

# Niagara Mohawk

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December 3, 1999  
NMP2L 1915

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

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

**Subject:       *Second Ten-Year Interval Relief Request***

Gentlemen:

By letter dated September 15, 1999, Niagara Mohawk Power Corporation (NMPC) submitted relief request RR-RI-ISI-1 for Nine Mile Point Unit 2 (NMP2). RR-RI-ISI-1 requested relief from the minimum inservice inspection requirements of ASME Code Section XI, IWB-2412 and IWC-2412. On November 5, 1999, a telephone discussion took place between the NRC staff and NMPC to clarify certain points made in the relief request. Attachment A summarizes that telephone discussion in a request and response format. NMPC requests that the NRC approve RR-RI-ISI-1 no later than December 15, 1999.

Sincerely,

  
John T. Conway  
Vice President Nuclear Generation

JTC/IAA/kap

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

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## **ATTACHMENT A**

### **SUMMARY OF TELEPHONE DISCUSSION WITH NRC**

The following telephone discussion took place on November 5, 1999. The NRC participants were Shou Ho and Ted Sullivan. The Nine Mile Point Unit 2 participants were Glenn Perkins, Lynn McClain, and Ali Abbasi.

**1. NRC Request:**

*The relief request is not clear in some areas. The request specifically excludes from the scope of relief Category D welds that are covered by the augmented examination program of Generic Letter (GL) 88-01. Does this mean that only Category D welds are included in the augmented examination program?*

**NMPC Response:**

Category D, E and F welds are all excluded from RR-RI-ISI-1 because they are covered in the augmented examination program of GL 88-01. Category A (resistant material) welds are included in the Risk Informed (RI) Inservice Inspection (ISI) Analysis and are therefore included in RR-RI-ISI-1.

**2. NRC Request:**

*Are augmented examinations limited just to those welds covered by the GL 88-01 program?*

**NMPC Response:**

No. In addition to the GL 88-01 welds discussed in item 1 above, break exclusion region welds are also examined on an augmented basis. However, it is proposed not to do any break exclusion region examinations during refueling outage number 7 (RFO-07). It is intended that the break exclusion region examinations will be included in the Electric Power Research Institute (EPRI) methodology.

**3. NRC Request:**

*It is recognized that the examinations required by GL 88-01 as well as RI-ISI are complicated. The staff recommends that after initiation of RI-ISI evaluation but before proceeding too far, NMPC talk with the staff about the EPRI template, how augmented examinations will be handled, and the need for any deviations.*

**NMPC Response:**

We concur with this recommendation.

**ATTACHMENT A (Continued)**

**4. NRC Request:**

*How many welds are included in the scope of GL 88-01 at NMP2?*

**NMPC Response:**

There are 113 Category A welds, 47 Category D welds, one Category E weld and one Category F weld included in the scope of GL 88-01. Approximately half of the Category D welds and the one Category F weld will be examined during RFO7. The Category E weld was examined in refueling outage number 6 and is scheduled to be reexamined in refueling outage number 8, as required per GL 88-01.