

Mr. B. Ralph Sylvia
 Executive Vice President, Generation Business
 Group and Chief Nuclear Officer
 Niagara Mohawk Power Corporation
 Nuclear Learning Center
 450 Lake Road
 Oswego, NY 13126

January 28, 1997

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING SURVEILLANCE PERFORMED DURING THE REFUELING OUTAGE, NINE MILE POINT NUCLEAR STATION UNIT NO. 1 (TAC NO. M96649)

Dear Mr. Sylvia:

The NRC staff is reviewing your submittal of September 20, 1996, regarding the proposed technical specification change to various surveillances performed during a refueling outage. We find that additional information is necessary to complete our review.

Your response to the enclosure is requested as soon as possible to support your current outage schedule. If you have questions regarding the enclosure or are unable to meet the requested response date, please call me at (301) 415-3049, or e-mail me at dsh@nrc.gov.

Sincerely,

/s/

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

Docket No. 50-220

Enclosure: Request for Additional Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script that reads "Darl S. Hood".

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

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cc w/encl: See next page



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B. Ralph Sylvia
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit No. 1

cc:

Mr. Richard B. Abbott
Vice President and General Manager -
Nuclear
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. 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

Mr. Paul D. Eddy
State of New York
Department of Public Service
Power Division, System Operations
3 Empire State Plaza
Albany, NY 12223

Ms. Denise J. Wolniak
Manager Licensing
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, NY 13093

Mr. F. William Valentino, President.
New York State Energy, Research,
and Development Authority
Corporate Plaza West
286 Washington Avenue Extension
Albany, NY 12203-6399

Mr. Kim A. Dahlberg
General Manager - Projects
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, NY 13093

Mark J. Wetterhahn, Esquire
Winston & Strawn
1400 L Street, NW
Washington, DC 20005-3502

Mr. Norman L. Rademacher
Plant Manager, Unit 1
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, NY 13093

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

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Supervisor
Town of Scriba
Route 8, Box 382
Oswego, NY 13126

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



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REQUEST FOR ADDITIONAL INFORMATION

REGARDING SURVEILLANCES PERFORMED DURING REFUELING OUTAGES

NINE MILE POINT NUCLEAR STATION UNIT NO. 1

DOCKET NO. 50-220

1. In your September 20, 1996, letter you propose that various surveillance requirement intervals be changed to "once per operating cycle." Technical Specification (TS) 4.0.1, "Surveillance Intervals," states that "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." However, the definition of an operating cycle as stated in TS Section 1.9 is "that portion of Station operation between reactor startups following each major refueling outage." No nominal frequency is provided in the definition of an operating cycle. The use of administrative controls to ensure that the interval between surveillance testing does not exceed a maximum period of 30 months is not an acceptable resolution of the ambiguity the change would add to your Technical Specifications. Please revise your proposed changes to clearly indicate:
 - (a) The specific frequency/interval of an "operating cycle"
 - (b) How TS 4.0.1 is to be applied to surveillance intervals performed "once per operating cycle" if a specific frequency interval is not included in the definition of an operating cycle.
2. Our records do not indicate when or how Nine Mile Point Unit 1 converted to a 24-month fuel cycle. Was the 24-month fuel cycle and the associated increase in refueling outage surveillance intervals implemented by a TS amendment or under 10 CFR 50.59? When was this accomplished? In addition, was the guidance in Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991, used when evaluating an increase in the refueling outage surveillance intervals to 24 months?
3. Please discuss the evaluations you performed upon converting to a 24-month fuel cycle to show that the net effect on safety of increased refueling outage surveillance intervals to 24 months was small and that the assumptions in the plant licensing basis remain valid on the basis of performing refueling outage surveillances at 24 months (maximum of 30 months when including 25% extension). Please provide the original bases and/or safety evaluation used to support a 24-month refueling outage surveillance interval for a sample of the surveillances described in your September 20, 1996, submittal.

Enclosure



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4. Describe or provide the instrument drift analysis completed to support an increase in refueling outage instrumentation channel tests and channel calibrations to 24 months. The description should indicate whether and how the effects of an increased calibration interval on instrument errors were evaluated to confirm that drift would not result in instrument errors that exceed the assumptions of the safety analysis.
5. For the instrumentation specified in your September 20, 1996, submittal that have refueling outage channel calibration surveillance intervals, are the associated instrumentation setpoint calculations based on a 24-month drift term? Are the setpoint calculations based on the setpoint methodology described in ISA 67.04 and Regulatory Guide 1.105?
6. The proposed changes, with regard to the Surveillance Requirements for vacuum breakers in Section 4.3.6 of the Nine Mile Point Unit 1 TS, are a relaxation of the existing TS that deviates even further from the currently acceptable testing requirements of the new Standard TS (STS). For example, Section 3.6.1.8 of the new BWR4 STS, "Suppression Chamber-to-Drywell Vacuum Breakers," requires a functional test of each required vacuum breaker every 31 days AND within 12 hours after any discharge of steam to the suppression chamber from the S/RVs AND within 12 hours following an operation that causes any of the vacuum breaker to open. Also, Section 3.6.1.7, "Reactor Building-to-Suppression Chamber Vacuum Breakers," requires a functional test of each vacuum breaker every 92 days. (The new BWR4 STS is used as an example because the safety functions of the vacuum breakers in question are very similar). These examples are considerably more stringent than what is currently in Section 4.3.6 of the Nine Mile Point Unit 1 TS. In view of these differences, please provide further justification of your proposed changes.
7. Parameters 1, 3, and 5 of TS Table 4.6.2b currently specify instrument channel test and channel calibration surveillance intervals of once per 3 months. However, parameters 6, 7, 8, and 9 currently specify instrument channel test and channel calibration surveillance intervals of once per major refueling outage. It would appear that the channel test and channel calibration surveillance intervals can be performed quarterly. Therefore, please justify the refueling outage channel test and channel calibration surveillance intervals for parameters 6, 7, 8, and 9.
8. For the category 2 and 4 surveillances, you state that evaluations have been performed for the associated surveillance intervals and it has been determined that these surveillances may be safely performed while at power. For these surveillances, please describe the evaluations that were performed and their results.



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9. The footnotes on pages 204 and 233 and the bases on page 253 of the marked-up version of the proposed TS changes state that the mode switch surveillance may be performed "as part of the plant shutdown sequence prior to a maintenance outage, forced shutdown, or refueling outage." The terms "plant shutdown sequence", "forced shutdown" and "maintenance outage" are not defined in the TS, are general, and do not adequately indicate when in a sequence of actions the mode switch surveillance is to be performed. Please clarify the mode switch surveillance.

