

NIAGARA
MOHAWK

NIAGARA MOHAWK POWER CORPORATION/200 ERIE BOULEVARD WEST SYRACUSE, N.Y. 13202, TELEPHONE (315) 474-1511

May 11, 1984
(NMP2L 0050)

Mr. A. Schwencer, Chief
U. S. Nuclear Regulatory Commission
Licensing Branch No. 2
Washington, DC 20555

Dear Mr. Schwencer:

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

The Standard Review Plan (NUREG-0800, dated July 19, 1981) requires an analysis of the Probable Maximum Precipitation at Nine Mile Point - Unit 2. FSAR Section 2.4 provides the results of the analysis performed for Unit 2. The analysis used Hydromet 33 and Corps of Engineers Engineering Manual as required by NUREG-0800. The Unit 2 design, based upon these references, prevents any local flooding at the site.

Subsequently, in Nuclear Regulatory Commission Question F240.11, it was requested that that we base the Probably Maximum Precipitation on Hydromet 51 and 52. We believe that these bases go beyond the current Standard Review Plan requirements since these reports are not referenced in the Standard Review Plan explicitly. We request the Nuclear Regulatory Commission Committee for the Review of Generic Requirements review this generic new requirement to determine if Hydromet 51 and 52 are applicable to the Nine Mile Point Unit 2 licensing basis.

Our review of Hydromet 52 indicates that the development of the Probable Maximum Precipitation curves for the Nine Mile Point Unit 2 area was heavily influenced by the Smethport, Pennsylvania storm. It is our opinion that it may be inappropriate to translate the Smethport storm to the Nine Mile Point Unit 2 site. Also, it is unclear what the basis is of the 0.7 ratio used to determine the one hour Probable Maximum Precipitation rainfall from the six hour Probable Maximum Precipitation rainfall. If Hydromet 51 and 52, as presently defined, were applicable to the Nine Mile Point Unit 2 site, our preliminary review indicates that local flooding could occur.

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During the period that the Committee for the Review of Generic Requirements is reviewing the applicability of Hydromet 51 and 52, we request that a meeting be arranged with the National Oceanographic and Atmospheric Administration (authors of Hydromet 52) and our technical staff to discuss and clarify these technical requirements, if applicable. We believe this to be an expedient approach in completing our evaluation of the Probable Maximum Precipitation.

Very truly yours,

C. V. Mangan

C. V. Mangan
Vice President
Nuclear Licensing and Engineering

CVM/NLR:lf

cc: Director of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. C. V. Mangan
Vice President
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Docket File
NRC PDR
Local PDR
PRC System
NSIC
LE#2 Reading
EHylton
MHaughey
BBordenick
ACRS (16)
EJordan
KGrace
RWescott
MFiegel

Dear Mr. Mangan:

SUBJECT: NINE MILE POINT UNIT 2 PROBABLE MAXIMUM PRECIPITATION (PMP)

In your letter to Mr. A. Schwencer dated May 11, 1984, concerning the use of Hydrometeorology Reports (HMR) 51 and 52 as the basis for the PMP at Nine Mile Point Unit 2 (NMP-2), you requested that (1) the NRC request a meeting be arranged with the National Oceanographic and Atmospheric Administration (NOAA) and your staff to discuss and clarify the use of HMR 51 and 52 at the NMP-2 site and (2) the NRC Committee for the Review of Generic Requirements (CRGR) review the use of HMR's 51 and 52 as a design basis for NMP-2.

The meeting you requested with NOAA was held on May 15, 1984. During that meeting representatives of NOAA discussed why HMR's 51 and 52 are appropriate for the NMP-2 site. Translation of the Smethport, PA storm and the basis of the 0.7 ratio used to determine the one hour PMP rainfall were also discussed. During the meeting the NRC staff also discussed alternate means of dealing with potential flooding.

In our letter from Thomas M. Novak to Gerald K. Rhode dated February 3, 1984, we stated the reasons why use of HMR 51 and 52 as a design basis for NMP-2's PMP have been evaluated to be in conformance with the SRP.

As noted in our letter of February 3, 1984, if there are still objections to the use of HMR's 51 and 52 you have the right to appeal. If you do intend to appeal, it should contain a clear statement of your position along with supporting justification. The appeal process is described in Generic Letter 84-08 "Interim Procedures for NRC Management of Plant-Specific Backfitting."

If you have any questions concerning the above information, please contact the licensing project manager, Mary F. Haughey at (301) 492-7897.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

cc: See next page

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*See previous concurrence

