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SUBJECT: Forwards response to NRC 990326 RAI re Sections 3.1 & 302,
per application for amend converting CTS to ITS, dtd 981016.

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Senior Vice President and
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May 10, 1999
NMP2L 1866

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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: *Request for Additional Information Regarding Improved Technical Specification (ITS) Sections 3.1 and 3.2 for the Nine Mile Point Nuclear Station, Unit 2 (TAC No. MA3822)*

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) transmitted an Application for Amendment regarding conversion of the Nine Mile Point Unit 2 (NMP2) Current Technical Specifications (CTS) to the ITS by letter dated October 16, 1998 (NMP2L 1830). Subsequently, by letter dated March 26, 1999, the Nuclear Regulatory Commission (NRC) has requested additional information pertaining to our Application for Amendment. Specifically, the Staff has requested information regarding Section 3.1, titled "Reactivity Control Systems" and Section 3.2, titled "Power Distribution Limits."

Attached to this letter are the required NMPC responses.

Very truly yours,

John H. Mueller
Senior Vice President and
Chief Nuclear Officer

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Attachment

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REQUEST FOR ADDITIONAL INFORMATION
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT NO. 2

Request for Information #1 (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 3.1.7.8 & 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 3.1.7.8 & SR 3.1.7.9, which state 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 3.1.7.8 & SR 3.1.7.9 frequency is proposed to be 24 months, the refueling cycle interval. The DOC L.2 needs to be corrected.

Required Response #1

Discussion of Change (DOC) L.2 is correct as written. Nine Mile Point Unit 2 (NMP2) can perform this Surveillance Requirement (SR) while at power, though it would normally be performed while shutdown. However, the Bases for SR 3.1.7.8 and SR 3.1.7.9, which currently state that the Surveillance Frequency is based on the need to perform these Surveillances while under the conditions that apply during a plant outage, need to be revised to state that the Surveillances can be performed at power, and that the basis for the 24-month Frequency is based on operating experience. The wording for the basis of the 24-month Frequency will be similar to that of Improved Technical Specification (ITS) SR 3.6.4.3.3 (page B 3.6-109 of NUREG-1434, Rev. 1).

Request for Information #2 (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 Support
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.

Required Response #2

The added information can be split into two parts, the title of the Average Power Range Monitor (APRM) Function affected, and the change to the Allowable Value. The first part of the current wording "Each required APRM setpoint" is ambiguous and does not properly describe the requirement. There is no "setpoint" in the ITS. The only value in the ITS is the "Allowable Value." Also, there are, in the NMP2 ITS, five different APRM Functions in the Reactor Protection System (RPS) Specification (ITS 3.3.1.1 Functions 2.a through 2.e). Therefore, NMP2 made part of the change to properly identify the Function affected ("Each required APRM Flow Biased Simulated Thermal Power—Upscale Function Allowable Value"). This portion of the change is necessary for clarity and ease of use. It is also consistent with a change approved by the NRC in the Washington Public Power Supply System (WNP-2) ITS. The second part of the change, describing the adjustment to the Allowable Value, was placed in the ITS Limiting Condition for Operation and SR since this value is not cycle specific. This is consistent with the discussion provided in ITS 3.2.4, Justification for Deviation 3. Accordingly, the "Flow Biased Simulated Thermal Power—Upscale Function Allowable Value" does not need to be in the Core Operating Limits Report (COLR). However, Niagara Mohawk Power Corporation (NMPC) concurs that the phraseology of the last part of the sentence could be made more clear. NMPC will change the statement to say "...shall be modified by \leq FRTP/MFLPD" in lieu of the current words "...shall be modified by less than or equal to the ratio of FRTP and the MFLPD."

Request for Information #3 (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 AOs)."

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.

Required Response #3

NMPC will submit a TS Task Force (TSTF) change to the Boiling Water Reactor Owners Group TS Committee for their review and concurrence. As discussed during a telephone conference with the Staff, approval of NMPC's TS conversion is not contingent upon approval of the TSTF, since adequate justification has been provided to support the change in the ITS submittal.

