FORD 1

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SUBJECT: Forwards written confirmation of licensee response to specific discussion items re implementation of Reg Guide 1.97 at facility.

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RIDS/FORD 1 DOCUMENT

NIAGARA MOHAWK

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August 26, 1991
NMP1L 0601

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

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Gentlemen:

SUBJECT: Documentation of questions and responses in regards to the July 30, 1991 Telephone Conference on Regulatory Guide 1.97

The attached provides written confirmation of Niagara Mohawk's response to specific discussion items regarding the implementation of Regulatory Guide 1.97 at Nine Mile Point Unit 1. This information was orally provided to the NRC Senior Project Manager, Mr. D. S. Brinkman during a July 30, 1991 telephone conference.

Very truly yours,

C.D. Terry
Vice President
Nuclear Engineering

NAS:drc
000713SS
Enclosure

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Records Management

A007 1/0

Question 1:

Primary Containment Isolation Valve Position

a. Primary containment isolation valve position indication components:

40-30-1LSC	40-30-1LSO
41-31-1LSC	41-31-1LSO
40-02-01LSC	40-02-01LSO

are not environmentally qualified. Since they are located inside the containment they may be subjected to a potentially harsh environment. Therefore, these components should be environmentally qualified under the licensee's 10 CFR 50.49 program.

b. Primary containment isolation valve position indication components:

44.2-15-1LSC	44.2-15-1LSO	44.2-15A
44.2-16-1LSC	44.2-16-1LSO	44.2-16A
44.2-17-1LSC	44.2-17-1LSO	44.2-17A
44.2-18-1LSC	44.2-18-1LSO	44.2-18A
40-02-01LSC	40-02-1LSO	40-02B
40-12-01LSC	40-12-1LSO	40-12B

are not powered from Class 1E power sources. The licensee has not provided a specific justification for not supplying Class 1E power to the above components. The licensee should provide Class 1E power for these components.

Response 1:

a. Environmental qualification of the listed primary containment isolation valve (PCIV) components is not required for the reasons stated below. Detailed evaluation information for each of these PCIVs is maintained in the Equipment Qualification Program files.

PCIV Components	Reason for Not Being EQ Program Equipment
40-30-1LSC 40-30-1LSO 40-31-1LSC 40-31-1LSO	Administrative controls are implemented whereby the downstream manual valve in each line is Locked Closed except for the performance of required testing. Therefore, this downstream manual isolation accomplishes the required isolation except during valve testing time which is limited to once per month for approximately one (1) minute.

40-02-1LSC 40-02-1LSO 40-12-1LSC 40-12-1LSO	Administrative controls are implemented whereby the breaker for each of the listed valves is racked out except for the performance of required testing. Thus, these normally open valves will remain in their required open state during accident conditions. The only exception to this condition is during quarterly testing for approximately one (1) hour during which time an Reactor Protection System signal will be provided in the unlikely event an accident occurs.

b. Although the open/closed position indication located immediately adjacent to the respective control switch for the following primary containment isolation valves (PCIVs) is not powered from a Class 1E power source, redundant position indication for each of these valves is separately provided on the control room PCIV mimic display and the power supply to the PCIV mimic is from a Class 1E power source. For this reason, the position indication located immediately adjacent to the respective control switch is not required to be backfitted with a Class 1E power source. Applicable valves are as follows:

Valve Component Number	Valve "Closed" Position Contact	Valve "Open" Position Contact
44.2-15A	44.2-15-1LSC	44.2-15-1LSO
44.2-16A	44.2-16-1LSC	44.2-16-1LSO
44.2-17A	44.2-17-1LSC	44.2-17-1LSO
44.2-18A	44.2-18-1LSC	44.2-18-1LSO
40-02B	40-02-1LSC	40-02-1LSO
40-12B	40-12-1LSC	40-12-1LSO

Question 2:

Drywell Atmosphere Temperature

The licensee lists drywell atmosphere temperature as an EOP key parameter. Therefore, drywell atmosphere temperature should meet the Category 1 criteria. The licensee's current instrumentation does not meet the redundancy or recording criteria. The licensee has committed to provide the recommended additional Category 1 channel. The licensee also states that they will isolate the computer from this instrument. However, it is not clear that this variable will be recorded by the computer. The licensee should provide confirmation that at least 1 channel of drywell temperature information is recorded.

Response 2:

The capability of recording one channel of average drywell temperature will be provided as part of the installation of the

new separate and independent Category 1 channel of drywell temperature monitoring instrumentation. The recording function for average drywell temperature will be provided by a dedicated strip chart recorder which is to be located on Control Room Panel L.

Question 3:

High Pressure Coolant Injection System Flow

R.G. 1.97 recommends Category 2 instrumentation to monitor high pressure coolant injection (HPCI) system flow. The licensee states that the main feedwater pumps perform the HPCI function. The licensee's main feedwater flow instrumentation does not meet the environmental qualification criteria for Category 2 instrumentation. Therefore, since the main feedwater pumps perform the HPCI function, the main feedwater flow instrumentation should meet the Category 2 criteria.

Response 3:

FT 29-53 and FT 29-54 (Feedwater/HPCI flow transmitters) are not Environmental Qualification Program Equipment because these flow transmitters are physically located on turbine building floor elevation 293' (column/row H-9 and H-10, respectively), which has been determined to be a "mild environment" for accidents this equipment is required to mitigate. Documentation is maintained in the Equipment Qualification Program files to support these analyses.

Question 4:

Standby Liquid Control System

The licensee's standby liquid control system storage tank level instrumentation has a range of 350 gallons to 4150 gallons. Based upon the information provided, this is an acceptable deviation. However, the licensee has stated that they are planning to modify this range, the licensee has not provided any justification for the proposed modification. The licensee should justify the proposed modification.

Response 4:

The new level monitoring instrumentation to be installed for the Standby Liquid Control System storage tank liquid level will provide display of indicated level over a range extending from 0 gallons (the bottom of the tank) to approximately 2000 gallons. Because a high boron concentration solution is now used, the expected range of operation for this tank is 0 to 1500 gallons and the Technical Specification for minimum storage tank level is 1185 gallons. The new monitoring instrumentation for tank liquid level bounds this range while providing the operator with better resolution, greater accuracy, and higher reliability.