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SUBJECT: Forwards addl info supporting application to use alternative to 10CFR50.55a requirements.

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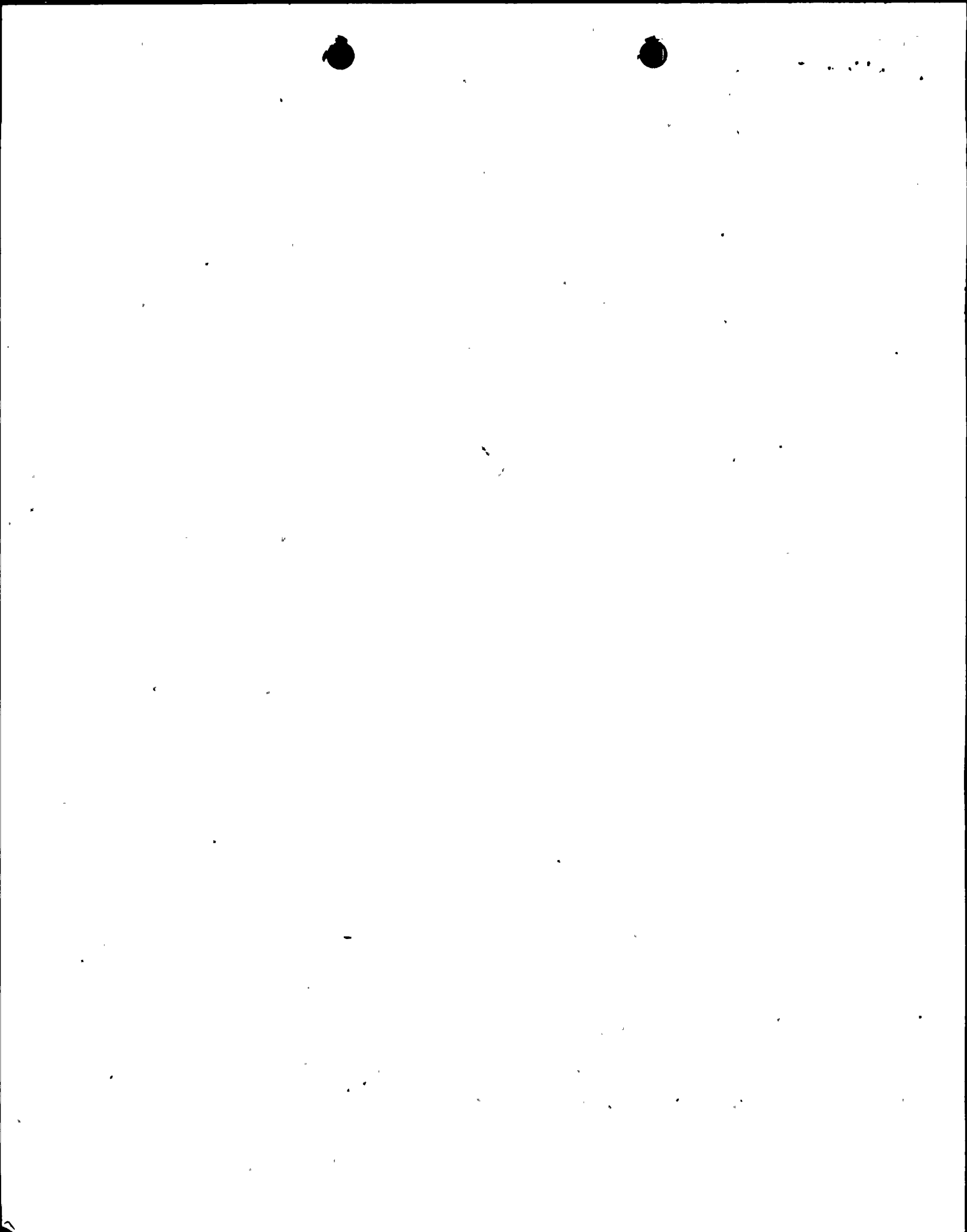
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March 23, 1989
NMPIL 0375

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

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

Gentlemen:

Attached please find additional information supporting our application to use an alternative to the requirements of 10 CFR 50.55a (NMPIL 0350 dated January 18, 1989). This additional information is provided in response to comments from the Nuclear Regulatory Commission's staff.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

