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Richard B. Abbott Vice President Nuclear Engineering Phone: 315.349.1812 Fax: 315.349.4417

April 20, 1999 NMP1L 1424

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: Generic Letter 94-03, "Intergranular Stress Corrosion Cracking of Core Shrouds in Boiling Water Reactors"

Gentlemen:

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By letter dated December 30, 1998 (NMP1L 1398), Niagara Mohawk Power Corporation (NMPC) provided the NRC with its plan for reinspecting the Nine Mile Point Unit 1 (NMP1) core shroud and core shroud repair assemblies during Refueling Outage Number 15 (RFO15). The NRC approved the reinspection plan in a safety evaluation (SE) dated March 24, 1999. The purpose of this letter is to describe NMPC's proposed disposition of the reinspection results.

NMPC expects that the reinspections will confirm that the shroud weld cracking is essentially unchanged from the inspection obtained at RF014. In that case, the operating interval will be defined in accordance with the criteria specified by BWRVIP-07, "BWR Vessel and Internals Project Guidelines for Reinspection of BWR Core Shrouds." NMPC will also perform an evaluation of the fluence effects, as recommended by the staff's SE dated March 24, 1999, to confirm that the crack growth rate credited in the SE remains bounded for the defined operating interval. The reinspection results and NMPC's analysis to disposition the reinspection findings will be submitted to the NRC within 30 days of completing the reinspection, as required by BWRVIP-01, "BWR Core Shroud Inspection and Flaw Evaluation Guideline."

Under certain conditions, shroud vertical weld repairs may be warranted. Changes in the characterization of the crack length or depth, whether real or conservatively assumed, may result in a determination by NMPC that vertical weld repair is the prudent or economically beneficial course of action. Contingency shroud vertical weld repair plans were submitted to the NRC on February 3, 1999 (NMP1L 1404). NMPC has requested staff approval of the contingency repair plans by May 2, 1999.



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Reinspection of the vertical welds during RFO15 may reveal minor differences than those identified in the previous RFO14 inspection. Provided analyses demonstrate acceptable margins per BWRVIP-01 criteria and ASME Code Section XI margins are maintained, NMPC may elect to justify continued operation based on shroud vertical weld analyses rather than repair. In such an event, the analysis would be submitted to the NRC for review and approval consistent with the BWRVIP-01 reporting requirements. NMPC considers NRC approval prior to restart of these analyses only to be required if the analysis methods and or criteria applied are different than previously submitted and approved for application to the NMP1 core shroud.

Very truly yours,

Richard B. Clet

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Richard B. Abbott Vice President - Nuclear Engineering

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 Mr. H. J. Miller, NRC Regional Administrator Region I 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 Records Management



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