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SUBJECT: Discusses actions taken re GL 94-02, "Long-Term Solutions & Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in BWRs."

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JOHN T. CONWAY
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October 9, 1997
NMP1L 1258

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: *Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors"*

Gentlemen:

By letter dated July 11, 1994, the Commission issued Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors." Generic Letter 94-02 requested that each licensee take appropriate actions to augment its procedures and training for responding to thermal-hydraulic instabilities and to submit a plan describing the long-term stability solution option it had selected and the associated implementation schedule.

Niagara Mohawk Power Corporation's (NMPC) letter dated September 8, 1994, indicated that Nine Mile Point Unit 1 (NMP1) would implement the Boiling Water Reactor Owners' Group (BWROG) solution Option II. Option II (Quadrant-Based APRM SCRAM), as delineated in NEDO-31960, indicates that the existing quadrant-based APRM systems of Boiling Water Reactor/2 plants (e.g., NMP1) will initiate a reactor scram when the magnitude of the expected oscillations are sufficiently less than would be needed to challenge the Minimum Critical Power Ratio (MCPR) safety limit. NMPC committed to perform a plant-specific analysis for NMP1 using the Option II methodology to confirm the acceptability of the quadrant-based APRM to automatically suppress oscillations before safety margins were compromised.

Our letter dated October 2, 1995, submitted the plant-specific analysis for NMP1. This analysis indicated that the NMP1 quadrant-based APRM system is adequate to detect and suppress reactor core oscillations. However, the analysis required that the APRM flow-biased trip setpoint be changed to limit the size of the oscillation magnitude prior to a reactor trip, thereby limiting the associated CPR change (and ensuring compliance with the MCPR safety limit).

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As indicated in our letter dated December 15, 1995, Niagara Mohawk has decided to replace the existing APRM analog trip biased units with new digital Flow Control Trip Reference (FCTR) cards. These cards are similar to the cards developed for BWROG Enhanced Option I-A and are designed to cope with the increased complexity of the trip function settings. Our letter also indicated that these cards would be operational (to implement Stability Solution Option II) by December 31, 1997.

As previously discussed, to assure that the NMP1 APRM system is adequate to detect and suppress oscillations, the APRM flow-biased trip setpoint contained in the NMP1 Technical Specifications (TS) must be changed. However, the receipt of vendor documentation required to support the change was delayed and is currently going through final NMPC review and approval. Accordingly, NMPC proposes to revise the commitment date to have the cards operational (to implement Stability Solution Option II) from December 31, 1997 to September 30, 1998 in order to: 1) finalize the required documentation; 2) prepare and submit the subject TS Amendment Application; and 3) receive NRC approval of the TS submittal and implement the change. If the required submittal, reviews, and approvals proceed ahead of schedule, NMPC will be prepared to implement the TS change within 30 days of its issuance but no earlier than July 31, 1998. The Interim Corrective Actions currently in place to address potential reactor instabilities will remain in place until the Option II solution is fully implemented. The FCTR cards may be placed in service prior to approval of the TS amendment under the guidelines of 10CFR50.59 with a setpoint consistent with the existing TSs.

In summary, the FCTR cards will be operational to implement Stability Solution Option II by September 30, 1998. Please contact us if additional information is required.

Sincerely,

John T. Conway
Vice President - Nuclear Engineering

JTC/JMT/cmk

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