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CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 1		DOCKET NO: 50-220		

DESCRIPTION: Ltr submitted on behalf of Niagara Mohawk Power Corp. trans the following:

ACKNOWLEDGED
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PLANT NAME: Nine Mile Pt. Unit 1

ENCLOSURES: Request for Exemption from App. J to 10 CFR Part 50 with attachment A entitled "Requested Exemptions to 10 CFR 50, App. J" & Attachment B entitled "Safety Evaluation for Niagara Mohawk Power Corp."

(1 cy. encl rec'd)

CERTIFICATE OF SERVICE dated 10-31-75 shw svc of Request for Exemption upon R. Jones, Town of Scriba, Oswego, N.Y.

FOR ACTION/INFORMATION

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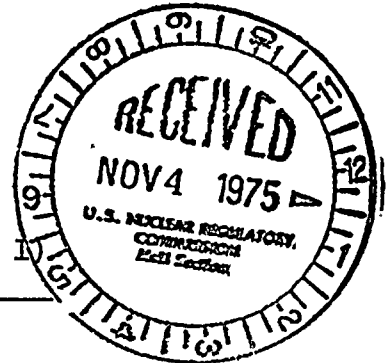
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Regulatory Docket File

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Niagara Mohawk Power Corporation
(Nine Mile Point Nuclear Station No. 1)
Docket No. 50-220



Dear Sir:

On October 28, 1975, Niagara Mohawk Power Corporation filed with the Commission an Application For Amendment To Operating License to conform Nine Mile Point Unit No. 1's technical specifications to Appendix J to 10 C.F.R. Part 50 of the Commission's regulations. A member of the Commission's Regulatory Staff has requested that the company seek an exemption from those provisions of Appendix J which are the basis for October 28th filing.

Accordingly, pursuant to Section 50.12 of the Commission's regulations, we hereby transmit an original of a document entitled "Request For Exemption" together with Attachments A and B. Two additional copies of this document are also transmitted for your convenience.

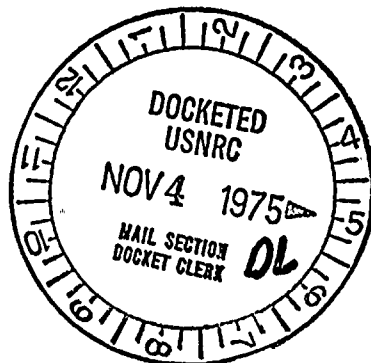
A Certificate of Service showing service of these documents upon the persons listed therein is also enclosed.

Very truly yours,

LeBoeuf, Lamb, Leiby & MacRae

LeBoeuf, Lamb, Leiby & MacRae
Attorneys for Niagara Mohawk
Power Corporation

Enclosures



12709

01551

Regulatory Docket File

BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION



In the Matter of)

NIAGARA MOHAWK POWER CORPORATION)
(Nine Mile Point Nuclear Station)
Unit No. 1))

Docket No. 50-220

10-31-75

CERTIFICATE OF SERVICE

I hereby certify that I have served a document
entitled "Request For Exemption" by mailing a copy thereof
first class, postage prepaid, to the following persons this
31st day of October, 1975.

