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

September [redacted], 1999

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING OUT OF SCOPE ISSUES OF THE IMPROVED TECHNICAL SPECIFICATIONS (ITS) SECTIONS 3.6.1.3, 3.6.1.6, 3.6.2.4, 3.7.2.3, 3.7.2.4, 3.7.2.1, AND 3.3.1.1, 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 (CTS) 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 ITS Sections 3.6.1.3, 3.6.1.6, 3.7.2.3, 3.7.2.4, 3.7.2.1, and 3.3.1.1, we find that additional information, identified in the enclosure, is needed. As discussed with members of your licensing organization, the mutually agreeable response date is September 10, 1999.

If you have questions regarding this letter or are unable to meet this response schedule, please contact Guy S. Vissing by phone on (301) 415-1441 or by electronic mail at gsv@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

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PDR ADOCK 05000410
P PDR

Docket No. 50-410

Enclosure: Request for Additional Information of ITS 3.6, 3.7, and 3.3

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

September 2, 1999

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Chief Nuclear Officer
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Nine Mile Point Nuclear Station
Operations Building, Second Floor
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Lycoming, NY 13093

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Enclosure: Request for Additional Information of ITS 3.6, 3.7, and 3.3

cc w/encl: See next page

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Unit No. 2

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REQUEST FOR ADDITIONAL INFORMATION

REGARDING IMPROVED TECHNICAL SPECIFICATIONS (ITS)

FOR

NINE MILE POINT NUCLEAR STATION, UNIT NO. 2

DOCKET NO. 50-410

1. ITS 3.6.1.3- The licensee proposed to delete CTS 4.6.3.4 requirement that each excess flow check valve (EFCV) must check flow. The proposed SR 3.6.1.3.9 now requires the EFCVs to actuate to their isolation position. The accident analysis assumed the maximum allowed through the broken line and not the actual leakage. It is indicated that the proposed change will not impact the method of testing the EFCVs.

   If the method of testing the EFCVs is not being changed, why is the above requirement to check flow being deleted? What is being gained; please explain.

2. ITS 3.6.1.6 and ITS 3.6.2.4- CTS 3.6.2.2 requires the drywell and the suppression pool spray mode of the RHR System to be capable of recirculating water from the suppression pool through the RHR heat exchangers to the drywell and suppression pool spray spargers. ITS 3.6.1.6 and ITS 3.6.2.4 relocates the details of what constitutes Operable drywell and suppression pool spray subsystems to the Bases. The requirement to circulate water through the heat exchangers has not been included. Please indicate how the heat will be removed from the containment in the spray mode if the requirement to circulate water through the heat exchanger is not included.

3. ITS SR 3.7.2.3 and SR 3.7.2.4 require that the control room outdoor air special filter train (CROAFT) be tested every 24 months. The licensee justified the test interval extension from 18 months to 24 months, based on historical maintenance and surveillance data. These data are not sufficient to justify the test interval extension. Please provide a technical evaluation that demonstrates that the impact on this change is minimal.

4. The licensee's proposed deletion of staggered testing requirement in ITS SR 3.7.2.1 for the CREF subsystem is not justified because CTS 4.7.3.b has this test requirement. Alternating the CREF subsystems on a staggered test basis is to discover undetectable CREF subsystem failures. Please provide your technical bases for concluding that this test requirement can be deleted.

5. The NRC staff in their safety evaluation on NEDO-31400 identified three conditions that needed to be addressed by each licensee in their plant-specific applications to remove the main steam line radiation monitor (MSLRM) scram function and main steam isolation valve (MSIV) isolation function. Condition 2 was that the application for such a change should provide sufficient evidence (implemented or proposed operating procedures, or equivalent commitments) to provide reasonable assurance that increased significant

Enclosure

levels of radioactivity in the main steam lines will be controlled expeditiously to limit both occupational doses and environmental releases. In the submittal for this proposed change, the response addressing Condition 2 indicated that Nine Mile Point, Unit 2 (NMP2) has procedures in place which address the actions required in the event of high radiation in the main steam line. It was further stated that if the request was approved, these procedures would be enhanced to incorporate the considerations of this Technical Specification (ITS 3.3.1.1). The staff does not understand the licensee's response to Condition 2. If the procedures covering this situation are already in place, then why are revisions required? The licensee should clarify this response, provide the procedure numbers that will contain the actions addressing high radiation in the MSL and summarize the actions to be taken by the operators using such procedures in the event of high radiation.

6. The NRC staff in their safety evaluation on NEDO-31400 identified three conditions that needed to be addressed by each licensee in their plant-specific applications to remove the MSLRM scram function and MSIV isolation function. Condition 3 was that the application for such a change should standardize the MSLRM and the offgas radiation monitor alarm setpoint at 1.5 times the nominal ^{16}N background dose rate at the monitor locations and commit to promptly sample the reactor coolant to determine possible contamination levels in the plant reactor coolant and the need for additional corrective actions if the MSLRM or offgas radiation monitors or both exceed their alarm setpoints. It was stated in the submittal that the MSLRM is set to alarm at 1.5 times the ^{16}N background dose rate at the monitor. It was also stated that NMP2 currently controls the offgas monitor setpoints as part of their Offsite Dose Assessment Manual. However, the licensee did not commit to promptly sampling the reactor coolant if either the MSLRM and/or the offgas radiation monitor exceeded their alarm setpoint nor did the licensee commit to have the offgas radiation monitor setpoint at 1.5 times the nominal ^{16}N background. Please provide adequate justification for the deviations from Condition 3 noted above.

7 Do the NMP2 operating procedures allow continued bypassing of the offgas treatment system until late in the power ascension? If they do, then the offgas pretreatment and post-treatment radiation monitors should be utilized to isolate the offgas treatment line and/or the offgas process line before the acceptable release rates are exceeded. As noted in NEDO-31400A, the pretreatment monitor is typically included in the TS with the requirements for periodic calibration and functional testing. If this condition applies at Nine Mile Point, then some additional TS changes may need to be made to incorporate one or more of these monitors into the TS. Please note that according to NEDO-31400A plants that do not have the capability to bypass the treatment system, do not have the additional requirement of automatic isolation of the process line.