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SUBJECT: Notices of completion of commitment to address & update issues re procedures generation package, w/one exception. Also made appropriate revisions w/10CFR50.59 to emergency operating procedures.

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June 28, 1991
NMP1L 0593

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

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63
TAC Nos. 44318 and 69206

Gentlemen:

On October 27, 1989, the NRC issued a safety evaluation for Nine Mile Point Unit 1 regarding the Procedures Generation Package (PGP). In this safety evaluation the NRC Staff requested revisions to the PGP and as a result, to the Emergency Operating Procedures (EOPs) for Nine Mile Point Unit 1 to reflect issues identified in the NRC safety evaluation.

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Niagara Mohawk responded to the NRC's safety evaluation by letter dated March 9, 1990 (NMP1L 0482), and committed to address the NRC issues by June 1, 1991. This letter notifies you that we have completed this commitment and updated the PGP, with one exception discussed below, and have made the appropriate revisions in accordance with 10CFR50.59 to the Emergency Operating Procedures.

Section 2.B of the October 27, 1989, NRC safety evaluation provided a review of the EOP writer's guide and requested Niagara Mohawk to resolve items in a subsequent revision. The version of the writer's guide reviewed by the NRC was developed for text Emergency Operation Procedures exclusively. This version of the writer's guide is no longer applicable to Nine Mile Point Unit 1 since the implementation of flowchart style EOPs in August 1988. Therefore, the comments contained in the NRC's October 27, 1989, safety evaluation are not applicable to the current EOP writer's guide and were not incorporated. However, the NRC conducted an inspection of the Nine Mile Point Unit 1 Emergency Operation Procedure Program in June 1988 (Inspection Report No. 88-22). The writer's guide reviewed during this inspection was a later edition addressing flowchart style EOPs. All concerns raised in Inspection Report No. 88-22 were addressed and serve as the basis for resolution of this item.

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In addition to incorporating the NRC requested changes to the PGP and EOPs, Niagara Mohawk is performing an additional assessment of the Emergency Operating Procedures in accordance with industry guidelines and experienced gained from a similar process performed at Nine Mile Point Unit 2. A task force, plan and schedule are in place to review each EOP step against its licensing basis. A separate safety evaluation prepared pursuant to 10CFR50.59 will address any changes to the licensing basis or the Emergency Operating Procedures resulting from this review. This review is to be completed before the end of 1991.

Very truly yours,



C. D. Terry
Vice President
Nuclear Engineering

NAS/mls
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