



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555
May 16, 1991

Docket No. 50-410

Mr. B. Ralph Sylvia
Executive Vice President, Nuclear
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13211

Dear Mr. Sylvia:

SUBJECT: TIME EXTENSION FOR SUBMITTAL OF NINE MILE POINT NUCLEAR STATION
UNIT 2 FIRST REFUELING OUTAGE INSERVICE INSPECTION SUMMARY REPORT

By letter dated May 6, 1991, Niagara Mohawk Power Corporation (NMPC) requested an extension of time from April 30, 1991, until May 31, 1991, for submittal of the "Nine Mile Point Unit 2 First Refueling Outage Inservice Inspection Summary Report." NMPC stated that the additional time was needed to make several changes to the report prior to its submittal and that the extension would also provide an opportunity to include the results of certain additional tests and examinations conducted during the forced outage of March 29-April 12, 1991.

The NRC staff has reviewed and approved your request for a time extension to submit the subject summary report. The NRC staff will begin its review of the subject report when it is submitted on May 31, 1991.

Sincerely,

Donald S. Brinkman

Donald S. Brinkman, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. B. Ralph Sylvia
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit 2

cc:

Mr. Mark J. Wetterhahn, Esquire
Winston & Strawn
1400 L Street, NW.
Washington, D.C. 20005-3502

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406.

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

Charlie Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, New York 10271

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

Mr. Richard M. Kessel
Chair and Executive Director
State Consumer Protection Board
99 Washington Avenue
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Plant Manager, Unit 2
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Supervisor
Town of Scriba
R. D. #4
Oswego, New York 13126



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May 16, 1991

Docket No. 50-410

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Executive Vice President, Nuclear
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13211

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Sincerely,

ORIGINAL SIGNED BY:

Donald S. Brinkman, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

OFC	: PDI-1:LA	: PDI-1:PM	: NRR/EMCB	: PDI-1:D
NAME	: CVogan	: DBrinkman:avl	: CYCheng	: RACapra
DATE	: 5/16/91	: 5/16/91	: 5/16/91	: 5/16/91

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Document Name: NMP2 LETTER SYLVIA

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

Docket No. 50-410

April 26, 1991

Mr. B. Ralph Sylvia
Executive Vice President, Nuclear
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13211

Dear Mr. Sylvia:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE FOR INOPERABLE CONTAINMENT PURGE
VALVE (TAC NO. 80233)

By letter dated April 25, 1991, Niagara Mohawk Power Corporation (NMPC) submitted a written follow-up to its oral request of April 24, 1991, for a Temporary Waiver of Compliance for relief from the requirements of Technical Specification (TS) 3/4.6.1.7 for Nine Mile Point Nuclear Station Unit 2 due to the inoperability of a primary containment purge supply valve (2CPS*AOV106): This Temporary Waiver of Compliance would permit power operation to continue with the affected penetration isolated by its redundant purge supply valve and by a backup locally operated valve in the penetration. NMPC proposed that the Temporary Waiver of Compliance would remain in effect until issuance of an emergency technical specification change by the NRC. A copy of NMPC's request is enclosed.

On April 23, 1991, during performance of the surveillance requirements of TS 4.6.1.7.2, primary containment purge valve 2CPS*AOV106 failed the leakage criterion of 4.38 scf per hour. The initial leakage was approximately 167 scf per hour which was subsequently reduced to approximately 60 scf per hour following a purge with nitrogen while the valve was open. The licensee stated that this decrease in leakage was indicative of foreign material on the valve seat being partially removed during the purging operation. A similar failure had occurred during testing in January 1991; on that occasion, subsequent testing after purging was acceptable. These tests indicate that the leakage was apparently due to foreign material on the valve seat rather than an impending catastrophic failure of the resilient seal material used for the seat material in the purge valves.

There are eight purge valves used in Nine Mile Point 2. Four valves are 12-inch diameter and have an allowable leakage rate of 3.75 scf per hour and four valves are 14-inch diameter with an allowable leakage rate of 4.38 scf per hour. All eight valves were tested on April 23, 1991. The test results of the other seven valves were acceptable. The valve that failed the leak test (2CPS*AOV106) and its redundant valve (2CPS*AOV104) were placed in their

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April 26, 1991

closed position, tagged, and deactivated to prevent inadvertent reopening. A locally operated valve (2CPS-V6) upstream in the affected penetration was also closed and locked to prevent inadvertent opening of this penetration. All three of these valves will be maintained closed until the plant is shutdown to permit repair of the leaking valve. This shutdown will occur no later than September 30, 1991. A leak test of valve 2CPS*AOV104 following its closure and deactivation disclosed an acceptable leak rate of 0.023 scf per hour.

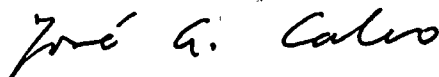
The leaking valve (2CPS*AOV106) is located inside the drywell. The drywell is inaccessible during plant operation since the drywell atmosphere is nitrogen which must be maintained during plant operation. Therefore, a plant shutdown would be required for access to the inoperable valve. TS 3.6.1.7 requires that these valves be operable. Action b. of TS 3.6.1.7 requires the plant to be in cold shutdown within 60 hours if the valves are not operable. The surveillance requirements of TS 4.6.1.7.2 require these valves be tested at least once per 92 days.

Based on the foregoing, NMPC orally requested a Temporary Waiver of Compliance from the operability requirements of TS 3.6.1.7, the requirements of Action b. to TS 3.6.1.7, and the surveillance requirements of TS 4.6.1.7.2 applicable to valve 2CPS*AOV106. NMPC proposed that the Temporary Waiver of Compliance would be effective from 12:00 noon, April 23, 1991, until issuance of an emergency TS change that is to be submitted by April 30, 1991.

The NRC reviewed your oral request for a Temporary Waiver of Compliance during a telephone conference call on April 24, 1991, and concluded that the granting of the requested temporary waiver was appropriate since the safety significance of the leaking valve is low when the affected penetration is maintained isolated by closed valves 2CPS*AOV104 and 2CPS-V6 and since the failure is not indicative of an impending catastrophic failure of the resilient seal material used for the seat material in the purge valves. This letter confirms our granting of the requested Temporary Waiver of Compliance regarding the Nine Mile Point 2 inoperable containment purge valve (2CPS*AOV106).

This Temporary Waiver of Compliance will remain in effect until issuance of an emergency technical specification change.

Sincerely,



Jose Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
NMPC's Request

cc w/enclosure:
See next page



Mr. B. Ralph Sylvia
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit 2

cc:

Mr. Mark J. Wetterhahn, Esquire
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1400 L Street, NW.
Washington, D.C. 20005-3502

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This Temporary Waiver of Compliance will remain in effect until issuance of an emergency technical specification change.

Sincerely,
ORIGINAL SIGNED BY:
Jose Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
NMPC's Request
cc w/enclosure:
See next page

CONCURRENCE
BY P11026
ON 4/26/91-4:26 PM

OFC	:PDI-1:LA	:PDI-1:PM	:NRR:SPLB	:PDI-1:D	:DIR:DRP:R	:NRR/ADRI	
NAME	:CVogan <i>CV</i>	:DBrinkman <i>DB</i>	:av1 <i>av1</i>	:CMcCracken <i>CMcC</i>	:RACapra <i>for</i>	:CHehl <i>FOR</i>	:JCalvo <i>NAC</i>
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

Docket No. 50-410

April 26, 1991

SECOND ISSUANCE

ENCLOSURE INADVERTENTLY
LEFT OFF 1ST MAILING

Mr. B. Ralph Sylvia
Executive Vice President, Nuclear
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13211

Dear Mr. Sylvia:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE FOR INOPERABLE CONTAINMENT PURGE
VALVE (TAC NO. 80233)

