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SUBJECT: Revised corrective actions to 890116 & 0206 special repts.

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NMP67585

July 6 , 1990

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

RE: Docket No. 50-410
SPECIAL REPORT

Gentlemen:

We are submitting this letter to revise the corrective actions provided in our two SPECIAL REPORT submittals dated January 16, 1989, and February 6, 1989, (copies attached). These reports dealt with the relocation of Seismic Monitoring Instrumentation to alternate low level background vibration areas to prevent unnecessary wear and damage to the equipment. Specifically, Triaxial Peak Accelerograph (2ERS-PAC 2C) was to be relocated from the Primary Containment Recirculation Pump Motor area to a Motor Control Center (MCC) cabinet in the Nine Mile Point Unit 2 (NMP2) Secondary Containment (North Auxiliary Bay) at the 240 foot elevation. Accelerograph 2ERS-PAC 2B was to be relocated from its Primary Containment High Pressure Core Spray (CSH) piping location to a (CSH) line just outside the Primary Containment penetration, upstream of injection valve 2CSH*MOV107 on 292 foot elevation Secondary Containment.

EXECUTIVE SUMMARY

The Triaxial Peak Accelerographs (2ERS-PAC 2B&C) are maintained as required by the NMP2 Technical Specification (T.S.). As a result of corrective actions reported in previous submitted SPECIAL REPORTS (NMP44026 and NMP44061), temporary modifications were developed by NMPC Engineering in accordance with Administrative Procedure AP-6.1, "Control of Equipment Temporary Modifications". These were to allow instruments to be installed in low background vibration locations where Instrument and Control technicians would perform periodic examinations of the Accelerographs and verify new monitoring location acceptability.

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These new selected locations are not locations specified in the NMP2 Technical Specifications. Thus, NMPC is not taking credit for meeting T.S. requirements with these Accelerographs.

If new mounting sites were determined to be acceptable, a T.S. change would be submitted to the Nuclear Regulatory Commission to change Table 3.3.7.2-1 items 2.b and 2.c to reflect new locations. Additionally, permanent modifications would be generated to document the new engineering approved instrument mounting locations. Expected completion of this process of determining the new location, making necessary hardware changes and submitting a T.S. change was to be prior to the end of the first refueling outage.

ACTIONS TAKEN

Triaxial Peak Accelerographs (2ERS-PAC 2B&C) were relocated in accordance with NMP2 Temporary Modifications 89-026 and 89-031. Permanent plant modification PN2Y89MV083 was generated to provide final Engineering acceptance for the new Accelerograph locations.

However, during the Licensing Department's safety review of the modification, the determination was made that the monitors must remain located in the Reactor Primary Containment due to plant Standard Review Plan requirements. Subsequently, the Engineering Department has completed the design documents to relocate these instruments at temporary locations back in the Primary Containment. Triaxial Peak Accelerograph 2ERS-PAC 2B will be located on High Pressure Core Spray piping, 1 foot downstream of Primary Containment penetration Z-14 near its original location but at a more stable area; 2ERS-PAC 2C will be mounted on Reactor Pedestal Wall elevation 265' 5 1/2".

Physical work associated with these relocations will be completed during the stations first refueling outage presently scheduled for September 1990. Verification of instrument operability at these new locations will be completed during the performance of Instrument Surveillance Procedure N2-ISP-ERS-R102, "Operating Cycle Channel Calibration of Seismic Monitoring Triaxial Peak Accelerographs Instrument Channels", scheduled to be completed during the second refueling outage. If these locations are found to be acceptable, the monitors will remain at these locations and a Technical Specification change will be submitted to the Nuclear

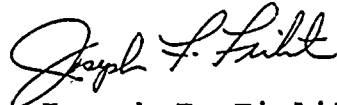
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United States Nuclear Regulatory Commission

July 6 , 1990

Regulatory Commission to change Table 3.3.7.2-1 to reflect these new locations.

Very truly yours,



Joseph F. Firlit
Vice President
Nuclear Generation

JFF/GB/lmc
(A:NMP67585)

ATTACHMENTS

cc: Regional Administrator, Region I
Sr. Resident Inspector, W. A. Cook

