



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 20, 1994

Docket File

Docket Nos. 50-220
and 50-410

LICENSEE: Niagara Mohawk Power Corporation
FACILITY: Nine Mile Point Nuclear Station, Unit Nos. 1 and 2
SUBJECT: SUMMARY OF APRIL 14, 1994, MEETING TO DISCUSS STATUS OF CURRENT LICENSING ISSUES FOR NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2

A meeting was held in the NRC One White Flint North Office in Rockville, Maryland, with Niagara Mohawk Power Corporation (NMPC) and NRC staff representatives to discuss the status of current licensing issues for Nine Mile Point Units 1 and 2. The licensee had requested this meeting. Enclosure 1 is a list of meeting attendees. Enclosure 2 is a copy of the handout material provided by NMPC.

NMPC initially discussed their Regulatory Reduction Program. This effort is being implemented within NMPC's Nuclear Division to identify, assess, and eliminate or reduce regulatory requirements which provide little or no safety benefit but incur significant costs. The program will ultimately result in the identification of cost beneficial licensing actions (CBLAs). The various groups within the Nuclear Division are now in the process of identifying potential CBLAs. NMPC anticipates that their prioritization of these potential CBLAs will be completed by the end of July 1994.

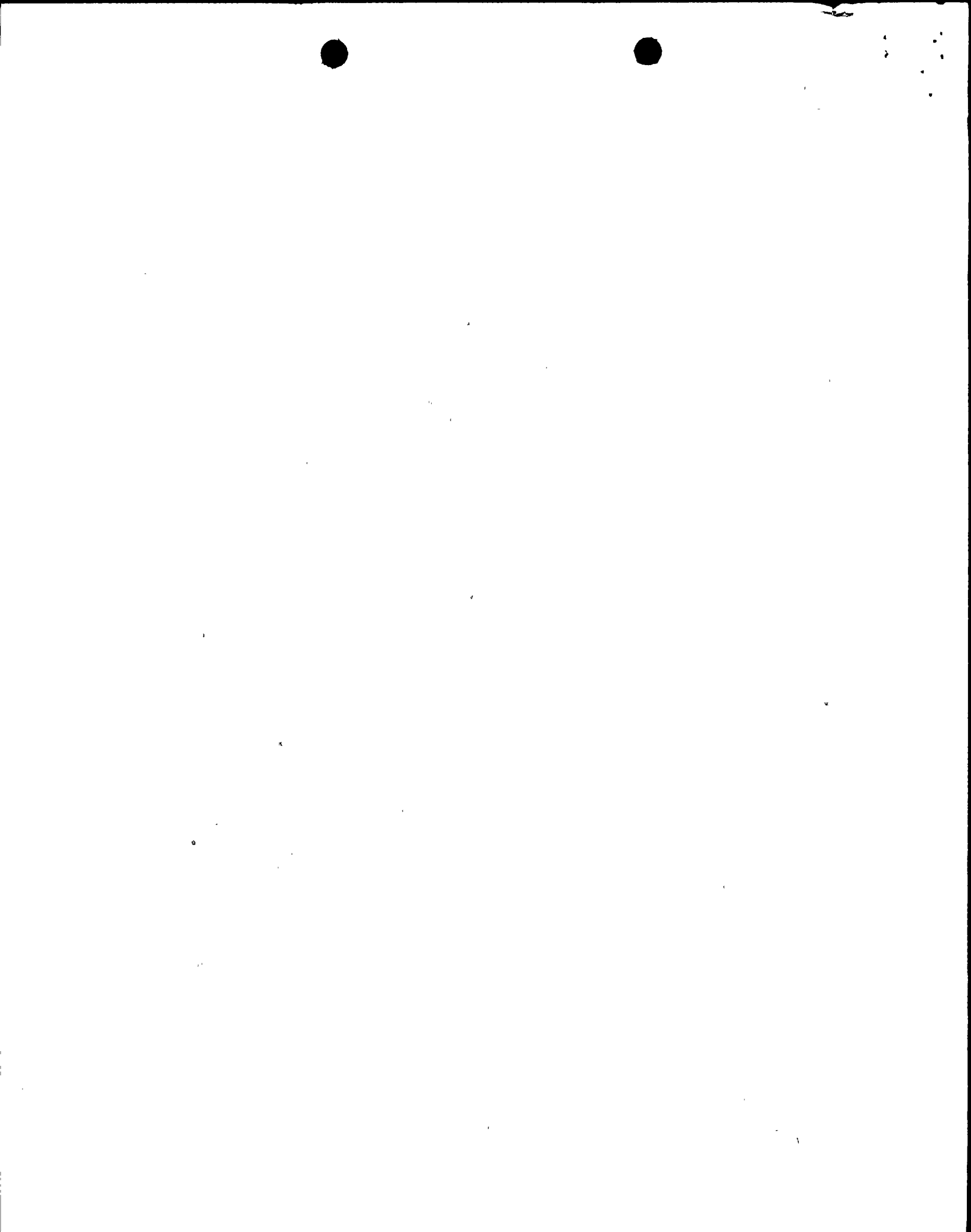
NMPC subsequently updated the staff on the status of their program to "right size" the Unit 2 Updated Safety Analysis Report (USAR). The Unit 2 USAR has grown to more than 12,500 pages contained in 32 volumes as a result of 28 amendments and 6 update revisions. The right size program was developed to improve access to information in the USAR by identifying and dispositioning similar, identical, poorly organized, inapplicable, or inappropriate information and formatting and reflowing text, tables, and figures to eliminate blank and partial pages. USAR right-sizing began with USAR Revision 4, dated October 1992 and continued in USAR Revision 5, dated October 1994. NMPC advised the staff during the meeting that an administrative revision to reflow various USAR sections is scheduled to be issued in April 1994. This administrative revision will not reflect changes to the facility, procedures, tests, or experiments.

The open licensing issues for Unit 1 and NMPC's plans for near-term license amendment requests for that unit were subsequently discussed. The licensee currently anticipates submitting seven new license amendment requests for Unit 1 by June 30, 1994. Five of these planned Unit 1 license amendment requests are either required or desired for the 1995 Unit 1 refueling outage.

