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March 14, 2000
NMP2L 1943

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

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

Subject: *Generic Letter 96-06 Corrective Actions (TAC No. M96837)*

Gentlemen:

This letter is regarding the piping thermal overpressurization issue identified in NRC Generic Letter (GL) 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," dated September 30, 1996, and its Supplement 1, dated November 13, 1997.

In a letter dated March 31, 1999, Niagara Mohawk Power Corporation (NMPC) informed the NRC that thermal overpressure analyses for eight Nine Mile Point Unit 2 (NMP2) reactor recirculation (RCS) penetrations had been completed utilizing the ASME Code, Section III, Appendix F criteria. The letter stated that the use of Appendix F criteria for other than Class 1 applications (such as the RCS penetrations, which are Class 2) is a license/design basis change requiring NRC approval. The letter committed to submit by October 30, 1999, the required documentation for NRC approval. On October 30, 1999, NMPC informed the NRC Senior Resident Inspector that the impact of using Appendix F on the NMP2 license/design basis was being re-assessed and, as a result, the October 30, 1999, due date could not be met.

Based on a 10 CFR 50.59 evaluation using the guidance in Supplement 1 of GL 96-06, NMPC has determined that the use of Appendix F criteria for Class 1, 2, and 3 applications is not an unreviewed safety question. Based on this determination, and considering that the Appendix F analyses demonstrated that the eight RCS penetrations in question satisfy the applicable ASME Code, Section III stress limits, no NRC approval is required.

During refueling outage number 7 (RFO7), NMPC plans to modify six of the seven pipe segments that were identified for modification during RFO7 in NMPC's letter dated January 20, 1999. Regarding the seventh pipe segment, which passes through penetration 2WCS*Z23 (Reactor Water Cleanup System), an Appendix F analysis has demonstrated that no modification is required. Therefore, the commitment in the January 20, 1999 letter to modify penetration 2WCS*Z23 is being withdrawn.

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Consistent with NMPC's commitment in Supplement 2 to Licensee Event Report 96-16, dated March 13, 1997, various vents, drains, and test connections that had initially been determined to be susceptible to overpressurization were also analyzed using the Appendix F criteria. The results demonstrated that the applicable ASME Code, Section III stress limits are satisfied. Therefore, no modifications are required.

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/IAA/tmk

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Gamberoni, Acting Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR
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