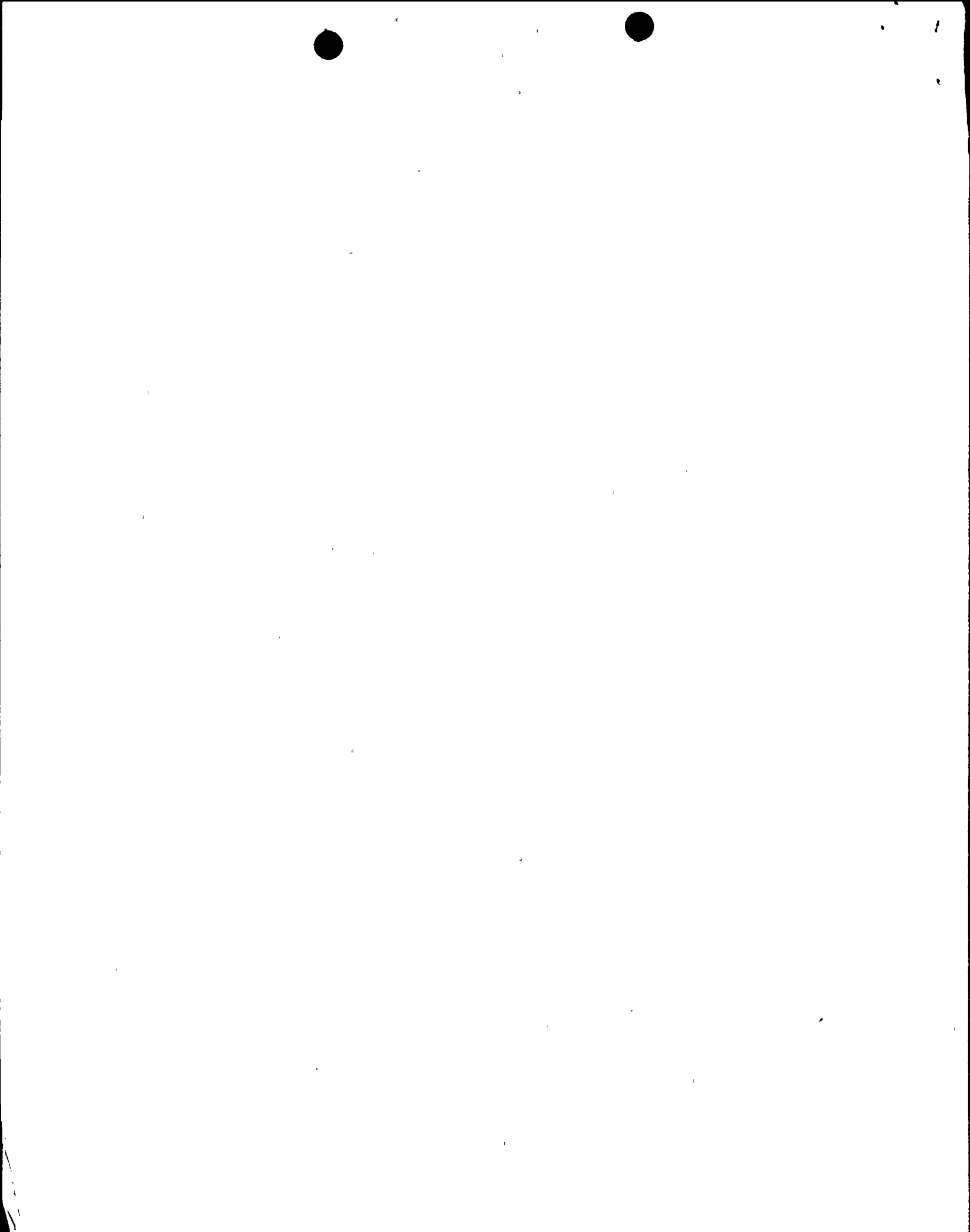
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A handwritten signature in black ink, appearing to be "M/A" followed by a stylized flourish.



April 26, 1991

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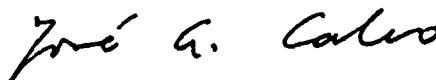
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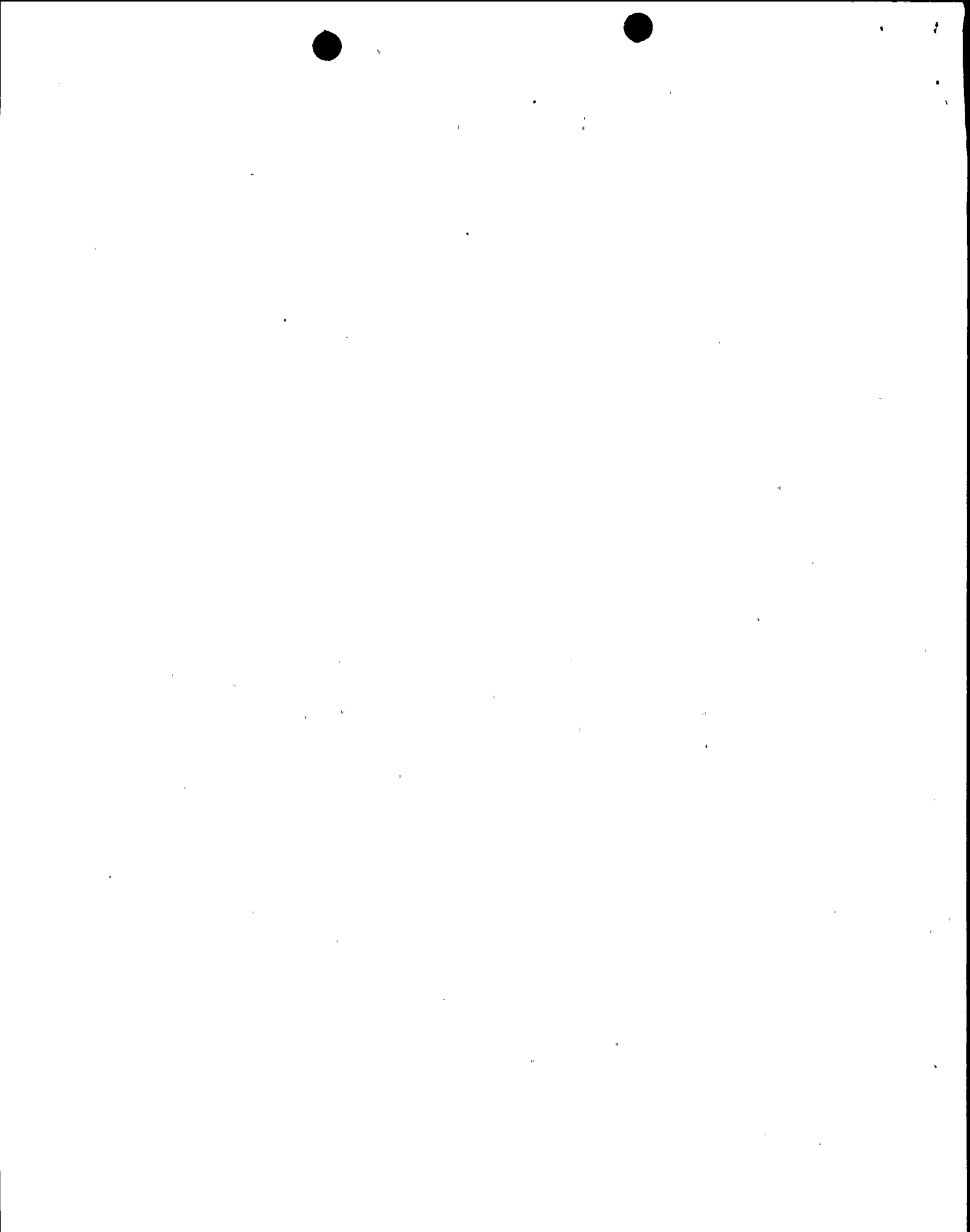
Sincerely,



Jose Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
NMPC's Request

cc w/enclosure:
See next page



Mr. B. Ralph Sylvia
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit 2

cc:

Mr. Mark J. Wetterhahn, Esquire
Winston & Strawn
1400 L Street, NW.
Washington, D.C. 20005-3502