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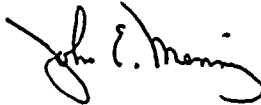
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that is scheduled to begin in February 1995. The attendees also discussed the open licensing issues for Unit 2 and NMPC's plans for near-term license amendment requests for that unit. Two new Unit 2 license amendment requests are scheduled for submittal to the NRC by June 30, 1994. NMPC is also developing five Unit 2 license amendment requests that are desired for the 1995 Unit 2 refueling outage and will be submitted to the NRC subsequent to June 30, 1994. The 1995 Unit 2 refueling outage is currently scheduled to begin in May 1995.

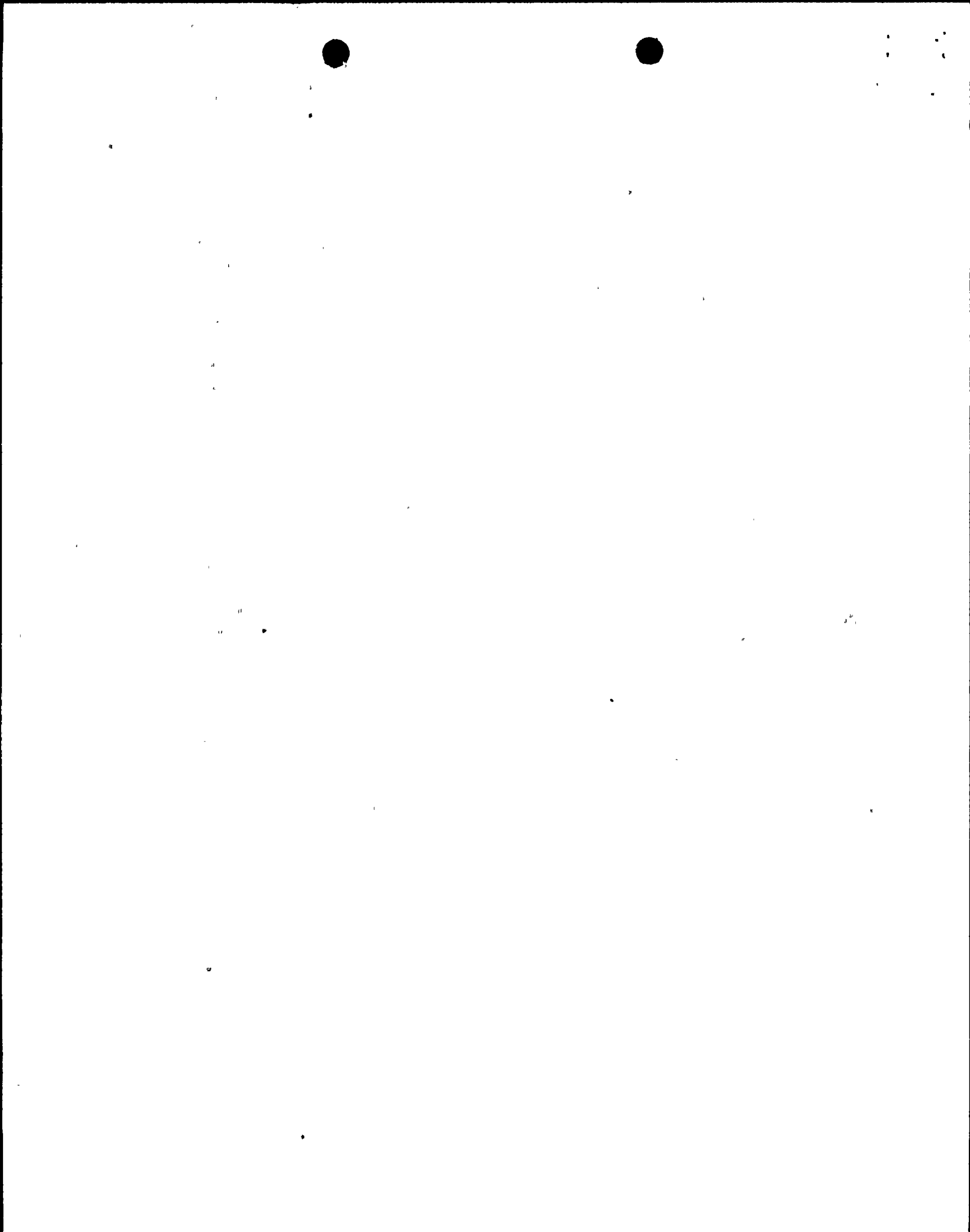


John E. Menning, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. List of Attendees
2. Licensee Handout Material

cc w/enclosures:
See next page



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Original signed by:

John E. Menning, Project Manager
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Office of Nuclear Reactor Regulation

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- 2. Licensee Handout Material

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See next page

*Licensee's Handout Material

Distribution:

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WRussell/FMiraglia, 12/G/18
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S. Varga
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R. A. Capra

- *J. Menning
- *D. Brinkman
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ACRS (10)
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*C. Cowgill, RGN-I

LA:PDI-1 <i>for</i>	PM:PDI-1	PM:PDI-1	D:PDI-1		
CVogan	JMenning: <i>sym</i>	DBrinkman <i>D86</i>	RACapra <i>ra</i>		
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April 14, 1994

