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RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Requests exemption to exclude certain relief valves from Type C testing contained in Section II.H of App J of 10CFR50. Valves located inside primary containment or discharge to suppression pool from outside.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

March 5, 1986
(NMP2L 0649)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

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

Niagara Mohawk Power Corporation ("Niagara Mohawk") hereby requests exemptions pursuant to 10 CFR 50.12(a) from Type C test requirements of 10 CFR Part 50 Appendix J. Specifically, Niagara Mohawk requests the exclusion of certain relief valves from Type C testing contained in Section II.H of Appendix J.

The exemption has been reviewed and found to be authorized by law and consistent with the common defense and security. The attachment to this letter demonstrates that the requested exemption presents no undue risk to the health and safety of the public and that special circumstances are present that justify granting the exemptions.

With regard to the "common defense and security" standard, the grant of the requested exemptions is consistent with the common defense and security of the United States. The Commission's Statement of Considerations in support of the exemption rule note with approval the explanation of this standard as set forth in Long Island Lighting Company (Shoreham Nuclear Power Station, Unit 1), LBP-84-45, 20 NRC 1343, 1400 (October 29, 1984). There, the term "common defense and security" refers principally to the safeguarding of special nuclear material, the absence of foreign control over the applicant, the protection of Restricted Data, and the availability of special nuclear material for defense needs. The granting of the requested exemptions will not affect any of these matters and thus such grant is consistent with the common defense and security.

The proposed exemption has been analyzed and determined not to cause additional construction or operational activities which may significantly affect the environment. They do not result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Impact Statement-Operating License Stage, a significant change in effluents or power levels or a matter not previously reviewed by the Nuclear Regulatory Commission which may have a significant adverse environmental impact.

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Niagara Mohawk is ready to meet with the cognizant Nuclear Regulatory Commission personnel to review these matters should you require additional information.

Very truly yours,

C. V. Mangan
Senior Vice President

NLR:ja
1380G

xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-410
(Nine Mile Point Unit 2)	)	

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C V Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 5th day of March, 1986.

Janis M. Macro
Notary Public in and for
Onondaga County, New York

My Commission expires:

JANIS M. MACRO
Notary Public in the State of New York
Qualified in Onondaga County No. 4784555
My Commission Expires March 30, 1987

ATTACHMENT

EXEMPTION REQUEST

RELIEF VALVES TYPE C TESTING

It is requested that an exemption be issued to exclude certain relief valves from the requirements of Section II.H of 10 CFR Part 50, Appendix J. These valves either are located inside the primary containment or discharge to the suppression pool from outside the primary containment. The discharges of the relief valves would be exposed to containment atmosphere following a loss of coolant accident. A listing of these valves is provided below:

a. Residual Heat Removal System (RHS)

1. 2RHS*RV20A, B, C
2. 2RHS*RV61A, B, C
3. 2RHS*RV108
4. 2RHS*RV110
5. 2RHS*RV139
6. 2RHS*RV152

b. Low Pressure Core Spray (CSL)

1. 2CSL*RV105
2. 2CSL*RV123

c. High Pressure Core Spray (CSH)

1. 2CSH*RV113
2. 2CSH*RV114

d. Reactor Building Closed Loop Cooling Water (CCP)

1. 2CCP*RV170
2. 2CCP*RV171

The relief valves and associated containment penetration piping are all Seismic Category I, Safety Class 2 components.

The grant of the requested exemption will not present an undue risk to the public health and safety. These valves are all included in the Type A primary containment integrated leak test. The discharge piping of the valves is exposed to either drywell or wetwell pressure during the test.

The purpose of this exemption request is to waive the requirement for Type C testing of these valves in accordance with 10 CFR 50 Appendix J. They will be included in the Type A test instead. The basis for this exemption request is the ALARA and design considerations related to the conduct of the Type C test for these valves.

All the valves are located in potentially high radiation areas. They require dismantling of discharge piping to perform the test, since there are no maintenance valves to provide a test boundary. The relief valves were purposely designed without surrounding block valves to comply with the guidance of Subsection NC7000 of the ASME Code, Section III. Thus, preparations and performance for Type C testing of these valves could result in excessive radiation exposure to plant personnel. This is contrary to ALARA policies considering that the valves can be included in the Type A test.

In addition to ALARA concerns, other considerations support the exemption of these valves from Type C test requirements. All the valves located in the secondary containment (13 out of 16 valves) discharge into common headers which penetrate the primary containment wall and then turn down into the suppression pool. To provide a test boundary for individual valves would require blank flanges in each valve discharge line. These flange connections would themselves represent additional leakage paths from the primary containment. Also, these flange connections would require Type B testing, thereby aggravating the ALARA concerns. It should also be noted that LOCA pressure and valve spring pressure tend to seat the valves against leakage.

For the three valves located inside the drywell, i.e., CCP*RV170, 171 and RHS*RV152, there is little likelihood of any leakage to the secondary containment. The only path through these valves is across the valve seat. LOCA pressure opposes the normal valve opening, and the valve springs, set for relief pressures of 100 psig to 1575 psig, assist in seating the valves. Furthermore, any leakage that might occur would be detected during normal system operation. System operating pressures are higher than LOCA pressure and tend to open the valves. Thus, any valve seat degradation would be evident during system operation prior to reaching a condition that would permit significant post-LOCA leakage. Leakage through these valves would be detected early by several means, e.g., loss of expansion tank level (CCP), a loss of reactor level (RHS), and an increase in drywell floor drain tank level.

Based on the above considerations, exclusion of the safety relief valves from the Type C testing would present no undue risk to the public health and safety.

Special Circumstances are Present Which Warrant Issuance of the Requested Exemptions

Special circumstances are present which warrant issuance of the requested exemption. These special circumstances are discussed in accordance with the classification contained in the rule.

> (i) "Application of the regulation in the particular circumstances conflicts with other rules or requirements of the Commission; or"

As previously discussed, Appendix J is in conflict with ALARA considerations. Thus, special circumstances are present which warrant granting the exemption.

> (ii) "Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule..."

As previously discussed, to provide a test boundary for certain individual valves would require blank flanges in each valve discharge line. These flange connections would themselves represent additional leakage paths from the primary containment. Thus, special circumstances are present which warrant granting the exemption.

> (ii) "Application of the regulation in the particular circumstances . . . is not necessary to achieve the underlying purpose of the rule; or

The underlying purpose of the rule is to assure a low leakage containment with the ultimate objective of keeping accident doses low. These valves are all included in the Type A primary containment integrated leak test. The discharge piping of the valves is exposed to either drywell or wetwell pressure during the test. Thus, special circumstances are present which warrant granting the exemptions.