



Richard B. Abbott
Vice President
Nuclear Engineering

Phone: 315.349.1812
Fax: 315.349.4417

October 26, 2000
NMP1L 1547

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

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

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

Subject: *Inservice Inspection Relief Requests*
 TAC No.'s MA9803 (Unit 1) and MA9804 (Unit 2)

Gentlemen:

By this letter Niagara Mohawk Power Corporation (NMPC) is withdrawing from consideration three (3) Performance Demonstration Initiative (PDI) inservice inspection (ISI) relief requests that were submitted for NRC review by letter dated August 31, 2000. These relief requests, ISI-15, ISI-19 and ISI-20 are being withdrawn per NMPC's conference call with the NRC.

Additionally, pursuant to 10 CFR 50.55a(a)(3)(i), 10 CFR 50.55a(a)(3)(ii) and 10 CFR 50.55a(g)(6)(i), NMPC is resubmitting two (2) ISI relief requests for NRC approval. These relief requests, ISI-16 and ISI-17, supersede the previously submitted ISI-16 and ISI-17 relief requests in their entirety. These relief requests are common to Nine Mile Point Unit 1 and Nine Mile Point Unit 2 (NMP1 and NMP2) and provide supplemental information requested by the NRC.

The attached relief requests relate to the NRC's Final Rule amending 10 CFR 50.55a, as published in the Federal Register on September 22, 1999 (64 FR 51370). This rulemaking requires NMPC to implement Appendix VIII titled, "Performance Demonstration for Ultrasonic Examination Systems," to the American Society of Mechanical Engineers (ASME) Section XI, Division 1, 1995 Edition with the 1996 Addenda, with modifications as stated in 10 CFR 50.55a(b)(2)(xiv, xv and xvi), on an expedited basis.

The attached relief requests have been prepared using the revised guidance from the Electric Power Research Institute and PDI, and their discussions with the NRC.

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Page 2

The Final Rule specifies an implementation date of May 22, 2000, for Supplements 1, 2, 3 and 8 of Appendix VIII. NMPC has revised the applicable Ultrasonic Testing examination procedures to comply with the 1995 Edition, 1996 Addenda of ASME Section XI as they pertain to Appendix VIII and PDI. Refueling Outage 16 (RFO16) for NMP1 is currently scheduled to start in March 2001. Inservice inspections per Supplements 1, 2, 3 or 8 pursuant to the Final Rule will be performed during RFO16 as described in the attached relief requests. Therefore, NRC approval of the attached relief requests is requested by March 1, 2001.

Sincerely,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/SHC/cld
Attachments

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Gamberoni, Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR
Records Management