

September 26, 1979

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Reactor Regulation  
Washington, D. C. 20555

Dear Mr. Denton:

Re: Nine Mile Point Unit 2  
Docket No. 50-410

Our letter of April 26, 1978 transmitted the Stone & Webster Engineering Corporation's "Quality Assurance Manual, Nine Mile Point Nuclear Station - Unit 2." Subsequently, it is desired to take exception to a requirement in ANSI N45.2.5, Draft 3, Revision 1, January 1974, "Supplemental Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants" referenced in Appendix VII of the Quality Assurance Manual.

Section 5.4 of the ANSI N45.2.5 - 1974 code defines criterion for correct bolt length to be indicated by two threads of the bolt extending beyond the face of the nut. For construction of Unit 2 we will define correct bolt length to be indicated by one thread extending beyond the face of the nut.

This alternative is justified by the requirements in the Research Council on Riveted and Bolted Structural Joints "Specifications for Structural Joints using ASTM A325 and A490 Bolts." This document requires full thread engagement as defined by the end of the bolt being flush with the face of the nut. The 1978 update of ANSI N45.2.5 has also deleted the "two thread" criterion and adopted the Research Council on Riveted and Bolted Structural Joints criterion noted above.

Niagara Mohawk intends to use the "one thread" criterion for inspection of all high strength bolting at Unit 2. This practice adequately ensures that all bolts will have full thread engagement. Your expeditious review and approval of the use of the "one thread" criterion for high strength bolting in Category I structures is requested.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

*James Bartlett*  
James Bartlett  
Executive Vice President

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Mr. Gerald K. Rhode  
Vice President, System Project Management  
Niagara Mohawk Power Corporation  
300 Erie Boulevard West  
Syracuse, New York 13202

cc: Eugene B. Thomas, Esquire  
Leibusf, Lamb, Leiby & MacKae  
1335 New Hampshire Avenue, N. W.  
Washington, D. C. 20036

Mr. Richard Goldsmith  
Syracuse University  
College of Law  
E. I. White Hall Campus  
Syracuse, New York 13210

T. K. DeBoer, Director  
Technological Development Programs  
New York State Energy Office  
Agency Building 2  
Empire State Plaza  
Albany, New York 12223

Ezra I. Bialik  
Assistant Attorney General  
Environmental Protection Bureau  
New York State Department of Law  
2 World Trade Center  
New York, New York 10047

Resident Inspector  
Nine Mile Point Nuclear Power Station  
P. O. Box 126  
Lycoming, New York 13093