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U.S. Nuclear Regulatory Commission
475 Allendale Road
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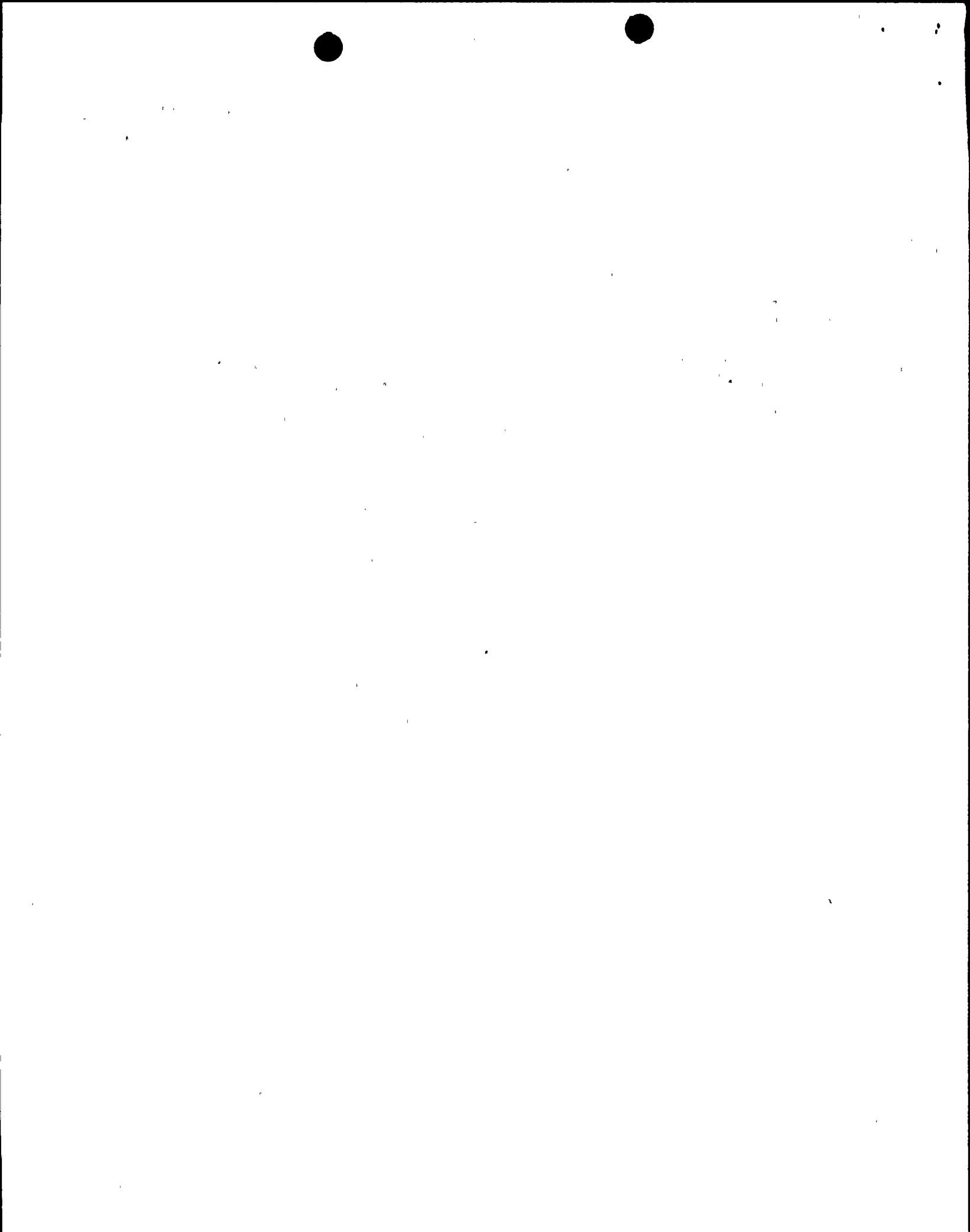
Mr. Martin J. McCormick Jr.
Plant Manager, Unit 2
Nine Mile Point Nuclear Station
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B. Ralph Sylvia
Executive Vice President
Nuclear

April 25, 1991
NMP2L 1295

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

Re: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

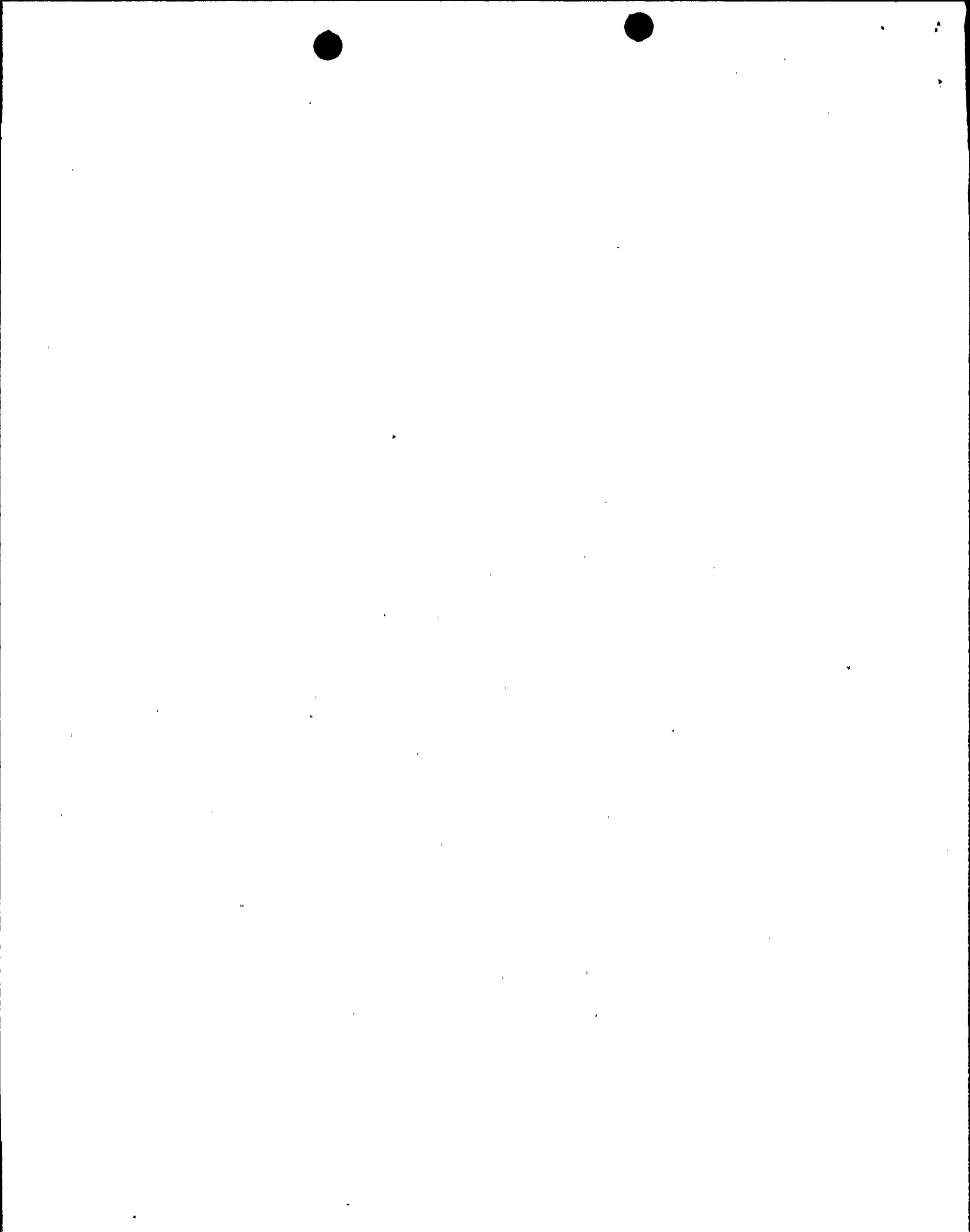
Gentlemen:

The purpose of this letter is to request a temporary waiver of compliance from Nine Mile Point Unit 2 (NMP2) Technical Specification (T.S.) Limiting Condition of Operation (LCO) 3.6.1.7, action statement "b" and Surveillance 4.6.1.7.2 for 2CPS*AOV106. Specifically, valve 2CPS*AOV106 does not meet the leakage requirements specified in T.S. Surveillance 4.6.1.7.2. This would require entry into action statement "b" for LCO 3.6.1.7. This action statement would require that NMP2 be in cold shutdown within 60 hours of entering of the action statement.

