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SUBJECT: Provides supplemental info re three relief requests VG-2,LP-RR-2 & CRD-RR-3.

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> February 28, 1997 NMP1L 1189

MARTIN J. McCORMICK JR. P.E. Vice President Nuclear Engineering

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

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

Subject:

Relief Requests

Gentlemen:

This letter provides supplemental information to three relief requests submitted in a letter dated August 9, 1996 (NMP1L 1110). These relief requests were VG-2 (Rev. 1), LP-RR-2 (Rev. 1), and CRD-RR-3 (Rev. 1). The supplemental information provided by this letter is in response to matters discussed with the Staff during recent telephone conferences.

With regard to relief request VG-2 (Rev. 1), primary containment isolation valves will be leak tested in accordance with Option B of Appendix J of 10CFR50 and Part 10 of ASME/ANSI OMa-1988 (OM-10) Sections 4.2.2.2, 4.2.2.3(e) and 4.2.2.3(f).

Regarding relief requests LP-RR-2 (Rev. 1) and CRD-RR-3 (Rev. 1), Niagara Mohawk has proposed to verify valve closure during each refueling outage, either by performing a 10CFR50 APPENDIX J leak test or by applying differential pressure across the valve. This proposal is consistent with OM-10 Paragraph 4.3.2, which allows full-stroke exercising that is not practical during power operation or cold shutdown to be deferred to refueling outages. Furthermore, the relief requests also document the justification for deferral of closure testing in accordance with OM-10, Paragraph 6.2(d). These two relief requests involve four check valves, and therefore, the provisions of OM-10 Paragraph 4.2.1, related to stroke time testing, is not applicable. Accordingly, Niagara Mohawk will revise the IST Program to reference paragraph 3.1.1.3 of NUREG-1482, "De-inerting Containment of Boiling Water Reactors to Allow Cold Shutdown Testing," for these two relief requests, except that Paragraph 4.2.1 of OM-10, related to stroke time testing, does not apply.

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If additional information is needed with regard to these three relief requests, please contact Anthony Zallnick (315) 349-2428 of our Licensing staff.

Very truly yours,

M.Y. McCormick Jr.

Vice President Nuclear Engineering

AFZ/kap

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