NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

September 4, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Dear Mr. Vassallo:

Our April 30, 1984 letter provided information and schedules related to the generic implications of the Salem Anticipated Transient Without Scram events (Generic Letter 83-28). Attached is information regarding Sections 2.1 and 2.2.2 of your generic letter for Nine Mile Point Unit 1.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

PM/bd
Attachment

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ADDITIONAL INFORMATION REGARDING GENERIC LETTER 83-28

I. Equipment Classification Methodology (Section 2.1)

In our initial response to Generic Letter 83-28, dated November 8, 1983, Niagara Mohawk stated that a review of General Electric's equipment classification methodology would be conducted and appropriate Engineering Procedures would be revised if necessary. Niagara Mohawk has reviewed General Electric's methodology, as stated in NEDC-30505, and has concluded that general agreement exists with the appropriate engineering procedures. Therefore, procedure revisions are not warranted.

However, at this time, Niagara Mohawk has a project underway which involves a review of our equipment classification list (Q-List). The present Q-List delineates the applicable quality requirements on a system basis, with updates for individual components. This project will convert the Q-List to a component level list. This list, when completed, will include the mechanical, electrical, instrumentation and control, and structural portions of Nine Mile Point Unit 1. The criteria being used for the component classification are those listed in the Nine Mile Point Unit 1 Final Safety Analysis Report, dated June 1967, and its Second, Supplement, dated October 1968. Additional guidance is being utilized from ANSI/ANS 52.1-1983, "Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants," and appropriate industry codes and standards (i.e. ASME, IEEE, etc.). This project will provide a clear definition to those structures and components, subject to the requirements of our Quality Assurance program and consistent with General Electric's criteria and the Nine Mile Point Unit 1 licensing basis.

II. Vendor Interface Program (Section 2.2.2)

As indicated in our previous correspondence, Niagara Mohawk was an active participant in the Nuclear Utility Task Action Committee formed to address control and utilization of information regarding safety related components. At the outset the Committee recognizeed that individual utilities have the greatest experience with, and are most cognizant of, the application of safety related equipment. Based on this recognition, the Committee investigated the mechanisms currently available to facilitate information exchange among utilities. These included the routine utility/vendor and utility/regulator interchanges and the Significant Event Evaluation and Information Network (SEE-IN) and Nuclear Plant Reliability Data System (NPRDS) programs managed by the Institute of Nuclear Power Operations (INPO). The Committee concluded that these existing activities, coupled with a coordinated program within each utility, constituted an overall program to ensure the dissemination and utilization of technical information regarding reliability of safety related equipment. Additional information describing this overall program was provided to the Nuclear Regulatory Commission in March 1984 by the Committee.

A key element of the vendor equipment technical information program is a utility program to contribute information to the NPRDS and SEE-IN programs and to use the results of these programs. The administrative controls currently being implemented at Nine Mile Point Unit 1 contain procedures and data collection requirements related to these programs. These requirements provide assurance that information regarding safety related equipment is handled in an efficient, timely manner. No specific change to these existing administrative controls is deemed necessary at this time. However, to increase the effectiveness of the NPRDS an additional individual has been added to the Nine Mile Point Technical Staff to coordinate the activities of this program. This action, coupled with the existing administrative controls, meets the intent of Section 2.2.2 of Generic Letter 83-28 addressing vendor information and interface.