The temporary waiver of compliance is requested to allow continued operation of NMP2 until an emergency Technical Specification change can be submitted and reviewed by the Nuclear Regulatory Commission. Niagara Mohawk Power Corporation (NMPC) is requesting the temporary waiver of compliance be granted from 12 noon, April 23, 1991, until issuance of the emergency T.S. change by the NRC.

The following are included in an attachment to this letter.

- (1) A discussion of the requirements for which the waiver is requested.
- (2) A discussion of circumstances surrounding the situation including the need for prompt action, and a description of why the situation could not have been avoided.
- (3) A discussion of compensatory actions.
- (4) A preliminary evaluation of the safety significance and potential consequences of the proposed request.
- (5) A discussion which justifies the duration of the request.



- (6) A discussion of the basis for the conclusion that the waiver does not involve a significant hazards consideration.
- (7) A discussion of the basis for the conclusion that the waiver does not involve irreversible environmental consequences.
- (8) A discussion of the internal review performed within NMPC for the waiver.

Pursuant to our discussion, NMPC will submit an emergency T.S. change in accordance with 10CFR50.91(a)(5).

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

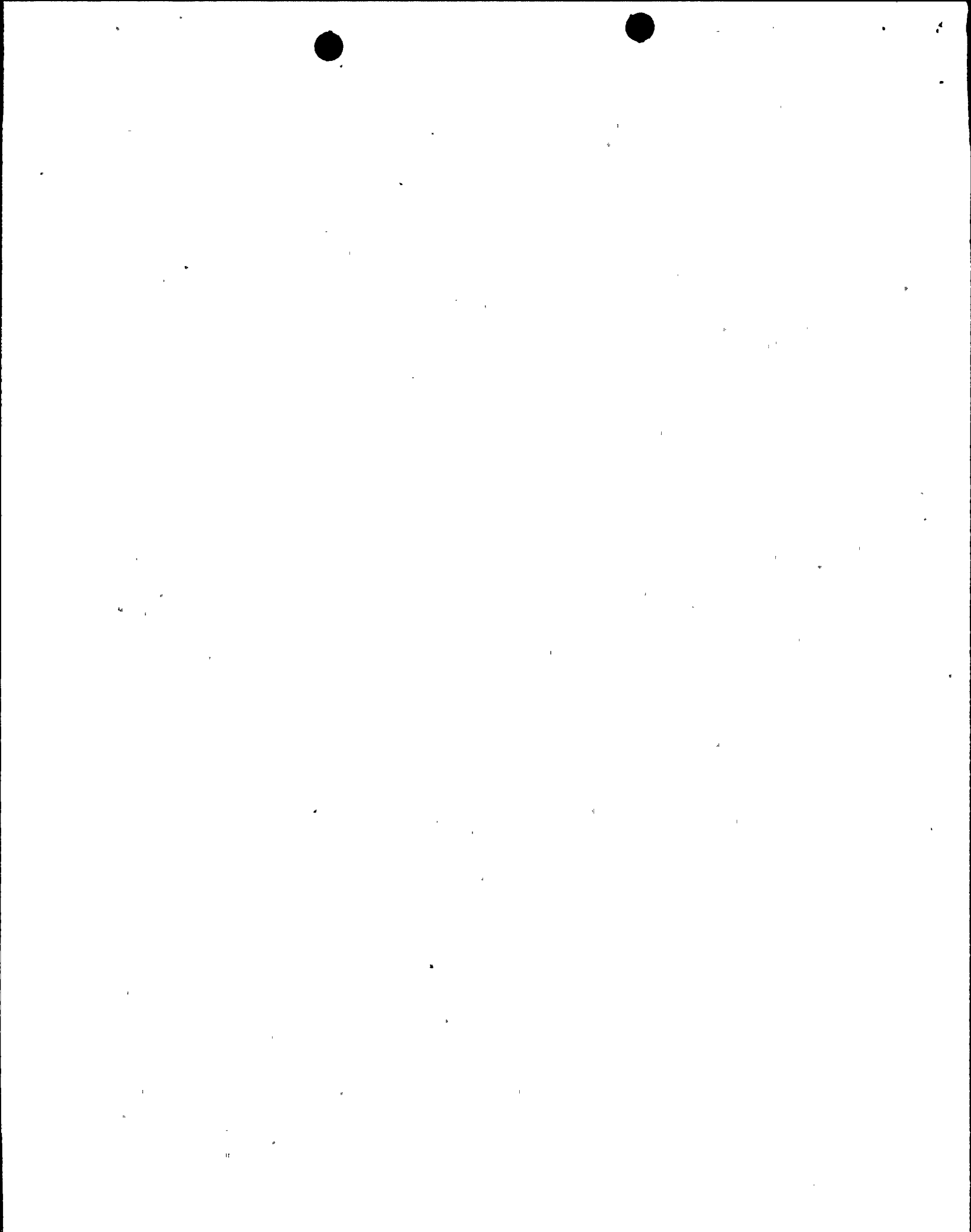


B. Ralph Sylvia

Executive Vice President-Nuclear

KK/jab
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xc: Regional Administrator, Region I
Mr. W. A. Cook, Senior Resident Inspector
Mr. R. A. Capra, Project Directorate No. 11, NRR
Mr. D. S. Brinkman, Project Manager, NRR
Ms. Donna Ross
Division of Policy Analysis and Planning
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, NY 12223
Records Management



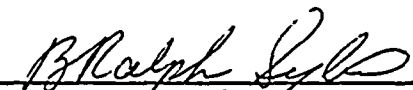
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Niagara Mohawk Power Corporation.)
(Nine Mile Point Unit 2))

Docket No. 50-410


AFFIDAVIT

B. Ralph Sylvia, being duly sworn, states that he is Executive Vice President-Nuclear 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.



B. Ralph Sylvia
Executive Vice President-Nuclear

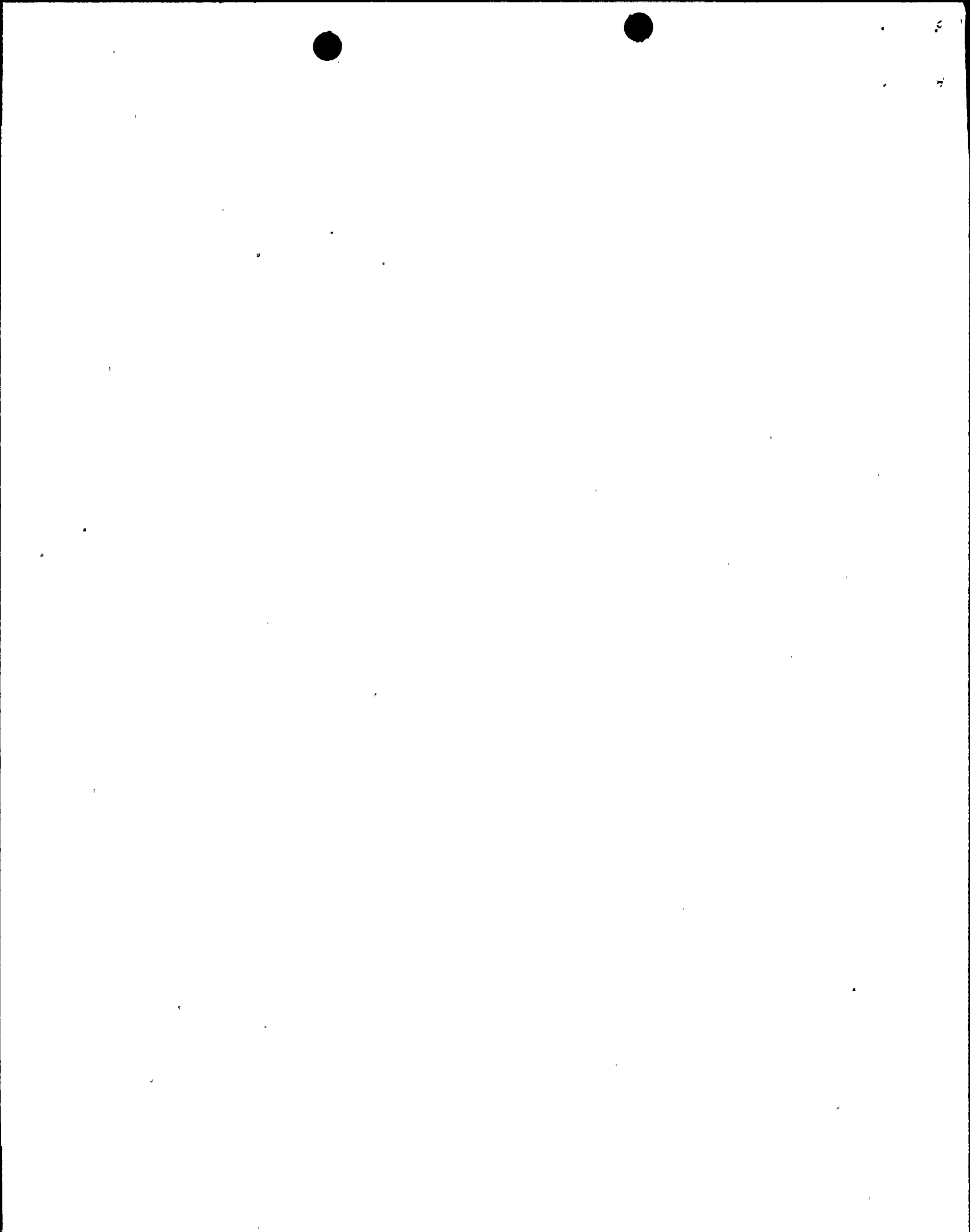
Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Oranada, this 25th day of April, 1991.