Status of Licensing Issues for Nine Mile Point Units 1 and 2

ATTENDANCE LIST

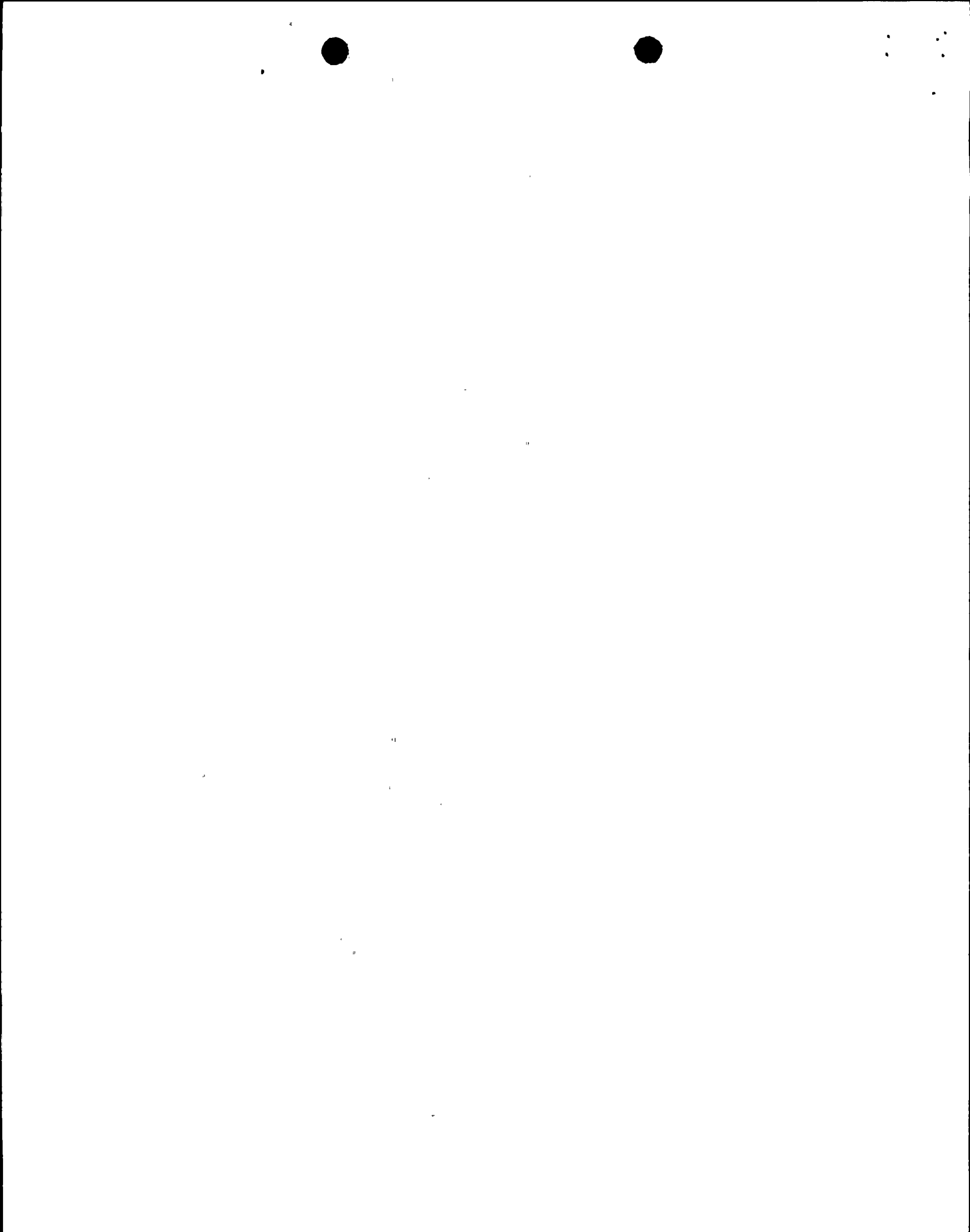
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John Menning	Project Manager	NRC/NRR/PDI-1
David Greene	Licensing Manager	NMPC
Denise Wolniak	Supervisor - Licensing Support	NMPC
John Laffrey	FSAR Program Director	NMPC
Al Reyna	Licensing Engineer	NMPC
David Baker	Program Director	NMPC



REGULATORY REDUCTION PROGRAM

Nuclear SBU Business Plan item 3.D.1

A division effort to identify, assess and eliminate or reduce regulatory requirements which provide little or no safety benefit but incur significant implementation costs.



REGULATORY REDUCTION **PROGRAM PROCESS**

- IDENTIFY POTENTIAL COST BENEFICIAL LICENSING ACTIONS (CBLAs)
- ASSESS AND PRIORITIZE CBLAs
- PROCESS HIGH PRIORITY CBLAs
- DOCUMENT AND COMMUNICATE PROGRAM RESULTS



REGULATORY REDUCTION PROGRAM

IDENTIFY POTENTIAL CBLAs

- PROVIDE SOURCE DOCUMENTS FOR POTENTIAL CBLAs
- DEVELOP CBLA INPUT FORM
- IDENTIFY POTENTIAL CBLAs INCLUDING COST SAVINGS AND POTENTIAL BARRIERS (DEPARTMENTAL "BRAINSTORMING")



COST BENEFICIAL LICENSING ACTION

Date _____

Unit _____

Branch _____

TITLE

DESCRIPTION

SOURCE OF COMMITMENT/REQUIREMENT (LER, IR, GL, TS, Bulletin Notice, License, Reg Guide, Code, Standard, etc.)

JUSTIFICATION

POTENTIAL BARRIERS

CHANGE DOCUMENT

TS or License
Change

Exemption

Safety
Evaluation

50.59
Screening
Document

Relief
Request

RESPONSIBLE INDIVIDUAL (TECHNICAL)

