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

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

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

Gentlemen:
The purpose of this letter is to provide you our response to Generic Letter 89-06, "Task Action Plan Item I.D. 2 - Safety Parameter Display System".

Generic Letter 89-06 was issued by the Commission to all licensees to obtain the implementation status of the Safety Parameter Display Systems (SPDS) as required by NUREG-0737, Supplement 1. Attached to Generic Letter 89-06 was NUREG-1342, "A Status Report Regarding Industry Implementation of Safety Parameter Display Systems". NUREG-1342 describes methods used by some licensees/applicants to implement SPDS requirements in a manner found acceptable by the Staff.

Specifically, Generic Letter 89-06 requested each licensee to provide one of the following: 1) Certification that the SPDS fully meets the requirements of NUREG-0737, Supplement 1, taking into account the information provided in NUREG-1342; 2) Certification that the SPDS will be modified to fully meet the requirements of NUREG-0737. Supplement 1, taking into account the information provided in NUREG-1342, and the modification implementation schedule; 3) If a certification cannot be provided, the reasons for the finding and a discussion of the compensatory actions to be taken.

To meet the requirements of Generic Letter 89-06, Niagara Mohawk submits the enclosed certification which states the Nine Mile Point Unit I SPDS system meets the requirements of NUREG-0737, Supplement 1, (Category I) and the Nine

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Mile Point. Unit 2 (NMP2) SPDS system will be modified to meet the requirements of NUREG-0737, Supplement 1 (Category II). A list of the required NMP2 modifications/evaluations and the scheduled implementation dates is also included.

JT/mlf
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xc: Regional Administrator, Region I
Mr. R. A. Capra, Director
Ms. M. M. Slosson, Project Manager
Mr. W. A. Cook, Resident Inspector Records Management

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## UNITED STATES

## NUCLEAR REGULATORY COWNISSION

| In the matter of | , |
| :--- | :---: |
| Unit 1 |  |
| Niagara Mohawk Power Corporation) | Docket No. 50-220 |
| and |  |
| Nine Mile Point Nuclear Station, | Unit 2 |

## CERTIFICATION

C. D. Terry, being duly sworn, states that he is Vice President, Nuclear Engineering and Lícensing of Niagara Mohawk Power Corporation, that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this certification; and that the following statements/information attached hereto are accurate.


Subscribed and Sworn to
Before me this ilth day
of
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## NMP1

Nine Mile Point Unit 1 (NMPI) Safety Parameter Display System (SPDS) meets the requirements of NUREG-0737, Supplement 1, taking into account the information provided in NUREG-1342. A brief discussion is provided below to clarify NMP1's position on NUREG-1342 Items III.A.I/III.B.1.

- NUREG-7342 Sections III.A.I/III.B.l require all SPDS-related information be physically displayed such that the information can be clearly read from the SPDS user's typical position. In the past, the main SPDS terminal and the Emergency Operating Procedures (EOP's) were located at the same work location. However, converting the EOP's from procedure to flow chart format has resulted in locating the EOP's away from the SPDS terminals. The NMPC Operations and Computer Departments are tasked with evaluating means to rectify this situation.


## MMP2

The Nine Mile Point Unit 2 (NMP2) Safety Parameter Display System (SPDS) will be modified to meet the requirements of NUREG-0737, Supplement 1, taking into account the information provided in NUREG-1342. The implementation schedule for the modifications required to bring about compliance with NUREG-0737, Supplement 1, are provided on Attachment 1.


1) Radioactivity control will be added to the SPDS displays. This includes plant overview display (Level I) and additional detail (Level II) display. All five required safety functions will then be displayed on the SPDS
2) Drywell temperature will be added as a containment integrity parameter
3) The SPDS reactor water level parameter has displayed invalid/erroneous information or has been in a false alarm condition greater than 5 percent of operation. A work request (HR 162049) has been issued to troublshoot.
4) High and Low Level setpoints will be re-evaluated as part of the overall SPDS modification.
5) Complete verification and validation (V\&V) requirements (as identified in the pre-implementation audit) i.e. man-in-theloop testing, collect and centrally locate all necessary V\&V documentation. -validation test

## Checklist Section

$2.1 .4,2.2 .9,3.1,3.3$
2.2.10, 2.2.7
4.7, 4.8
5.10
4.5, 5.15

## Scheduled <br> Completion

By end of first
refueling outage

By end of first refueling outage

By end of first refueling outage

By end of first refueling outage.

By end of first refueling outage.
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4MP2

## Description

7) Limit marks will be added on the SPOS Level II displays.
8) The SPDS computer points are not included in routine instrument loop survelllances. A Problem Report has been issued to identify all SPDS points and to include these points into applicable surveillances.
9) The SPDS screens cannot be clearly read from the EOP flowcharts. A Problem Report has been issued to evaluate options to correct this condition.

Checklist Section
5.3

Scheduled Completion
5.11
4.4

> Complete preliminary evaluátion by end of first refueling outage.

By end of first refueling outage.

Indentify points and begin process of including points in
surveillances by end of first refueling outage

Note: The changes to the SPDS defined by the NMPC response to the pre-implementation audit will be completed by the end of the first refuel outage. Other changes, resulting from the SPDS design evaluation and/or from the man-in-the loop testing will be scheduled as appropriate.

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