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 TERRY, C.D. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Submits listed changes to util 880609 comments on SALP, including advisal that review of nonradiological chemistry program revised to more accurately describe how review performed.

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 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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July 7, 1988
NMPIL 0280U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555Re: Nine Mile Point Units 1 and 2
Docket Nos. 50-220 and 50-410
DPR-63 and NPF-69
Systematic Assessment of Licensee Performance

Gentlemen:

Niagara Mohawk's letter of June 9, 1988 (NMPIL 0266), provided our comments on the Nuclear Regulatory Commission's Systematic Assessment of Licensee Performance report dated April 21, 1988. A subsequent review of our comments has identified certain information contained in our response regarding radiological controls and chemistry that requires clarification. Accordingly, attached are revised pages 3 and 4 to our comments. Changes from the original submittal are designated by vertical lines in the right hand margin.

The changes to our June 9, 1988 comments on the Systematic Assessment of Licensee Performance are as follows:

- 1) The description of the review of the non-radiological chemistry program has been revised to more accurately describe how the review was performed.
- 2) On page 4 of our June 9 response, we estimated the average BWR radioactive waste volume to be 20,000 to 25,000 cubic feet per year. Information contained in the INPO 1987 Annual Report indicates that the average BWR radioactive waste volume for 1987 was 16,200 cubic feet. Page 4 of our response has been revised to reflect this more accurate figure.
- 3) The discussion regarding manrem savings associated with Control Rod Drive (CRD) work on page 4 has been deleted as there is still additional work to be done during the 1988 outage on CRD's and any conclusion as to potential manrem savings would be speculative.

