

September 26, 1979

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Reactor Regulation  
Washington, D. C. 20555

Dear Mr. Denton:

Re: Nine Mile Point Unit 2  
Docket No. 50-410

Our letter of April 26, 1978 transmitted the Stone & Webster Engineering Corporation's "Quality Assurance Manual, Nine Mile Point Nuclear Station - Unit 2." Subsequently, it is desired to take exception to a requirement in ANSI N45.2.5, Draft 3, Revision 1, January 1974, "Supplemental Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants" referenced in Appendix VII of the Quality Assurance Manual.

Section 5.4 of the ANSI N45.2.5 - 1974 code defines criterion for correct bolt length to be indicated by two threads of the bolt extending beyond the face of the nut. For construction of Unit 2 we will define correct bolt length to be indicated by one thread extending beyond the face of the nut.

This alternative is justified by the requirements in the Research Council on Riveted and Bolted Structural Joints "Specifications for Structural Joints using ASTM A325 and A490 Bolts." This document requires full thread engagement as defined by the end of the bolt being flush with the face of the nut. The 1978 update of ANSI N45.2.5 has also deleted the "two thread" criterion and adopted the Research Council on Riveted and Bolted Structural Joints criterion noted above.

Niagara Mohawk intends to use the "one thread" criterion for inspection of all high strength bolting at Unit 2. This practice adequately ensures that all bolts will have full thread engagement. Your expeditious review and approval of the use of the "one thread" criterion for high strength bolting in Category I structures is requested.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

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Executive Vice President

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