

NOV 2 2 1976

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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:

RE: NINE MILE POINT NUCLEAR STATION UNIT

Earlier this year we sent letters to licensees of operating nuclear power plants notifying them of a revision to 10 CFR Part 50, Section 50.55a which was published in the Federal Register on February 12, 1976 (41 FR 6256). The revised regulation changed the inservice inspection and testing requirements for nuclear power plant components contained in paragraph (g) of § 50.55a. A letter regarding this subject was sent to you on April 26, 1976.

Since that time, the NRC has received a number of inquiries from licensees regarding acceptable methods for complying with the regulation. In general, the inquiries have been directed toward three major areas relative to compliance with the regulation:

1. The determination of which ASME Boiler and Pressure Vessel Code Edition and Addenda are applicable for any updated inservice inspection or testing program,
2. The requirement to conform the Technical Specifications to a revised program, and
3. The process of obtaining relief from ASME Code requirements found to be impractical.

Consequently, we are transmitting for your use, Enclosure 1: "NRC Staff Guidance For Complying with Certain Provisions of 10 CFR 50.55a(g), Inservice Inspection Requirements". This enclosure describes the major provisions of the revised regulation, addresses the areas of licensee concern listed above, and provides guidance on information which the NRC staff will need to review inservice inspection and testing programs and to evaluate requests for relief from ASME Code requirements that are determined to be impractical. We believe this enclosure will serve to clarify the proper method(s) for implementing the regulation in several important areas.

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NOV 22 1976

Niagara Mohawk Power Corporation - 2 -

We reiterate our previous request that you submit proposed Technical Specification changes to incorporate standard language referencing §50.55a(g), at least 6 months before the start of the next 40-month inspection period for your facility. Also, as discussed in Enclosure 1, you should submit a description of your planned inservice inspection and testing programs, as well as any request for relief from ASME Code requirements determined to be impractical for your facility, as far in advance as possible of, but at least 90 days before, the start of any 40-month inservice inspection period, or 20-month pump and valve testing period.

In addition, we would like to emphasize an important point regarding the ASME Code Section XI requirements to test selected pumps and valves, that are now incorporated in §50.55a(g): The ASME Code Section XI requirements apply only to selected valves and pumps that can be tested without placing the plant in an unsafe condition. You should exercise care in planning your testing programs to ensure that no test will be conducted while the plant is in an operating mode that would make it vulnerable to a test error or a test failure. Particular attention should be directed toward the valve exercising (cycling) tests. In this regard, some basic guidelines for excluding exercising (cycling) tests of certain valves during plant operation are contained in Enclosure 2. Valve leakage tests and other valve and pump tests required by the ASME Code, should be reviewed for each component, relative to each plant operating mode, to ensure that no test will have an adverse impact on plant safety.

If you have any further questions regarding implementation of 10 CFR 50.55a(g) at your facility, please contact us.

Sincerely,

Original signed by
George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Enclosures:

1. NRC Staff Guidance for Complying with Certain Provisions of 10 CFR 50.55a(g)
2. Guidelines for Excluding Exercising (Cycling) Tests of Certain Valves During Plant Operation

cc: See next page	ORB #3	ORB #3	ORB #3
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