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SUBJECT: Forwards responses to GL 92-01, Rev 1, Suppl 1, "RV Structural Integrity." O

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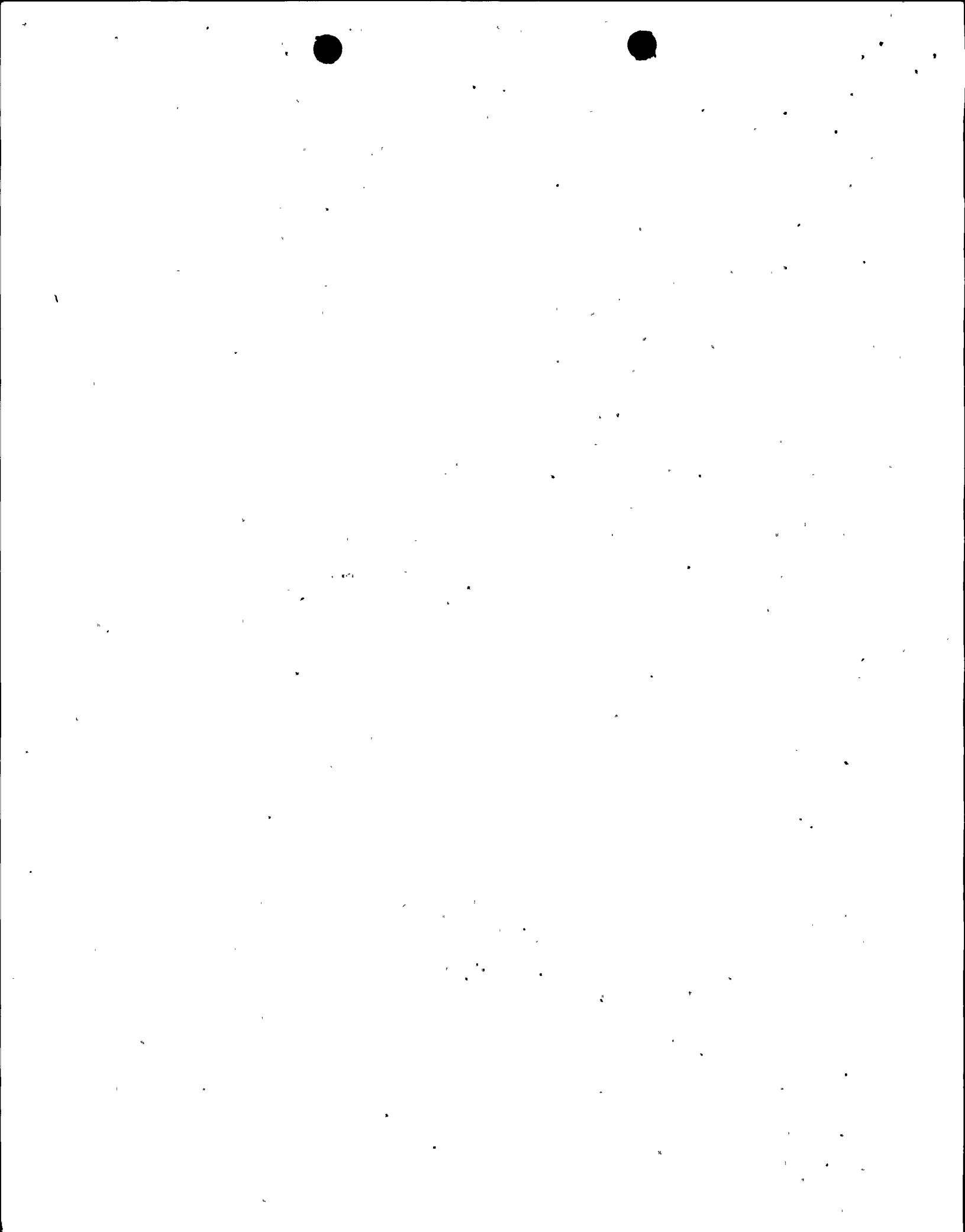
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MAY



B. Ralph Sylvia
Executive Vice President
Nuclear

August 16, 1995
NMPIL 0967

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

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

 Nine Mile Point Unit 2
 Docket No. 50-410
 NPF-69

Subject: *Generic Letter 92-01, Revision 1, Supplement 1, "Reactor Vessel Structural Integrity"*

