

CATEGORY 1

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ABBOTT, R.B. Niagara Mohawk Power Corp.
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SUBJECT: Informs NRC that actions required, to address NRC Bulletin
96-003, "Potential Plugging of ECC Suction Strainers by
Debris in BWRs," have been completed.

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Richard B. Abbott
Vice President
Nuclear Engineering

Phone: 315.349.1812
Fax: 315.349.4417

January 6, 1999
NMP2L 1845

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

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

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 require licensees to 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). Also, the Bulletin required that licensees report to the Commission within 180 days as to whether, and to what extent, the requested actions would be taken and to notify the Commission when actions associated with this Bulletin were complete. All licensees were requested to implement these actions by the end of the first refueling outage starting after January 1, 1997. Our letter dated November 4, 1996 provided our initial response to Bulletin 96-03. The purpose of this letter is to inform you that the actions required to address this Bulletin have been completed.

As indicated in our April 18, 1994 response to Bulletin 93-02, Supplement 1, "Debris Plugging of Emergency Core Cooling Suction Strainers," the majority of insulation used on piping and equipment located in the Nine Mile Point Unit 2 (NMP2) drywell is reflective metal insulation (RMI) with Min-K and Temp-Mat insulation used for special and limited applications. As discussed in our November 16, 1995 response to Bulletin 95-02, "Unexpected Clogging of a Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Pool Cooling Mode," current NMP2 procedures establish the overall controls for foreign material exclusion (FME) measures, including material accountability for activities in the suppression chamber. Our response also noted that the suppression pool was cleaned in the Spring 1995 refueling outage (RFO4) and would be inspected during RFO5 in the fall of 1996. An inspection of the suppression pool was also performed during our Spring 1998 refueling outage (RFO6).

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As explained in detail in our responses to Bulletin 93-02, Supplement 1, and Bulletin 95-02, NMP2 is considered to have a low fibrous debris source term. Niagara Mohawk Power Corporation (NMPC) believed that the low debris source term, together with the relatively large, stacked disc suction strainers used at NMP2, supported the conclusion that the strainers were adequately sized to support the ability of ECCS systems to meet the criteria of 10CFR50.46. NMPC attempted to validate the design of our strainers using the guidance provided in the Boiling Water Reactor Owners' Group (BWROG) developed, Utility Resolution Guidance (URG) for Resolution of ECCS Suction Strainer Blockage. The evaluation of the adequacy of our strainer design, using the URG document, was unsuccessful. Alternate actions were evaluated and the decision was made to replace our existing strainers with General Electric (GE) designed strainers using the guidance provided in the URG. The new GE strainers were installed in RFO6.

On August 20, 1998, the Commission issued a Safety Evaluation Report (SER) on the BWROG's URG. NMPC evaluated the design of the new strainers against the Commission's SER and calculations were prepared and issued which documented the acceptability of the new strainers to meet the requirements of Regulatory Guide 1.82, Rev. 2 utilizing the URG guidance. Upon completion of these activities, the actions required by the Bulletin were considered finished. As noted above, the installation of the new strainers was completed prior to startup from RFO6 consistent with the schedule requirements of Bulletin 96-03.

In summary, NMPC considers the actions required to meet Bulletin 96-03 complete. NMPC will continue to adhere to our commitment made in response to Bulletin 95-02 to periodically inspect and clean the suppression pool and to trend ECCS pumps suction pressure.

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/JMT/sc

xc: Mr. H. J. Miller, NRC Regional Administrator
Mr. S. S. Bajwa, Director, Project Directorate I-1, NRR
Mr. G. K. Hunegs, Senior Resident Inspector
Mr. D. S. Hood, Senior Project Manager, NRR
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UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of)

Niagara Mohawk Power Corporation)

Nine Mile Point Unit 2)

Docket No. 50-410

Richard B. Abbott, being duly sworn, states that he is Vice President Nuclear Engineering of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the document attached hereto; and that the document is true and correct to the best of his knowledge, information and belief.

Richard B. Abbott
Richard B. Abbott
Vice President Nuclear Engineering

Subscribed and sworn before me,
in and for the State of New York
and the County of Oswego,
this 1st day of January, 1999.

My Commission expires: 4/2/2000

Eunice B. Naklick
NOTARY PUBLIC

Eunice B. Naklick #4964683
Notary Public, State of New York
Qualified in Jefferson County
My Commission Expires April 2, 2000

