12/30/76

Docket No. 50-220

Niagara Mohawk Power Corporation
ATTN: Mr. Gerald K. Rhode
Vice President - Engineering
300 Erie Boulevard West
Syracuse, New York 13202

Gentlemen:

We have completed our evaluation of your two submittals dated October 28, 1975 and October 31, 1975 regarding compliance with Appendix J, 10 CFR Part 50. The above cited letters were submitted in response to our letter dated August 7, 1975, in which you were requested to determine if you were conducting containment leakage testing at Nine Mile Point Unit No. 1 in full compliance with Appendix J. If you were not in full compliance with Appendix J, you were requested to identify your planned actions and the associated schedule for attaining conformance.

In your October 28, 1975 and October 31, 1975 responses to our August 7, 1975 letter, you requested a number of exemptions from the containment leak testing requirements of Appendix J. The Safety Analysis provided in Attachment B to your October 28, 1975 and October 31, 1975 submittals do not provide adequate information to support your contention that, "Though the facility does not fully comply with the specifics of the containment "design criteria", it does meet the general intent of those criteria".

Please amend and resubmit your request for exemption, to include identification of: (1) specific exemptions and (2) the specific areas of non-compliance from the requirements of Appendix J. With regard to the latter, please provide your planned actions and the associated schedule for achieving compliance. For each exemption requested, identify the design features that do not permit testing in accordance with Appendix J and provide specific justification to support the proposed exemption. In addition, provide the following additional information regarding the application of the Appendix J requirements:.

1. Type C Tests

NMP4

Table 3.2.7 and 3.3.4 of the Technical Specifications list the reactor coolant isolation valves and the primary containment isolation valves on the fluid lines penetrating the containment. Identify each valve

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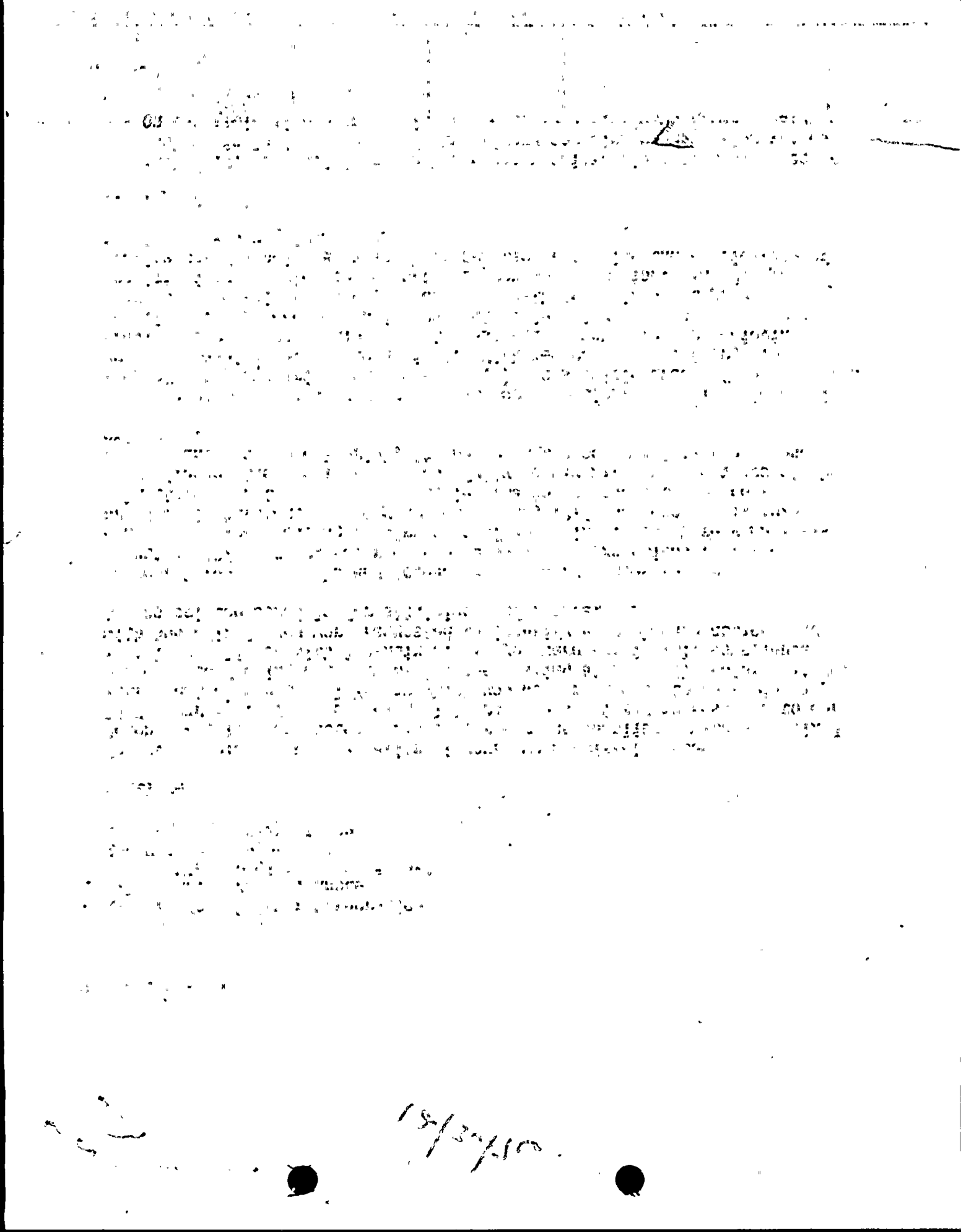

which requires Type C testing by applying Section II.H of Appendix J and considering potential single active failures which may result in a valve becoming a containment leakage barrier.

2. Type B Tests

Your submittals indicate that Type B testing should not be required for the TIP system, drywell vent and purge lines, suppression chamber vent and purge lines, drywell nitrogen makeup lines, suppression chamber nitrogen makeup, vacuum relief lines, and spare penetrations. It is not clear in what context Type B testing has been considered for these systems. Therefore, identify all penetrations which require Type B testing by applying Section II.G of Appendix J.

3. Containment Airlocks

Your submittals did not include any requests for exemptions associated with the containment airlock testing requirements. However, your existing Technical Specifications are not in full compliance with Appendix J. In your submittal to the Commission, describe the planned actions and the associated schedule for achieving compliance. To assist you in preparing this submittal, a clarification of the airlock testing requirements is provided in Attachment A.

Your response to these requirements should be provided within 60 days from receipt of this letter. If you have any questions concerning this matter, please feel free to contact me.

George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Enclosure:
Attachment A

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