Gentlemen:

The Commission issued Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity," on March 6, 1992 to obtain information necessary to assess Licensee compliance with requirements regarding reactor pressure vessel (RPV) integrity. Niagara Mohawk Power Corporation (NMPC) provided the Commission the required information in various submittals for Nine Mile Point Unit 1 (NMP1) and Nine Mile Point Unit 2 (NMP2). Recent Commission reviews of data pertinent to the RPV structural integrity issue has indicated that Licensees may not have considered all data when developing their responses to Generic Letter 92-01, Revision 1 or in their RPV integrity evaluations. Generic Letter 92-01, Revision 1, Supplement 1, has been issued to require that all Licensees identify, collect, and report any new data and to assess the impact of the data on their RPV integrity analyses. Specifically, Required Response No. 1 of Supplement 1 required that Licensees provide a description of those actions taken or planned to locate all data relevant to the determination of RPV integrity, or an explanation of why the existing data is considered complete as previously submitted. The requested information is provided on Attachment 1 and Attachment 2 of this letter for NMP1 and NMP2, respectively.

By letter dated August 10, 1995, the Boiling Water Reactor Vessel & Internals Project (BWRVIP) provided the Commission a generic response to Generic Letter 92-01, Revision 1, Supplement 1. NMPC's responses delineated in Attachments 1 and 2 are, in general, consistent with the BWRVIP response, with additional clarifications provided as necessary.

Very truly yours,

220055



B. Ralph Sylvia
Executive Vice President - Nuclear

BRS/JMT/lmc
Enclosures

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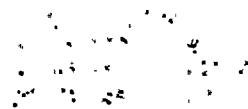
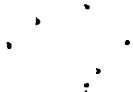
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xc: Regional Administrator, Region I
Mr. L. B. Marsh, Director, Project Directorate I-1, NRR
Mr. G. E. Edison, Senior Project Manager, NRR
Mr. B. S. Norris, Senior Resident Inspector
Records Management



UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Niagara Mohawk Power Corporation) Docket No. 50-220
) Docket No. 50-410
Nine Mile Point Unit 1 and Unit 2)

B. Ralph Sylvia, being duly sworn, states that he is Executive Vice President - Nuclear of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the document attached hereto; and that the document is true and correct to the best of his knowledge, information and belief.



B. Ralph Sylvia
Executive Vice President - Nuclear

Subscribed and sworn before me,
in and for the State of New York
and the County of Oswego,
this 16 day of August, 1995



NOTARY PUBLIC

BEVERLY W. RIPKA
Notary Public State of New York
Qual. in Oswego Co. No. 4644879
My Commission Exp. Mar 30, 1996
2/28/96



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ATTACHMENT 1

NINE MILE POINT UNIT 1

NRC Required Response No. 1

Provide a description of those actions taken or planned to locate all data relevant to the determination of RPV integrity, or an explanation of why the existing database is considered complete as previously submitted.

Nine Mile Point Unit 1 Response

Niagara Mohawk Power Corporation (NMPC) has conducted comprehensive searches for pertinent data and for archive material relevant to reactor pressure vessel (RPV) integrity. NMPC considers all Nine Mile Point Unit 1 (NMP1) plant-specific docketed information to be accurate and complete. However, by letter dated September 1, 1994, NMPC submitted a NMP1 Technical Specification (TS) amendment application proposing changes to Section 3.2.2, "Minimum Reactor Vessel Temperature for Pressurization." Supplemental information was provided in letters dated December 5, 1994 and December 20, 1994. As part of our Technical Specification application, a plant-specific Charpy shift model was developed. Data from other plants were used in this model. Also, the Palisades weld W5214 is the same heat number as the NMP1 surveillance weld and more data are now available through the Reactor Vessel Integrity Database (RVID) and industry cooperative arrangements. Accordingly, NMPC has developed and, in conjunction with the BWR Vessel & Internals Project (BWRVIP), is currently implementing a plan to locate additional relevant data.

