

September 4, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Dear Mr. Vassallo:

Our April 30, 1984 letter provided information and schedules related to the generic implications of the Salem Anticipated Transient Without Scram events (Generic Letter 83-28). Attached is information regarding Sections 2.1 and 2.2.2 of your generic letter for Nine Mile Point Unit 1.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangano

C. V. Mangano
Vice President
Nuclear Engineering and Licensing

PM/bd
Attachment

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1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the study and the objectives of the research.

2. The second part of the report is a detailed description of the methodology used in the study. It includes information about the sample size, the data collection methods, and the statistical analysis techniques.

3. The third part of the report is a discussion of the results of the study. It presents the findings of the research and discusses their implications for the field of study.

4. The fourth part of the report is a conclusion and a summary of the main findings of the study. It also includes some recommendations for further research.

5. The fifth part of the report is a list of references. It includes all the sources of information used in the study.

6. The sixth part of the report is a list of appendices. It includes any additional information that is relevant to the study.

ADDITIONAL INFORMATION REGARDING GENERIC LETTER 83-28

I. Equipment Classification Methodology (Section 2.1)

In our initial response to Generic Letter 83-28, dated November 8, 1983, Niagara Mohawk stated that a review of General Electric's equipment classification methodology would be conducted and appropriate Engineering Procedures would be revised if necessary. Niagara Mohawk has reviewed General Electric's methodology, as stated in NEDC-30505, and has concluded that general agreement exists with the appropriate engineering procedures. Therefore, procedure revisions are not warranted.

However, at this time, Niagara Mohawk has a project underway which involves a review of our equipment classification list (Q-List). The present Q-List delineates the applicable quality requirements on a system basis, with updates for individual components. This project will convert the Q-List to a component level list. This list, when completed, will include the mechanical, electrical, instrumentation and control, and structural portions of Nine Mile Point Unit 1. The criteria being used for the component classification are those listed in the Nine Mile Point Unit 1 Final Safety Analysis Report, dated June 1967, and its Second, Supplement, dated October 1968. Additional guidance is being utilized from ANSI/ANS 52.1-1983, "Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants," and appropriate industry codes and standards (i.e. ASME, IEEE, etc.). This project will provide a clear definition to those structures and components, subject to the requirements of our Quality Assurance program and consistent with General Electric's criteria and the Nine Mile Point Unit 1 licensing basis.

II. Vendor Interface Program (Section 2.2.2)

As indicated in our previous correspondence, Niagara Mohawk was an active participant in the Nuclear Utility Task Action Committee formed to address control and utilization of information regarding safety related components. At the outset the Committee recognized that individual utilities have the greatest experience with, and are most cognizant of, the application of safety related equipment. Based on this recognition, the Committee investigated the mechanisms currently available to facilitate information exchange among utilities. These included the routine utility/vendor and utility/regulator interchanges and the Significant Event Evaluation and Information Network (SEE-IN) and Nuclear Plant Reliability Data System (NPRDS) programs managed by the Institute of Nuclear Power Operations (INPO). The Committee concluded that these existing activities, coupled with a coordinated program within each utility, constituted an overall program to ensure the dissemination and utilization of technical information regarding reliability of safety related equipment. Additional information describing this overall program was provided to the Nuclear Regulatory Commission in March 1984 by the Committee.

THE 21st CENTURY: A NEW WORLD ORDER

The 21st century is a new world order. It is a world of globalisation, of interconnectedness, of shared challenges and opportunities. The world is no longer divided into separate nations and regions, but is a single, unified entity. The challenges we face are global in scope, and the solutions we seek must be global in nature. We must work together, across borders and cultures, to address the challenges of the 21st century.

The challenges of the 21st century are many and varied. They include the challenges of climate change, of globalisation, of technological advancement, of social inequality, and of political instability. These challenges are interconnected and interdependent, and they require a coordinated and comprehensive response. We must work together to address these challenges, and we must do so in a way that is fair, just, and sustainable. We must ensure that the benefits of the 21st century are shared by all, and that the challenges are met with a sense of unity and purpose.

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A key element of the vendor equipment technical information program is a utility program to contribute information to the NPRDS and SEE-IN programs and to use the results of these programs. The administrative controls currently being implemented at Nine Mile Point Unit 1 contain procedures and data collection requirements related to these programs. These requirements provide assurance that information regarding safety related equipment is handled in an efficient, timely manner. No specific change to these existing administrative controls is deemed necessary at this time. However, to increase the effectiveness of the NPRDS an additional individual has been added to the Nine Mile Point Technical Staff to coordinate the activities of this program. This action, coupled with the existing administrative controls, meets the intent of Section 2.2.2 of Generic Letter 83-28 addressing vendor information and interface.

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