Notary Public in and for
Oranada 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 APRIL 30, 1991



(1) A DISCUSSION OF THE REQUIREMENTS FOR WHICH THE WAIVER IS REQUESTED

The proposed temporary waiver will permit continued operation of NMP2 with leakage of 2CPS*AOV106 in excess of T.S. Surveillance 4.6.1.7.2 criteria requirements. This valve is a 14" valve and the applicable leakage criteria is 4.38 scf per hour. The waiver will also allow exception to action statement "b" for LCO 3.6.1.7. The temporary waiver of compliance will be needed from 12:00 Noon, April 24, 1991 until issuance of the emergency T.S. change by the NRC.

(2) A DISCUSSION OF CIRCUMSTANCES SURROUNDING THE SITUATION INCLUDING THE NEED FOR PROMPT ACTION, AND A DESCRIPTION OF WHY THE SITUATION COULD NOT HAVE BEEN AVOIDED.

On April 23, 1991, T.S. Surveillance 4.6.1.7.2 was performed on 2CPS*AOV106. The valve failed to pass the T.S. leakage criterion of 4.38 scf per hour. Nitrogen was passed through the 2CPS*AOV106 valve to remove any foreign particles resting on the valve seat that may have contributed to the test failure. Subsequent retesting did not meet T.S. leakage criterion. The initial valve leakage was quantified at 166.990 scf per hour which was subsequently reduced to approximately 60 scf per hour following the purge. After discussion with the NRC staff, a temporary waiver of compliance was verbally granted on April 24, 1991. With this filing the licensee has made timely application for this temporary waiver of compliance.

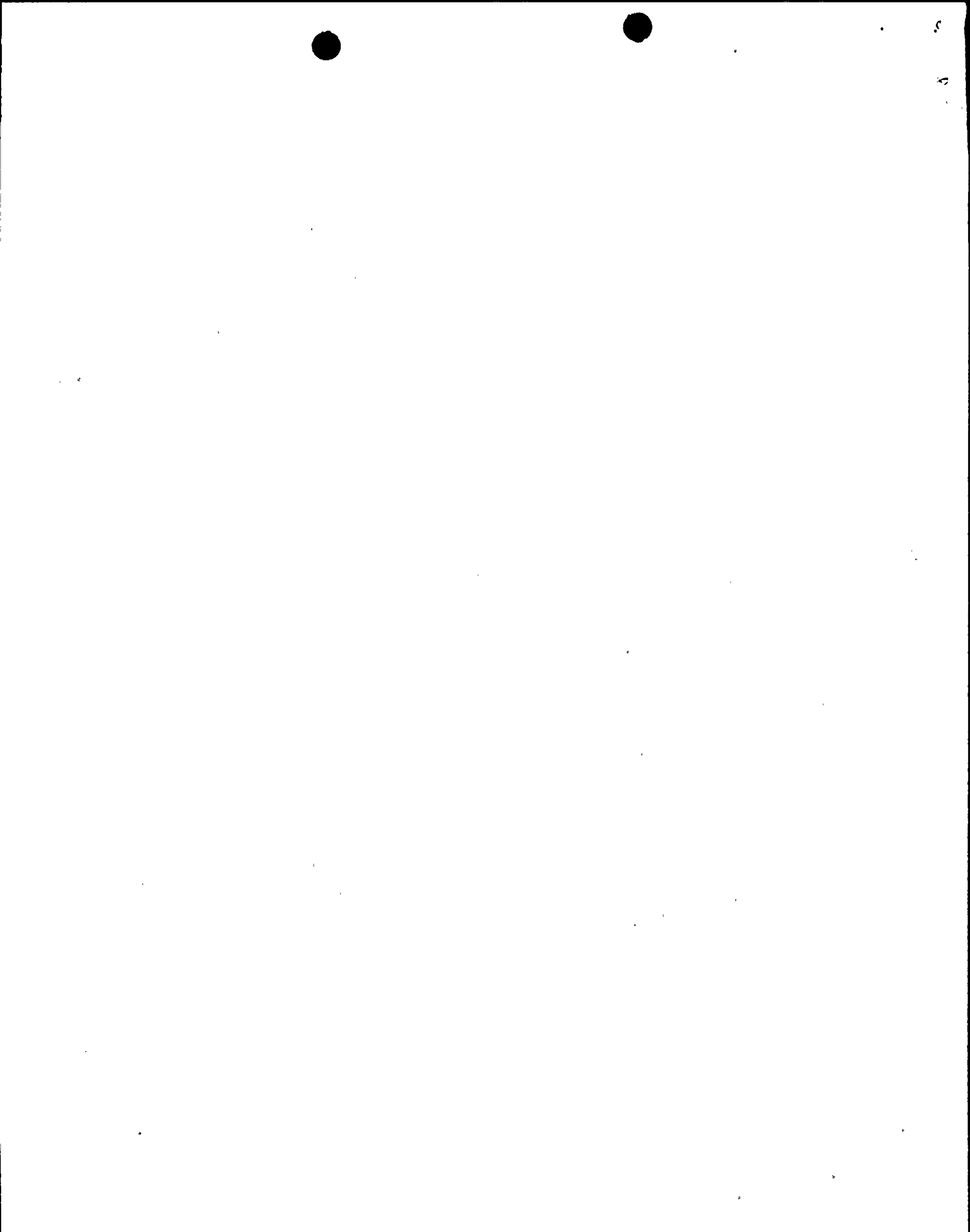
Failure to pass T.S. Surveillance 4.6.1.7.2 would result in entry into action statement "b" for LCO 3.6.1.7. This action statement would require that NMP2 be in cold shutdown within 60 hours upon entering the action statement.

Previous testing of 2CPS*AOV106 during January, 1991, resulted in a test failure while performing T.S. Surveillance 4.6.1.7.2. Corrective action was initiated that involved passing of air over the valve seat to remove any particles. Retesting following the purging process resulted in the valve passing the T.S. Surveillance test. No physical modifications or valve seat rework was required to pass the T.S. surveillance. Niagara Mohawk thus, could not anticipate or avoid this situation leading up to this request.

