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SUBJECT: Provides addl info requested on 960926 amend application re
 sys leakage & hydrostatic testing.

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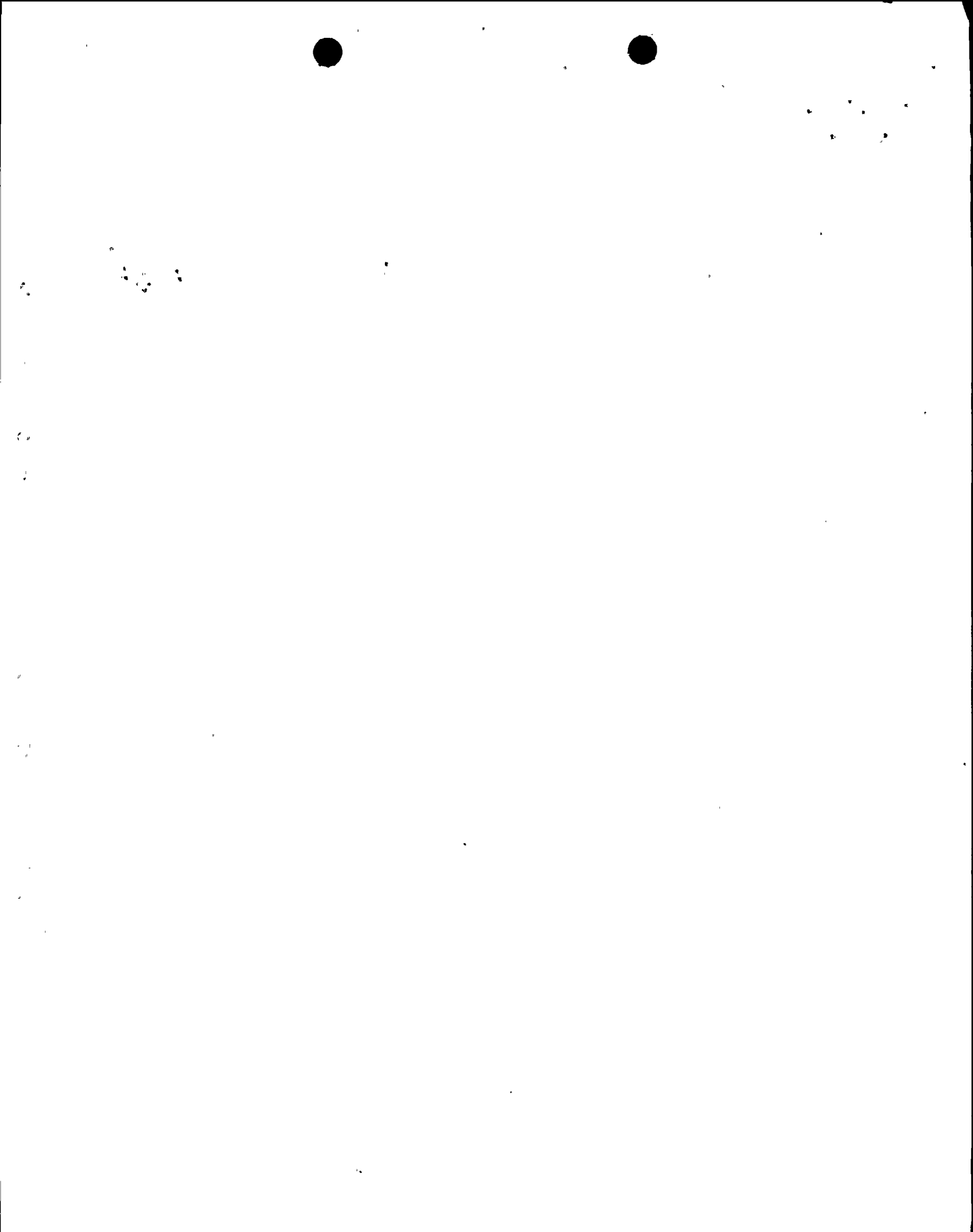
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NIAGARA MOHAWK

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RICHARD B. ABBOTT
Vice President and
General Manager - Nuclear

March 6, 1997
NMP1L 1193

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

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

Subject: Request for Additional Information Regarding System Leakage and Hydrostatic Testing Amendment Application

Gentlemen:

By letter dated September 26, 1996, Niagara Mohawk Power Corporation (NMPC) transmitted an Application for Amendment to the Nine Mile Point Unit 1 Technical Specifications. On February 10, 1997, the Commission sent NMPC a Request for Additional Information regarding our September 26, 1996 submittal. The purpose of this letter is to provide the information requested. Also included are Technical Specification pages 341a, 341b, and 341c of our submittal with editorial changes incorporated as proposed by the Commission. The editorial changes revise the reference made to Table 3.b.21 to Table 3.b.2l on page 341b and change the wording "system leakage or hydrostatic testing and scram time testing" to "system leakage and scram time testing or hydrostatic testing and scram time testing" on pages 341a, 341b, and 341c.

Sincerely,

Richard B. Abbott
Vice President and General Manager - Nuclear

RBA/JMT/lmc
Enclosures

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REQUEST FOR ADDITIONAL INFORMATION

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION UNIT NO. 1

Request for Information #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.

