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SUBJECT: Responds to NRC Bulletin 96-03, "Potential Plugging of ECC Suction Strainers by Debris in BWRs." Current commitment to install new strainers by end of refueling outage 15, is planned.

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JOHN T. CONWAY
Vice President
Nuclear Engineering

November 25, 1997
NMP1L 1270

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: NRC Bulletin 96-03, "Potential Plugging Of Emergency Core Cooling Suction Strainers By Debris In Boiling-Water Reactors"

Gentlemen:

By letter dated May 6, 1996, the Commission issued NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors." Bulletin 96-03 was issued to request that licensees implement appropriate procedural measures and plant modifications to minimize the potential for clogging of emergency core cooling system (ECCS) suppression pool suction strainers by debris generated during a loss-of-coolant accident (LOCA). All licensees were requested to implement actions by the end of the first refueling outage starting after January 1, 1997.

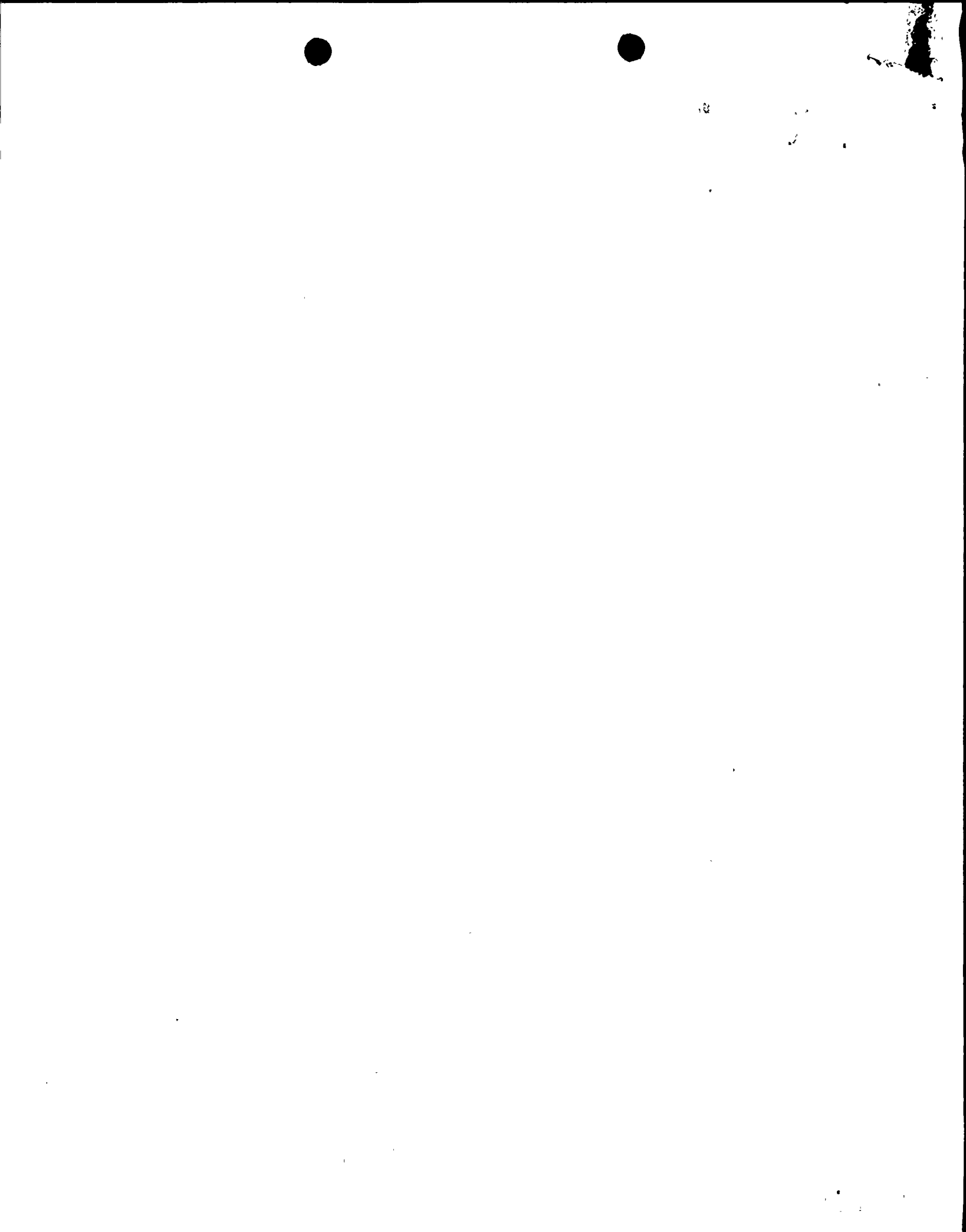
Niagara Mohawk Power Corporation's (NMPC) letter dated October 4, 1996, provided the NRC notification that NMPC could not implement certain of the requested actions identified in Bulletin 96-03 by the end of our spring 1997 Refueling Outage (RFO14) (i.e., our first refueling outage starting after January 1, 1997). This letter provided the bases for not being able to implement a final resolution by RFO14 and the justification for deferring implementation of the requested actions from the spring of 1997 (RFO14) until the spring of 1999 (RFO15). The information included a discussion of Nine Mile Point Unit 1 (NMP1) specific design features, current mitigative strategies and the interim compensatory actions that would be implemented during RFO14.