EXTENSION

To be completed by Licensing

LICENSING CONTACT

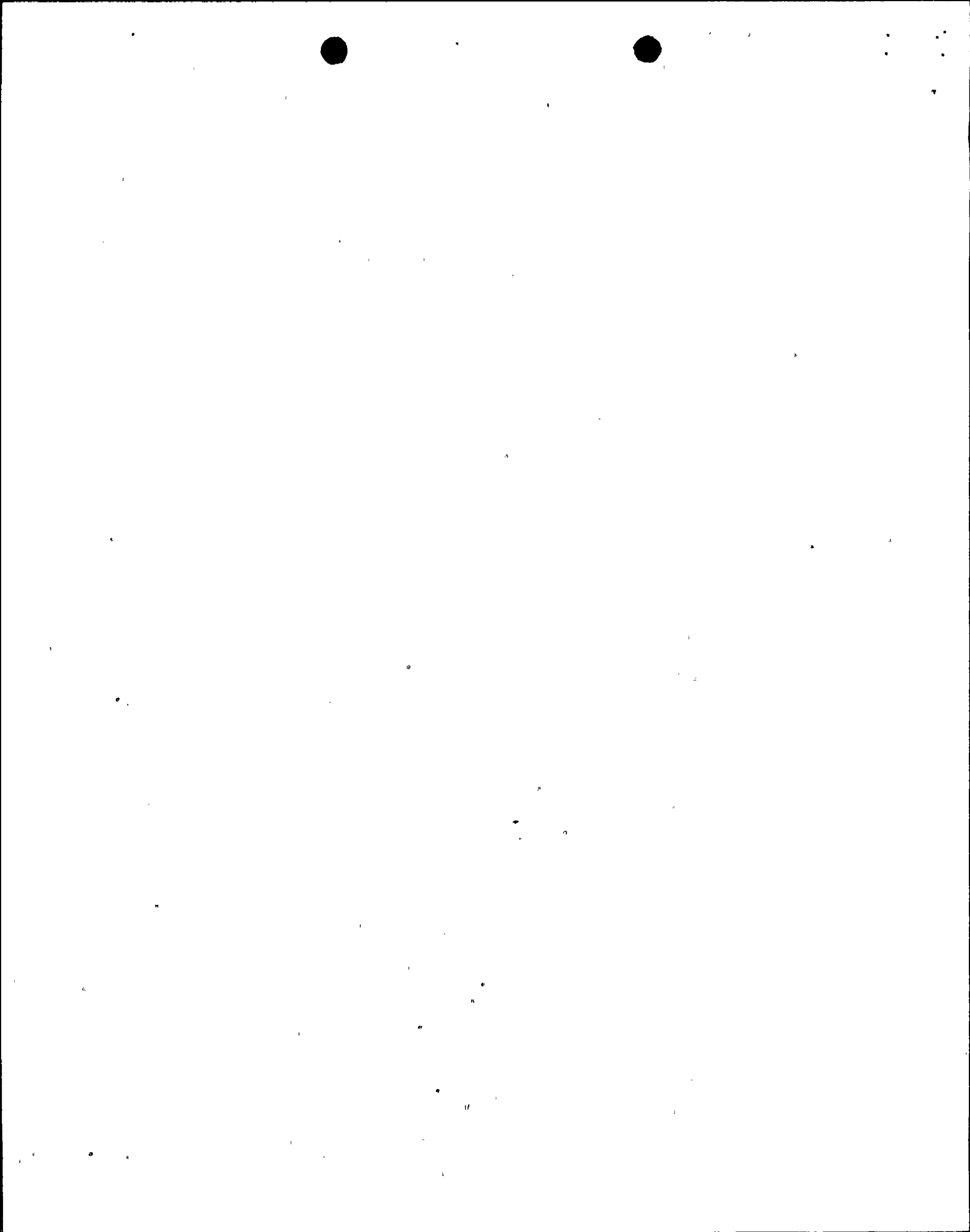
CLOSURE REFERENCES

CBLA NO.

IMPLEMENTED

YES
NO

DATE



CBLA SAVINGS SUMMARY

A. MATERIALS

(Value of materials saved per occurrence) \$ _____ x (Number of occurrences for remaining life of plant) _____ =	Total Materials Savings \$ _____
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B. PERSON HOURS

(Number of person-hours saved per occurrence) _____ x (Number of occurrences for remaining life of plant) _____ x (Present average value of a person-hour) \$ _____ =	Total Person-Hour Savings \$ _____
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C. OUTAGE DAYS

(Number of outage days saved per occurrence) _____ x (Number of occurrences for remaining life of plant) _____ x (Present cost of an outage day -not including replacement power) \$ _____ =	Total Outage Days Savings \$ _____
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D. ESTIMATED COST OF PROCESSING CBLA

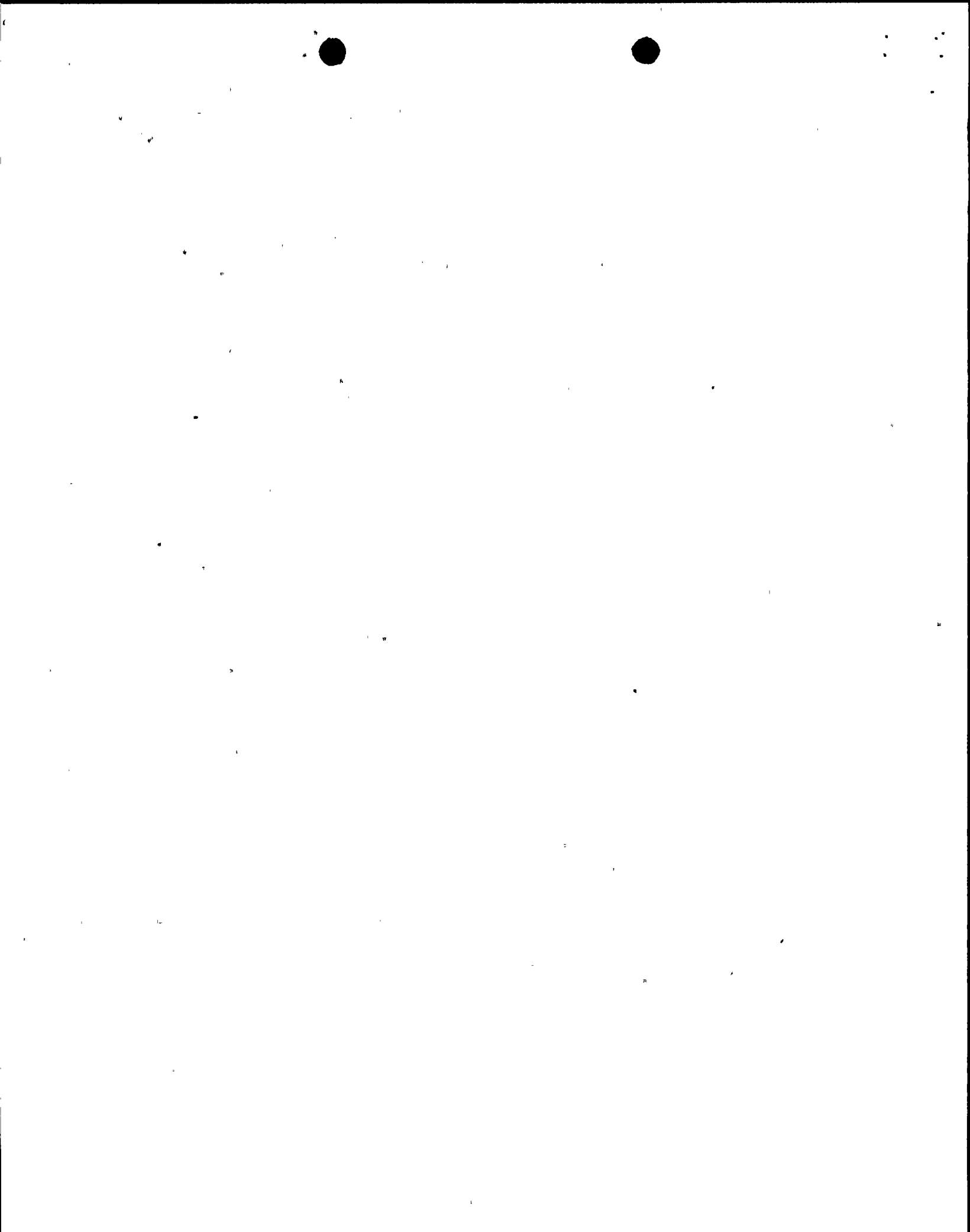
To be completed by Licensing

(Estimated utility costs) \$ _____ + (NRC review costs) \$ _____ =	Total Processing Costs \$ _____
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NET CBLA SAVINGS

