



Richard B. Abbott
Vice President
Nuclear Engineering

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February 3, 1999
NMP1L 1404

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

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

Subject: *Generic Letter 94-03, "Intergranular Stress Corrosion Cracking of Core Shrouds in Boiling Water Reactors," Contingency Repair Plans for the Nine Mile Point Unit 1 (NMP1) Core Shroud*

Gentlemen:

By letter dated April 8, 1997 (NMP1L 1200), Niagara Mohawk Power Corporation (NMPC) stated that it would develop a contingency plan for a repair of the core shroud vertical welds. Enclosure 1 to this letter contains the design details of the proposed core shroud repair that have been prepared for use as a contingency.

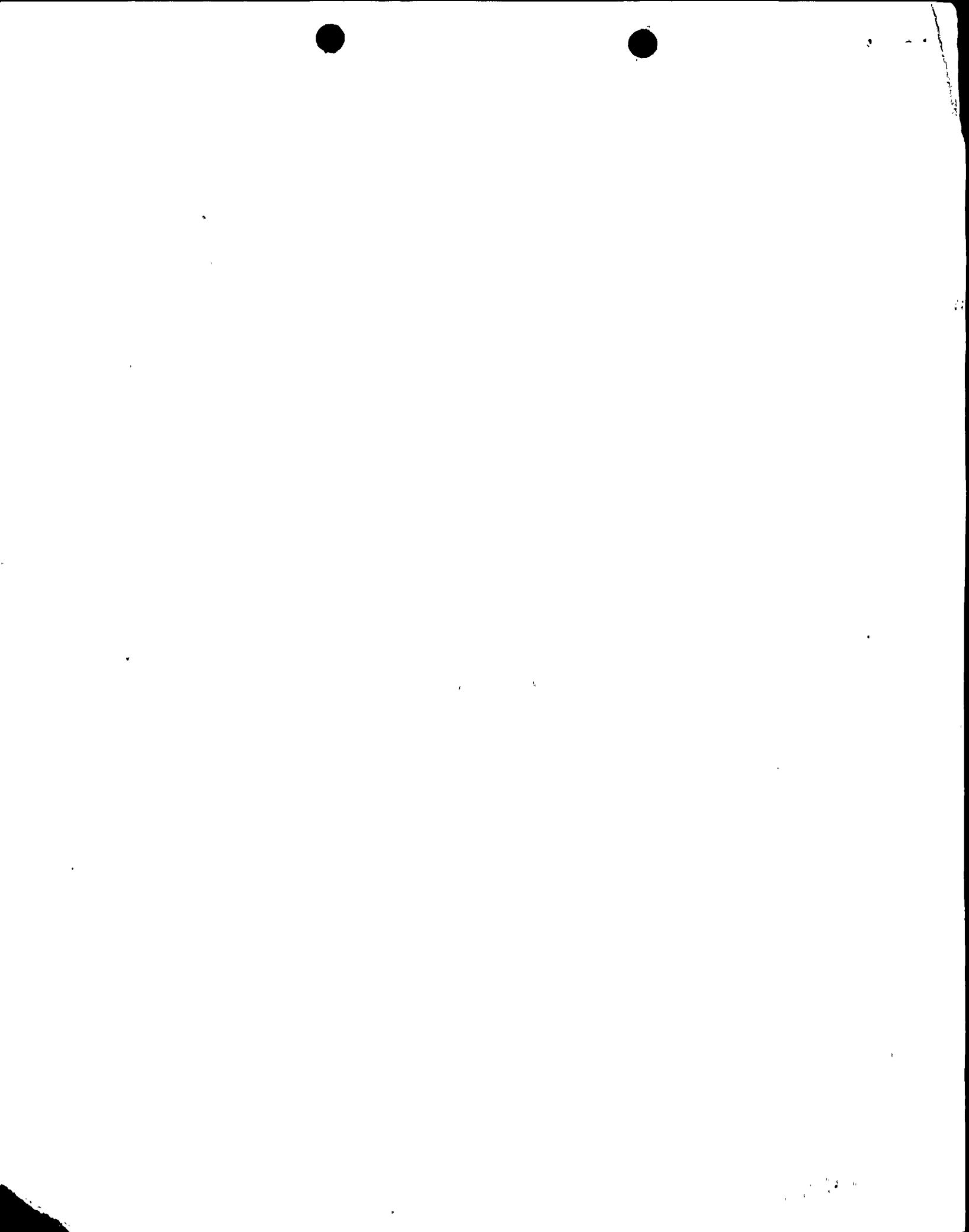
Enclosure 1, titled, "Nine Mile Point Unit 1 (NMP1) Core Shroud Vertical Weld Repair Design Report," is considered by its preparer, MPR Associates, Inc. (MPR), to contain proprietary information exempt from disclosure pursuant to 10CFR2.790(a)(4). Therefore, on behalf of MPR, Niagara Mohawk hereby makes application to withhold this document from public disclosure in accordance with 10CFR2.790(b)(1). An affidavit executed by MPR detailing the reasons for the request to withhold the proprietary information has been included as Enclosure 2. A non-proprietary version of this document has been included with this letter as Enclosure 3.