During RFO14, inspections of the NMP1 core shroud were performed. As detailed in our April 8, 1997 letter, because of cracking found during these inspections, NMP1 is currently limited to 10,600 hours of hot operation during the current cycle (about 14 1/2 months) before it must shut down to perform additional core shroud inspections. Also discussed in that letter were NMPC's plans to conduct additional analyses to justify an extension to this reinspection interval.

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The NRC's letter of June 19, 1997, indicated that they had reviewed NMPC's response to Bulletin 96-03, including the actions that were completed during RFO14, and concluded that these actions provided reasonable assurance of the continued safe operation of NMP1 until the installation of new, high capacity strainers. However, the NRC requested that NMPC install the high capacity passive suction strainers while shut down for the above mentioned core shroud inspection outage, but no later than December 31, 1998 (versus RFO15 as proposed by NMPC).

Our letter dated August 4, 1997, notified the NRC that the request to install new ECCS suction strainers prior to December 31, 1998, may not be acceptable to NMPC. In this letter NMPC indicated that 1) the information provided in our letter of October 4, 1996, provided the technical justification for allowing NMP1 to continue to operate until RFO15 without installing new suction strainers, and 2) committing to an implementation date prior to RFO15 at this time could place an unnecessary economic hardship on NMPC due to various uncertainties. NMPC committed to provide to you additional details concerning our strainer installation schedule by November 30, 1997. The purpose of this letter is to provide that information.

Since our August 4, 1997 submittal, NMPC has made progress in the conceptual design of the ECCS suction strainers as well as the core shroud analysis to justify extending the shroud inspections until RFO15. The outage duration to install new strainers is estimated to be three weeks. This schedule is based on modification activities which include dewatering the torus, strainer installation, and restoration of torus water. NMPC believes performing this modification with the torus dewatered (versus with underwater divers) removes many of the complexities associated with this activity.

Preliminary indications are that the core shroud analysis work will provide justification to extend the core shroud inspections from the operating limit of 10,600 hours of hot operation to a full cycle of operation. Accordingly, NMPC expects to justify that no mid-cycle outage will be required. In addition, new BWRVIP committee crack growth criteria, when considered in the analysis, supports this extension. Without a required shroud inspection outage, a three week forced outage would be required solely to install the new strainers resulting in an unnecessary economic hardship.

In addition, NMP1 is currently shut down for maintenance activities involving the Emergency Cooling System emergency condensers. Because of this extended shutdown, the plant operating limit of 10,600 hours at hot operation will not occur until December of 1998, approximately three to four months prior to the start of RFO15. Installation of the new strainers at that time versus RFO15 will provide marginal safety benefit. As previously discussed, NMPC provided the technical justification to allow NMPC to continue to operate until RFO15 in our letter dated October 4, 1996.



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Based on the above, NMPC plans to meet our current commitment to install new strainers by the end of RFO15.

Very truly yours,


John T. Conway
Vice President - Nuclear Engineering

JTC/JMT/cmK

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