

February 8, 1989
NMP2L 1188

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

The Commission's staff is currently reviewing the Nine Mile Point Unit 2 Pump and Valve Inservice Testing Program Plan. On September 30, 1988, Niagara Mohawk submitted revised relief requests and other minor editorial corrections in response to comments from the Commission's staff. We have recently identified one additional relief request and one additional cold shutdown justification. We are also withdrawing relief request FWS-VRR-1. These documents are enclosed for your review (Attachment 1). A revised program plan will be issued incorporating these changes and the changes submitted in September 1988 after resolution of any comments.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



C. D. Terry
Vice President
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KBT/pns
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Mr. R. A. Capra, Director
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Mr. W. A. Cook, Resident Inspector
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ATTACHMENT 1
NINE MILE POINT UNIT 2

Pump and Valve
Inservice Testing Program
Additional Relief Request
and
Cold Shutdown Justification

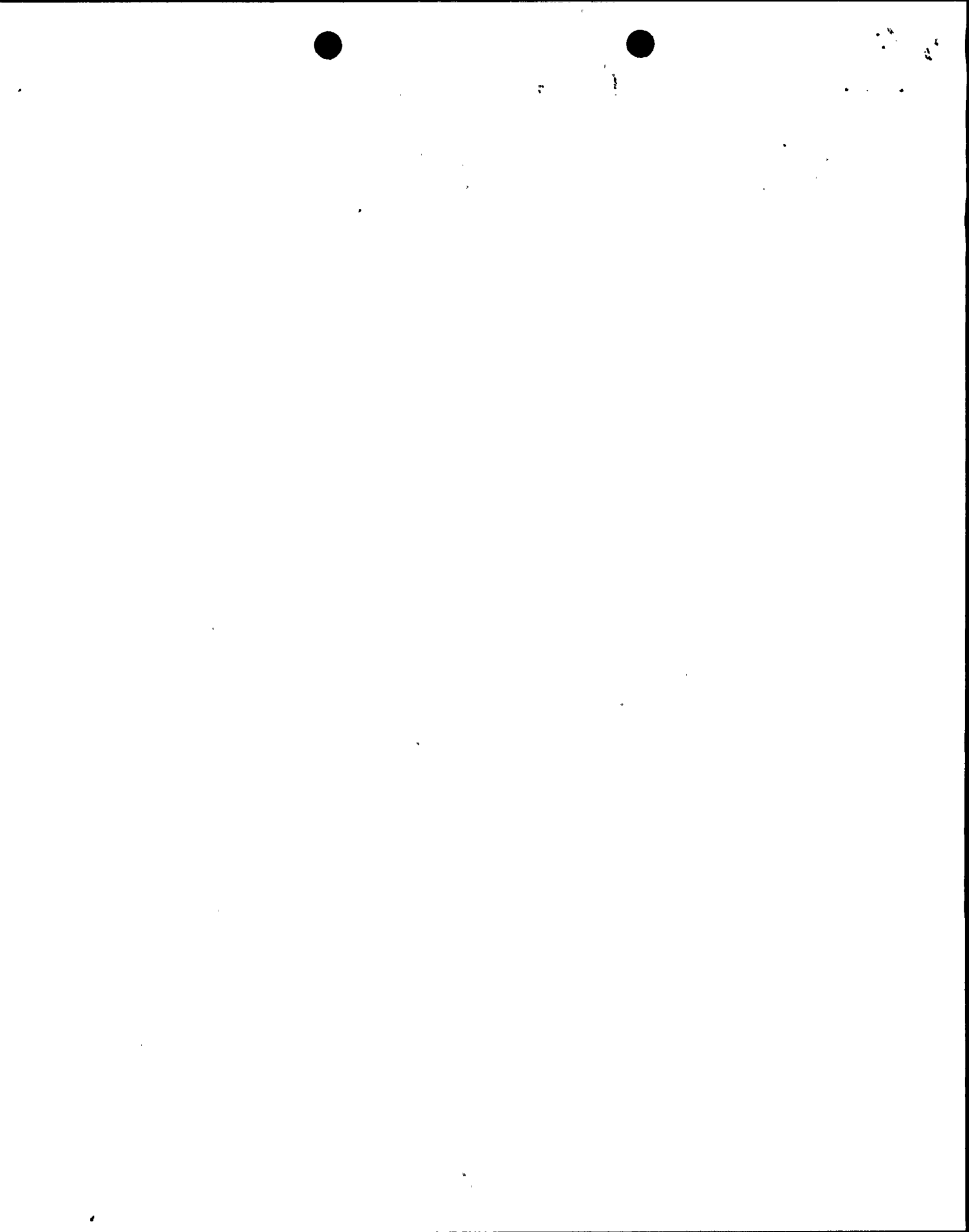


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RELIEF REQUEST FWS-VRR-1

WITHDRAWN

Superseded by Cold Shutdown Test Justification FWS-VCS-3



COLD SHUTDOWN TEST JUSTIFICATION FWS-VCS-3

System: Feedwater

Valve(s): 2FWS*V12A, B

Category: AC

Class: 1

Function: Feedwater system inside primary containment valves.

Quarterly Test Requirement: Verify reverse flow closure.

Cold Shutdown Test Justification: Verification of reverse flow closure of these valves during normal operation would require a significant reduction in power and the isolation of one loop of feedwater flow. Isolation of one feedwater loop during normal operation would introduce an undesirable operation transient that could result in a reactor scram. During cold shutdowns, when the feedwater system is not in operation, reactor vessel head pressure (approximately 15 psig) is applied in the reverse direction causing the valves to close.

Cold Shutdown Testing: Verify reverse flow closure at cold shutdown by opening a drain connection upstream of the valve disc.



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RELIEF REQUEST NO. SLS-VRR-3

System: Standby Liquid Control

Valve(s): 2SLS*V10

Category: AC

Class: 1

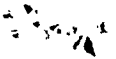
Function: SLS injection inside containment isolation valve.

Quarterly Test Requirement: Verify reverse flow operability.

Basis for Relief: This check valve is located inside the drywell and has full reactor pressure imposed on the seat in the reverse direction during reactor operation. Quarterly testing of this valve in the reverse direction during power operation is by opening the upstream test connection valves 2SLS*V30,31 located outside the drywell. However, if the check valve has failed in the open position, opening the test connection valves would result in a discharge of water at full reactor pressure and temperature (approximately 1000 psig and 500°F) from the test connection. Therefore, opening the test connection valves poses a safety hazard to operating personnel and a possible radiation release to the secondary containment.

It is not possible to perform the reverse closure test using this method during cold shutdowns since the reactor is depressurized; there is no differential pressure across the check valve. The reverse closure test can be performed by closing valve 2SLS*HCV114 and applying pressure in the reverse direction to the check valve through test connection valves 2SLS*V36.37; however, these valves are located inside the drywell which is normally inerted with nitrogen at cold shutdown.

Alternate Testing: Reverse flow exercising of this valve will be performed at every refueling outage and at cold shutdowns in which the containment is de-inerted.



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