Mr. Robert P. Jones
Supervisor
Town of Scriba
R. D. #4
Oswego, New York 13126

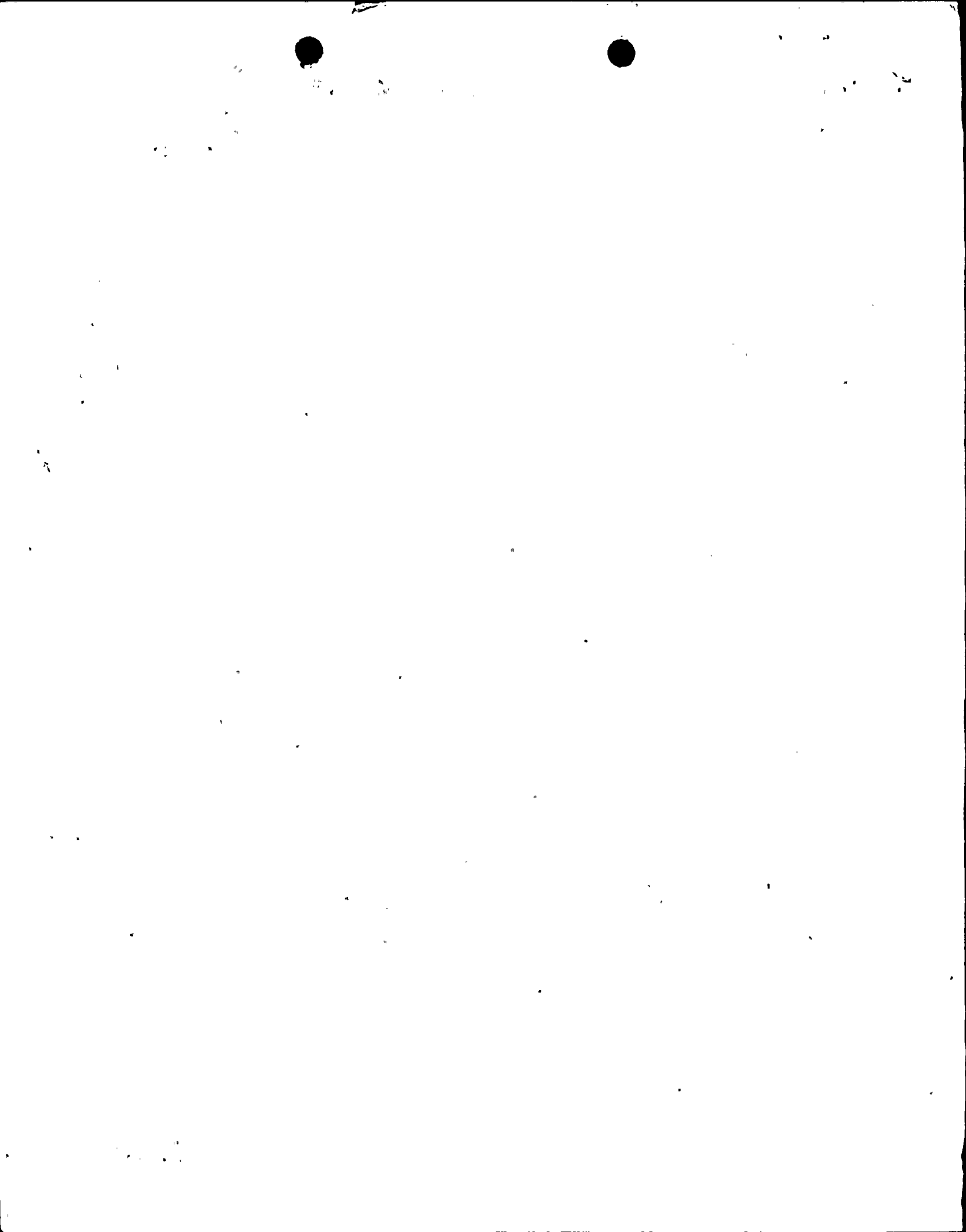
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LeBoeuf, Lamb, Leiby & MacRae
Attorneys for Applicant

12709



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

~~CONFIDENTIAL~~ 10-31-75

In the matter of

NIAGARA MOHAWK POWER CORPORATION
(Nine Mile Point Nuclear Station
Unit No. 1)

Docket No. 50-220

REQUEST FOR EXEMPTION

Pursuant to Section 50.12 of the regulations of the Nuclear Regulatory Commission, Niagara Mohawk Power Corporation, holder of Facility Operating License No. DPR-63, hereby requests that it be exempted from certain provisions of Appendix J to 10 CFR Part 50. The specific exemptions requested are set forth in Attachment A to this application. A safety evaluation which demonstrates that the proposed exemptions will not endanger life and property or the common defense and security and are otherwise in the public interest is set forth in Attachment B. The proposed exemptions would not authorize any change in the types or any increase in the amounts of normal plant effluents or any change in the authorized power level of the facility.

WHEREFORE, Applicant respectfully requests that it be
exempted from Appendix J to 10 CFR Part 50 as set forth in Attachment
A.

NIAGARA MOHAWK POWER CORPORATION

By 

Gerald K. Rhode

Vice President - Engineering

Subscribed and sworn to before
me this 30th day of October,
1975.

Patricia A. Connor (Patricia C. Nott)

Notary Public

PATRICIA A. CONNOR
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4608264
My Commission Expires March 30, 1977

REPRODUCED FROM
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Attachment A

Niagara Mohawk Power Corporation

License No. DPR-63

Docket No. 50-220

REQUESTED EXEMPTIONS TO 10 CFR 50, APPENDIX J

Specific exemptions to the testing requirements of 10 CFR 50, Appendix J are hereby requested as follows. The supporting information for these exemptions is contained in Attachment B.

Penetrations (Type B Tests)

1. Control rod drive hydraulic piping (262)
2. Containment ventilation lines (9)
3. TIP system indexer cables (4)
4. All spare penetrations (104)

Isolation Valves (Type C Tests)

Valves which may be called upon to perform a containment isolation function during a Loss-of-Coolant Accident, which are not testable, include:

1. Reactor cleanup - all isolation valves
2. Shutdown cooling - outside check valve and both inside isolation valves

Attachment A

(Continued)

3. Drywell equipment and floor drain isolation valves
4. Emergency cooling steam line drain isolation valves
(Test connections will be provided by the Spring, 1977 refueling outage.)

