report Table 14.2-32/System 8	Feedwater Heaters and Extraction Steam System	No
Final Safety Analysis Report Table 14.2-42/System 17	Post Accident Sampling System	No
Final Safety Analysis Report Table 14.2-44/System 2	Electrical Hydraulic Control System	No

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Test/System No.	System	Exemption Required
Final Safety Analysis Report Table 14.2-59/System 41	Solid Radwaste	No
Final Safety Analysis Report Table 14.2-60/System 42	Offgas System	Yes
Final Safety Analysis Report Table 14.2-108/System 82	Containment Atmospheric Monitoring System	Yes
Final Safety Analysis Report Table 14.2-112/System 85	Reactor Coolant and ECCS Leak Detection System	Yes
Final Safety Analysis Report Table 14.2-114/System 88	Containment Inerting System	No
Final Safety Analysis Report Table 14.2-78/System 62	DBA Recombiner System	Yes

Niagara Mohawk withdraws the exemption requests for the Automatic Depressurization System and Containment Leakage Monitoring System. The requested exemptions for the Offgas System, the Containment Monitoring System, and the Reactor Coolant and ECCS Leak Detection System were provided in our May 7, 1986 letter. Further, an exemption request to defer the Design Basis Accident Recombiner Testing will be provided under separate cover.

Revised information is provided in Attachment 1 for Electrical Hydraulic Control System, and new information is provided for Post Accident Sampling System.

Niagara Mohawk is ready to meet with the cognizant Nuclear Regulatory Commission personnel to review this matter at your convenience.

Very truly yours,

C. V. Mangan
Senior Vice President

BS:ja
1616G

xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-410
(Nine Mile Point Unit 2)	)	

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C V Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 13th day of June, 1986.

Janis M. Macro
Notary Public in and for
Onondaga County, New York

My Commission expires:

JANIS M. MACRO
Notary Public in the State of New York
Qualified in Onondaga County No. 4784555
My Commission Expires March 30, 19[illegible]

Attachment 1

Test No:	System	Schedule for Completion
FSAR Section 14.2-42 Preop Test 34	Post-Accident Sample System	Six months after fuel load but prior to operation above 5% of rated thermal power

System Description

As described in FSAR Sections 1.10 and 9.3.2, the PASS is designed to obtain representative liquid and gas samples from within the primary containment for radiological analysis in association with the possible consequences of a loss of coolant accident (LOCA). The system consists of: 1) a piping station located in the reactor building; 2) a sampling station located in the radwaste sample room; 3) two control panels situated approximately 10 ft. from the sample station in the sample room; 4) assorted transport equipment; 5) a ventilation system; and 6) assorted interconnecting tubing.

Justification for Not Completing the Test

During fuel loading and prior to low power testing,, no radioactive gaseous effluents can be generated. The operability of the Post-Accident Sample System ensures the system will be available for post-LOCA conditions.

The Post-Accident Sample System can only perform a function during a post-LOCA with degraded core conditions. This condition is not physically possible until after initiation of operation above low power (5% of rated thermal power).

Basis for Concluding Acceptability

Prior to initial power operation, the Post-Accident Sample System can perform no safety function, is not needed, and is not required. As the test will be performed prior to operation above low power (5% of rated thermal power), the test schedule is acceptable.

Technical Specification Requirements and Effects

There are no technical specifications applicable to this system.

Exemption Requests

No exemption requests are required at this time, since there are no deviations from regulatory requirements or plant Technical Specifications.

Test No:	System	Schedule for Completion
FSAR Table 14.2-44 Preop Test 23	Electrical Hydraulic Control System	Prior to opening of the main steam isolation valves

System Description

As described in FSAR Sections 1.2.5.3, 7.7.1.5 and 10.2.2, the Electrical Hydraulic Control System is used to maintain and control normal power generation of the turbine generating system and to provide protection for the Nine Mile Point Unit 2 turbine during transient conditions. The pressure regulator maintains control of the turbine, control of the turbine bypass valves to allow proper generator and reactor response to system load-demand changes, while maintaining the nuclear system pressure essentially constant. The turbine generator speed-load controls can initiate rapid closure of the turbine control valves (rapid opening of turbine bypass valves) to prevent turbine overspeed on loss of generator electric load.

Justification for Not Completing the Test

This system is nonsafety related and not required for safe operation of the plant - only for power generation.

Basis for Concluding Acceptability

Technical Specifications require that the Electrical Hydraulic Control Systems, which control the bypass valves, turbine stop valves and control valves, are tested in accordance with Section 3/4.3.8. This equipment is required for operational conditions 1 and 2. The turbine overspeed protection specification is provided to ensure that turbine overspeed protection system instrumentation and turbine speed control valves are operable and will protect the turbine from excessive overspeed. Therefore, provided that the system is tested prior to opening of the main steam isolation valves, the Unit will be in full conformance with the technical specifications.

Technical Specification Requirements and Effects

As indicated above, Technical Specification 3/4.2.8 describes the applicable requirements for Unit 2 compliance.

Exemption Requests

No exemption requests are required at this time, since this is a nonsafety related system, and Unit 2 will be in conformance with the Technical Specifications.