(3) A DISCUSSION OF COMPENSATORY ACTIONS

Testing was completed for all remaining drywell and suppression chamber purge supply and exhaust isolation valves with resilient material seats was completed by 5:00 a.m. on April 25, 1991.

The valves, their corresponding size, leakage and acceptance criteria are as follows.



<u>Valve No.</u>	<u>Nominal Size of Valve Diameter (Inches)</u>	<u>Test Results (scf per hour)</u>	<u>T.S. Acceptance Criteria (scf per hour)</u>
2CPS*AOV104	14	0.023	4.38
2CPS*AOV105	12	1.424	3.75
2CPS*AOV107	12	1.603	3.75
2CPS*AOV108	14	1.874	4.38
2CPS*AOV109	12	0.818	3.75
2CPS*AOV110	14	1.291	4.38
2CPS*AOV111	12	0.785	3.75

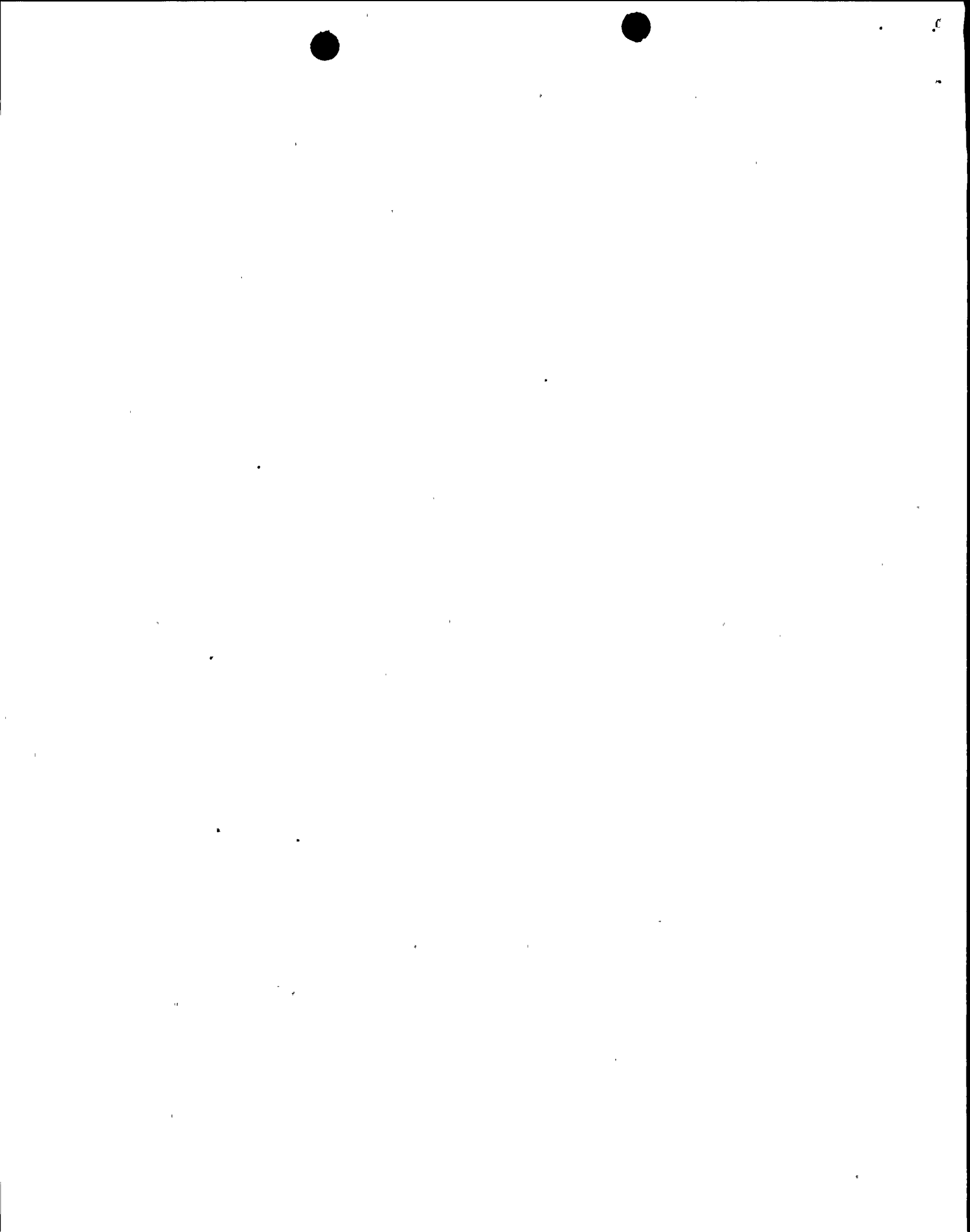
If any of these above valves fail to pass the acceptance criteria of T.S. Surveillance 4.6.1.7.2 leakage testing, the plant will comply with action statement "b" for LCO 3.6.1.7.

As indicated above, testing was performed on 2CPS*AOV104, which is the redundant primary containment isolation valve for the affected penetration. After this valve, 2CPS*AOV104, was T.S. Surveillance 4.6.1.7.2 tested, it has been left in its as tested closed condition, deactivated, and tagged to prevent inadvertent re-energization. In addition, the inboard valve 2CPS*AOV106 will also be left in a closed position. A locally operated valve, 2CPS-V6, which is the first valve upstream of 2CPS*AOV104, will be closed and locked.

After completion of leakage testing, the three valves, 2CPS*AOV104, 2CPS*AOV106 and 2CPS-V6, will not be operated during the period of time for which continued operation of NMP2 requires reliance on either the temporary waiver of compliance and the proposed emergency T.S. change.

NMPC believes that increasing the test frequency of T.S. Surveillance 4.6.1.7.2 for the above seven valves is not appropriate. The basis for this conclusion is:

- (1) the above test results for the seven valves indicates that the remaining valves are performing their leakage barrier function significantly better than that required by T.S. Surveillance 4.6.1.7.2.
- (2) a review of the testing history, since 1986, of all eight valves indicated that there are no indications of failure trends and that the valves have a high rate of success when tested in accordance with T.S. 4.6.1.7.2.
- (3) when the above two items are considered together, it can be concluded that the failure of the TS surveillance test for 2CPS*AOV106 is not indicative of resilient seal degradation on the remaining seven valves.



(4) A PRELIMINARY EVALUATION OF THE SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES OF THE PROPOSED REQUEST

Continued plant operation with 2CPS*AOV106 leakage in excess of the T.S. leakage criterion depicted in T.S. Surveillance 4.6.1.7.2 will not create any adverse consequences or safety issues. This conclusion is based upon the compensatory action discussed in item (3).

As discussed in item (3), T.S. Surveillance 4.6.1.7.2 testing was performed on 2CPS*AOV104, which is the redundant primary containment outboard isolation valve for the affected penetration. This testing involved the performance of a vacuum test on the piping volume between 2CPS-V6 and 2CPS*AOV104 and pressurization of the containment penetration at the downstream side of 2CPS*AOV104 to 40 psig. The V6 valve is the next valve immediately upstream of 2CPS*AOV104. The leakage value of 0.023 scf per hour from the vacuum test was conservatively assigned to 2CPS*AOV104. The successful completion of this test demonstrates that 2CPS*AOV104 provides a leakage barrier consistent with the requirements stipulated in T.S. 4.6.1.7.2. Since both the V6 and AOV104 valves will be left in their as tested closed position and not operated until the plant has achieved cold shutdown, it is reasonable to expect that the actual accident condition leakage through these two valves for the affected penetration is consistent with that assumed in the radiological dose calculations performed for accident conditions. In addition, as stated in item (3), V6 will be closed and locked and AOV104 will be deactivated and tagged. Therefore, based upon the above discussion, operation with 2CPS*AOV106 leakage in excess of T.S. leakage criterion will not increase onsite or offsite radiological consequences.