Niagara Mohawk has performed an evaluation of the proposed changes (i.e., the contingency repair of the core shroud) to the facility as described in the Updated Final Safety Analysis Report in accordance with 10CFR50.59. NMPC has concluded that installation of the repair would not involve an unreviewed safety question. A summary of the safety evaluation along with the basis for this conclusion is provided in Enclosure 4.

Niagara Mohawk has determined that the proposed core shroud repair is not included under the ASME Code, Section XI, definition for repair or replacement. As such, the design details of the proposed core shroud repair are being submitted to the Nuclear Regulatory Commission (NRC) as an alternative repair pursuant to 10CFR50.55a(a)(3)(i).

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Niagara Mohawk has scheduled the performance of core shroud inspections for the upcoming refueling outage (i.e., RFO15). The refueling outage is currently scheduled to commence on April 11, 1999 and end on May 24, 1999 with inspections of the core shroud scheduled to start on April 24, 1999. Should NMPC decide to install the repair, Staff approval would be needed prior to its installation. Installation of the repair could occur as early as May 2, 1999. Niagara Mohawk will continue to keep the Staff informed of changes to the May 2, 1999 date.

Very truly yours,



Richard B. Abbott
Vice President - Nuclear Engineering

RBA/KWK/kap
Enclosures

xc: Mr. H. J. Miller, Regional Administrator, Region I
Mr. S. S. Bajwa, Director, Project Directorate I-1, NRR
Mr. G. K. Hunegs, Senior Resident Inspector
Mr. D. S. Hood, Senior Project Manager, NRR
Records Management