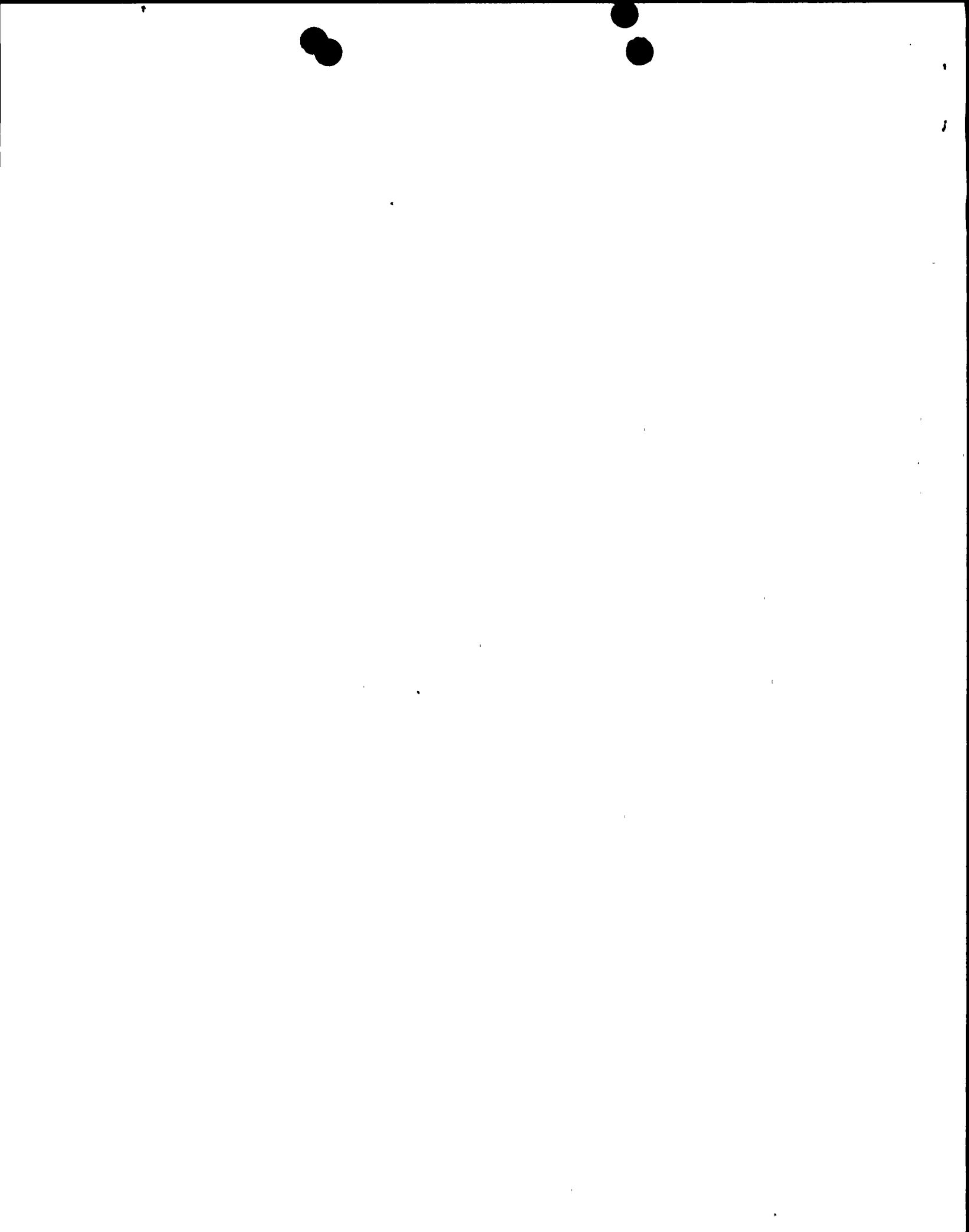
Very truly yours,

NIAGARA MOHAWK POWER CORPORATION


C. D. Terry
Vice President

Nuclear Engineering and Licensing

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Mr. R. A. Capra, Director
Mr. R. A. Benedict, Project ManagerMs. M. F. Haughey, Project Manager
Mr. W. A. Cook, Resident Inspector
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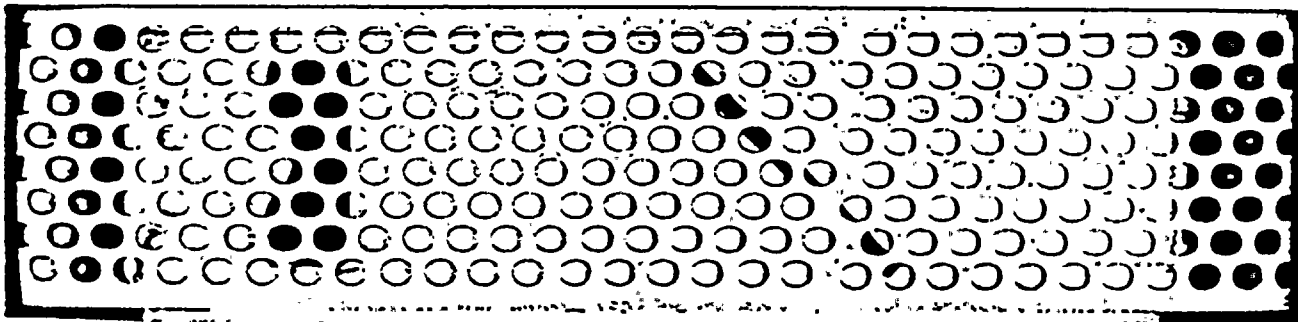
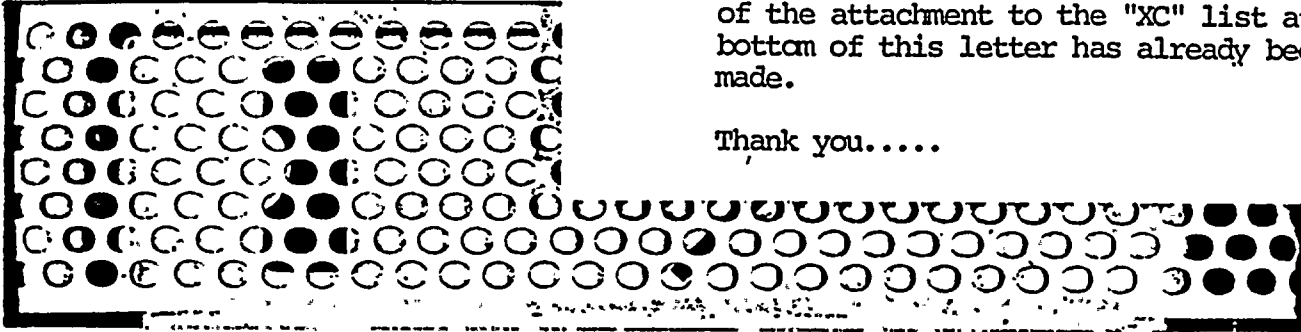
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Please Note:

The original letter mailed to you lacked the attached pages. We apologize for this oversight.

