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: REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED TECHNICAL SPECIFICATION CHANGE TO REVISE THE PRESSURE-TEMPERATURE LIMITS FOR NINE MILE POINT NUCLEAR STATION UNIT NO. 1 (NMP-1) (TAC NO. M90288)

By letter dated September 1, 1994, Niagara Mohawk Power Corporation (NMPC), proposed a license amendment to revise the pressure-temperature limits for the NMP-1 reactor vessel.

The NRC staff has begun its review of NMPC's September 1, 1994, submittal. However, we have determined that additional information, as identified in the enclosure, is required to complete our review of the submittal. As indicated in the attached request for additional information (RAI), additional information is required regarding the calculation of the proposed pressuretemperature limits for the NMP-1 reactor vessel]. NMPC is requested to respond to this RAI within 30 days of receipt of this letter in order for us to complete our review in a timely manner.

This requirement affects one respondent and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

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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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B. Ralph Sylvia

Niagara Mohawk Power Corporation
cc:
Mark J. Wetterhahn, Esquire Winston \& Strawn 1400 L Street, NW
Washington, DC 20005-3502
Supervisor
Town of Scriba
Route 8, Box 382
Oswego, NY 13126

Mr. Louis F. Storz
Vice President - Nuclear Generation
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63

Lycoming, NY 13093
Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 126

Lycoming, NY 13093
Gary D. Wilson, Esquire Niagara Mohawk Power Corporation 300 Erie Boulevard Hest Syracuse, NY 13202

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission

475 Allendale Road
King of Prussia, PA 19406
Ms. Donna Ross
New York State Energy Office.
2 Empire State Plaza
16th Floor
Albany, NY 12223

Nine Mile Point Nuclear Station Unit No. 1

Mr. Richard B. Abbott
Unit 1 Plant Manager
Nine Mile Point Nuclear Station P.O. Box 63

Lycoming, NY 13093
Mr. David K. Greene
Manager Licensing
Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station P.O. Box 63

Lycoming, NY 13093
Charles Donaldson, Esquire Assistant Attorney General
New York Department of Law
120 Broadway
New York, NY 10271
Mr. Paul D. Eddy
State of New York
Department of Public Service Power Division, System Operations 3 Empire State Plaza
Albany, NY " 12223
Mr. Martin J. McCormick, Jr.
Vice President
Nuclear Safety Assessment and Support
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63

Lycoming, NY 13093


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REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED CHANGES TO THE REACTOR VESSEL PRESSURE-TEMPERATURE LIMITS
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT NO. 1
DOCKET NO. 50-220

## 1. Scope/Status of Review

The fracture toughness requirements for ferritic materials in the pressure-retaining components of the reactor coolant pressure boundary are specified for testing and operational conditions; including anticipated operational occurrences, in Section IV of Appendix G of 10 CFR Part 50. This appendix requires the acceptance and performance criteria of Appendix $G$ of Section III of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). Pressure-temperature calculation procedures are described in Appendix G of the ASME Code. Changes in the fracture-toughness properties of materials in the beltline region, resulting from neutron irradiation and the thermal environment, are monitored by a surveillance program in compliance to the requirements of Appendix H of 10 CFR Part 50. The effect of neutron fluence on the shift in the nil-ductility temperature of pressure vessel steel is predicted by Regulatory Guide 1.99 (RG 1.99), "Effect of Residual Elements on Predicted Radiation Damage to Reactor Vessel Materials." The licensee, Niagara Mohawk Power Corporation, has prepared an application for amendment to the operating license in order to revise TS 3.2.2, "Minimum Reactor Vessel Temperature for Pressurization."

## 2. Additional Information Required

Based on the review of the licensee's submittal, the NRC staff has concluded that the following information and/or clarification is required to complete the review of the amendment request:
A. For the surveillance plate material, Criteria 1 of RG 1.99, Rev. 2 was not met because the limiting material (upper plate G-307-4) is not the surveillance material. Criteria 3 was not met because the method described in Regulatory Position 2.1 was not used to obtain the best-fit line of the plant specific data.. Verify and provide the basis for determining that the surveillance. data are credible.

B. For equation (2-2) on Page 5 of the submittal (calculation of $\Delta R T_{\text {ndt }}$ for the beltine plate material);
(1) Identify all raw data used to arrive at this equation,
C. Figure 2-1 on Page 11 of the submittal compares the RG 1.99, Rev. 2 model with the plant specific $\Delta R T_{\text {ndt }}$ model. For each data point:
(1) Provide the copper and nickel content,
(2) Identify the plant from which each data point was obtained, and
(3) Identify which data were not used in development of the curve.
D. Provide the basis and data used to conclude that ".... most BWRs operate at fluences below the fluence threshold for significant Cu precipitation." (Page 3 of submittal)
E. Provide the basis for using a margin of $17^{\circ} \mathrm{F}$ as opposed to $34{ }^{\circ} \mathrm{F}$ as specified in RG 1.99 in the calculation of the adjusted reference temperature for the beltine plates.
F. Provide applicable information, with respect to questions 1-6 above, regarding the beltline welds.