A + B + C - D =	Net CBLA Savings \$ _____
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CBLA NO. _____



REGULATORY REDUCTION PROGRAM

ASSESS AND PRIORITIZE CBLAs

- **DEVELOP PRIORITIZATION (VALUE/IMPACT) CRITERIA**
- **COMPLETE VALUE IMPACT ANALYSIS FOR POTENTIAL CBLAs AND PRIORITIZE**
- **SELECT HIGH PRIORITY CBLAs FOR PROCESSING AND OBTAIN BRANCH BUY IN**



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CBLA PRIORITIZATION SHEET

CBLA DESCRIPTION _____

S	CRITERIA	WEIGHT	VALUE
	NET COST SAVINGS (1994 \$\$)	30%	_____
0	___ None		
1	___ Low benefit \$ < 100K		
3	___ Medium benefit \$ > 100K < \$500K		
5	___ High benefit > \$500K		
	FUEL COST DIFFERENTIAL SAVINGS (1994 \$\$)	30%	_____
0	___ None		
1	___ Low benefit < \$100K		
3	___ Medium benefit > \$100K < \$500K		
5	___ High benefit > \$500K		
	EARLY CBLA SUCCESS	20%	_____
0	___ Approval > 24 months		
1	___ Approval > 12 months < 24 months		
3	___ Approval > 3 months < 12 months		
5	___ Approval < 3 months		
	MAN-REM	10%	_____
0	___ None		
1	___ Low benefit < 1 man-rem		
3	___ Medium benefit > 1 < 5 man-rem		
5	___ High benefit > 5 man-rem		
	PERSONNEL PRODUCTIVITY (LABOR SAVINGS)	10%	_____
0	___ None		
1	___ Low benefit < 200 man-hours/year		
3	___ Medium benefit > 200 man-hours/year < 1000 man-hours/year		
5	___ High benefit > 1000 man-hours/year		

TOTAL PRIORITY RATING=
 (Scale of 0-5)



REGULATORY REDUCTION PROGRAM

PROCESS HIGH PRIORITY CBLAs

- **IDENTIFY CHANGE MECHANISMS**
- **DETERMINE CHANGE MECHANISM FOR HIGH PRIORITY CBLAs**
- **COMPLETE NECESSARY JUSTIFICATION FOR HIGH PRIORITY CBLAs**
- **DISCUSS ITEMS REQUIRING SUBMITTAL WITH NRC PRIOR TO SUBMITTAL TO ASSURE PROPER PRIORITIZATION**
- **DRAFT CHANGE PAPERWORK AND OBTAIN NMPC APPROVALS**



REGULATORY REDUCTION PROGRAM

DOCUMENT AND COMMUNICATE PROGRAM RESULTS

- COMPLETE DOCUMENTATION PACKAGE FOR COMPLETED CBLAs
- COMMUNICATE WITH INDUSTRY AND NUMARC ON COMPLETED CBLAs



... DEVELOPMENT ...
... equipment ...
... collection ...
... test ...

... RIGHT-SIZING ISSUES

... INFORMATION **FSAR PROGRAM**

NMP2 USAR RIGHT-SIZING PLAN, OVERVIEW

... REPORT ...
... APPENDIX ...

Presented by: J. J. Laffrey

... **FSAR Program Director**

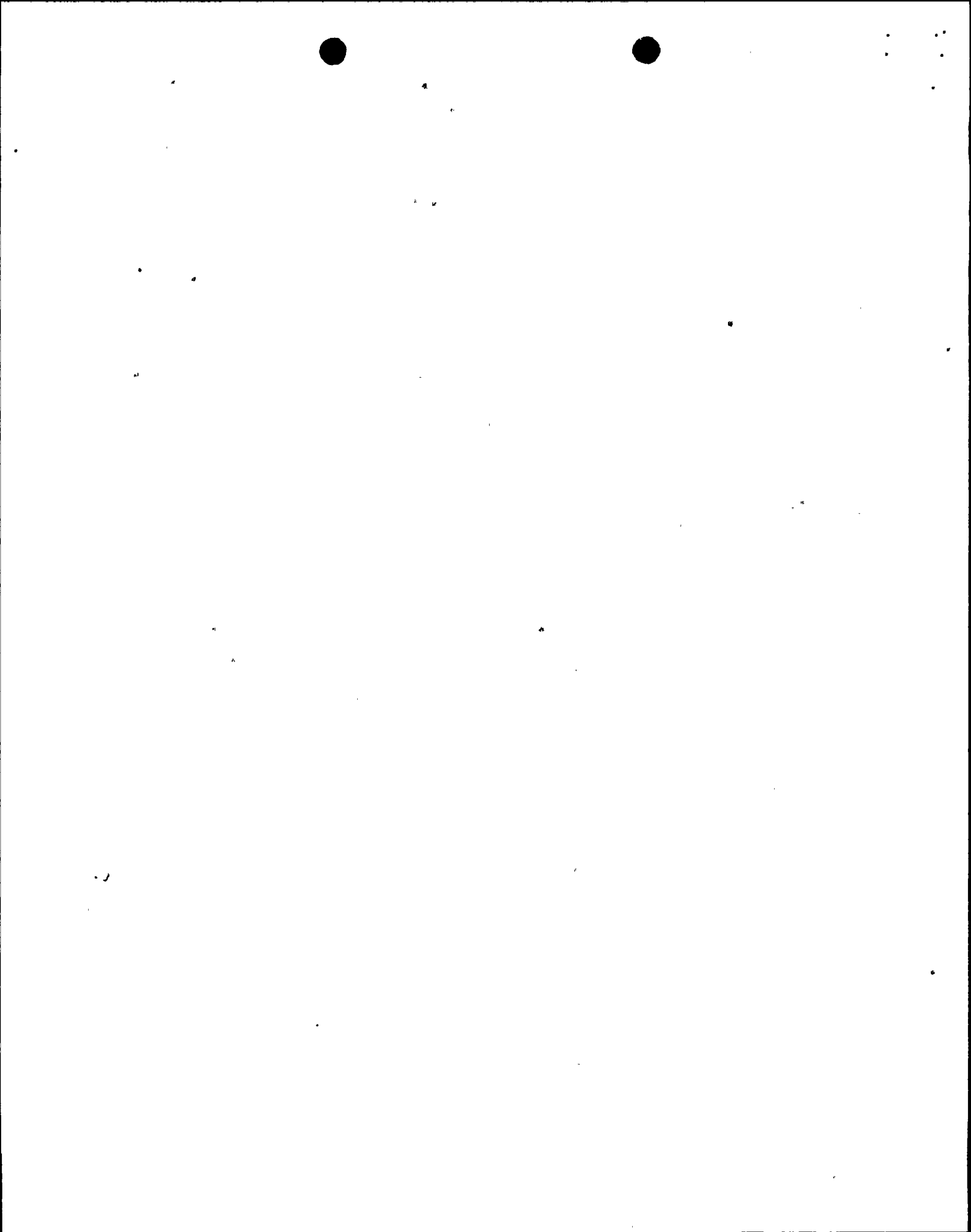
... APPENDIX ...

