

**NIAGARA
MOHAWK**

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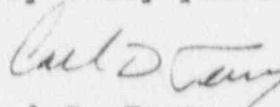
Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

On January 31, 1991, the Nuclear Regulatory Commission published for comment proposed revisions to 10CFR50.55a regarding Inservice Testing and Inservice Inspection (50 Fed. Reg. 3796, January 31, 1991). Attached please find Niagara Mohawk's comments regarding the proposed rule.

Very truly yours,



Carl D. Terry
Vice President
Nuclear Engineering

xc: Ron Simard, NUMARC

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NIAGARA MOHAWK POWER CORPORATION
COMMENTS ON PROPOSED CHANGES TO
10CFR50.55A

The proposed changes to 10CFR50.55a will separate Inservice Inspection (ISI) and Inservice Testing (IST) into two separate sections, 10CFR50.55a(f) and (g). This change will help clarify which requirements are applicable to ISI and which are applicable to IST. The proposed change anticipates the deletion of IST requirements from ASME XI and prepares the way for the imposition of the O&M Code. Niagara Mohawk believes additional clarification is required for component supports. Supports are visually inspected under ISI rules, but snubbers are functionally tested to both technical specification requirements and OM-4. Referencing OM-4 in 10CFR50.55a(f) would clarify functional testing requirements and would complement Technical Specification improvement efforts.

The proposed changes to 10CFR50.55a(f) endorse the use of OM-6&10 for testing pumps and valves. OM-6&10 expand the scope of testing programs to include pumps and valves that were not originally designed, purchased, or installed to ASME rules (e.g., Diesel auxiliary systems). This expanded scope creates a conflict with the Technical Specifications which requires ASME Class 1, 2, or 3 components to be tested. Furthermore, this expansion in scope does not take into consideration the impact of additional testing on the reliability of these systems nor the fact that these systems were not designed to be tested to OM standards. Consequently, this rule change will result in more testing on auxiliary components and more requests for relief from testing requirements. We also object to the more restrictive valve leakage limits being proposed. OM-10 valve leakage limits are based on the expected leakage of a valve in good operating condition. These limits are not based on containment leakage limits. 10CFR50 Appendix J contains the overall leakage limits for containment isolation valves. The Appendix J limit is based on 10CFR100. It is inappropriate to apply a specific containment leakage limit on a valve-by-valve basis. If changes to local leak rate test requirements are necessary, they should be addressed in Appendix J, not in 10CFR50.55a.

Niagara Mohawk has no problem with the proposed change to 10CFR50.55a(g). We have been pursuing alternate techniques for examining the reactor vessel beltline region for several years. We note, however, that even with the improved techniques, there will still be some access restrictions and that full coverage will not be obtained. Thus, relief requests for the reactor welds will still be required. It might, therefore, be more prudent to require existing relief requests to be revised and resubmitted rather than cancel all the relief requests for category B-A weldments.