MAR 2 1 1972

Docket No. 50-220

Niagara Mohawk Power Corporation
ATTN: Mr. Thomas J. Brosnan
Vice President and
Chief Engineer
300 Erie Boulevard West
Syracuse, New York 13202

Gentlemen:

Your letter dated February 28, 1972, proposed changes to the Technical Specifications of Provisional Operating License No. DPR-17 for the Nine Mile Point (NMP) Nuclear Station. The proposed changes include lowering the set points of the solenoid-actuated pressure relief valves, lowering the set point for initiation of the emergency cooling condensers and increasing the requirement for operation of five, rather than four, relief valves to maintain the same margin between the transient peak pressure and the safety valve set points. These proposed changes to the Technical Specifications are required as the result of revision of the basic scram reactivity curves used to calculate NMP systems' response to transients. To continue our review and evaluation of the proposed changes and the accompanying analyses, the following additional information is required:

1. You state that improved analytical techniques available at General Electric Company caused you to adopt the proposed revised scram reactivity curve, but no information regarding these techniques was provided. Describe the analytical techniques used previously, the changes being made to the analytical model, and the basis for considering the change an improvement.

2. Describe the data and measurements obtained at NMP from reactor operations and tests that support use of the new analytical techniques.

3. The effect of partial refuelings on the scram reactivity curve has not been presented. Please define the relationship of the present core loading with the scram reactivity

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curve and describe the effect on scram reactivity from approaching an equilibrium fuel loading, including the expected operational control rod patterns.

4. Your analyses supporting the proposed changes do not include consideration of the control rod drop accident. The change in slope of the scram reactivity curve would indicate an increased rate of reactivity insertion in the event of a control rod drop accident. Provide a complete reanalysis of this accident, including consideration of the validity of the assumed maximum reactivity worth of the control rod involved in the drop accident. Your attention is directed to a letter dated March 8, 1972, to Mr. A. P. Bray of the General Electric Company from R. S. Boyd, Division of Reactor Licensing. A copy of this letter is enclosed for your convenience.

You are requested to provide information responsive to the above concerns by May 1, 1972. Please provide one signed and 39 additional copies of the information. Do not hesitate to contact Messrs. C. J. DeBevec or D. L. Ziemann of my staff for clarification of the requested information.

Sincerely,

/s/

Donald J. Skovholt
Assistant Director for
Reactor Operations
Division of Reactor Licensing

Enclosure:
Ltr fm Boyd to Bray
dtd 3/8/72

cc w/enclosure:
Arvin E. Upton, Esquire
LeBoeuf, Lamb, Leiby & MacRae
1821 Jefferson Place, N. W.
Washington, D. C. 20036

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