

April 16, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Eisenhut:

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

Your letter of March 17, 1982 requested information regarding completion dates and/or schedules for implementation of various TMI action items.

Contained herein is the information you requested.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Thomas E. Lempges

Thomas E. Lempges
Vice President - Nuclear Generation

RJP:ja

A001
5
11

STATE OF NEW YORK)

SS:

COUNTY OF ONONDAGA)

THOMAS E. LEMPGES, being duly sworn says:

I am Vice President - Nuclear Generation of Niagara Mohawk Power Corporation. I have read the foregoing letter and the facts contained in the letter and attachment are true to the best of my knowledge, information and belief.

Thomas E. Lempges
Thomas E. Lempges

Sworn to before me on
this 16th day of April, 1982

Phyllis V. Joytko
Notary Public

NOTARY PUBLIC IN THE STATE OF NEW YORK
Qualified by Commission No. 10104-82-01
Date of Expiration: March 15, 1984

TABLE OF CONTENTS

<u>ITEM</u>	<u>TITLE</u>	<u>PAGE</u>
I.A.3.1	Simulator Exams	1
II.B.2	Plant Shielding	2
II.B.3	Post-accident Sampling	3
II.B.4	Training for Mitigating Core Damage	4
II.E.1.2	Auxiliary Feedwater Initiation & Flow Indicator	Applies to PWR Plants Only
II.E.4.2	Containment Isolation Dependability	5
	Part 5 - lower containment pressure setpoint to level compatible with normal operation	5
	Part 7 - isolate purge and vent valves on radiation signal	5
II.F.1	Accident Monitoring	6
	(1) install noble gas effluent monitors	6
	(2) provide capability for effluent monitoring of iodine	6
	(3) install in-containment radiation-level monitors	6
	(4) provide continuous indication of containment pressure	6
	(5) provide continuous indication of containment water level	6
	(6) provide continuous indication of hydrogen concentration in containment	6
II.K.2.10	Safety Grade Trip	Applies to B&W Plants Only
II.K.3.15	Isolation of HPCI and RCIC Modification	7
II.K.3.19	Interlock on Recirculation Pump	8
II.K.3.22	RCIC Suction	9
II.K.3.24	Space Cooling for HPCI/RCIC	10
II.K.3.27	Common Reference Level	11

TMI Action Plan Item No. 1.A.3.1

Revised Scope and Criteria for Licensing Exams -
Simulator Exams

As indicated in our December 17, 1980 letter, no specific implementation is required by Niagara Mohawk other than to ensure operating training is consistent with NRC examination scope and criteria. In addition, the Nuclear Regulatory Commission's Generic Letter 81-29 dated August 27, 1981 requested the schedule of exams for the remainder of 1981 and all of 1982. This was provided by letter dated October 5, 1981 and subsequent revision dated February 23, 1982. Niagara Mohawk will continue to advise the NRC with regard to schedule changes as the need arises.

Based on the aforementioned, Niagara Mohawk has met its requirements on this action item prior to the NUREG 0737 schedule of October 1, 1981.

TMI Action Plan Item No. II.B.2

Plant Shielding

Niagara Mohawk has met its requirements regarding NUREG 0737, Item II.B.2 as discussed in our letter of December 31, 1981. The modifications performed were completed prior to the NUREG 0737 schedule of January 1, 1982.

TMI Action Plan Item II.B.3

Post Accident Sampling Capability

As indicated in our December 31, 1981 letter, Nine Mile Point Unit 1 will utilize a newly installed post accident system for reactor coolant sampling and the existing H₂-O₂ containment monitoring system for containment atmosphere analysis and sampling. The letter further identified several outstanding items. The status of the outstanding items are as follows:

Outstanding Items	Status
Pre-operational Testing of Reactor Coolant Post Accident Sampling System	Site Operations Review Committee (SORC) approval of pre-operational test results on 2/4/82 with minor exceptions which do not effect the operability of the system.
Supporting Procedures for Reactor Coolant Sampling and Analysis	Completed as of 1/30/82 with procedure approval.
Installation and Pre-operational Testing of Reactor Coolant Sample Isolation Valves	Completed as of March 1, 1982 including SORC review of the pre-operational test.
Containment Atmospheric Isotopic Analysis Enhancement	Completed as of April 6, 1982 with approval of containment sample dilution procedure and procurement of required material
Procurement of Gas Chromatograph for Dissolved Gas Analysis	Equipment has been received and is currently undergoing preliminary testing.
Evaluation of Laboratory Ventilation System and Post Accident Sampling Ventilation System	Results of the evaluations provided to the NRC by letter dated April 1, 1982

Based on the aforementioned, Niagara Mohawk has met its requirements on this action item effective April 6, 1982.

TMI Action Plan Item II.B.4

Training for Mitigating Core Damage

Our letter of March 25, 1981 provided a training program outline for mitigating core damage training and a completion date for the training program. By letter dated September 30, 1981, a revised schedule was provided for completion of the initial program. The initial training program was completed in accordance with the schedule set forth in the September 30, 1981 letter, specifically it was completed by November 30, 1981.

Based on the aforementioned, Niagara Mohawk has met its requirements on this action item with completion of the initial training program on December 1, 1981.

TMI Action Plan Item II.E.4.2

Containment Isolation Dependability

Part 5 - Lower containment pressure setpoint to level compatible with normal operation

By letter dated December 31, 1980, Niagara Mohawk provided a discussion of the existing containment isolation pressure setpoint of 3.5 psig. In addition, it was indicated the existing setpoint would continue to be used for containment isolation. By letter dated December 9, 1981, the NRC transmitted the Safety Evaluation for this item which concluded that the existing setpoint meets the NUREG 0660/0737 requirements.

