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

February 10, 1997

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING SYSTEM LEAKAGE/HYDROSTATIC TESTING AND SCRAM TIME TESTING TECHNICAL SPECIFICATION CHANGES, NINE MILE POINT NUCLEAR STATION UNIT NO. 1 (TAC NO. M96907)

Dear Mr. Sylvia:

The NRC staff is reviewing your submittal of September 26, 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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REQUEST FOR ADDITIONAL INFORMATION
REGARDING TECHNICAL SPECIFICATION AMENDMENTS
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT NO. 1
OPERATING LICENSE NUMBER DPR-63
DOCKET NO. 50-220

1. Pages 164, 165, 168, 170, and 174 add hot shutdown to the list of plant modes for which the respective secondary containment LCO is required. Is the addition of the hot shutdown condition a change to the plant design bases, as the secondary containment LCO's (3.4.1 through 3.4.4) will now be applicable during the hot shutdown mode? This change appears to go beyond requiring the secondary containment LCO's for TS 3.7.2 only. Do these changes represent a change to the plant design bases? Also, comment on whether note (a) on page 246 may be similarly affected.

2. Special Test Exception 3.7.2 provides a number of additional requirements involving LCOs in 3.4.1, 3.4.2, 3.4.3, 3.4.4 and 3.4.5. However, proposed TS 3.7.2 does not mention the individual action statements in 3.4.1 through 3.4.5. Confirm that if individual LCOs in 3.4.1 through 3.4.5 cannot be met, then the 3.7.2 action statement will be enforced, requiring the plant to immediately abort system leakage or hydrostatic testing and scram time testing activities and reduce the average reactor coolant temperature to $\leq$212F within 10 hours.

3. LCO 3.4.2.a, "Reactor Building Integrity - Isolation Valves" specifies ventilation system valves only. Are there other valves that are used to ensure reactor building integrity which are not ventilation system valves? If so, how are they covered during 3.7.2 operations?

4. LCO 3.4.4.a, "Emergency Ventilation System" is included under proposed LCO 3.7.2. However, parts b, c and d are not included. Will these sections of LCO 3.4.4 also be in effect during operation under LCO 3.7.2? If not, justify.

5. LCO 3.4.5.a, "Control Room Air Treatment System" is included under proposed LCO 3.7.2. However, parts b, c and d are not included. Will these sections of LCO 3.4.5 also be in effect during operation under LCO 3.7.2? If not, justify.

6. Confirm that all surveillance requirements for TS 3.4.1 through 3.4.5 and for tables 3.6.2j and 3.6.2l will be in effect during TS 3.7.2 operation.

7. From table 3.6.2j, will the High Radiation Refueling Platform LCO be applicable during 3.7.2 operation?

8. Which systems normally are used for shutdown cooling? Will any TS LCO's be bypassed due to isolation of shutdown cooling during the hydrostatic test?

Enclosure