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TERRY,C.D. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC Bulletin 93-002, "Debris Plugging of ECC Suction Strainers." Investigation identified no fibrous air filters or other temporary sources of fibrous matl,not designed to withstand LOCA,installed or stored in drywell.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/301 PLAINFIELD ROAD, SYRACUSE, N.Y. 13212/TELEPHONE (315) 474-1511

June 10, 1993
NMP1L 0764

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

Gentlemen:

Subject: NRC Bulletin No. 93-02, Debris Plugging of Emergency Core Cooling Suction Strainers

On May 11, 1993, the Commission issued NRC Bulletin No. 93-02, Debris Plugging of Emergency Core Cooling Suction Strainers, to notify licensees of a contributor to the potential loss of net positive suction head margin for Emergency Core Cooling Systems. Specifically, Bulletin No. 93-02 discussed the concern that Loss-of-Coolant-Accident generated debris (fibrous material) could enter the suppression pool and block Emergency Core Cooling System suction strainers.

Accordingly, the Commission requested that licensees identify fibrous air filters or other temporary sources of fibrous material, not designed to withstand a Loss-of-Coolant-Accident, which are installed or stored in primary containment. Licensees were requested to take any immediate compensatory measures which may be required to assure the functional capability of the Emergency Core Cooling System. The Commission also requested that licensees submit a written report within 30 days stating actions that have been taken or that will be taken to address the identified concerns.

Niagara Mohawk has investigated the use of fibrous material in the Nine Mile Point Unit 1 drywell. The investigation has identified no fibrous air filters or other temporary sources of fibrous material, not designed to withstand a Loss-of Coolant-Event, currently installed or stored in the drywell. The enclosure to this letter provides the basis for this determination.

Very truly yours,

C. D. Terry
Vice President
Nuclear Engineering

150099

JMT/mls

xc: Mr. T. T. Martin, Regional Administrator, Region I
Mr. R. A. Capra, Director, Project Directorate I-1, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. W. L. Schmidt, Senior Resident Inspector
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UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	Docket No.50-220
	)	
Nine Mile Point Nuclear Station Unit No. 1	)	

C. D. Terry, being duly sworn, states that he is Vice President - Nuclear Engineering 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 document attached hereto; and that the document is true and correct to the best of his knowledge, information and belief.

C. D. Terry
Vice President
Nuclear Engineering

Subscribed and sworn before me,
in and for the State of New York
and the County of Onondaga,
this 16th day of June, 1993

KATHLENA R. CICCARINO
Notary Public in the State of New York
Qualified in Onondaga County No. 4966237
My Commission Expires June 18, 1994

My Commission expires:

June 18, 1994 Kathlena R Ciccarino

NRC Bulletin No. 93-02 was issued following an event that occurred at the Perry Nuclear Station, a Boiling Water Reactor 6 with a Mark III Containment. A routine outage practice at Perry was to install temporary filters in the drywell and containment cooling systems for the purpose of maintaining cleanliness. These filters were replaced each outage and left there during normal operation. Fibers from these filters eventually entered the suppression pool resulting in clogged Emergency Core Cooling System suction strainers.

Unlike Perry, the Nine Mile Point Unit 1 drywell cooling system is adequate to support refueling activities. Therefore, enhancements to the existing cooling system are not normally required (fibrous air filters are not routinely brought into the drywell during an outage). If additional ventilation is required, portable High Efficiency Particulate Air Ventilation units are brought into the drywell and removed prior to plant startup. The accountability of these units is maintained through a site radiation protection procedure. The use of temporary fibrous insulation is minimal. If fibrous material (filters, insulation, etc.) were to be used, even on a temporary basis, its use would need to be reviewed in accordance with the temporary modification or other plant change procedure. This would include evaluating the potential impact of fibrous material on plant operation. Currently, no temporary modifications exist on drywell cooling or ventilation systems.

Cleanliness of the pool is a key contributor to the potential for strainer blocking. Because of the Mark III containment design (Perry), maintenance activities can take place over the suppression pool. With a Mark I containment (Nine Mile Point Unit 1) the pool is enclosed and less susceptible to foreign material intrusion. Therefore, the possibility of intrusion of foreign matter into a Mark III containment pool is greater than for a Mark I pool.

The Nine Mile Point Unit 1 drywell is thoroughly inspected for cleanliness (housekeeping) by plant operators prior to start-up following each refueling outage. In addition, during Nine Mile Point Unit 1's most recent outage, personnel performed a drywell walkdown prior to the performance of the containment integrated leak rate test. This walkdown would have identified any poor housekeeping or abnormal drywell configurations. Non-essential materials are not stored in the drywell. Accordingly, filters or other fibrous material stored in the drywell would have been identified and removed.

In conclusion, the need and therefore use of fibrous material in the Nine Mile Point Unit 1 drywell on a temporary basis is minimal. If fibrous material were to be used (such as the use of filters at Perry) the potential impact of its use would be evaluated in accordance with the temporary modification or other plant change procedure. This evaluation would include determining the effect of the use of fibrous material on plant operations during a Loss-of Coolant-Accident. The walkdown performed prior to start-up from the last refueling outage would have identified the storage of any fibrous material and identified any such material inadvertently left behind following outage work. Based on the above discussion, no fibrous air filters or other temporary sources

of fibrous material, not designed to withstand a Loss-of-Coolant-Accident, are installed or stored in the Nine Mile Point Unit 1 drywell. Therefore, no specific actions are required. Also, the Nine Mile Point Unit 1 Mark I containment design is less susceptible than the Mark III containment design to the introduction of fibrous material into the suppression pool. Therefore, design features and controls are in place to preclude an event similar to the one at Perry at Nine Mile Point Unit 1.