As discussed in item (3), all remaining seven drywell and suppression chamber purge supply and exhaust isolation valves with resilient material seats have been tested in accordance with T.S. Surveillance 4.6.1.7.2. The successful completion of this testing demonstrates that the failure of the surveillance test for 2CPS*AOV106 is not indicative of a common problem associated with the other Contained Purge Systems (CPS) valves. A review of the testing history of all eight valves indicated that there are no indications of failure trends and that the valves have a high rate of success when tested in accordance with T.S. Surveillance 4.6.1.7.2. Based upon the recent test results of the remaining seven valves with resilient seals and a review of previous testing results, it can be concluded that the failure of the surveillance test for 2CPS*AOV106 is not indicative of early resilient materials seal degradation and is evidence that the margin of safety has not been reduced.

The 2CPS*AOV106 valve is leak rate tested to meet Appendix J requirements. As previously indicated, the initial and highest

quantified leakage of 2CPS*AOV106 is 166.990 scf per hour. In accordance with NMP2 T.S. LCO 3.6.1.2.b, the combined leakage rate for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves, subject to Type B and C testing when pressurized to Pa of 39.75 psig must be less than or equal to 0.60 La. Valve 2CPS*AOV106 is listed on T.S. Table 3.6.3-1. The value for 0.60 La is 494.640 scf per hour. With an initial and highest quantified leakage of 166.990 scf per hour for 2CPS*AOV106, the combined leakage for Type B and C testing is currently equal to 314.419 scf per hour. Therefore, it can be concluded that operation with 2CPS*AOV106 leakage in excess of T.S. criterion specified in T.S. surveillance 4.6.1.7.2 does not lead to non-compliance with LCO 3.6.1.2.b.

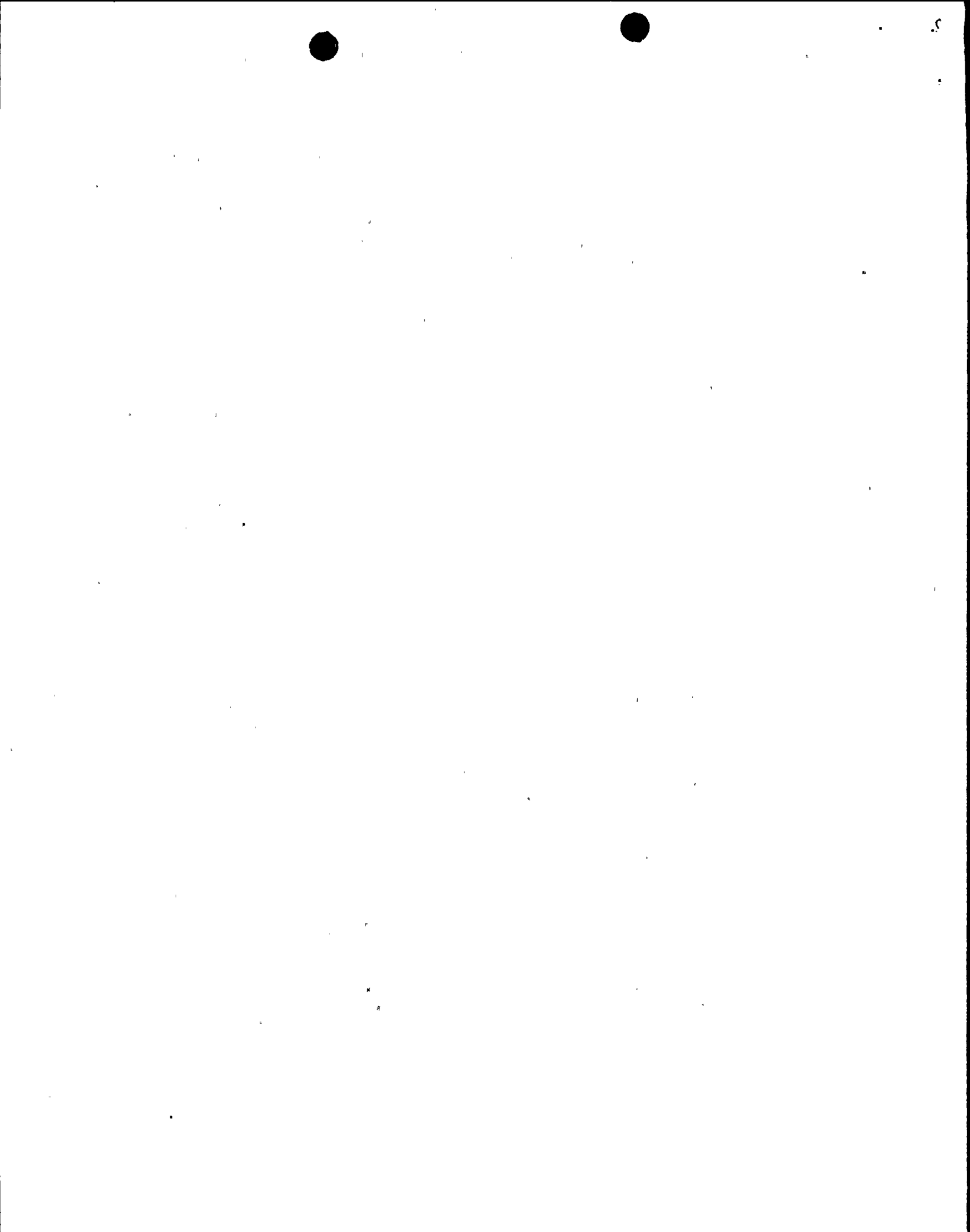
The only primary containment isolation valves with resilient seals are the eight containment purge system valves.

The primary containment nitrogen inerting system establishes and maintains an oxygen deficient atmosphere in the primary containment during normal operation. In addition, the primary containment purge system is provided to aid in the post accident cleanup operation. The 2CPS*AOV106 valve is located on the nitrogen supply line for the drywell. Since an alternate pathway is available within the primary containment purge system to supply nitrogen to the drywell, the closing of the redundant primary containment isolation valve for 2CPS*AOV106 does not adversely affect the ability of the primary containment nitrogen inerting system to maintain an oxygen deficient atmosphere nor does it adversely affect the ability of the containment purge system to support post accident cleanup operations.

The alternate pathway is through a primary containment penetration which has inboard and outboard isolation valves which automatically close on receipt of a containment isolation signal and are each powered from separate divisional power source. No credit is taken during an accident for the operation of the primary containment nitrogen inerting system or for the primary containment purge system other than the automatic closure of primary containment isolation valves within these systems.

(5) A DISCUSSION WHICH JUSTIFIES THE DURATION OF THE REQUEST

NMPC is requesting that this temporary waiver of compliance be granted from 12 noon, April 24, 1991, until issuance of the emergency T.S. change by the NRC. When the compensatory actions discussed in item (3) and the safety significance of the proposed waiver discussed in item (4) are considered, NMPC believes the duration of the request is appropriate.



If an outage were to occur prior to issuance of the emergency T.S. change by the NRC, then the 2CPS*AOV106 valve will be restored to operability consistent with the requirements of T.S. Surveillance 4.6.1.7.2 prior to restart of the unit.