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NMP2 USAR RIGHT-SIZING PLAN OVERVIEW

1. PURPOSE, GOAL, OBJECTIVES

PURPOSE

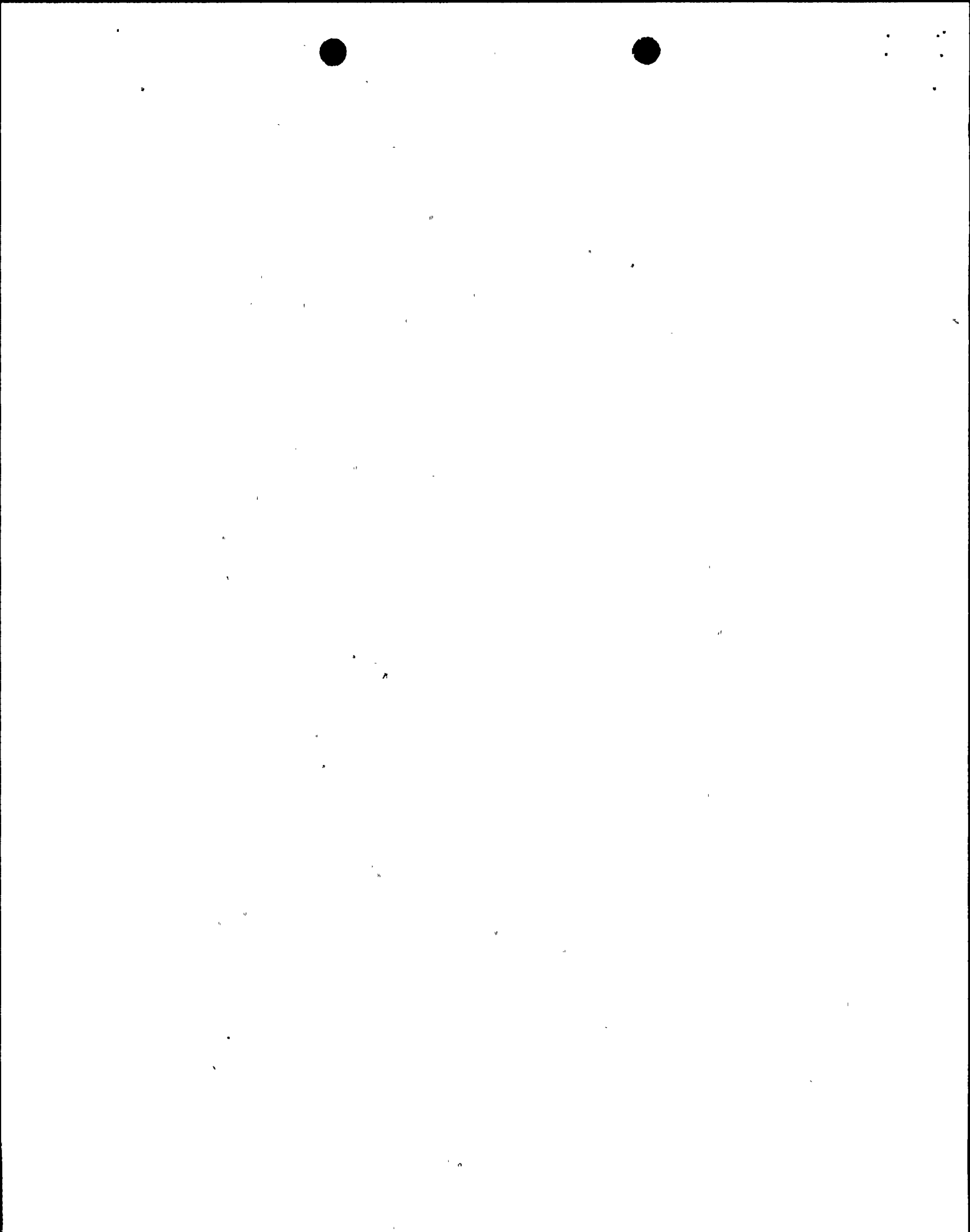
To ensure that the information contained in the USAR is accurate, complete, and organized in a format that provides easy access.

GOAL

Revise the USAR to provide clear and concise presentations of applicable and appropriate information.

OBJECTIVES

- A. Identify and disposition similar or identical (redundant) information.
- B. Identify and disposition disorganized information.
- C. Identify and disposition inapplicable or inappropriate information.
- D. Format and reflow text, tables, and figures to eliminate blank and partial pages.



2. BACKGROUND

Over the course of twenty-eight (28) amendments and six (6) update revisions, the UNIT 2 USAR has grown to more than 12,500 pages. Contained in thirty-two (32) volumes, the Nine Mile Point Unit 2 Updated Safety Analysis Report is perhaps the largest USAR in the nuclear industry.

