

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

May 18, 1999

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING SECTIONS 3.0, 3.5  
AND 5.0 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.

On the basis of our review of the changes proposed for TS Sections 3.0, 3.5 and 5.0, we find that additional information, identified in the enclosure, is needed. In accordance with the "NMP2 ITS Review Schedule" jointly established by Niagara Mohawk Power Corporation and NRC, the mutually agreeable response date is June 15, 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, Sr. Project Manager, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure: Request for Additional  
Information on ITS 3.0, 3.5 and 5.0

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script, reading "Darl S. Hood".

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

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cc w/encl: See next page



Nine Mile Point Nuclear Station  
Unit No. 2

Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

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

Mr. Jim Rettberg  
NY State Electric & Gas Corporation  
Corporate Drive  
Kirkwood Industrial Park  
P.O. Box 5224  
Binghamton, NY 13902-5224

Mr. John V. Vinqvist, MATS Inc.  
P.O. Box 63  
Lycoming, NY 13093

Supervisor  
Town of Scriba  
Route 8, Box 382  
Oswego, NY 13126

Mr. Richard Goldsmith  
Syracuse University  
College of Law  
E.I. White Hall Campus  
Syracuse, NY 12223

Charles Donaldson, Esquire  
Assistant Attorney General  
New York Department of Law  
120 Broadway  
New York, NY 10271

Mr. Timothy S. Carey  
Chair and Executive Director  
State Consumer Protection Board  
5 Empire State Plaza, Suite 2101  
Albany, NY 12223

Mark J. Wetterhahn, Esquire  
Winston & Strawn  
1400 L Street, NW.  
Washington, DC 20005-3502

Gary D. Wilson, Esquire  
Niagara Mohawk Power Corporation  
300 Erie Boulevard West  
Syracuse, NY 13202

Mr. F. William Valentino, President  
New York State Energy, Research,  
and Development Authority  
Corporate Plaza West  
286 Washington Avenue Extension  
Albany, NY 12203-6399



**Nine Mile Point-2 Improved TS Review Comments**  
**Section 3.0, LCO And SR Applicability**

**RAI 3.0-1**

**ITS SR 3.0.1 Surveillance Requirement Applicability**

The approved TSTF-8 R1 affects STS SR 3.0.1.

**Comments:**

Incorporate TSTF-8 R1, or provide JDF for not incorporating this generic change into the ITS SR 3.0.1.

Enclosure





Nine Mile Point 2 Improved TS Review Comments  
Section 3.5, ECCS

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**3.5.1 ECCS - Operating**

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**3.5.1.-1 CTS 4.5.1.b & 4.5.2.1**

**DOC 3.5.1-A.5**

**ITS SR 3.5.1.4 & SR 3.5.2.5**

**JFD 1**

CTS 3.5.1.4 and 4.5.2.1 require the ECCS pumps to develop a specified flow rate against a test line pressure specified as a gauge pressure value (psig). ITS SR 3.5.1.4 and SR 3.5.2.5 require the ECCS pumps develop the same specified flow rate against a "total developed head" specified as a differential value (psid). STS SR 3.5.1.4 requires the ECCS pumps develop the specified flow rate against a system head corresponding to the specified reactor pressure.

**Comments:**

JFD 1 is generic and indicates that the ITS values are proper plant-specific values, although this is not immediately apparent. The ITS does not use either the CTS wording or the STS wording for this surveillance. In addition, it doesn't appear that the ITS Bases have been revised to reflect this proposed change. Either retain the CTS or STS wording for this surveillance and provide corresponding Bases or explain the need for the proposed revised wording and provide corresponding Bases. While DOC A.5 explains what was done in the proposed change, it does not explain why it was done. In addition, the staff notes that you did not use the same proposed wording for the identical SRs in ITS SRs 3.5.3.3 and 3.5.3.4; please explain why.

**NMPC response:**

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**3.5.2 ECCS - Shutdown**

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No comments.

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**3.5.3 RCIC System**

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No comments.



Beyond Scope Issues

3.5-1 CTS 3.5.1  
DOC L.1  
ITS 3.5.1  
JFD 1

CTS 3.5.1 requires that seven ADS valves be operable to support operability of ECCS Divisions I and II. ITS 3.5.1 requires the operability of only six ADS valves. DOC L.1 states that two ADS valves out of service was approved by the NRC as documented in the initial "Safety Evaluation Report Related to the Operation of NMP2," Docket No. 50-410, Supplement No. 4.

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3.5-2 CTS 4.5.1.e.2.b  
DOC L.7  
ITS SR 3.5.1.7  
JFD 5

CTS 4.5.1.e.2.b requires that ADS operability be demonstrated by manually opening each ADS valve. ITS SR 3.5.1.7 requires verification that each ADS valve actuator strokes when manually actuated. This change would permit testing of the ADS valves using an alternate approach whereby the disk is not lifted off its seat at power.

