NIAGARA MOHAWK POWER CORPORATION / 300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

May 16, 1984 (NMP2L 0056)

Mr. R. W. Starostecki, Director U.S. Nuclear Regulatory Commission Division of Project and Resident Programs 631 Park Avenue King of Prussia, PA 19406

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

Dear Mr. Starostecki:

Enclosed is a final report in accordance with 10CFR50.55(e) for the problem concerning backpressure on valves furnished by Clow Corporation (55(e)-84-10). This problem was reported in a telephone conversation between Mr. T. Loomis (Nine Mile Point Unit 2 Licensing) and Mr. S. Collins of your staff on February 16, 1984. An interim report was submitted via our letter dated March 21, 1984.

Very truly yours,

C. V. Mangan Vice President

Nuclear Engineering & Licensing

CVM/TL:ja Enclosure

xc: Director of Inspection and Enforcement U.S. Nuclear Regulatory Commission Washington, DC 20555

R. A. Gramm, Resident Inspector

NIAGARA MOHAWK POWER CORPORATION NINE MILE POINT - UNIT 2 DOCKET NO. 50-410

Final Report for a Problem Concerning Backpressure on Valves Furnished by Clow Corporation

## Description of the Problem

The problem pertains to the tricentric valves furnished by Clow Corporation. These valves were designed based on the maximum differential pressures applied in the normal flow (to-seat) direction. A review of design criteria indicates that some of these valves could be subject to backpressure under certain plant conditions. Backpressure was not a design criterion in the design of these valves.

## Analysis of Safety Implications

The Niagara Monawk architect/engineer (Stone & Webster Engineering Corporation) performed a review of all systems containing Clow valves to determine which valves were susceptible to backpressure. This information was forwarded to Clow where a computer analysis was performed for every valve. The analysis indicated that stress levels could exceed ASME Code allowables for certain valves when exposed to prescribed backpressures. It also was concluded that although ASME stress levels would be exceeded, no permanent deformation of valve materials or valve damage would occur. It was concluded that the only noticeable effect resulting from backpressurization would be increased leakage in the reverse direction. With the exception of two valves, 2RHS MOVIA and 1B, it was determined that the leakage would be contained within the system and would not affect operability of any system. Valves 2RHS MOVIA and 1B are RHR suppression pool suction valves, and leakage from these valves is directly to the suppression pool. In the worst case, the leakage would result in a low water level (low water level 3) signal that would automatically initiate the closing of isolation valves 2RHS MOVII2 and 2RHS MOVII3. The reactor water level would be restored by feedwater, nigh pressure core spray, low pressure core spray, etc., depending upon the reactor/plant conditions. Consequently, this deficiency would not have adversely affected the safe operation of the plant and would not be reportable under 10CFR50.55(e).

## Corrective Actions

The following corrective actions have been taken to accommodate backpressure in the subject safety-related valves without exceeding ASME stress allowables:

- 1. Valves, Mark Nos. 2SWP MOV3A and 3B and 2SWP MOV5OA and 50B, nave been reworked with new shafts and keys.
- Valves, Mark Nos. 2RHS \*MOV1A and IB, 2HRS \*MOV9A and 9B, 2RHS \*MOV12A and 12B, and 2HRS \*MOV3OA and 30B will be replaced with new valves.

3. Clow valves, listed below, in the low pressure core spray, residual heat removal, and service water systems will be reoriented and/or given special operating instructions:

2CSL\*V121 2RHS\*MOV1C 2SWP\*MOV74A,B,C,D,E&F 2SWP\*MOV93A&B 2CSL\*MOV112 2CSL\*HCV118 2SWP\*MOV92A&B

This action will be completed by October 31, 1984.