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AUTH.NAME AUTHOR AFFILIATION
TERRY,C.D. Niagara Mohawk Power Corp.
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SUBJECT: Responds to NRC request for appropriate TS governing operability & surveillance requirements for instrumentation which provides reactor vessel overfill protection,per GL 89-19

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

August 1, 1994
NMP1L 0845

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

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63
TAC No. M74966

Subject: ***Generic Letter 89-19, Reactor Vessel Overfill Protection - Request for Additional Information***

Gentlemen:

By letter dated May 27, 1994, the Staff transmitted its safety evaluation for the Boiling Water Reactor Owners' Group (BWROG) response to Generic Letter 89-19 regarding reactor vessel overfill protection and requested additional information for Nine Mile Point Unit 1. Based on its review, the Staff concluded that upgrading existing overfill protection systems to achieve additional separation is not warranted. However, the Staff requested that Niagara Mohawk submit appropriate Technical Specifications governing the operability and surveillance requirements for instrumentation which provides reactor vessel overfill protection. This letter responds to the Staff's request for additional information.

The purpose of the Technical Specifications is to impose conditions or limitations upon reactor operation to prevent or minimize the possibility of an event that could pose an immediate threat to public health and safety. The Staff's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (July 22, 1993), established a specific set of objective criteria as guidance for determining which regulatory requirements and operating restrictions should be included in Technical Specifications. An assessment by General Electric for the BWROG determined that the vessel overfill protection system should be included in the Technical Specifications in accordance with Criterion 3 if the instrumentation serves to protect any fuel safety limits.

The specific objective of reactor vessel overfill protection is to enhance the safety of operating plants by minimizing the potential for water ingress into the steamlines, thereby decreasing the potential to damage the main steamlines or the equipment associated with the steamlines. The reactor vessel overfill protection system is not credited for fuel protection in any design basis accident or transient event described in the Nine Mile Point Unit 1 Updated Final Safety Analysis Report. Therefore, the instrumentation associated with the feedwater trip on high water level should not be added to the Technical Specifications.

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As noted in our May 4, 1990 response to Generic Letter 89-19, Nine Mile Point Unit 1 plant procedures include provisions to verify periodically the operability of overfill protection and ensure that automatic overfill protection to mitigate main feedwater overfill events is operable during power operation. Quarterly channel functional testing and once per operating cycle calibration and operability testing of the motor driven and turbine shaft driven feedwater pump high water level trip functions are performed in accordance with Instrument Surveillance Procedures N1-ISP-029-001, N1-ISP-036-003 and N1-ISP-036-103 and Instrumentation Preventative Maintenance Procedure N1-IPM-036-017. In addition, operator training includes simulator practice demonstrations during normal and transient events to maintain reactor vessel water level within prescribed bands to preclude vessel overfill.

The information provided in this response, in conjunction with existing plant procedures which ensure that automatic overfill protection is available to mitigate main feedwater events during reactor power operation, justify excluding Technical Specification requirements for vessel overfill protection. Accordingly, no further actions are planned for Nine Mile Point Unit 1 regarding Generic Letter 89-19.

Very truly yours,

C. D. Terry
Vice President - Nuclear Engineering

AER/lmc

xc: Regional Administrator, Region I
Mr. M. L. Boyle, Acting Director, Project Directorate I-1, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. B. S. Norris, Senior Resident Inspector
Records Management