



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 12, 1994

Docket No. 50-220

Mr. B. Ralph Sylvia  
Executive Vice President, Nuclear  
Niagara Mohawk Power Corporation  
Nine Mile Point Nuclear Station  
P.O. Box 63  
Lycoming, New York 13093

Dear Mr. Sylvia:

SUBJECT: RESPONSE TO GENERIC LETTER 89-19 REACTOR VESSEL OVERFILL PROTECTION,  
NINE MILE POINT NUCLEAR STATION UNIT NO. 1 (NMP-1) (TAC NO. M74966)

By letter dated August 1, 1994, Niagara Mohawk Power Corporation (NMPC) responded to the NRC staff's May 27, 1994, request for additional information regarding additional Technical Specifications (TSs) governing the availability of the reactor vessel overfill protection system instrumentation for NMP-1. NMPC's response stated that NMPC had determined that the instrumentation associated with the feedwater trip on high water level should not be added to the NMP-1 TSs.

The NRC's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (58 FR 39132) established a specific set of objective criteria as guidance for determining which regulatory requirements and operating restrictions should be included in TSs. Criterion 3 of the final policy statement would require that the reactor vessel overfill protection system instrumentation be included in the TSs if this instrumentation serves to protect any fuel safety limits. However, NMPC stated in its August 1, 1994, response that the reactor vessel overfill protection system is not credited for fuel protection in any design basis accident or transient event described in the NMP-1 Updated Final Safety Analysis Report (UFSAR). Therefore, NMPC concluded that the instrumentation associated with the feedwater trip on high water level should not be added to the NMP-1 TSs.

The NRC staff has reviewed the August 1, 1994, response from NMPC and the analyses of the NMP-1 design basis accidents and transient events as described in the NMP-1 UFSAR and we have determined that the reactor vessel overfill protection system was not taken credit for as the primary instrument for providing fuel protection in any of the design basis accidents or transient

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August 12, 1994

events. The August 1, 1994, response also stated that the NMP-1 plant procedures include provisions to periodically verify the operability of the automatic overflow protection system during power operation. The procedures require quarterly channel functional testing and once per operating cycle calibration and operability testing of the feedwater pumps high water level trip functions. 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 overflow. Therefore, the NRC staff agrees that inclusion of the reactor vessel overflow protection system instrumentation is not required in the NMP-1 TSs.

We consider all efforts regarding TAC No. M74966 completed.

Sincerely,



Donald S. Brinkman, Senior Project Manager  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

cc: See next page



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ORIGINAL SIGNED BY:

Donald S. Brinkman, Senior Project Manager  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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