

Mr. John H. Mueller
 Chief Nuclear Officer
 Niagara Mohawk Power Corporation
 Nine Mile Point Nuclear Station
 Operations Building, Second Floor
 P.O. Box 63
 Lycoming, NY 13093

March 10, 1999

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED AMENDMENT ON SERVICE WATER SYSTEM, NINE MILE POINT NUCLEAR STATION, UNIT NO. 2 (TAC NO. MA3895)

Dear Mr. Mueller:

By letter dated October 16, 1998, Niagara Mohawk Power Corporation (NMPC) requested a license amendment to change the Technical Specifications regarding the Service Water System at Nine Mile Point Nuclear Station, Unit 2. We are reviewing your request and find that additional information, identified in the enclosure, is needed.

The schedule for responding to this letter was discussed with Mr. S. Leonard of your organization. Based upon that discussion, a mutually agreeable response date is May 10, 1999.

If you have questions regarding this letter or are unable to meet this response schedule, please contact me by phone on (301) 415-3049 or by electronic mail at dsh@nrc.gov.

Sincerely,

Original signed by:

Darl S. Hood, Senior Project Manager
 Project Directorate I-1
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure: Request for Additional Information

cc w/encl: See next page

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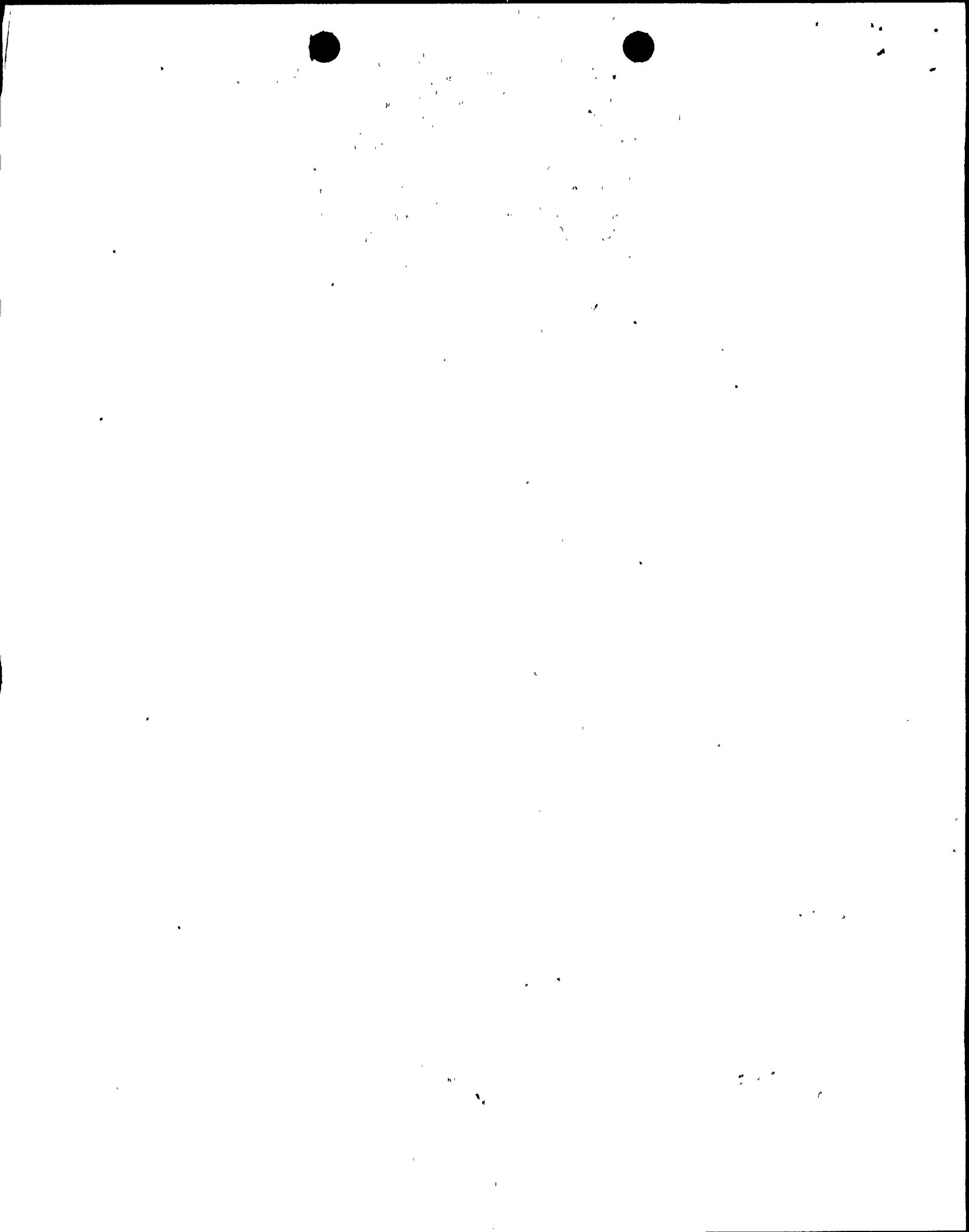
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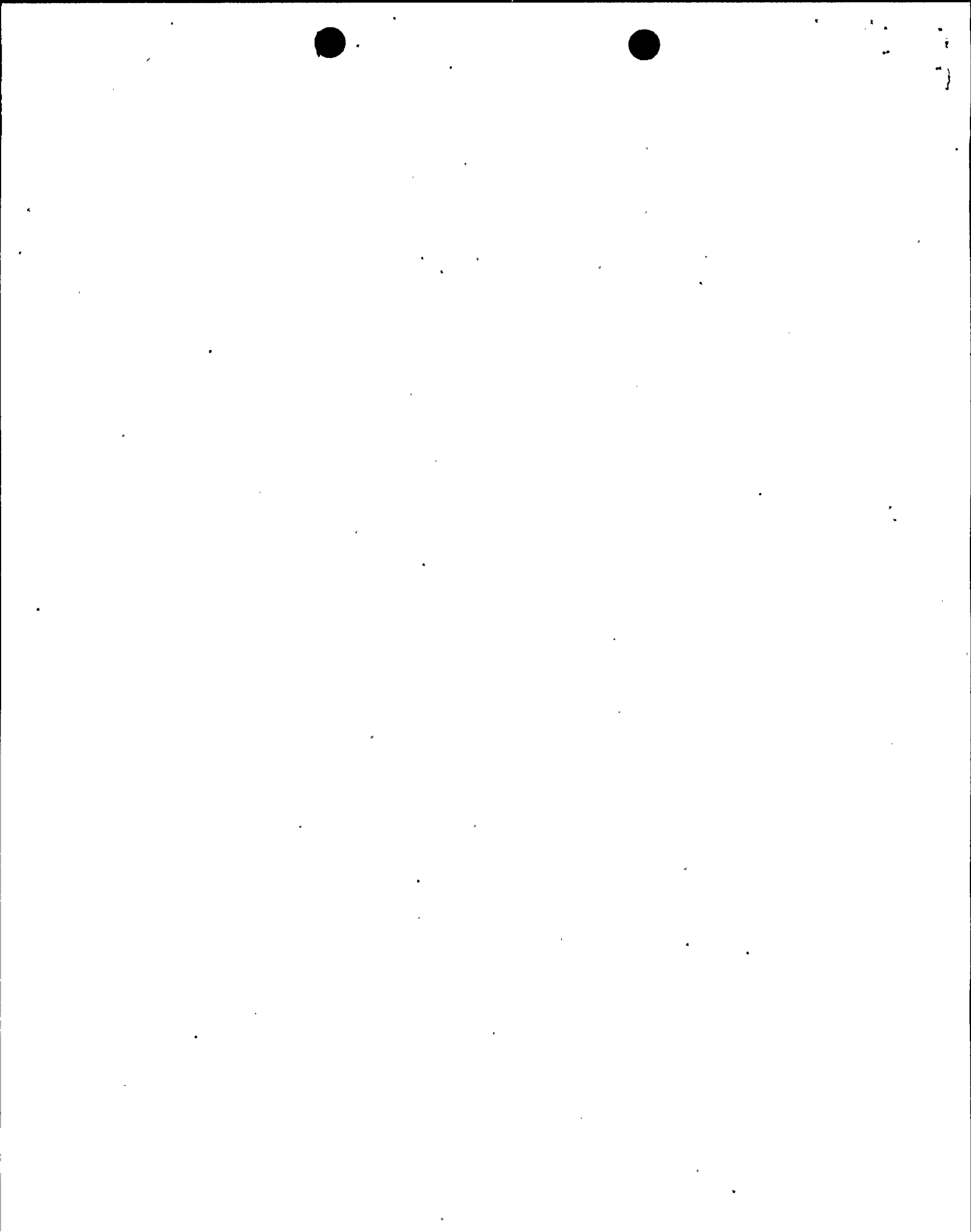
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 10, 1999

Mr. John H. Mueller
Chief Nuclear Officer
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
Operations Building, Second Floor
P.O. Box 63
Lycoming, NY 13093

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED
AMENDMENT ON SERVICE WATER SYSTEM, NINE MILE POINT NUCLEAR
STATION, UNIT NO. 2 (TAC NO. MA3895)

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The schedule for responding to this letter was discussed with Mr. S. Leonard of your organization. Based upon that discussion, a mutually agreeable response date is May 10, 1999.

