



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

F 85-00-02

June 28, 1985
(NMP2L 0435)

Mr. R. W. Starostecki, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Reactor Projects
631 Park Avenue
King of Prussia, PA 19406

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

Dear Mr. Starostecki:

Enclosed is a final report, in accordance with 10CFR50.55(e), for the problem concerning Carbo Zinc 11 primer. This problem was reported via tel-con to R. Barkley of your staff on January 30, 1985. An interim report was submitted on February 28, 1985.

Very truly yours,

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

CVM/GG/c1a

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

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

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NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT - UNIT 2
DOCKET NO. 50-410

Final Report for a Problem
Concerning Carbo Zinc 11 Primer
(55(e)-85-02)

Description of the Problem

Carbo Zinc 11 primer supplied by the Carboline Company has been used on the liner and various steel surfaces inside the primary containment. After being left to cure for the manufacturer's recommended cure time, a cure test indicated that the required cured coating properties were not developed.

Analysis of Safety Implications

A test program was performed by Oak Ridge National Laboratories and Carboline resulting in a report issued April 1, 1985. Results of the testing revealed that only surfaces, which had the zinc primer reduced to 0.5 mils (+ 0.5 mils) prior to applying the epoxy topcoating material or which were not topcoated, would yield a system that would successfully withstand Design Base Accident conditions in accordance with ANSI N101.2. Since the surface area involved is approximately 37,000 sq. ft., the potential debris generated following a Design Base Accident could be substantial and could have posed a problem to the operation of the post accident fluid systems. No calculations were performed to establish whether the failure of a topcoated system in the affected areas would be detrimental to the operation of the post accident fluid systems. Therefore, it is conservatively assumed that had the zinc primer been topcoated, it could have adversely affected the safety of operation of the plant.

Corrective Action

Approximately 8000 square feet of the involved area has had the zinc primer removed. About 3000 square feet was recoated with Carboline 193 LF primer and will receive an approved topcoat. The remaining 5000 square feet have been recoated with Carboline 191 HB topcoat only.

The zinc primer currently existing on the liner and various steel surfaces is untopcoated and will be left "as-is". The existing untopcoated zinc primer has been Design Base Accident qualified and will not create debris following an accident. It has also been considered in the evaluation for hydrogen generation.

It should be noted that future changes in the coatings may be made based on operational considerations. Such changes, if made, will also result in a system capable of withstanding a Design Base Accident.