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February 25, 2000
NMP2L 1938

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

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

Subject: *Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves"*

Gentlemen:

The purpose of this letter is to provide a revision to our commitment regarding Generic Letter (GL) 95-07 for Nine Mile Point Unit 2 (NMP2). Specifically, certain service water system valves will not be modified during the NMP2 refueling outage scheduled for the spring of 2000.

On August 17, 1995, the NRC issued GL 95-07, titled "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves," to request that licensees take actions to ensure that safety-related power-operated gate valves susceptible to pressure locking or thermal binding, are capable of performing their safety functions. By letters dated October 16, 1995, and February 13, 1996, Niagara Mohawk Power Corporation (NMPC) provided responses to GL 95-07. The NRC Staff requested additional information on May 21, 1996, to which we responded on June 20, 1996.

On November 21, 1996, NMPC revised previous responses to GL 95-07 based upon further review of our method for evaluating pressure locking and thermal binding. By letter dated February 8, 1999, the Staff indicated that additional information was required concerning our November 21, 1996, submittal. On April 21, 1999, NMPC provided the requested additional information.

Specifically, in our April 21, 1999, response NMPC stated that service water system valves 2SWP*MOV66A/B and 2SWP*MOV94B meet the Commonwealth Edison methodology, but not the additional 20% margin and will be modified. Niagara Mohawk also stated that the methodology used to determine the pressure increase to the bonnet is very conservative and if further evaluation of the valve(s) confirm(s) that modification(s) is (are) not required, NMPC will notify the Staff.

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After further evaluation, NMPC has concluded that these valves are not susceptible to pressure locking because there are no accident or operational scenarios that will result in bonnet heatup. These valves are normally closed valves with an active safety-related function to open and permit service water return flow from the respective Emergency Diesel Generator. Therefore, the Commonwealth Edison methodology plus 20% margin does not apply to these valves. Accordingly, these valves will not be modified to satisfy this anti-pressure locking criteria.

If you have further questions regarding this matter, please contact Kenneth Korcz of my Licensing Staff at (315) 349-7222.

Sincerely,



Richard B. Abbott
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RBA/KWK/tmk

xc: Mr. H. J. Miller, NRC Regional Administrator
Ms. M.K. Gamberoni, Acting Section Chief, Project Directorate I-1, NRR
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