

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 SECTIONS 3.1 AND 3.2 OF IMPROVED TECHNICAL SPECIFICATIONS, NINE MILE POINT NUCLEAR STATION, UNIT NO. 2 (TAC NO. MA3822)

Dear Mr. Mueller:

The NRC staff is reviewing your application for license amendment, dated October 16, 1998, to change the format and content of the current Technical Specifications (TSs) for Nine Mile Point Nuclear Station, Unit 2 (NMP2) to be generally consistent with NUREG-1434, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR 6," and extend surveillance requirements from 18 to 24 months.

Based upon our review of the changes proposed for TS Sections 3.1 and 3.2, we find that additional information, identified in the enclosure, is needed.

The schedule for responding to this letter was discussed with Messrs. S. Leonard and T. Page in your organization. Based upon that discussion, a mutually agreeable response date is May 13, 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:

í) Ho,

9903310395 990326 PDR ADDCK 05000410 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 on ITS 3.1 & 3.2

cc w/encl: See next page

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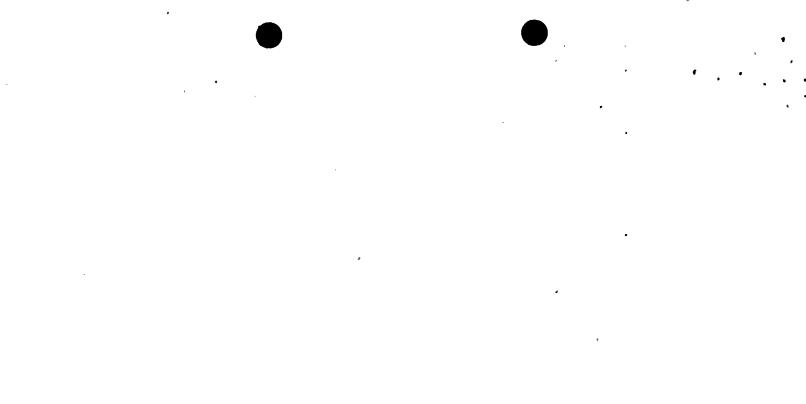
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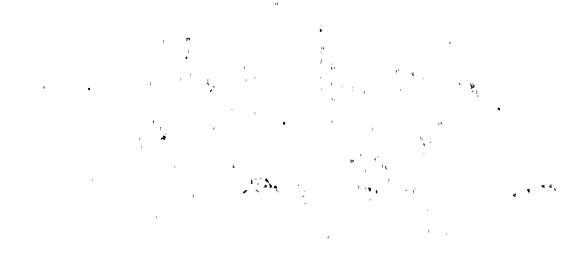
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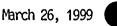






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UNITED STATES · NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 26, 1999

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John H. Mueller Niagara Mohawk Power Corporation

CC:

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Resident Inspector Nine Mile Point Nuclear Station P.O. Box 126 Lycoming, NY 13093

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NINE MILE POINT NUCLEAR STATION, UNIT 2 IMPROVED TECHNICAL SPECIFICATIONS SECT 3.1 - REACTIVITY CONTROL SYSTEMS

RAI 3.1-4 ITS 3.1.7 Standby Liquid Control System SR 3.1.7.8 & SR 3.1.7.9 CTS 4.1.5.d DOC L.2

The DOC L.2 states that the requirement that CTS 4.1.5.d (SR 3.3.1.7.8 & SR 3.1.7.9) "be performed during shutdown is proposed to be deleted ... might be able to be performed while operating without jeopardizing safe plant operation."

Comment: This relaxation is not supported by the Bases for SR 3.3.1.7.8 & SR 3.1.7.9, which state that the "Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the surveillance were performed at power." The ITS SR 3.3.1.7.8 & SR 3.1.7.9 frequency is proposed to be 24 months, the refueling cycle interval. The DOC L.2 needs to be corrected.

NMPC Response:

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RAI 3.1-6 ITS 3.1.8 SDV Vent and Drain Valves SR 3.1.8.3, SR Frequency CTS 4.1.3.1.4.a DOC LD.1

Cyclic Surveillance Frequency is proposed to be changed from 18 to 24 months. **Comment:** Under review by the NRC Technical Staff.

NMPC Response: [No response required at this time; NRC Technical Staff is reviewing]

RAI 3.1-7 ITS 3.1.8 SDV Vent and Drain Valves, Required Action A.1 CTS 3.1.3.1.d DOC L.1 & JFD 1

The CTS requires restoring an SDV vent or drain line with one inoperable valve to operable status within 24 hours. The STS requires restoring an SDV vent or drain line with one inoperable status within 7 days. The ITS requires isolating an SDV vent or drain line with one inoperable valve within 7 days. NMPC justifies this based upon WNP2 and LaSalle approved TS, and NMP2 design being similar to those plants.

Comment: Changes to both the CTS and STS are beyond scope changes that require NRC. Technical Staff review.

NMPC Response: [No response required at this time; NRC Technical Staff is reviewing]

3/99

NINE MILE POINT NUCLEAR STATION, UNIT 2 IMPROVED TECHNICAL SPECIFICATIONS SECT 3.2 - POWER DISTRIBUTION LIMITS

RAI 3.2-1

ITS 3.2.4 Average Power Range Monitor (APRM) Gain and Setpoint ITS 3.2.4 LCO & SR 4.2.4.2 STS 3.2.4 Average Power Range Monitor (APRM) Gain and Setpoint CTS 3/4.2.2 Average Power Range Monitor Setpoints DOC A.4 and JFD-3

In the CTS the APRM flow biased simulated thermal power scram setpoint is established in the COLR, according to a relationship ("T"). This relationship is returned to the ITS because it "is not cycle specific." This change results in the ITS 3.2.4 LCO & SR 4.2.4.2 including additional detail that is not in the STS.

Comments: (1) While it is agreed that the proposed change is administrative, the detail removed from the COLR and placed in the ITS, is in the COLR under both the CTS and STS. The rationale for utilizing the COLR is that, while the relationship "T" is not cycle specific it does vary and it can be defined and determined external from the specification. The details add significantly to the specification, particularly ITS SR 4.2.4.2. Reconsider returning the information to the COLR. Or, in the case of ITS SR 4.2.4.2, consider placing the detail in the Bases. (2) The phraseology, "... the ratio of FRTP and MFLPD," while it may be grammatically correct, is not clear. Preferable is, "... the ratio of FRTP:MFLPD," or

"... the ratio FRTP/MFLPD." Consider rewording for clarity.

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NMPC Response:

RAI 3.2-2

B 3.2.1 Average Planar Linear Heat Generation Rate (APLHGR) Bases Sections: Background & Applicable Safety Analysis JFD-1

The ITS Bases, B 3.2.1, for APLHGR limits do not include the STS Bases discussion on anticipated operational occurrences (AOOs), because "AOOs are not considered in establishing the APLHGR limits (the MCPR and LHGR limits are considered for AOOs)." **Comment:** In confirming this JFD-1 justification with the NRC's Reactor Systems Technical Staff, it seems this change is generically correct. Request that a TSTF change request be submitted to revise the STS.

NMPC Response: NMPC to submit TSTF Change proposal (per verbal response on 3/11/99; no additional response required).

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