Please correct your copy. Distribution of the attachment to the "XC" list at the bottom of this letter has already been made.

Thank you.....







Also, the information gained during the plant supervisor tours is now being trended in our Radiological Performance Monitoring Report. This trending program will also allow us to track the effectiveness of our corrective actions.

We are aggressively pursuing the timely implementation of corrective actions identified in the radiological area. For example, corrective action programs for internal dosimetry concerns, portal monitor concerns and hot particle programs have been reviewed and found acceptable to the NRC.

2. Unit 1 Non-Radiological Chemistry Area Improvements

Improvements are being pursued in the area of non-radiological water chemistry. A Corporate policy regarding water chemistry was issued in February 1987. An INPO Assist visit in 1988 resulted in recommendations to improve our non-radiological chemistry operations philosophies. Corporate support addressing 1987 INPO recommendations led to the drafting of a layup guideline document which will provide the direction and guidance for the preparation of detailed layup procedures for specific plant systems. Also, a hazardous material survey to address the mixed waste issue and improve the chemical control program is presently ongoing. Modifications are currently underway at Unit 1 to replace conductivity instrumentation and dissolved oxygen instrumentation. Maintenance practices are being revised to address temperature control features; if these prove inadequate, modifications will be made. Existing practices at Unit 2 will be reviewed to assess demineralizer capacity requirements.

3. Restore GEMS at Unit 2

We have in place a project team to address the problems associated with the Unit 2 Gaseous Effluent Monitoring System (GEMS). The system has been pre-operationally tested, however, software changes are needed to make all aspects of the system functional. These are currently being addressed. We anticipate the system will be operational by July 31, 1988.

4. ALARA Review Program

We agree with the assessment of the ALARA Review Program. We are working to develop improved dose tracking systems to better identify the status of work in progress. Increased management attention will be directed to the ALARA program in an effort to provide heightened ALARA awareness. Improvements will be made in our tracking and reporting techniques to keep all workers and supervisors informed of site and task related ALARA performance.

The current Site Respiratory Protection Coordinator is also responsible for oversight of our ALARA Program. We plan to separate these two functions so that oversight of both programs will receive increased attention.

5. Performance Trends

As indicated above, we have in place programs to address the concerns outlined in the Report. Additionally, we have been



aggressive in addressing other radiological and chemistry area concerns. For example, due to our demineralizer operating practices, Unit 1 has an exceptionally low reactor water conductivity. The radwaste volume generated at Unit 1 in 1987 was 5767 cubic feet compared to the BWR average of 16,200 cubic feet (INPO 1987 Annual Report). A "zero discharge" for liquid effluents at Unit 1 has been maintained. Pipe and tank replacements have helped to reduce Radwaste Operations exposure. An in-reactor stress corrosion cracking water chemistry test was performed at Unit 1 in 1987. Data generated will be used to develop a permanent Hydrogen Water Chemistry program for Unit 1. We have developed an aggressive "Hot Particle" program.

We believe these examples provide an indication that our Radiological Controls and Chemistry program is not declining in overall performance and we request that this assignment of a declining trend be reconsidered.

C. Maintenance

1. Root Cause Evaluations

As indicated in your Report, this area shows signs of improvement. The root cause evaluation area is one of our ongoing Long Term Programs. Initial program accomplishments include the development and implementation of Root Cause Determination Procedures. Lessons Learned books are updated to reflect root cause evaluation results. Analytical troubleshooting training is planned for first-line supervisors.

Continuation of our Long Term Program is expected to further improve our root cause evaluation capabilities.

2. Feedwater Control Valve Failure

The report indicates that the sticking feedwater control valve problem experienced earlier in the cycle at Unit 1 was a precursor to the failure that occurred with the same valve shortly thereafter. However, as outlined in our report to you dated March 1, 1988, we have determined that these events were not related.

3. Engineering Review of Work Requests

The Report at Page 25 indicates that the Work Requests for future safety related valve packing adjustments will be reviewed by the engineering staff to ensure proper post-maintenance testing. However, to clarify this point, this review is only required for post-maintenance testing for certain containment isolation valves. Also, this review may not be required on each post-maintenance testing requirement if there exists a prior applicable generic review.



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