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B. Ralph Sylvia
Executive Vice President
Nuclear

January 9, 1992
NMP2L 1333

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

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

Gentlemen:

The purpose of this letter is to request a temporary waiver of compliance from Nine Mile Point Unit 2 Technical Specification Limiting Condition for Operation (LCO) 3.3.7.5, Accident Monitoring Instrumentation, ACTION 80a, for item (9), "Drywell Oxygen Concentration", and item (10), "Drywell Hydrogen Concentration Analyzer and Monitor" on Table 3.3.7.5-1.

Niagara Mohawk requests a temporary waiver of compliance from the required number of channels shown in Table 3.3.7.5-1 for these two specific instrument channels in order to complete the repair and calibration of the Division 2 channel, found to be inoperable during the conduct of its Technical Specification required, quarterly surveillance test.

During performance of the quarterly surveillance test, Division 2 for these instruments was taken out of service on 1/2/92 at 1305 hrs, and T.S. 3.3.7.5 ACTION 80a was entered at that time. ACTION 80a requires restoration of the inoperable channel to operable status within 7 days or be in at least hot shutdown within the next 12 hours.

Due to unanticipated problems encountered during the repair of the Division 2 channel, a seven day extension to the allowable outage time of T.S. 3.3.7.5, ACTION 80a, is requested. This extension would enable continued plant operation and the performance of post repair calibration activities, without incurring the risk of potential transients associated with a plant shutdown.

The following are included in the Attachment to this letter:

- 1) A discussion of the requirements for which the waiver is requested.
- 2) A discussion of the circumstances surrounding the situation including the need for prompt action, and a description of why the situation could not have been avoided.

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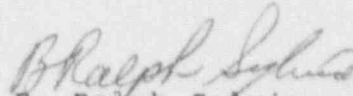
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- 3) Discussion of compensatory actions.
- 4) A preliminary evaluation of the safety significance and potential consequences of the proposed request.
- 5) A discussion justifying the duration of the request.
- 6) The basis for the conclusion that the request does not involve a significant hazards consideration.
- 7) The basis for the conclusion that the request does not involve irreversible environmental consequences.

The Nine Mile Point Unit 2 Station Operations Review Committee (SORC) has reviewed and approved the contents of this request for temporary waiver of compliance.

If you have any further questions regarding this matter, please contact my office.

Very truly yours,



B. Ralph Sylvia
Exec. Vice President - Nuclear

/mls
Attachment
002228GG

xc: Regional Administrator, Region I
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. R. A. Capra, Project Director, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. D. R. Haverkamp, Chief, Reactor Projects, Section 1B
Records Management

1) A DISCUSSION OF THE REQUIREMENTS FOR WHICH THE WAIVER IS REQUESTED

The proposed temporary waiver would permit continued operation during restoration of the Required Number of Channels for item (9), "Drywell Oxygen Concentration", and item (10), "Drywell Hydrogen Concentration Analyzer and Monitor" as required by Table 3.3.7.5-1 of the Technical Specifications. With the number of operable accident monitoring instrumentation channels less than the Required Number of Channels, ACTION 80a of T.S. Table 3.3.7.5-1 requires restoration of the inoperable channel(s) to operable status within 7 days or be in at least hot shutdown within the next 12 hours. The temporary waiver is requested for ACTION 80a as it applies to items (9) and (10) on T.S. Table 3.3.7.5-1, hereinafter referred to as the Division 2 H₂/O₂ Monitor. The requested duration of this waiver is from 1305 hours, January 9, 1992, to 1305 hours, January 16, 1992.

2) A DISCUSSION OF THE CIRCUMSTANCES SURROUNDING THE SITUATION INCLUDING THE NEED FOR PROMPT ACTION, AND A DESCRIPTION OF WHY THE SITUATION COULD NOT HAVE BEEN AVOIDED

On January 2, 1992, at 0820 hours permission was granted by the Control Room to commence the quarterly surveillance test on the Division 2 H₂/O₂ monitor. In support of the surveillance test, the monitor was subsequently removed from service (made inoperable) at 1305 hours and T.S. 3.3.7.5 ACTION 80a was entered at that time. During the performance of the surveillance test, a number of component problems internal to the monitor were identified and required component replacements. Due to the complexity and time consuming nature of the calibration procedure for the monitor, and the potential for additional repairs, it is expected that the LCO allowable outage time will likely be exceeded before the monitor can be declared operable. The Division 1 H₂/O₂ monitor has been visually verified to be operating properly. A successful calibration of the Division 1 H₂/O₂ monitor was conducted 12/18/91.

3) DISCUSSION OF COMPENSATORY ACTIONS

The Post-Accident Sampling System (PASS) can serve as a monitoring system to temporarily replace the Division 2 H₂/O₂ monitor. The PASS normally serves as a backup to the on-line H₂/O₂ monitors. The PASS is capable of providing a grab sample of the containment atmosphere for analysis using gas chromatography.

