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Comments on the Safety Evaluation Report for Nine Mile Point Nuclear Facility....

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August 26, 1974

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Mr. Karl R. Goller
Assistant Director for Operating Reactors
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Goller:

The New York State Atomic Energy Council has completed its review of the Safety Evaluation Report, issued by the Directorate of Licensing on July 3, 1974, which relates to Niagara Mohawk Power Corporation's application for a full-term operating license for Nine Mile Point Nuclear Power Plant Unit No. 1 (Docket 50-220).

In preparing the attached comments, the views of all State agencies comprising the New York State Atomic Energy Council have been considered. Some of these comments are directed to specific points in the Safety Evaluation Report with the intent of clarifying and/or improving any supplementary documentation which the Commission may issue related to this document. It is requested that utmost consideration be given to these comments.

We appreciate being given the opportunity to participate with the U. S. Atomic Energy Commission in this matter.

Sincerely yours,

Wm Seymour

Dr. William E. Seymour
Staff Coordinator

Att.

cc: Members of the New York State Atomic Energy Council
Hon. Alfred E. Kahn
J. Bruce MacDonald, Esq.
C. Thomas Hodsdon

8922

NEW YORK STATE COMMENTS RELATING TO THE JULY 3, 1974 SAFETY EVALUATION REPORT FOR THE NINE MILE POINT NUCLEAR POWER PLANT UNIT NO. 1

1. General

The Regulatory Operations Regional Office's summary of plant operations presented in Appendix A provides a significant, chronological, safety related overview of plant operations. It is considered that the U.S. AEC should include a summary of plant operations by the cognizant Regulatory Operations Regional Office in all Safety Evaluation Reports issued for the purpose of conversion from a provisional to a full-term operating license.

2. General

The Safety Evaluation Report should address the fuel storage capacity at the site and its related safety implications. It should also address the storage and ultimate disposal of spent fuel in the event that storage is not available at other facilities such as fuel reprocessing plants.

3. Section 2.0, Background or Section 6.0, Other Safety Considerations

Since these safety related items have not been discussed in previous safety evaluation reports for Nine Mile Point Unit 1, new subsections should be added which discuss the safety related implications and criteria of hydrology, tornado loading on Category I structures and missile protection. In addition, comment should be made relating to the on-site meteorological program meeting the requirements of Regulatory Guide 1.23, which was issued after the Safety Evaluation Report of May 26, 1969.

4. Section 6.0, Other Safety Considerations

It is stated that this Section discusses the design adequacy of NMP-1 relative to certain regulatory requirements and guidelines that have evolved since the Provisional Operating License was issued. In addition to the discussions contained in Section 6.0, it is considered that this Section should contain discussions relating to the implementation of all newly issued (since 1969), and applicable, Regulatory Guides related to plant safety (i.e., Regulatory Guide 1.12 - Instrumentation for Earthquakes, Regulatory Guide 1.32 - Use of IEEE Std 308-1971, Regulatory Guide 1.46 - Protection of Pipe Whip Inside Containment, Regulatory Guide 1.48 - Design Limits and Loading Combinations for Seismic Category I Fluid Systems, etc.).

5. Table 7.1, Page 35

The Regulatory Staff has recalculated off-site doses for design basis accidents, and the results of all calculations fall within the guidelines of 10 CFR Part 100. Significant differences are noted between the results of the new calculations presented in Table 7.1 as opposed to the results of the calculations presented in the Safety Evaluation Report for Unit No. 1 dated May 26, 1969. For example, the revised analysis for the loss of coolant accident indicates a lower (factor of 0.57) 2 hour site boundary thyroid inhalation dose and a higher (factor of 1.9) "course of accident" thyroid inhalation dose in the low population zone (LPZ). It is requested that the U.S. AEC provide the State with its current curves for inhalation dose versus distance, and an explanation of the reasons for the change in slope between the 1969 and current curves. This information is required for updating the State's Specific Operating Procedure emergency plans for Nine Mile Point which are currently based on the data in the 1969 Safety Evaluation Report.

6. Appendix A, Section II, 5.C, Control Rod Performance

In the first sentence, November 20 and 26, 1974 should be corrected to read November 20 and 26, 1973 (editorial).

7. Appendix A, Section XIII, Quality Assurance

This section notes that the current Quality Assurance Program does not comply with the licensee's commitments. It is considered that during this time of increased emphasis on the implementation of effective quality assurance, the applicant should be required to upgrade and implement the Quality Assurance Program for operations to meet all Regulatory Guides and guidelines prior to being issued a full-term operating license.

8. Appendix A, Section XIII, Physical Security

This section notes that the applicant's physical security plan does not comply with the licensee's commitments, but that the applicant has submitted a proposed security plan for evaluation by Amendment No. 2 to the Application to Convert to a Full-Term Operating License. It is considered that prior to the issuance of a full-term operating license that the applicant's physical security plan and related procedures should be acceptable to the U.S. AEC and in addition to the criteria contained in 10 CFR Part 73, meet all requirements of ANSI N18.17-1973, Regulatory Guide 5.20 and other applicable guides and guidelines.

9. Appendix A, Section XIV, Item B, Additional Action Items

It is noted that the licensee is currently reviewing and updating operating procedures to meet the requirements of ANSI N18.7-1972, but no schedule of completion is noted or projected. It is considered that the operating procedures should be updated and reviewed by the U.S. AEC for compliance prior to the issuance of a full-term operating license.

August 26, 1974