NIAGARA MOHAWK POWER CORPORATION



NIAGARA MOHAWK

300 ERIE BOULEVARD. WEST SYRACUSE, N. Y. 13202

December 10, 1984

Richard C. DeYoung, Director United States Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, Pennsylvania 19406

> Re: Docket No. 50-220 IE Bulletin No. 83-03, Rev. 1

Dear Mr. DeYoung:

With regard to the response to IE Bulletin 83-03 (NMPC letter 6777 dated 6-14-84 Lempges to DeYoung) Nine Mile Point Unit 1 Nuclear Station committed to perform two (2) tests on the check valves in the Emergency Diesel Generator Cooling Water (72) system. One test is a quarterly forward and reverse flow test for valves 72-66 and 72-67, thereby proving the valves are operating properly. The other test outlined in the response is to disassemble, inspect and reassemble valves 72-68 and 72-69 every refueling outage to assure valve integrity. After evaluating these tests, NMPC will combine them into maintenance and ISI procedures that shall be performed only during refueling outages.

The rationale for combining these tests and performing them every refueling outage is based on two reasons: first, each Emergency Diesel Generator Cooling Water line has to be drained to disassemble, inspect and reassemble the check valve nearest the pump (72-68 or 72-69). Failure of the other check valve in the line (72-66 or 72-67) will be demonstrated if water collects in the disassembled valve cavity. Since there is a constant back pressure on the downstream side of the check valves in the diesel generator room (72-66 or 72-67) from Service Water and no restrictions between the disassembled valve and the check valve downstream of the Diesel Generator when each line is drained, leakage from the diesel generator room valve will be forced into the disassembled valve cavity in the screenhouse. If no water appears, then the valve in the diesel generator room is demonstrated as fulfilling its design function. In effect, while one valve is inspected, a reverse flow test is being performed on the other check valve in the line because of the

Page 2 NMP-7947 IEB 83-03, Rev. 1 drained line; the second reason to combine the tests is to reduce the number of times the cooling water lines are drained thereby reducing the frequency of the Diesel Generator being inoperable as a result of mark-ups to perform these tests. Since there is no history of valve failure and considering the two reasons previously sited, this change to the original response is believed to be a reasonable and preferred method of testing the Emergency Diesel Generator Cooling Water check valves. Effective immediately, Nine Mile Point Unit 1 Nuclear Station will discontinue quarterly reverse flow testing and shall implement this response during refueling outages only unless directed otherwise. Very truly yours, Thomas E. Lempges Vice President Nuclear Generation TEL/RWS/rt