A review of the USAR has identified several factors which collectively contribute to its unique size. These factors are as follows:

A. SIMILAR OR IDENTICAL INFORMATION

Duplication of information has been identified in various text, table and figure sections of the USAR. Examples of similar or identical information contained in the USAR include the following:

1. Twenty-eight (28) of the general arrangement drawings found in USAR Section 1.2 are also presented in Section 12.3 as radiation zone drawings and as shielding drawings.
2. Forty-nine (49) isolation valve arrangement drawings contained in Section 6.2 present identical information to that shown on USAR P&ID figures.
3. Figures 1.1-1, 5.1-1a and 10.1-2 are heat balance diagrams. Figure 5.1-1a is specifically requested by Regulatory Guide 1.70, and Figure 10.1-2 shows the balance of plant. However, Figure 1.1-1 provides the same information as shown on Figure 5.1-1a.
4. Table III.D.3.4-1 (page 1.10-133) is redundant to Table 2.2-8.
5. Figure 3.9B-1 is similar to Figure 5.3-4.
6. Figure 6.4-1 is identical to Figure 11.3-2.
7. Figure 8.3-9 Sheet 1 is similar to Figure 1.2-15 Sheet 3, except that Figure 1.2-15 Sheet 3 does not show the area between AA and AB line.
8. Figure 8.3-9 Sheet 2 is identical to Figure 1.2-17 Sheet 1.
9. Figures 9.2-10, 9.2-11, 9.2-12 and 9.2-14 are redundant to Figure 1.2-29 Sheets 1, 2 and 3, and Figure 1.2-30.



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10. Figures 9.5-49, 9.5-50 and 9.5-51 are similar to Figures 1.2-17 and 1.2-18.
11. Figure 15.0-2 is similar to Figure 4.4-1.
12. Figure 6A.6-1 is redundant to Figure 1.2-12.
13. Figure 6A.6-3 is redundant to Figure 3.8-14.
14. Figure 6A.6-4 Sheet 2 is redundant to Figure 3.8-20.
15. Figures 6A.5-6 and 6A.6-6 are identical.
16. Figures 6A.5-7 and 6A.6-7 are identical.
17. Figure 6A.7-1 is redundant to Figure 3.8-2.
18. Table 9.5-2 material is redundant to information presented in Section 9.5.3.1 and 9.5.3.2.

NOTE: The above list of items reflects only a portion of duplicated material contained in the USAR.

B. USAR ORGANIZATION/FORMAT

Several tables in the USAR are organized or formatted such that they occupy more space than necessary. An estimated 300 pages could be eliminated by presenting certain tables in a more appropriate, space-saving format.

USAR Table 1.8, "Conformance to NRC Regulatory Guides," is one example. This table is presented on 184 pages. However, the majority of these pages contain information only on the top one-quarter to one-half of the page. Presenting the information on a consolidated landscaped format would eliminate approximately 100 pages.

C. INAPPLICABLE OR INAPPROPRIATE INFORMATION

USAR CONTENT

Using the guidance provided by Generic Letter 81-06, nuclear utilities have updated their FSARs in accordance with Section 50.71 of 10 CFR Part 50. In doing so, most utilities not only updated, but also edited and republished their FSARs as new and unique documents. This results in a single, complete document that serves as the baseline for future changes while preserving the original FSAR (as amended), which is still considered to be the licensing basis for the plant.



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Rather than edit and republish the USAR as a unique document, Niagara Mohawk requested and received from the NRC an exemption which allowed the initial update to be processed on a replacement page basis similar to the FSAR amendment process. Although this alternative appeared to provide cost-saving benefits, there are no real cost-saving benefits associated with maintaining an oversized 12,500-page USAR.

D. BLANK AND PARTIAL PAGES

The Unit 2 USAR contains over 600 blank pages and over 2,000 partially filled pages. Other utilities eliminated blank and partial pages by reflowing the document during the initial update. Reflowing the Unit 2 USAR would eliminate approximately 1,200 pages.

