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SUBJECT: Forwards response to request for plan of action re #11
 concentrated waste tank as contained in NRC insp rept
 50-220/97-07 & 50-410/97-07.

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NIAGARA MOHAWK

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**GENERATION
BUSINESS GROUP**

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January 5, 1998
NMP1L 1281

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: *Response to Request for a Plan of Action Regarding #11 Concentrated Waste Tank as Contained in NRC Inspection Report 50-220/97-07 and 50-410/97-07*

Gentlemen:

Niagara Mohawk Power Corporation's response to the request for a plan of action regarding #11 Concentrated Waste Tank at Nine Mile Point Unit 1 is enclosed in the Attachment to this letter. Information regarding the current condition of the tank and clean-up efforts is also included.

Very truly yours,

B. Ralph Sylvia
Chief Nuclear Officer

BRS/TWP/cmK
Attachment

xc: Mr. H. J. Miller, Regional Administrator, Region I
Mr. A. W. Dromerick, Acting Director, Project Directorate I-1, NRR
Mr. B. S. Norris, Senior Resident Inspector
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ATTACHMENT

**NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT 1
DOCKET NO. 50-220
DPR-63**

As described in NRC Inspection Report 50-220/97-07 and 50-410/97-07, the inspectors noted that the #11 Concentrated Waste Tank still had concentrates in it, even though the #11 Waste Evaporator was taken out of service over 17 years ago. Niagara Mohawk Power Corporation (NMPC) agreed to conduct a detailed evaluation of this situation.

In response to the NRC concern, a team was formed and an initial plan was developed to address the issue. The room that houses #11 Concentrated Waste Tank is classified as an asbestos hazards area and a locked high radiation area. The initial plan involved performing detailed inspections of the room housing the #11 Concentrated Waste Tank and associated components, and determining if the tank was storing waste. The first inspection was performed on December 16, 1997 by an asbestos qualified insulator and a radiation protection technician. A visual inspection of the inside of the #11 Concentrated Waste Tank was performed which noted that the tank was empty. While concentrates were not found in the tank, a small amount of dried residue was visible on the inside of the tank, consistent with the residue that would remain after draining a tank without flushing it. The inspection was performed through a pipe penetration opening on the top of the tank. In addition to the tank inspection, an overall room inspection was performed, which noted friable asbestos insulation on the tank, piping and floor and dried concentrator sludge and resin on the floor of both elevations of the room.

A second inspection was performed on December 23, 1997 by an asbestos qualified insulator, to gather additional samples and information for future clean-up efforts, and to perform a detailed inspection of the tank exterior. The inspection revealed a break on the vertical portion of the tank drain line. No other breaches in the tank were identified. Based on interviews, the tank drain line break occurred around 1975 during a back-flush of the tank. Repairs to the drain line were never completed due to the radiological conditions and asbestos hazards inside the room. Following the break, the #11 Concentrated Waste Tank was not utilized to process or store waste, and the #11 Concentrator was subsequently removed. It appears that the dried sludge and resin on the floor are the result of this line break and other system operation which occurred during this time frame. This tank is not specifically described in the Updated Final Safety Analysis Report (UFSAR).

A detailed clean-up plan is being developed based on these inspections as part of the corrective actions to a Deviation/Event Report. This plan will include the removal of loose asbestos and radiological debris. Additional clean-up will be determined based on continuing evaluation of these efforts with due consideration being given to keeping exposure as-low-as-reasonably-achievable (ALARA) and to the asbestos hazards conditions.



NMPC verified that all waste stream inlets and outlets to this tank are disconnected. In addition, other water and air lines were visually verified to be closed and maintained closed via administrative controls.

The UFSAR states that the waste disposal building is designed as a Class I structure. The UFSAR addresses the conditions of tank ruptures and states that any tank contents would be contained within the waste disposal building. The #11 Concentrated Waste Tank and Room are housed in the waste disposal building and are therefore generically bounded by this analysis. The ventilation exhaust from the waste disposal building is routed to the main plant stack and is filtered and monitored prior to discharge. The debris is contained within the room and the ventilation exhaust continues to be filtered and monitored, therefore, the current room conditions do not pose a threat to the public or to plant personnel. The tank and room are in a safe condition and have been since the time that a decision was made to no longer utilize them to process or store waste.