Based on the aforementioned, Niagara Mohawk has met its requirements regarding NUREG 0737, Item II.E.4.2 Part 5 consistent with the NUREG-0737 schedule for this part of June 1, 1981.

Part 7 - Isolate purge and vent valves on radiation signal.

As indicated by our letter of December 31, 1981, Niagara Mohawk does not plan to implement this modification unless otherwise informed by the NRC.

TMI Action Plan Item II.F.1

Accident Monitoring

II.F.1.1, Noble Gas Effluent Monitor and

II.F.1.2, Sampling and Analysis of Plant Effluents

As indicated in our letters of September 22, 1981 and December 31, 1981, Niagara Mohawk will install the radioactive gaseous effluent monitoring system designed and supplied by Science Applications, Inc. This system will perform an on-line isotopic analysis of radioactive effluents including particulate, iodine, and noble gases. The modification is scheduled to be completed by January 1, 1983. The interim measures described in the December 31, 1981 letter will continue to be implemented until the final modification is completed.

Your letter of January 18, 1982 indicated no deviations from NRC positions based on NRC discussions with our instrument vendor and stated our request for delayed implementation was under Commission review.

II.F.1.3, Containment High Range Radiation Monitor

Our letter of December 31, 1980 provided a description of the modifications to be performed to meet this action item. By letter dated February 1, 1982, we provided clarification regarding our implementation of this modification and indicated we had met requirements concerning this item.

II.F.1.4, Containment Pressure Monitor

As indicated in our September 23, 1981 and December 31, 1981 letters, the containment pressure monitor design modification described in our December 31, 1980 submittal has been completed.

Based on the aforementioned, Niagara Mohawk has met its requirements on this action item prior to the NUREG 0737 schedule of 1/1/82.

II.F.1.5, Containment Water Level Monitor

As indicated in our December 31, 1981 letter, the containment water level monitor modification described in our December 31, 1980 submittal has been completed.

Based on the aforementioned, Niagara Mohawk has met its requirements on this action item prior to the NUREG 0737 schedule of 1/1/82.

II.F.1.6, Containment Hydrogen Monitor

By letter dated March 31, 1981, Niagara Mohawk provided a description of our existing H₂-O₂ containment atmosphere sampling systems. It further stated redundant continuous indication of hydrogen concentration in the containment atmosphere is provided in the control room over the range from 0 to 20%.

Based on the aforementioned, Niagara Mohawk has met its requirements on this action item prior to the NUREG 0737 schedule of 1/1/82.

TMI Action Plan Item II.K.3.15

Modify Break-detection Logic to Prevent
Spurious Isolation of High-pressure Coolant Injections (HPCI)
and Reactor Core Isolation Cooling (RCIC)

As indicated in our December 17, 1980 letter, this item is not directly applicable to Nine Mile Point Unit 1 because it pertains to boiling water reactors with steam driven RCIC and HPCI systems. Nine Mile Point Unit 1 does not have a RCIC system and utilizes the motor driven feedwater pumps as a high pressure coolant injection system. Therefore, this item requires no further action for Nine Mile Point Unit 1.

Based on the aforementioned, no action on this item is required for Nine Mile Point Unit 1.

TMI Action Plan Item II.K.3.19

Interlock on Recirculation Pump Loops

By letter dated February 12, 1982, NRC transmitted their safety analysis for this item. It concluded the alternate means proposed by Niagara Mohawk to ensure water level in the core is measured meets the objective of Item II.K.3.19 and is therefore acceptable.

Based on the aforementioned, installation of interlocks on the recirculation loop isolation valves will not be required and no further action for Nine Mile Point Unit 1 is required.

TMI Action Plan Item II.K.3.22

Automatic Switchover of Reactor Core Isolation Cooling (RCIC)
System Suction - Verify Procedures and Modify Design

As indicated in our December 17, 1980 letter, this item is not directly applicable to Nine Mile Point Unit 1 because it pertains to boiling water reactors with a RCIC system. Nine Mile Point Unit 1 does not have a RCIC system.

Based on the aforementioned, no action on this item is required for Nine Mile Point Unit 1.

TMI Action Plan Item II.K.3.24

Confirm Adequacy of Space Cooling
for High-pressure Coolant Injection (HPCI)
and Reactor Core Isolation Cooling (RCIC) System

As indicated in our December 17, 1980 letter, this item is not applicable to Nine Mile Point Unit 1. This item pertains to boiling water reactors with HPCI and RCIC systems with pump rooms which require space cooling to maintain temperature within allowable limits. Nine Mile Point Unit 1 does not have a RCIC system. The motor driven feedwater pumps, located in open floor area of the Turbine Building, are utilized as a HPCI system.

Based on the aforementioned, no action is required on this item for Nine Mile Point Unit 1.

TMI Action Plan Item II.K.3.27

Provide Common Reference Level for Vessel Level Instrumentation

By letter dated June 1, 1981, the NRC issued an amendment which revised the Nine Mile Point Unit 1 Technical Specifications to approve the instrument scale changes necessary to provide a common reference level. In addition, a wide range reactor water level instrument newly installed to comply with NUREG 0737 Action Item II.F.2 is referenced to the same level as the existing reactor water level instrumentation.

Based on the aforementioned, Niagara Mohawk has met its requirements, and the NRC issued the technical specifications revision regarding NUREG 0737 Item II.K.3.27 effective June 1, 1981.