If you have questions regarding this letter or are unable to meet this response schedule, please contact me by phone on (301) 415-3049 or by electronic mail at dsh@nrc.gov.

Sincerely,

A handwritten signature in cursive script that reads "Darl S. Hood".

Darl S. Hood, Senior Project Manager
Project Directorate I-1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure: Request for Additional
Information

cc w/encl: See next page



John H. Mueller
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit No. 2

cc:

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College of Law
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Syracuse, NY 12223



REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED TECHNICAL SPECIFICATION CHANGE
FOR SERVICE WATER SYSTEM
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION, UNIT NO. 2
DOCKET NO. 50-410

Please provide the following additional information regarding your application for license amendment, dated October 16, 1998, to change the Technical Specifications (TSs) on the Service Water System (SWS) at Nine Mile Point Nuclear Station, Unit No. 2 (NMP2):

Plant Systems Branch

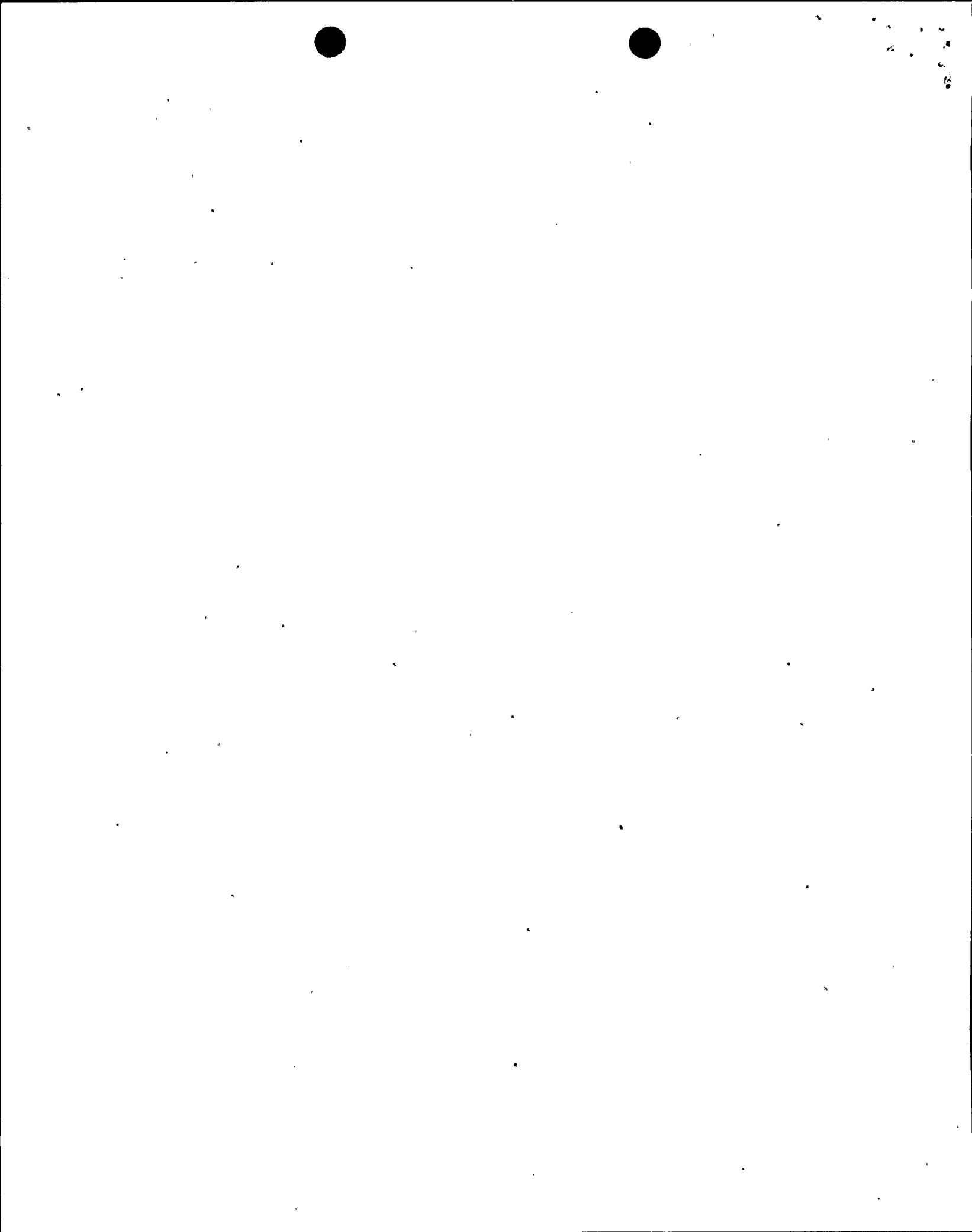
1. Currently, TS Section 3.7.1.2 requires two independent SWS loops, each with two pumps, to be operable, and one loop to be in operation, for Modes 4 and 5. You state that the heat load during Modes 4 or 5 can vary significantly with time after shutdown. As a result, the number of SWS pumps required to be operable or in operation can vary. Therefore, you propose to revise the TS to require only those portions of the SWS needed to support equipment to be operable during Modes 4 or 5. With required portions of the SWS inoperable, the associated equipment would be declared inoperable and action statements required by the applicable specification would be followed.

