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SUBJECT: Notifies that util implemented change to delete commitment made in 901029 submittal to provide dedicated strip-chart recorder for monitoring drywell water level,relative to Reg Guide 1.97.

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August 23, 1994
NMP1L 0851

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

Subject: ***Regulatory Guide 1.97 "Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident"***

Gentlemen:

This letter is being provided to notify the NRC staff that Niagara Mohawk has implemented a change to one of its commitments related to Regulatory Guide (RG) 1.97 for Nine Mile Point Unit 1 (NMP1).

In our submittal dated October 29, 1990, Niagara Mohawk committed to provide a "dedicated strip-chart recorder for monitoring drywell water level." This commitment was made because drywell water level had been identified as an "EOP Key Parameter" by the Niagara Mohawk Nuclear Engineering staff. As such, monitoring of drywell water level was considered for upgrading relative to the recommendations of RG 1.97, Revision 2, for Category 1 instrumentation, which recommended the recording of one channel of instrumentation. However, during the detailed design phase of the drywell level modification, several concerns were raised by our NMP1 Operations group and Human Factors Engineer about adding a dedicated chart recorder to monitor drywell level:

1. The Drywell Flooding evolution is the only scenario where this chart recorder will provide useable information. Entry into Drywell Flooding is directed by the Emergency Operating Procedures (EOPs) if Reactor Pressure Vessel (RPV) water level cannot be maintained above top of active fuel (TAF) or if conditions specified in the RPV Flooding procedure cannot be attained. Because the basis of Drywell Flooding is to assure long-term adequate core cooling through submergence, knowledge that drywell level is above TAF is paramount. Drywell level can be determined by redundant safety related drywell level indicators which were installed during the 1993 Refuel Outage under modification N1-90-011.

   Drywell water level trending and recording capability is not necessary to execute Drywell Flooding. Moreover, it could be misleading due to the differences in the size and shape of the primary containment at various elevations which could be misinterpreted as changes in rate of flooding.

In addition, a drywell level chart recorder would not be used during normal operations nor would it monitor or record any Technical Specification parameter.

2. The drywell water level chart recorder was to be installed on Control Room Panel 'K'. This installation would have created several Human Factors concerns. First, 'K' Panel contains a large number of indicators and switches, thus space is limited and the additional recorder would create visual clutter. Additionally, because of these space limitations on 'K' Panel, the chart recorder would have been mounted above the maximum acceptable height of 72 inches specified in MDC-4 "Human Factors Manual for Future Control Room Change," the Niagara Mohawk design criteria document for human factors considerations (based on NUREG-0700).

Therefore, based on the limited usefulness of a drywell level chart recorder and its potential negative impact on human factors, Niagara Mohawk decided to delete this element of the design from the modification (Mod N1-90-011), entitled "Drywell Water Level Instrumentation." All other aspects of the design remain as described in Niagara Mohawk's submittal dated October 29, 1990.

In the course of a recent procedure review, Niagara Mohawk has strengthened its policy regarding notification to the NRC of changes to commitments. Specifically, should revisions to open (i.e., not yet completed) commitment actions or due dates be necessary, prior notification will be made. However, future plant or procedure changes, once commitments have been implemented, will be evaluated in accordance with established procedures and 10CFR50.59. If an unreviewed safety question or Technical Specification change is identified, prior NRC approval would, of course, be required for implementation. Otherwise, notification of such changes would be made as required by 10CFR50.71(e).

Very truly yours,

C. D. Terry
Vice President-Nuclear Engineering

/ksj
002587GG

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