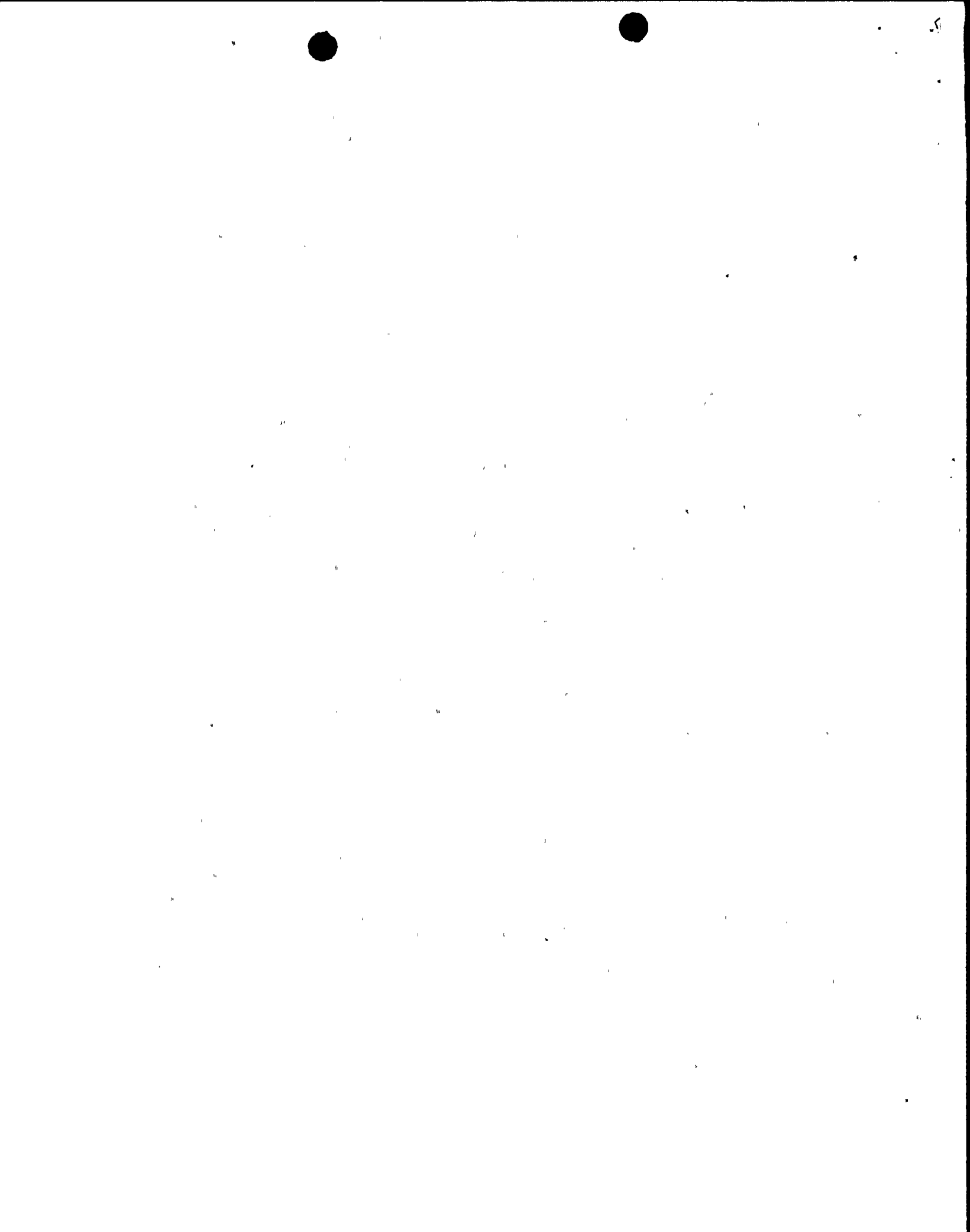
(6) A DISCUSSION OF THE BASIS FOR THE CONCLUSION THAT THE WAIVER DOES NOT INVOLVE A SIGNIFICANT HAZARDS CONSIDERATION

The operation of Nine Mile Point Unit 2, in accordance with the proposed temporary waiver of compliance, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed waiver does not involve a significant increase in the probability or consequences of an accident previously evaluated. Items (3) and (4) provide the basis for Niagara Mohawk's conclusion that the consequences of an accident previously evaluated in the USAR are not significantly increased. The probability of an accident previously evaluated in chapters 6 and 15 of the USAR is not increased since the operation of the unit with 2CPS*AOV104 and 2CPS-V6 closed and 2CPS*AOV106 leakage in excess of T.S. criteria does not contribute to the initiating events for accidents in the USAR.

The operation of Nine Mile Point Unit 2, in accordance with the proposed temporary waiver of compliance, will not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed waiver does not create the possibility of a new or different kind of accident from any accident previously evaluated in the USAR based upon the discussion in items (3) and (4). The successful testing of all remaining seven drywell and suppression chamber purge supply and exhaust isolation valves with resilient material seals provides adequate assurance that the failure of the T.S. Surveillance 4.6.1.7.2 for 2CPS*AOV106 is not indicative of deteriorating resilient seals for the remaining valves of similar design at NMP2. In addition, a review of testing history for these valves indicates that there are no indications of failure trends and that the valves have a high rate of success when tested in accordance with T.S. Surveillance 4.6.1.7.2. Therefore, operation with the waiver does not increase the probability of having an accident concurrent with inadequate leakage rates associated with primary containment isolation valves with resilient seals.



The operation of Nine Mile Point Unit 2, in accordance with the proposed temporary waiver of compliance, will not involve a significant reduction in a margin of safety.

As discussed in item (4) the margin of safety is not reduced. Adequate assurance that leakage through primary containment penetrations with valves with resilient seals will not increase beyond the T.S. limits in 4.6.1.7.2 is provided by the successful testing of the remaining seven valves.

(7) A DISCUSSION OF THE BASIS FOR THE CONCLUSION THAT THE WAIVER DOES NOT INVOLVE IRREVERSIBLE ENVIRONMENTAL CONSEQUENCES

This change involves no significant increase in the amounts or types of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. The requested temporary waiver does not increase the plant's licensed power level or involve irreversible environmental consequences.

(8) A DISCUSSION OF INTERNAL REVIEWS PERFORMED WITHIN NMPC FOR THE WAIVER

The NMP2 Station Operations Review Committee (SORC) has reviewed and approved this request for a temporary waiver of compliance.

April 26, 1991

closed position, tagged, and deactivated to prevent inadvertent reopening. A locally operated valve (2CPS-V6) upstream in the affected penetration was also closed and locked to prevent inadvertent opening of this penetration. All three of these valves will be maintained closed until the plant is shutdown to permit repair of the leaking valve. This shutdown will occur no later than September 30, 1991. A leak test of valve 2CPS*AOV104 following its closure and deactivation disclosed an acceptable leak rate of 0.023 scf per hour.

The leaking valve (2CPS*AOV106) is located inside the drywell. The drywell is inaccessible during plant operation since the drywell atmosphere is nitrogen which must be maintained during plant operation. Therefore, a plant shutdown would be required for access to the inoperable valve. TS 3.6.1.7 requires that these valves be operable. Action b. of TS 3.6.1.7 requires the plant to be in cold shutdown within 60 hours if the valves are not operable. The surveillance requirements of TS 4.6.1.7.2 require these valves be tested at least once per 92 days.

Based on the foregoing, NMPC orally requested a Temporary Waiver of Compliance from the operability requirements of TS 3.6.1.7, the requirements of Action b. to TS 3.6.1.7, and the surveillance requirements of TS 4.6.1.7.2 applicable to valve 2CPS*AOV106. NMPC proposed that the Temporary Waiver of Compliance would be effective from 12:00 noon, April 23, 1991, until issuance of an emergency TS change that is to be submitted by April 30, 1991.

The NRC reviewed your oral request for a Temporary Waiver of Compliance during a telephone conference call on April 24, 1991, and concluded that the granting of the requested temporary waiver was appropriate since the safety significance of the leaking valve is low when the affected penetration is maintained isolated by closed valves 2CPS*AOV104 and 2CPS-V6 and since the failure is not indicative of an impending catastrophic failure of the resilient seal material used for the seat material in the purge valves. This letter confirms our granting of the requested Temporary Waiver of Compliance regarding the Nine Mile Point 2 inoperable containment purge valve (2CPS*AOV106).

This Temporary Waiver of Compliance will remain in effect until issuance of an emergency technical specification change.

Sincerely,
ORIGINAL SIGNED BY:
Jose Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
NMPC's Request
cc w/enclosure:
See next page

CONCURRENCE
BY *ATC*
ON 4/26/91-4:26 PM

OFC	:PDI-1:LA	:PDI-1:PM	:NRR:SP1B	:PDI-1:D	:DIR:DRP:R	:NRR/ADRI
NAME	:CVogan <i>CV</i>	:DBrinkman <i>DB</i>	:CMcCracken <i>CM</i>	:RACapra <i>RA</i>	:CHehl <i>CH</i>	:JCalvo <i>JA</i>
DATE	: 4/26/91	: 4/26/91	: 4/26/91	: 4/26/91	: 4/26/91	: 4/26/91



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