The NRC staff finds the proposed TS for the SWS for Modes 4 and 5 to be somewhat ambiguous and subject to various interpretations. Please clarify how the proposed TS would be applied by describing the methods (e.g., administrative controls and/or procedures) that would be used to ensure compliance with the proposed TS. Discuss how heat loads during shutdown would be determined and how the required equipment would be identified. Also, identify how required actions would be controlled when required equipment is inoperable.

Instrumentation and Controls Branch.

2. In TS Section 3/4.7.1, you propose to revise LCO 3.7.1.1, including its associated action and surveillance requirements, to change the Analytical Limit (AL) for the SWS supply header discharge water temperature from 81 °F to 82 °F.

You state that (1) the essential components cooled by the SWS are designed for a maximum inlet temperature of 82 °F; (2) the current TS limit is 81 °F; (3) the one degree difference accounts for uncertainty of the measuring instrumentation loop; (4) the proposed change to use an AL of 82 °F will make this TS consistent with other NMP2 TS; and (5) the SWS supply header discharge water temperature surveillance procedures include appropriate allowances to reflect measurement uncertainty. Provide the following additional information:



- a. Regarding your statement that the one degree difference in temperature accounts for the uncertainty of the measuring instrumentation loop, is this one degree an assumption or a value calculated using error-components of devices of the temperature instrument loop? Please provide details.
 - b. To prevent the SWS header discharge water temperature from exceeding 82 °F, the surveillance test measured temperature should be sufficiently low to provide appropriate allowances for measurement uncertainty. Provide a copy of your calculation to determine such allowances and the value of the acceptable measured temperature during a surveillance test. Alternatively, explain your in-house setpoint calculation methodology and confirm that the methodology used for uncertainty calculations was based upon guidance provided in the ISA 67- 04, 1982 standard as endorsed by Regulatory Guide 1.105, Revision 2.
3. In TS Table 3.3.9-1, "Plant Systems Actuation Instrumentation," you propose to change LCO 3.7.1.1, including its associated action and surveillance requirements, to require the intake heaters of the Deicing Heater System to be placed in service once the Lake Ontario water temperature reaches 38 °F.

You state that the deicing heaters are designed to minimize ice formation on the Ultimate Heat Sink system and that specifications for the intake deicing ensure that adequate intake flow area is available for the SWS. TS Table 3.3.9-2, "Plant Systems Actuation Instrumentation Setpoints," currently specifies a setpoint for actuating deicing heaters at a lake temperature ≥ 39 °F, which is well above freezing. The TS allowable value is ≥ 38 °F and the AL for this parameter is 34 °F, thus, the proposed change is consistent with the Allowable Value. Operability of the deicing heater system is based upon separate instrumentation that operates in parallel with the instrumentation that automatically actuates the deicing heaters. You further state that since the uncertainty associated with the instrumentation used to determine operability is lower than the instrumentation that actually switches the heaters, you believe adequate margin exists for reducing the limiting temperature to establish heater operability from 39 °F to 38 °F. Please provide the following additional information regarding these aspects of the proposed change.

- a. Provide a copy of the related calculation. Alternatively, explain your in-house setpoint calculation methodology and confirm that the methodology used for uncertainty calculations was based upon the guidance of the ISA 67- 04, 1982 standard as endorsed by Regulatory Guide 1.105, Revision 2.
- b. Explain how the operability of the "deicing heater actuation temperature loop" is verified using separate temperature instruments that are neither connected to the heater nor part of the deicing heater actuation temperature loop.

