

September 21, 1999

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 OUT OF SCOPE
ISSUES OF THE IMPROVED TECHNICAL SPECIFICATIONS (ITS) - 24-MONTH
SURVEILLANCE FREQUENCIES, ALLOWABLE VALUE CALCULATIONS, ITS
3.3.8.1, ITS 3.3.8.2, ITS 3.3.8.3, ITS 3.3.4.2 - ATWS-RPT, AND ITS 3.3.6.1, 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, as supplemented May 10, 1999, 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 concerning justification for 24-month surveillance frequencies; allowable value calculations for ITS 3.5.1, ITS 3.3.8.1, ITS 3.3.8.2, and ITS 3.3.8.3; for ITS 3.3.4.2 - ATWS-RPT; and ITS 3.3.6.1, we find that additional information, identified in the enclosure, is needed. Upon receipt of this letter, we would like to discuss the issues with you by telephone to establish a date upon which you can respond. Please discuss this with Guy S. Vissing by phone on (301) 415-1441.

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

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

September 21, 1999

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 OUT OF SCOPE ISSUES OF THE IMPROVED TECHNICAL SPECIFICATIONS (ITS) - 24-MONTH SURVEILLANCE FREQUENCIES, ALLOWABLE VALUE CALCULATIONS, ITS 3.3.8.1, ITS 3.3.8.2, ITS 3.3.8.3, ITS 3.3.4.2 - ATWS-RPT, AND ITS 3.3.6.1, NINE MILE POINT NUCLEAR STATION, UNIT NO. 2 (TAC NO. MA3822)

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Sincerely,

A handwritten signature in cursive script that reads "Darl S. Hood".

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

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Information

cc w/encl: See next page



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Nine Mile Point Nuclear Station
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. Justification for 24-Month Surveillance Frequencies:
 - a. The submittal provides generalized justifications for 24-month surveillance frequency in Attachment 4 and individual item wise justifications in LD1 and LE1 in Volume 3, Section 3.3, ITS, Bases, and CTS Markup/DOCs. Are all the generalized justifications provided in Attachment 4 applicable for all LD1s and LE1s included for 24-month extension in ITS, Bases, and CTS Markup/DOCs? If not, list the items that have exceptions to the LD and LE methodologies of Attachment 4.
 - b. ITS 3.3.1.2 - SRM Instrumentation, DOC M.3 calls for 24 months surveillance. Provide justification for this change.
 - c. Some LE1 items have utilized qualitative analysis, e.g. ITS 3.3.1.1, ITS 3.3.2.2, ITS 3.3.3.1. Provide a few typical worst case analyses to demonstrate the adequacy of the methodology used.
 - d. Provide clarification or information on following items on Attachment 4 of the submittal. Alternatively provide clarification on the following items:

Page 2, 3rd paragraph from the bottom: Provide typical examples of the associated SRs to demonstrate that the potential impact on availability from 24-month extension is small.

Page 3, 2nd paragraph from the bottom: Provide typical worst-case surveillance test data including the rare cases in which the instrument drift exceeded the acceptable limits.

Page 4, outlier evaluation: The submittal lists seven criteria for outlier evaluation. List the data points that were rejected by each criterion, the number of points that were investigated, and the associated rejection rate.

Page 4, NMPC evaluation: Provide a list of the instruments evaluated along with the drift value used.

Enclosure



Page 5, outlier detection by critical values for T-Test: Indicate the cases in which the T-Test was used for detecting outliers and the reasons for using the T-Test.

Page 5, 2nd paragraph from the bottom: List the correlation coefficients calculated and interpret their values.

Page 5, last sentence: Explain with examples how the 95 percent probability on drift value was calculated.

Page 6, 1st paragraph: Provide justification for using the first point as zero when the As-Found/As-Left value is not applicable for the first point.

Page 6, NMPC evaluation: Explain the methodology used to determine the "valid number of points", and the number of points used in each investigation.

2. Allowable Value Calculations

Confirm that the calculations used for determination of allowable values in ITS 3.5.1 - M4, ITS 3.3.8.1 - M2, ITS 3.3.8.2 - M3 and M4, ITS 3.3.8.3 - M2 and M3 are based on NRC-approved methodology similar to ITS 3.3.8.1 - L8.

3. ITS 3.3.4.2 - ATWS-RPT

Confirm that the time delay and RTP values specified in M2 have been addressed by plant-specific calculation or the FSAR.

4. ITS 3.3.6.1 Primary Containment Isolation

Confirm that the time delay specified in M3 has been addressed by plant-specific calculation or the FSAR.



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