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SUBJECT: Provides staff w/brief overview of UFSAR Verification Program, including descriptive outline of program, highlighting major elements & schedule for completion.

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Nuclear Safety Assessment and Support

July 1, 1997  
NMP1L 1231

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:**    *UFSAR Verification Program*

Gentlemen:

On February 18, 1997, Niagara Mohawk Power Corporation (NMPC) provided its response to the NRC's request for information pursuant to 10CFR50.54(f) regarding adequacy and availability of design basis information for Nine Mile Point Unit 1 (NMP1) and Unit 2 (NMP2). Our letter indicated that we were in the process of finalizing plans for an Updated Final Safety Analysis Report (UFSAR) Verification Program for both Units.

NMPC acknowledges the need for the UFSAR to be complete and accurate. As a result, it has undertaken an initiative to identify and correct UFSAR deficiencies for NMP1 and NMP2. NMPC intends for this program to fall within the amended Enforcement Policy (61 Fed. Reg. 54461 (October 18, 1996)) which encourages licensees to identify and correct violations associated with the UFSAR.

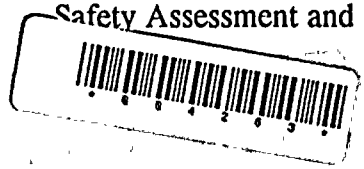
This letter provides the Staff with a brief overview of our UFSAR Verification Program. The attachment to this letter provides a descriptive outline of the program, highlighting the major elements and our schedule for completion. NMPC personnel are available to discuss the program at your convenience.

Very truly yours,

C. D. Terry  
Vice President of Nuclear  
Safety Assessment and Support

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Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator  
Mr. A. W. Dromerick, Acting Director, Project Directorate I-1, NRR  
Mr. B. S. Norris, Senior Resident Inspector  
Mr. D. S. Hood, Senior Project Manager  
Records Management



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# UFSAR VERIFICATION PROGRAM - NMP1 and NMP2

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## PROGRAM GOAL

Complete a comprehensive review of the NMP1/NMP2 UFSARs and identify and correct deviations resulting from the review.

## PROGRAM OBJECTIVES

- Review the NMP1 and NMP2 UFSARs to identify deviations between the UFSAR and the design bases, physical plant, implementing procedures/programs, and station operation.
- Ensure that UFSAR commitments and statements of fact are adequately implemented through approved procedures and programs.
- Ensure that each identified UFSAR deviation is promptly reviewed for plant/equipment operability concerns and reportability.
- Prioritize all identified UFSAR deviations for timely corrective action based on the safety significance and affect on reliable operation of the unit.

## PROGRAM PHASES

The UFSAR Verification Program will be completed in four major phases (Planning, Review, Prioritization and Resolution) which are discussed separately below.

### PHASE I - PLANNING

Phase I involved the development of four administrative FSAR Review Guidelines to ensure consistent implementation of the program. The four administrative guideline documents are:

1. FSAR Verification Program Administration - establishes responsibilities and administrative controls for performing the review and verification of the UFSAR.
2. FSAR Verification Review Process and Computerized Database - describes the methodology for reviewing and verifying the UFSAR and documenting the results in a computerized database.



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3. Deviation Processing Guideline - establishes the requirements and methods to evaluate and disposition potential deviations identified during the project.
4. Database and Software Quality Plan - establishes the controls applied to database software development and data for the project.

#### PHASE II - REVIEW

Phase II involves the review and verification of the UFSAR in accordance with the Verification Review Process and Computerized Database Guideline. The order of review of UFSAR sections will be established based on those sections containing systems with the highest risk significance to core damage. Review of lower risk UFSAR sections will be performed on a qualitative basis using system functional characteristics. UFSAR material which does not: capture licensing commitments, address design criteria or describe required implementing programs and procedures may be excluded from the verification program. In addition, historical information such as initial start-up testing/operations, original environmental studies and QA during design and construction may be excluded. However, the basis for excluding any UFSAR material will be approved and documented in the computerized database.

The review and verification of the UFSAR will be incorporated into a computerized database that will provide documentation of the following:

- UFSAR commitments and statements of fact
- Verification of the accuracy of UFSAR commitments and statements of fact
- Design features, procedures and programs that implement UFSAR information
- Deviations between the UFSAR and design bases, physical plant, implementing procedures/programs and station operation. The deviations will be classified as UFSAR related, hardware/configuration related, procedure/program related or other.

#### PHASE III - PRIORITIZATION

Phase III involves the evaluation and prioritization of identified deviations to establish an appropriate schedule for resolution. The prioritization phase is performed concurrently with the review phase and in accordance with the Deviation Processing Guideline such that identified deviations are promptly reviewed for significance and operability/reportability as appropriate.



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Deviations identified during the review phase will undergo further review by a Deviation Review Team (DRT). The DRT will evaluate each deviation with respect to its safety significance and affect on reliable plant operation and define one of two courses of action. Deviations which the DRT deems significant, will be processed in accordance with Nuclear Division Interface Procedure NIP-ECA-01, Deviation/Event Report (DER), which includes operability and reportability determinations. Valid deviations which do not meet the criteria for issuance of a DER (i.e., typos, incorrect references, clarifications, etc.), will be prioritized and targeted for Phase IV, Resolution. (The UFSAR Verification Program Manager may waive the DRT process for significant deviations that require immediate management attention.)

#### PHASE IV - RESOLUTION

Deviations which resulted in issuance of a DER during the prioritization phase will be dispositioned and closed in accordance with NIP-ECA-01. The remaining deviations which do not meet the criteria to qualify as a DER, will be resolved during this phase of the program.

The resolution of these lower priority deviations will be performed in accordance with current NMPC design and configuration control processes. Resolution of these deviations may be accomplished by any of the following means:

- correcting an existing condition
- generation of appropriate change documentation
- evaluations or clarifications to justify "accept as is"
- further evaluation and disposition through the DER process if appropriate

The results of the dispositions of identified deviations will be documented and trended in the program's computerized database.

#### ASSESSMENTS

The UFSAR Verification Program includes periodic self-assessments during the major project phases to determine the effectiveness of the guidance documents and evaluate overall project performance. Lessons learned from these assessments will be incorporated into the project guideline documents. Assessments by external groups will also be included.

#### SCHEDULE

The program planning, including development of the administrative FSAR Review Guidelines, was completed during April 1997. The review phase is currently in progress and is tentatively projected to be completed by October 1998. Final resolution of identified deviations will follow the review phase and is tentatively scheduled to be completed by December 1998.