In accordance with Section 6.8.4.c of the Administrative Controls section of the Technical Specifications, the post accident sampling program ensures the capability to obtain and analyze the primary containment atmosphere under accident conditions. This program includes training of personnel, procedures for sampling and analysis, and provisions for maintenance of sampling and analysis equipment.

The compensatory actions taken involve the verification of the operability of the PASS to support primary containment atmosphere sampling for hydrogen and oxygen concentration. Operability of PASS was confirmed on January 8, 1992 by use of sampling and analysis procedures to obtain and analyze multiple samples of the primary containment atmosphere for hydrogen and oxygen content. The PASS was demonstrated to be operable.

In addition, the Division 1 H_2/O_2 monitor has been visually inspected and determined to be operating properly.

Additionally, once per shift, the Division 1 H_2/O_2 monitor indicators will be visually observed for operability.

4) **A PRELIMINARY EVALUATION OF THE SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES OF THE PROPOSED REQUEST**

The Containment Monitoring System (CMS) is designed to sample the atmosphere in the drywell and in the suppression chamber. This capability is not compromised during the duration of the waiver. Although Division 2 is inoperable, atmospheric samples of the drywell and the suppression chamber can continue to be obtained by the operable Division 1 H_2/O_2 monitor. In the event that the Division 1 loop is lost due to a single failure, backup sampling and analysis for the containment on-line H_2/O_2 monitoring system is retained via the Post Accident Sampling System. A grab sample of the containment atmosphere can be obtained by the Post-Accident Sampling System and analyzed using gas chromatography. Approved procedures are available for performing these activities. Consequently, the sampling of the primary containment atmosphere following a design basis LOCA is minimally affected and any adverse consequences associated with the proposed request are negligible.

5) **A DISCUSSION JUSTIFYING THE DURATION OF THE REQUEST**

Niagara Mohawk is requesting that this temporary waiver of compliance be granted from 1305 hours, January 9, 1992, to 1305 hours January 16, 1992. During this period of time, primary containment H_2/O_2 concentration can continue to be monitored by the operable Division 1 channel and, as indicated in Table II.B.3-2 of the USAR, Section 1.10, by the operable Post-Accident Sampling System. Should this temporary waiver not be granted, Nine Mile Point Unit 2 will be required to commence a plant shutdown in accordance with the current Technical Specifications at 1305 hours on January 9, 1992.

6) **THE BASIS FOR THE CONCLUSION THAT THE REQUEST DOES NOT INVOLVE A SIGNIFICANT HAZARDS CONSIDERATION**

The operation of Nine Mile Point Unit 2, in accordance with the proposed temporary waiver of compliance, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed waiver does not involve a significant increase in the probability or consequences of an accident previously evaluated. The inoperability of the Division 2 loop does not affect the containment sampling and analysis capability of the operable Division 1 loop. In addition, the primary containment isolation valves associated with the inoperable Division 2 H_2/O_2 monitor are operable. In the event that the Division 1 loop is lost due to a single failure, sampling and analysis capability for the primary containment atmosphere for H_2/O_2 concentration is provided by the Post Accident Sampling System. A grab sample of the containment atmosphere can be obtained by the Post-Accident Sampling System and analyzed using gas chromatography during accident conditions. Approved procedures are available for performing these activities. Consequently, since two independent methods are available to support determination of H_2 and O_2 concentration levels in the primary containment, the consequences of an accident are not different from that previously evaluated. The probability of an accident previously evaluated will not significantly increase since the PASS and the inoperability of the Division 2 H_2/O_2 monitor are not initiating events to any previously evaluated accident.

The operation of Nine Mile Point Unit 2, in accordance with the proposed temporary waiver of compliance, will not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed temporary waiver does not create the possibility of a new or different kind of accident from any accident previously evaluated since two methods are maintained for the sampling and analysis of primary containment atmosphere for H_2/O_2 concentration. The sampling capability is provided by the Division 1 H_2/O_2 monitor and by PASS. This capability ensures the timely detection of increasing H_2 and O_2 levels in primary containment such that hydrogen recombiners will be started in a time frame consistent with the USAR accident analyses.

The operation of Nine Mile Point Unit 2, in accordance with the proposed temporary waiver of compliance, will not involve a significant reduction in a margin of safety.

Retention of the ability to sample and analyze the drywell and suppression chamber atmosphere with the operable Division 1 loop, in addition to the backup capability to sample and analyze these atmospheres through the Post-Accident Sampling System and gas chromatography, results in no significant reduction in the ability to carry out the monitoring of the primary containment atmosphere following accident conditions. Therefore, there is not a significant reduction in margin of safety.

7) THE BASIS FOR THE CONCLUSION THAT THE REQUEST DOES NOT INVOLVE IRREVERSIBLE ENVIRONMENTAL CONSEQUENCES

This request involves a temporary waiver in instrument operability requirements. This change involves no

significant increase in the amounts or types of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. The requested temporary waiver does not physically modify the plant, increase the plant's licensed power level or involve irreversible environmental consequences.