Required Response #1

The addition of hot shutdown applicability requirements to the secondary containment Limiting Conditions for Operations (LCOs) is a conservative change in that applicability requirements are being added. The proposed change will bring consistency between the Nine Mile Point Unit 1 (NMP1) Technical Specifications (TS) and the Improved Technical Specifications (ITS) concerning secondary containment applicability requirements. This consistency was required in order to use a format for proposed NMP1 Special Test Exception LCO 3.7.2 comparable to the Special Operations specification in the ITS. The proposed change will also bring consistency between wording in the NMP1 TSs and the NMP1 Updated Final Safety Analysis Report (UFSAR). The NMP1 UFSAR currently has a statement which indicates that when the reactor is hot and pressurized, the reactor building provides a secondary containment system. Although maintaining secondary containment integrity during reactor hot shutdown conditions is the normal practice in accordance with the UFSAR, the proposed change will bring consistency between wording in the NMP1 TSs and the UFSAR and eliminate any future confusion. Accordingly, the proposed change is not considered a design bases change (i.e., this requirement is already in NMP1's UFSAR).

Proposed Note (a) on page 264 requires that the Control Room Air Treatment System be operable when the reactor is in the hot shutdown condition. Since the current TSs require that the Control Room Air Treatment System be operable when secondary containment integrity is required, and the proposed change will add hot shutdown requirements to the secondary containment TS, Note (a) appropriately requires that the Control Room Air Treatment System be operable when the reactor is in the hot shutdown condition.



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Request for Information #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 $\leq 212^{\circ}\text{F}$ within 10 hours.

Required Response #2

TS 3.7.2.d states that if the requirements of specification 3.7.2.a (which includes LCOs 3.4.1, 3.4.2.a, 3.4.3.a, 3.4.4.a and 3.4.5.a), 3.7.2.b or 3.7.2.c are not satisfied, immediately abort system leakage or hydrostatic testing and scram time testing activities and reduce the average reactor coolant temperature to $\leq 212^{\circ}\text{F}$ within 10 hours. Failure to meet the above requirements would be a violation of TSs and be reportable as an LER. The 10 hour requirement to be in cold shutdown is conservative when compared to the ITS Action requirements and consistent with NMP1 TS loss of reactor building integrity requirements.

Request for Information #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?

Required Response #3

LCO 3.4.2.a lists those valves that are required to be operable to assure reactor building integrity. There are potential bypass leakage paths (i.e., paths directly from the primary containment to outside of secondary containment). During normal power operation and hot shutdown conditions, the containment isolation valves on these paths are required to be operable or closed. During TS 3.7.2 operations, major bypass leakage paths (i.e., main steam, feedwater) are required to be isolated to perform the pressure test. Valves not required to be isolated to perform the pressure test will be closed or operable in accordance with procedure.



Request for Information #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.

Required Response #4

LCO 3.4.4.a alone states the operability requirements for the Emergency Ventilation System. Accordingly, LCO 3.4.4.a and not LCOs 3.4.4.b, c, and d was listed in LCO 3.7.2 as a specification required to be met to perform a pressure test. If LCO 3.4.4.a cannot be met, the Actions delineated in 3.7.2.d must be taken as stated in Required Response #2 above. LCOs 3.4.4.b, c, and d delineate acceptance criteria associated with testing of the Emergency Ventilation System. Surveillance tests need to be performed successfully to declare a system operable and meet the associated LCO operability requirements. However, it is unnecessary to list LCOs 3.4.4.b, c, and d as specifications that need to be met. If any test or other information were to indicate that the Emergency Ventilation System were inoperable, the requirements of LCO 3.4.4.a and subsequently, TS 3.7.2 would not be met and the pressure test aborted. In other words, a failure to meet LCO 3.4.4.b, c and d would render the EVS inoperable and would be a failure to meet LCO 3.4.4.a. Therefore, LCO 3.4.4.b, c and d are "in effect" during operation under LCO 3.7.2.

Requested Information #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.

Required Response #5

LCO 3.4.5.a alone states the operability requirements for the Control Room Air Treatment System. Accordingly, LCO 3.4.5.a and not LCOs 3.4.5.b, c and d was listed in LCO 3.7.2 as a specification required to be met to perform a pressure test. If LCO 3.4.5.a cannot be met, the Actions delineated in 3.7.2.d must be taken as stated in Required Response #2 above. LCOs 3.4.5.b, c, and d delineate acceptance criteria associated with testing of the Control Room Air Treatment System. Surveillance tests need to be performed successfully to declare a system operable and meet the associated LCO operability requirements. However, it is unnecessary to list LCOs 3.4.5.b, c and d as specifications that need to be met. If any test or other information were to indicate that the Control Room Air Treatment System were inoperable, the requirements of LCO 3.4.5.a and subsequently, TS 3.7.2 would not be met and the pressure test aborted. In other words, a failure to



meet LCOs 3.4.5.b, c or d would render the Control Room Air Treatment System inoperable and would be a failure to meet 3.4.5.a. Therefore, LCOs 3.4.5.b, c and d are "in effect" during operation under LCO 3.7.2.

Requested Information #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.

Required Response #6

TS 3.7.2 lists those specifications which must be met when conducting system leakage or hydrostatic testing and scram time testing. These specifications list the operability requirements for each system. Surveillance requirements must be met prior to declaring a system operable and therefore must be performed to meet the requirements of TS 3.7.2.

Requested Information #7

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

Required Response #7

No, Table 3.6.2j requires that the High Radiation Refueling Platform instrumentation be operable any time that irradiated fuel or the irradiated fuel cask is being handled in the reactor building. The proposed change does not affect the applicability requirements of this instrumentation.

Requested Information #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?

Required Response #8

The NMP1 Shutdown Cooling System is designed to complete cooldown of the reactor coolant system from temperatures and pressures below which the main condenser may no longer be used as a heat sink following shutdown. During a system leakage or hydrostatic test, the Shutdown Cooling System is isolated. The Shutdown Cooling System is not a TS system; therefore, no TSs are affected by isolating this system.



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