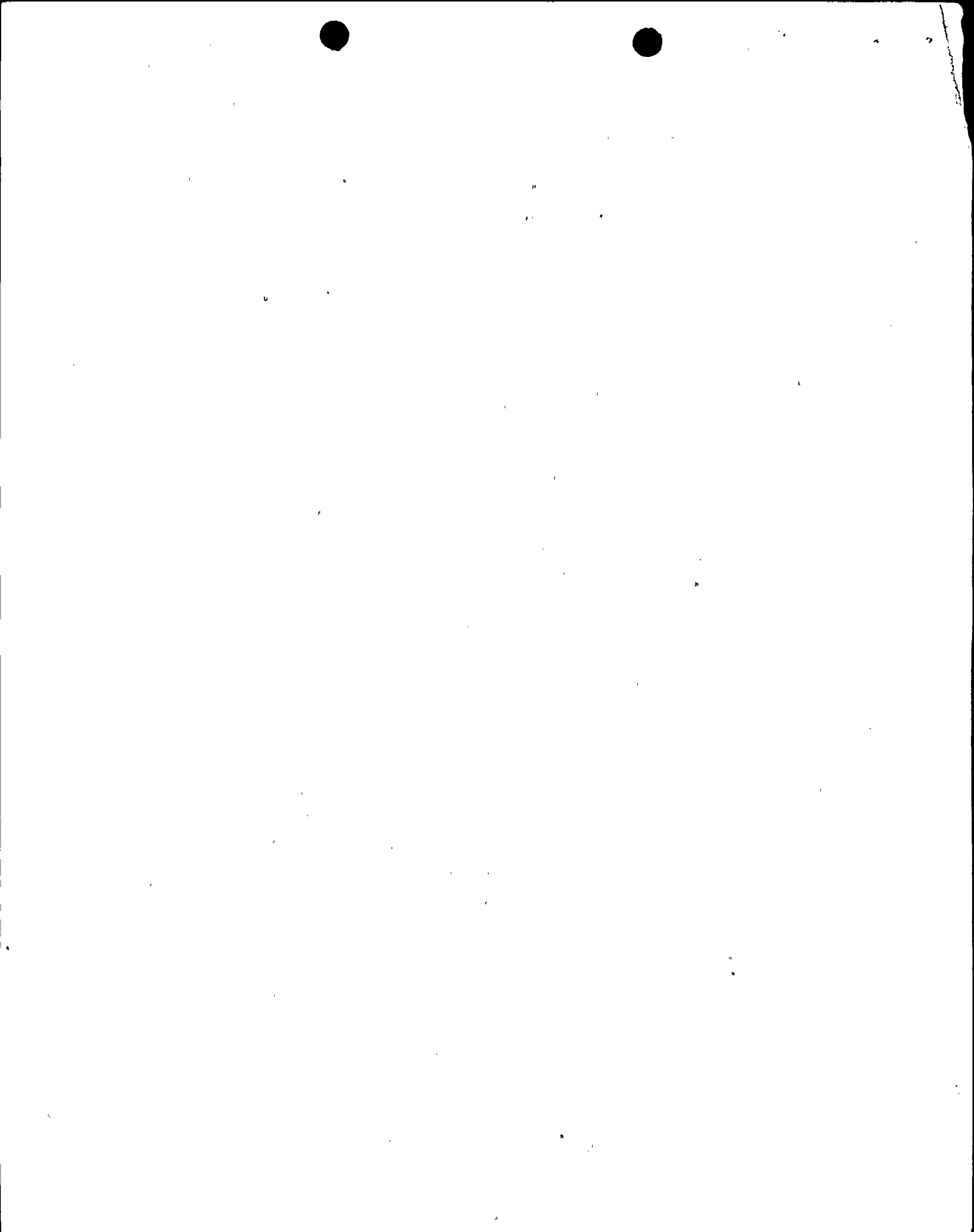


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ENCLOSURE 2

**AFFIDAVIT REQUESTING WITHHOLDING
PROPRIETARY INFORMATION**





**Affidavit Pursuant to 10 CFR 2.790
Relative to MPR Report 1966
"Nine Mile Point Unit 1 Core Shroud
Vertical Weld Repair Design Report"**

MPR Associates, Inc.
The Commonwealth of Virginia
City of Alexandria

I, William R. Schmidt, being duly sworn, depose and state that I am a Principal Officer of MPR Associates, Inc., duly authorized to make this affidavit, and have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations.

The information for which proprietary treatment is sought is contained in the attached report titled, "Nine Mile Point Unit 1 Core Shroud Vertical Weld Repair Design Report, MPR-1966, Revision 1, December 1998."

This document has been appropriately designated as proprietary to MPR Associates, Inc.

I have personal knowledge of the criteria and procedures utilized by MPR Associates in designating information as a trade secret, privileged or a confidential commercial or financial information.

Pursuant to the provisions of the paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure has been held in confidence by MPR Associates.
2. The information is of a type customarily held in confidence by MPR Associates and not customarily disclosed to the public. MPR Associates has a rational basis for determining the types of information customarily held in confidence by it and, in that connection utilizes a system to determine when and whether to hold certain types of information in confidence. This system was applied in determining that the subject document herein is proprietary.



3. The information will be transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
4. The information, to the best of my knowledge and belief, is not available in public sources.
5. Public disclosure of the information is likely to cause substantial harm to the competitive position of MPR Associates because:
 - a. The development of the information required a considerable amount of time and expense by MPR Associates.
 - b. For a competitor to develop the same information would require a similar or greater amount of time and expense.
 - c. In pricing MPR Associates products and services, significant research, development, engineering, analytical, manufacturing, quality assurance and other costs and expenses must be included. The ability of MPR Associates' competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

I have read the foregoing and the matters stated therein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of Virginia.

Executed at 320 King Street, Alexandria, VA, being the premises and place of business of MPR Associates.



William R. Schmidt
Principal Officer

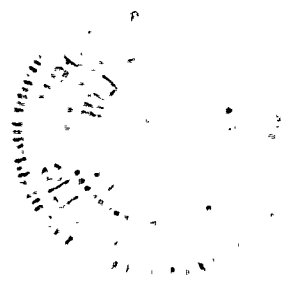
*City of Alexandria
Commonwealth of Virginia*

Sworn to before me this 5th day of January 1999 by
William R. Schmidt.



Notary Public

My commission expires: My Commission Expires October 31, 2001



Information Contained Herein is Non-Proprietary

***Nine Mile Point Unit 1 (NMP-1)
Core Shroud Vertical Weld Repair
Design Report***

Prepared For

Niagara Mohawk Power Corporation
Lake Road
Lycoming, NY 13093

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