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3.5-3 CTS 4.3.3.3  
DOCs 3.5.1-L.8 & 3.5.2-L.5  
ITS SR 3.5.1.8 & SR 3.5.2.7  
JFDs 3.5.1-5 & 3.5.2-3

CTS 4.3.3.3 requires that the ECCS response time of each required ECCS System be demonstrated to be within the limit and that each test include at least one channel per Trip System. ITS SRs 3.5.1.8 and 3.5.2.7 require verification that the ECCS response time for each ECCS injection/spray subsystem is within limits. These ITS SRs also contain a note that states that instrumentation response time may be assumed to be the design instrumentation response time. The associated DOCs state that deletion of the response time testing for these instruments was evaluated in NEDO-32291 and the DOCs discuss NMPC's compliance with the additional requirements outlined in the NRC SER for NEDO-32291.

**Comment:** These proposed changes to the CTS are beyond the scope of the conversion review and have been forwarded to the appropriate NRC technical staff for review. Any questions concerning these changes will be forwarded to you separately. No action on your part is required at this time.



Nine Mile Point-2 Improved TS Review Comments  
Section 5.0, Administrative Controls

5.2-01 DOC A.6  
CTS 6.2.4  
ITS 5.2.2.g  
STS 5.2.2.g  
JFD 6

CTS 6.2.4 and STS 5.2.2.g have been changed to revise wording from "Shift Supervisor" to "operating shift" in the context of to whom the STA shall provide advisory technical support. As per NUREG-0737, the STA should have clear lines of reporting and communication with the Shift Supervisor. DOC A.6 explains the change as being acceptable because there may be multiple instances of supervision in the control room. DOC A.6 also states that "This includes the Station Shift Supervisor and the ASSS, both of whom are members of the operating shift." This change may include these two positions but is not clearly limiting the reporting to only them.

**Comments:**

Revise the submittal to either include the STS wording for this instance or modify CTS/STS/DOC to explicitly outline site specific STA requirements as it relates to NUREG-0737.

**NMPC Response:**

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5.5-01 DOC A.2  
CTS 6.8.4.a Note: SR-3.0.2  
JFD 4  
STS 5.5.2.b Note: SR 3.0.2

A note has been added to STS 5.5.2 which states "The provisions of SR 3.0.2 are applicable to the 24 month frequency for performing integrated system leak test activities." This provision for this activity does not appear to be consistent with 10 CFR 50 Appendix J.

**Comments:**

The use of this provision in reference to integrated system leak test activities for Primary Coolant Sources outside containment, is proposed in TSTF-299.

**NMPC Response:**

No response required; TSTF-299 is being evaluated by the NRC staff.



**Nine Mile Point-2 Improved TS Review Comments  
Section 5.0, Administrative Controls**

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**5.5-02 ITS 5.5.4  
STS 5.5.4**

The STS/ITS 5.5.4 "Radioactive Effluent Control Program" has been changed to partially adopt parts of TSTF 258 Rev.3. Part of TSTF 258 Rev.3 has been omitted in the editing process. This part includes reference to the provisions to SR 3.0.2 and SR 3.0.3.

**Comments:**

Revise the submittal to include all of TSTF 258 Rev.3.

**NMPC Response:**

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**5.5-03 DOC None  
CTS 4.6.5.3.b  
JFD 12  
ITS 5.5.7  
STS 5.5.8 Insert 5.5.7-A**

STS 5.5.7 Insert 5.5.7-A is essentially consistent with CTS 4.6.5.3.b as edited to fit the ITS. The word "significant" has been added to describe at what point to perform certain tests. This term was not used in the CTS and there is not discussion of change for the less restrictive change.

**Comments:**

Revise the submittal to either not use the phrase "significant" or provide less restrictive discussion for this change in the CTS.

**NMPC Response:**

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**5.5-04 DOC None  
CTS 4.6.5.3/4.7.3  
JFD 8  
ITS 5.5.7.e  
STS 5.5.8.e**

ITS 5.5.7.e uses the additional term "nominal" in reference to the "value specified below..." JFD 8 states that this change has been done to ensure that the proper plant specific information/nomenclature is correctly provided. CTS 4.6.5.3 and CTS 4.7.3 does not use the term.

**Comments:**

Either remove the term "nominal" or provide discussion of change to justify this change in the CTS and the STS.





**Nine Mile Point-2 Improved TS Review Comments  
Section 5.0, Administrative Controls**

**NMPC Response:**

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**5.5-05 DOC A.4**

**CTS 6.8.4.e.1.a**

**JFD 20**

**ITS 5.5.9.1.a**

**STS 5.5.10**

CTS 6.8.4.e.1.a and STS 5.5.10 have been changed to include a new phrase in reference to acceptability of new fuel oil. This new phrase, "a specific gravity" is based upon information contained in the TS Bases 3.8.3 and has been identified as a beyond scope issue and in addition has an associated RAI 3.8.3-03.

**Comment:**

The acceptability of this wording will be based on the resolution of the 3.8.3 Diesel Fuel Oil Testing Program beyond scope issue and RAI 3.8.3-03.

**NMPC Response:**

No response required; under NRC review.

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