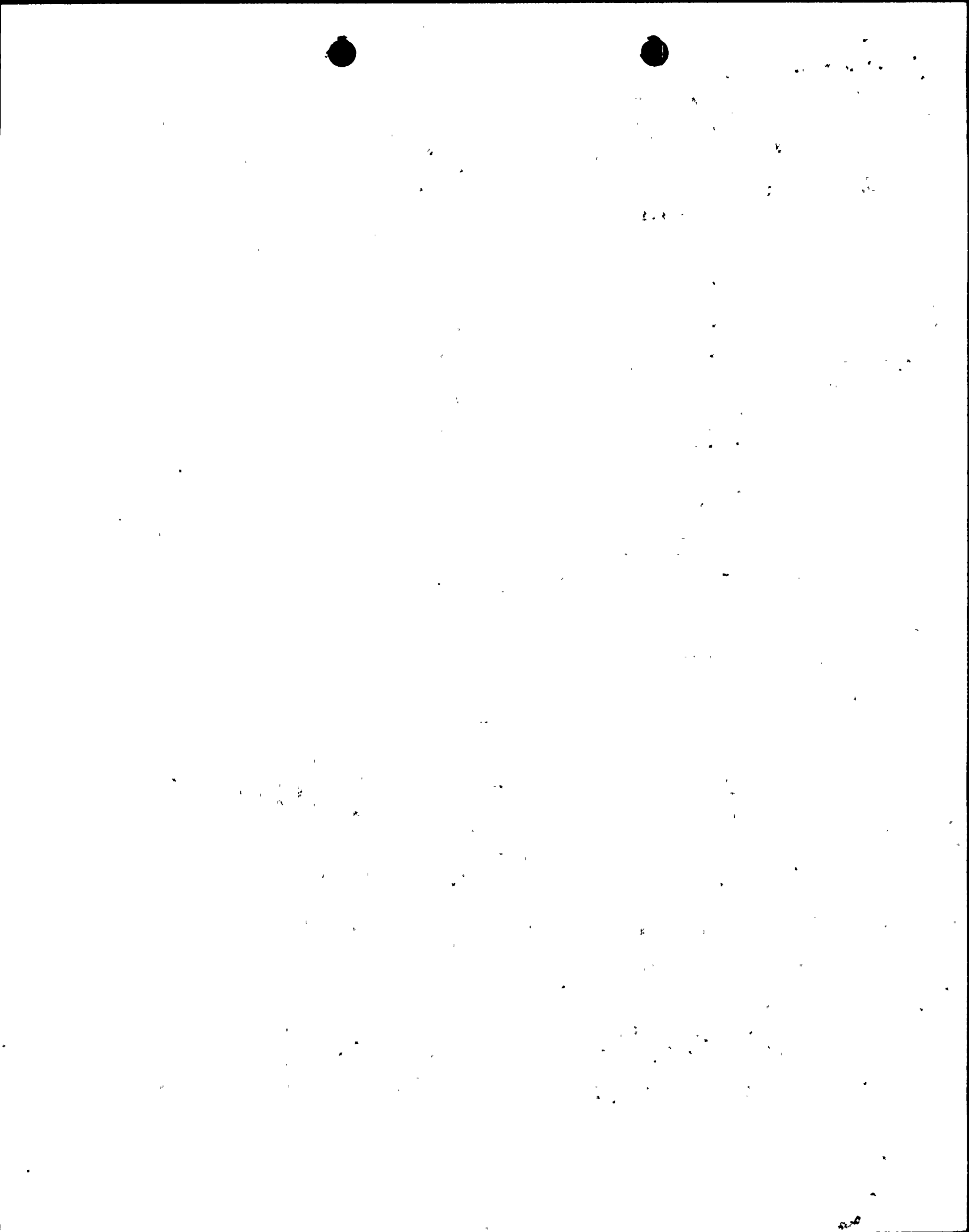


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Vice President
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Attachment

xc: Regional Administrator, Region I
Mr. R. A. Capra, Director
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A047
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NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT 1
DOCKET NO. 50-220
DPR-63

After welded repairs or replacements, a reactor system hydrostatic test is normally performed at a test pressure 1.08 times the nominal operating pressure (1035 psig). The Code specified minimum test temperature corresponding to this test pressure is 200°F (reference Table IWB-5222-1). The minimum temperature for pressurization required by Technical Specification 3.2.2.c is more restrictive (220°F), and therefore, is the governing requirement. The Technical Specification test temperature is based on stress intensity factors according to Appendix G of ASME Section III. Changing the test temperature does not affect the validity of the pressure test provided the temperature is below saturation; Furthermore, the test temperature is an important parameter for fracture toughness considerations. The reactor is designed for a limited number of hydrostatic pressure tests over the 40-year life of the vessel. The performance of this test has a major impact on the outage schedule. Relief valves have to be gagged to prevent inadvertent operation. After the test, the gags have to be removed. Thus, for minor repairs or replacements, such as replacement of the drain valves, an alternative to the hydrostatic test, a system leakage test is proposed.

The ASME Section XI system leakage test is performed at nominal operating pressure (1035 psig) and at the minimum temperature required by Technical Specification 3.2.2.c (200°F), reference paragraph IWB-5230(a). Performing this test at a higher pressure would be a burden similar to the hydrostatic pressure test. The relief valves would have to be gagged to prevent inadvertent operation. Consequently, there would be no advantage of an elevated pressure system leakage test over performing the ASME Section XI hydrostatic test. An ASME Section XI system leakage test is performed during startup after every refueling outage.

In response to the Nuclear Regulatory Commission staff's requests, we have included the attached boundary diagram, F-42234-C, and the piping elevation showing the configuration of the reactor vessel drain line and the location of the new welds for the replaced valves.



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