Actions taken by NMPC to locate all data relevant to the determination of RPV integrity include performing a comprehensive data and materials search in the mid-1980s after the first surveillance capsule report indicated an unanticipated large Charpy shift. This search involved an internal documentation search, a documentation and archive material search at General Electric (GE), a weld chemistry and mechanical property data search at Combustion Engineering (CE), and a certified material test report (CMTR) search at Lukens Steel. The archive surveillance plate G-8-3 was found and used to obtain additional baseline chemistry and mechanical properties. The beltline material CMTRs were located and CE found weld chemistry and mechanical property data for the beltline welds. The as-built drawings, CMTRs and plant-specific material chemistry and mechanical property data were used to resolve a surveillance material mixup and to definitively establish that plate G-307-4 is the limiting beltline material. In addition to the record and material search activities, the Commission's Power Reactor-Embrittlement Database (PR-EDB) was searched to identify plants which have RPV materials with similar neutron damage characteristics as the NMP1 limiting beltline plate. These data were used to develop the plant-specific Charpy shift and upper shelf energy (USE) drop model for NMP1.



NMPC does not anticipate any changes to information supplied in the Technical Specification application letters discussed above, based on actions associated with Generic Letter 92-01, Revision 1, Supplement 1. However, to verify that previously supplied data from other plants were accurate, the RVID will be searched to identify surveillance data which were used to develop the plant-specific Charpy shift model. These data will be compared with the data which were extracted from the PR-EDB to ensure that the data are consistent. If any inconsistencies are discovered, the utility which owns the plant will be contacted and the original data records will be examined to resolve the inconsistency. The RVID will also be searched to locate relevant weld chemistry and mechanical property data. Best estimate chemistries will be determined for the NMP1 welds and calculations will be performed to verify that plate G-307-4 is the limiting beltline material through end-of-license (EOL).

Also, NMPC plans to participate with the BWRVIP and the Nuclear Energy Institute (NEI) RPV Integrity Task Force, which includes representatives of all Owners' Groups, to locate and retrieve additional RPV integrity data on an industry wide basis. These groups are also developing standard methods of evaluating and applying RPV integrity data. The details of the BWRVIP action plan for RPV integrity data are described in letter dated August 10, 1995, from the BWRVIP to the Commission.



ATTACHMENT 2

NINE MILE POINT UNIT 2

NRC Required Response No. 1

Provide a description of those actions taken or planned to locate all data relevant to the determination of RPV integrity, or an explanation of why the existing database is considered complete as previously submitted.

Nine Mile Point Unit 2 Response

Niagara Mohawk Power Corporation (NMPC) has taken the following actions to locate all data relevant to the determination of Nine Mile Point Unit 2 (NMP2) reactor pressure vessel (RPV) integrity. The certified material test reports (CMTRs) from the vessel fabricator for all beltline shell plates have been retrieved. Also, Grand Gulf 1 and Perry have been identified as sister plants for NMP2 welds by using the ATI database.

Actions planned by NMPC for NMP2 will follow those of the BWRVIP. As indicated in BWRVIP's letter to the Commission dated August 10, 1995, the BWRVIP will review available industry databases, such as RVID from the Commission, published data from ABB-CE and hard copy of RPV DATA from the Westinghouse Owners' Group (WOG), and will review the collected records (at GE) of beltline materials used for past vessel integrity evaluations. The BWRVIP will review and evaluate information in these databases and resolve any inconsistencies. These data will be used to identify BWR (and PWR) plants with common materials (sister plants) and to generate a complete list of beltline materials for each BWR vessel fabricator. The list for each fabricator will identify all plate, weld and forging materials in each plant's beltline, and any known sister plant(s) for each material. The list will also document the best estimate vessel integrity data. ABB-CE is already performing a comprehensive data retrieval for owners of CE-fabricated vessels, including BWRs. The information available from ABB-CE will be incorporated into the BWRVIP work.

Also, the BWRVIP will request of vessel fabricators a proposal by November 20, 1995, to, by material, a) identify any vessels (BWR or PWR) which they fabricated which have the same material, and either b) retrieve and document all additional data relevant to vessel integrity on each material or c) verify that no additional data are available. Requests for proposals will be sent to the following BWR fabricators: B&W, CB&I/CBIN, Hitachi and Ishikawajima-Harima Industries (IHI).

As indicated in the BWRVIP letter, proposals would be obtained by November 20, 1995. However, the resulting data would not be collected and documented until considerably past that date. Therefore, preliminary generic evaluations will be performed with available data and



documented in a BWRVIP letter to the Commission to be provided by November 20, 1995. The preliminary evaluations will address the three remaining issues delineated in Generic Letter 92-01, Revision 1, Supplement 1 (i.e., Required Response No. 2).