An appropriate Technical Specification change was submitted on October 24, 1975 addressing these exemptions and the following valves discussed below.

No exemptions were requested for valves which are or may be relied upon to operate during a Loss-of-Coolant Accident since they are not considered to perform a containment isolation function. These valves are in the Feedwater (HPCI), Emergency Cooling, Liquid Poison, Control Rod Drive Hydraulic, Reactor Head Spray, Airborne Activity Monitor, Core Spray and Containment Spray piping. It should be noted that Emergency Cooling is the only ECCS system which is not normally sealed with water and that isolation valves are provided in the branch piping systems which will be tested in accordance with Appendix J. Valves in the Recirculation Pump and Drywell Cooler Water Supplies are not considered to perform a containment isolation function since these systems are not open to the free space of the containment or reactor vessel under normal or accident conditions.

Attachment B

Niagara Mohawk Power Corporation

License No. DPR-63

Docket No. 50-220

SAFETY EVALUATION

Attachment A presents the proposed exemptions to 10 CFR 50, Appendix J. The Nine Mile Point Unit 1 plant was designed and constructed prior to the issuance of the General Design Criteria of 10 CFR 50, Appendix A. Though the facility does not fully comply with the specifics of the containment design criteria, it does meet the general intent of those criteria. Approximately 73 percent of those valves which perform a containment isolation function will be tested in accordance with Appendix J. When test connections are completed on the Emergency Cooling steam line drain valves, by the Spring of 1977, this figure will rise to about 79 percent.

Penetrations

Penetrations will be tested for leakage in accordance with the requirements for Type B tests, with the exception of a few which have been classified as non-testable. Non-testable penetrations include control rod drive, containment ventilation, TIP system, and spares.

No provisions exist to test the control rod drive penetrations. As described in the FSAR, each control rod drive pipe (262 in all) is welded to a sleeve which in turn is welded to the drywell liner. Similarly, containment ventilation lines are welded directly to the penetration sleeves. Thus, there is no chamber between the line and penetration sleeve which makes testing impossible. The TIP system indexer cables are fed through a solid flange on the inside of the penetration sleeve, and must be free to move. There is no provision for testing these since the penetration sleeve outside the drywell is open ended. Also, no provision exists for the testing of spare penetrations since these penetration sleeves are welded shut from the inside and are open-ended on the outside.

Attachment B

(Continued)

Isolation Valves

Valves which are relied upon to perform a containment isolation function will be tested for leakage in accordance with the requirements for Type C tests, with the exception of those which have been classified as non-testable. Justification for each non-testable classification follows:

1. Reactor Cleanup and Shutdown Cooling

The only locally testable valve in these systems is the outside valve for the line carrying shutdown cooling water from the reactor. These are closed systems where leakage outside the system is an unlikely possibility. The inside valves on both systems cannot be isolated from the reactor for air or nitrogen tests. A water test is not feasible since the reactor would have to be pressurized and the test connection is inside the containment. The outside valves on the water return lines of both systems consist of check valves which were not designed to meet the stringent leakage criteria of Appendix J. The power operated outside valve on the cleanup line leaving the reactor is located in an area of high radiation even during shutdown. Local testing of this valve would result in high employee radiation doses.

2. Drywell Equipment Drain Line and Floor Drain Line

Testing these valves would require drainage of the systems and pressurization of the containment.

3. Reactor Cleanup System Relief Valve Discharge

Testing these valves would require the lowering of the suppression pool water level by about 3.5 feet which is impractical.

4. Emergency Cooling

There are presently no test connections on the steam line drain valves. Test connections will be provided by the next major refueling outage to permit these valves to be tested. This outage is currently planned for Spring, 1977.

Attachment B

(Continued)

All of the penetrations and isolation valves which perform an isolation function are tested during the integrated containment leak test (Type A). Leakage from the penetrations and valves listed in Attachment A of this report would be measured during this test. Therefore, the lack of local leak test capability does not preclude measurement of leakage through these valves and penetrations although the frequency of such measurement would be reduced. In addition, the systems involved in the exemptions are all normally filled with water, with the exception of Emergency Cooling, and therefore leakage from the containment is an unlikely possibility. As previously noted, the Emergency Cooling steam line drain valves have been committed to be made testable by the Spring of 1977.

It is concluded that these proposed exemptions will not endanger life and property or the common defense and security and are otherwise in the public interest.

