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 SYLVIA, B.R. Niagara Mohawk Power Corp.
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SUBJECT: Responds to NRC 900817 request that util submit Tech Spec
 amends for leak detection requirements to permit unit to
 conform to requirements of Generic Ltr 88-01. Requests delay
 in submittal date until issues in generic ltr resolved.

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B. Ralph Sylvia
Executive Vice President
Nuclear

June 25, 1991
NMP2L 1305

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:

In a letter to Niagara Mohawk dated August 17, 1990, the Staff requested that Niagara Mohawk submit technical specification amendments for leak detection requirements that would permit Nine Mile Point Unit 2 to conform to the Staff's position on the leakage detection requirements of Generic Letter 88-01. By letter dated November 20, 1990 (NMP2L 1263), Niagara Mohawk committed to submit the appropriate amendments by June 30, 1991. However, due to recent developments involving leakage detection requirements and problems encountered in attempting to integrate the proposed changes, Niagara Mohawk has concluded that a temporary delay in the submittal of these amendments is necessary.

Several problems were encountered in attempting to incorporate the proposed amendments within the context of our current leakage specifications. For instance, a 24 hour out-of-service time for the drywell floor drain monitoring system as proposed by the Staff conflicts with the continuing 8-hour surveillance requirement to monitor the drywell floor drain fill rate. Since equipment drain monitoring is included in the Nine Mile Point Unit 2 leakage specifications, the proposed changes by the Staff are not easily integrated into the leakage detection specification without interpreting Regulatory Guide 1.45 in a manner that is perhaps not consistent with the intent of the proposed changes recommended by the Staff.

Subsequent to the November submittal, it has come to Niagara Mohawk's attention that the Staff is planning to issue a Supplement to Generic Letter 88-01 with sample technical specifications. In addition, the BWR Owner's Group has formed an ad hoc committee to present a response to Generic Letter 88-01 including leakage detection requirements. Considering these recent developments and the complexity of integrating the proposed changes into the technical specification, Niagara Mohawk now believes that it is prudent to temporarily delay the submittal of these amendments until a resolution to the leakage detection requirements of the Generic Letter is achieved, and the sample technical specifications are published. This temporary delay will

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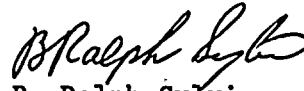
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enable Niagara Mohawk to submit an amendment that will be more consistent with the Staff's latest position on the leakage detection requirements associated with Generic Letter 88-01. Niagara Mohawk will contact the Staff to schedule an acceptable commitment date once these items are resolved.

Very truly yours,



B. Ralph Sylvia
Exec. Vice President-Nuclear

JB/sek
001125LL

xc: Regional Administrator
Mr. R. A. Capra, Director
Mr. D. S. Brinkman, Project Manager
Mr. W. L. Schmidt, Sr. Resident Inspector
Records Management



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