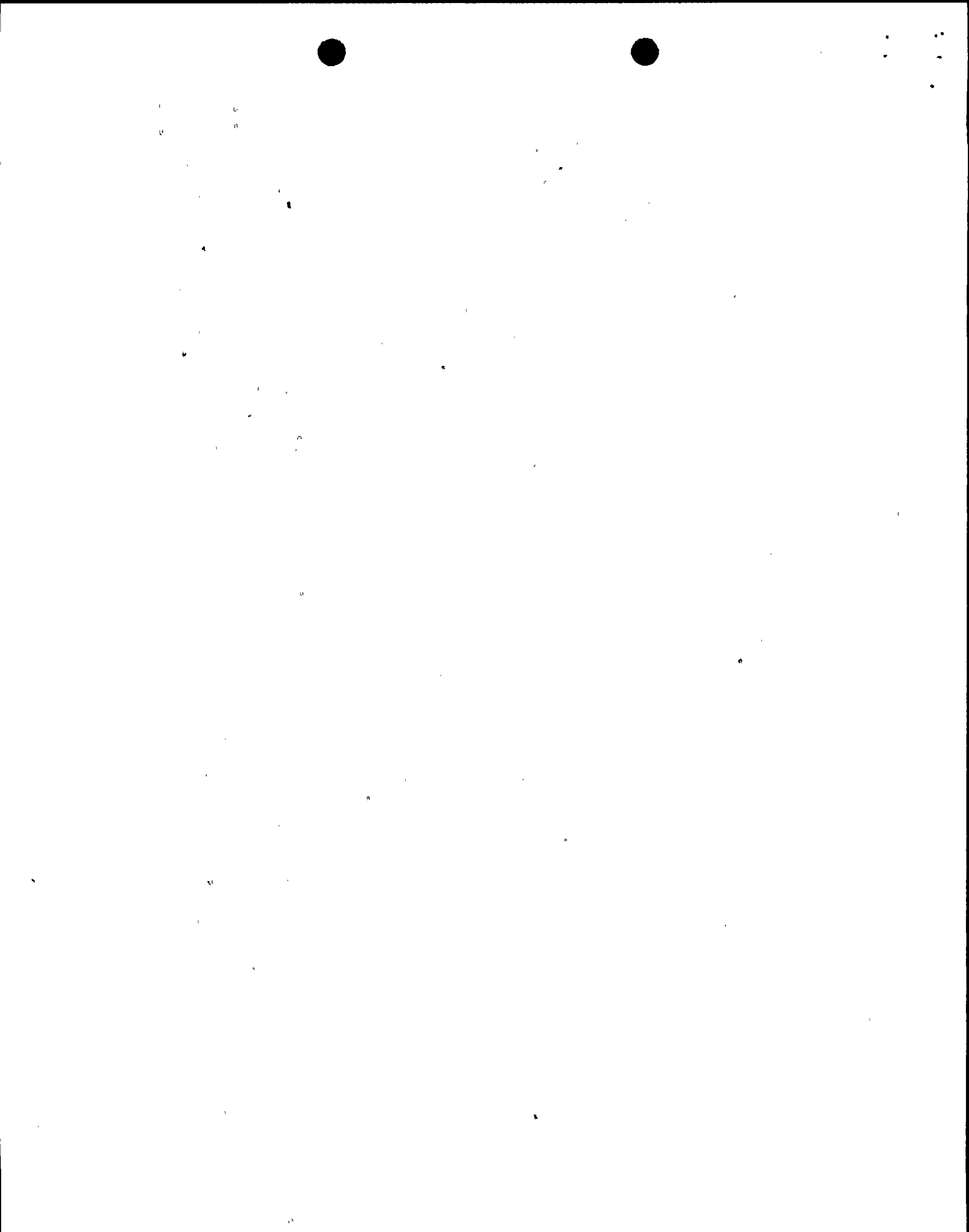
3. REVIEW AND EVALUATION METHODOLOGY

The Unit 2 USAR will be reviewed and evaluated against the guidance contained in Regulatory Guide 1.70, Revision 3, the information contained in NUREG-0800, and NUREG-1047, Supplements 1 through 6 inclusive.

4. IMPLEMENTATION STATUS

USAR right-sizing began with USAR Revision 4, dated October 1992 and continued in USAR Revision 5, dated October 1993. These revisions, as described in NMPC submittals to the NRC, included the removal of redundant information and moved other information to more appropriate locations. Additional redundant, inappropriate and/or inapplicable information is currently being evaluated for removal in a future USAR revision.

The reflow of USAR sections to consolidate information will be accomplished as administrative revisions or will be included with annual revisions. Administrative revisions will not reflect changes to the facility, procedures, tests or experiments. An administrative revision to reflow various USAR sections is scheduled for April 1994.



5. SUMMARY

The Right-Sized USAR will contain clear, concise, applicable and appropriate information consistent with Regulatory Guide 1.70 Revision 3, NUREG-0800, NUREG-1047, and 10 CFR 50.71(e).

Examples of redundant, inapplicable and inappropriate material identified during the plans' development help convey the purpose and goal of Unit 2 USAR right-sizing. These examples indicate that a significant reduction in USAR volume will be achieved by providing a clear, concise presentation of appropriate material.

EXAMPLES OF USAR RIGHT-SIZING RESULTS

REORGANIZED INFORMATION

- * USAR Revision 5, 1993, incorporated the Fire Protection Quality Assurance Program (FPQAP) into the NMPC Quality Assurance Topical Report (QATR) and incorporated the QATR into USAR Appendix B.

REMOVAL OF INAPPLICABLE/INAPPROPRIATE INFORMATION

- * USAR Revision 5, 1993, removed Appendix 13A, Typical Resumes. (64 plus pages)

FORMAT AND REFLOW (USAR Revision 6, April 1994)

- * USAR Section 1.10 (Unit 2 Responses to Regulatory Issues Resulting from TMI) was 254 pages. Formatted and reflowed to 157 pages.
- * USAR Table 1.8-1 (Conformance to NRC Regulatory Guides) was 184 pages. Formatted and reflowed to 81 pages in USAR Rev 5. Formatted and reflowed to 78 pages in Revision 6.
- * USAR Table 1.9-1 and Attachments (Standard Review Plan Conformance to Acceptance Criteria) was 112 pages. Formatted and reflowed to 53 pages.
- * USAR Table 9B.8-1 (List of Safe Shutdown Equipment) was 83 pages. Formatted and reflowed to 40 pages.



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12
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UNIT 1**Amendment Requests Planned but not Submitted to NRC**

NO.	ITEM	SUBMITTALS TO BE COMPLETED BY 6/30/94	STATUS/COMMENTS
1	Shutdown Cooling Water Seal	X	Drafting, required for outage.
2	Revise Flow Comparator Quarterly Surveillance to Refuel		In engineering, awaiting justification for changing analytical limit. Best date for engineering input is 6/94.
3	IRM Range 10/Calibration from Startup to 24 Months	X	Drafted, desired for outage.
4	4-hr Allowance for Manual Isolation Valves/And Add Note	X	
5	Delete Hot Shutdown Requirements for Hydrostatic Testing Above 200°F or Relocate PT Curves	X	Relocation of PT curves, engineering analysis is being scoped. Desired for outage.
6	Reduce No. of SRVs	X	Drafted, desired for outage.
7	Eliminate APRMs in refuel	X	Scoping amendment, desired for outage.
8	Reduce head bolt torquing requirements		Awaiting analysis from engineering. Moved to '97 Outage.
9	Liquid Poison Minimum Volume Limit	X	In Final Review, resolving CDT's comments.
10	Remote Shutdown Panels AOT		



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UNIT 2

Amendment Requests Planned but not Submitted to NRC

NO	ITEM	SUBMITTALS TO BE COMPLETED BY 6/30/94	STATUS/COMMENTS
1	Drawdown	X	Ready for signature
2	Eliminate excess flow check valves with restricting orifice		Investigating justification, desired for outage.
3	Removal of MSL Rad Monitor	X	Preparing for SRAB
4	H ₂ O ₂ Accident Monitoring/1.97		Drafting; Improved Tech. Spec. Item
5	Revise clear & bright, level, AOT and 31 day sample fuel oil		
6	Increased Allowable MSIV Leakage		Submit mid-1994, Lead plant submittal approved. Desired for outage.
7	Revise Type A to 1 in 10 years		
8	Revise ADS test pressure		Drafting, desired for outage
9	Revise 24-hour EDG test to perform on-line		System Engineering investigating, desired for outage
10	Revise definition of core alteration.		Outage desire



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