

This letter forwards proprietary information in accordance with 10 CFR 2.390. The balance of this letter may be considered non-proprietary upon removal of Attachment 2.

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**NINE MILE POINT
NUCLEAR STATION**

September 23, 2011

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTENTION: Document Control Desk

SUBJECT: Nine Mile Point Nuclear Station
Unit No. 2; Docket No. 50-410

Response to Request for Review of the Draft NRC Safety Evaluation Regarding Nine Mile Point Nuclear Station, Unit No. 2 – Re: The License Amendment Request for Extended Power Uprate Operation (TAC No. ME1476)

- REFERENCES:**
- (a) Letter from K. J. Polson (NMPNS) to Document Control Desk (NRC), dated May 27, 2009, License Amendment Request (LAR) Pursuant to 10 CFR 50.90: Extended Power Uprate
 - (b) Letter from R. V. Guzman (NRC) to T. A. Lynch (NMPNS), dated September 7, 2011, Nine Mile Point Nuclear Station, Unit No. 2 - Transmittal of Draft Safety Evaluation - Extended Power Uprate (TAC No. ME1476)

By letter dated May 27, 2009 (Reference a), as supplemented, Nine Mile Point Nuclear Station, LLC (NMPNS) proposed an amendment to Nine Mile Point Unit 2 (NMP2) Renewed Operating License (OL) NPF-69 that would increase the power level authorized by OL Section 2.C.(1), Maximum Power Level, from 3467 megawatts-thermal (MWt) to 3988 MWt.

As requested in the NRC letter dated September 7, 2011 (Reference b), NMPNS has reviewed the draft Safety Evaluation (SE) prepared by the NRC staff to support the proposed license amendment. Attachment 1 provides NMPNS comments regarding information in the draft SE, and Attachment 2 provides pages of the draft SE that have been highlighted to identify information that should be marked as proprietary, in addition to the text that is already shown enclosed in double brackets.

This letter forwards proprietary information in accordance with 10 CFR 2.390. The balance of this letter may be considered non-proprietary upon removal of Attachment 2.

ADD
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Attachment 2 is considered to contain proprietary information exempt from disclosure pursuant to 10 CFR 2.390. Applications to withhold the proprietary information in this attachment from public disclosure in accordance with 10 CFR 2.390(b)(1) have been submitted in previous correspondence (identified in Reference b); therefore, this letter does not represent a new request for withholding from public disclosure.

Should you have any questions regarding the information in this submittal, please contact John J. Dosa, Director Licensing, at (315) 349-5219.

Very truly yours,

Mark D Flaherty

STATE OF NEW YORK :
: TO WIT:
COUNTY OF OSWEGO :

I, Mark D. Flaherty, being duly sworn, state that I am the Nine Mile Point Plant General Manager, and that I am duly authorized to execute and file this supplemental information on behalf of Nine Mile Point Nuclear Station, LLC. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other Nine Mile Point employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Mark D Flaherty

Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Oswego, this 23 day of September, 2011.

WITNESS my Hand and Notarial Seal:

Tonya L Jones
Notary Public

My Commission Expires:

11/12/2014
Date

MDF/DEV

TONYA L. JONES
Notary Public in the State of New York
Oswego County Reg. No. 01JO6083354
My Commission Expires 11/12/2014

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Attachments:

1. Comments Regarding Information in the Draft NRC Safety Evaluation
2. Pages of the Draft NRC Safety Evaluation Highlighted to Identify Information that Should Be Marked as Proprietary

cc: NRC Regional Administrator, Region I
NRC Resident Inspector
NRC Project Manager
A. L. Peterson, NYSERDA (w/o Attachment 2)

ATTACHMENT 1

**COMMENTS REGARDING INFORMATION IN THE
DRAFT NRC SAFETY EVALUATION**

ATTACHMENT 1

COMMENTS REGARDING INFORMATION IN THE DRAFT NRC SAFETY EVALUATION

The following table provides comments prepared by Nine Mile Point Nuclear Station, LLC (NMPNS) regarding information in the draft Safety Evaluation (SE) prepared by the NRC staff to support the proposed extended power uprate (EPU) license amendment for Nine Mile Point Unit 2 (NMP2).

Note: The term "PUSAR" refers to NEDC-33351P, Safety Analysis Report for Nine Mile Point Nuclear Station Unit 2 Constant Pressure Power Uprate.

Comment No.	Draft SE Section No. and Title	Draft SE Page	Comment
1	2.4.1, Suitability of Existing Instruments	63	Table 2.4-2 of the PUSAR originally indicated that for the Main Steam Line (MSL) High Flow parameter, respan of the transmitters and associated loop components and revised setpoints were required to support operation at EPU conditions. Subsequent evaluation has determined that respan of the transmitters and associated loop components is not necessary. Only the setpoint change is required. The NRC staff is requested to revise the table on page 63 of the draft SE to indicate that the change for the MSL High Flow parameter is to revise setpoints.
2	2.4.1, Suitability of Existing Instruments	63	Table 2.4-2 of the PUSAR originally indicated that for the Moisture Separator Reheater (MSR) Outlet Pressure parameter, replacement of transmitters, respan of the associated loop instruments, and revised alarm setpoints were required to support operation at EPU conditions. Subsequent evaluation has determined that transmitter replacement is not necessary. The NRC staff is requested to revise the table on page 63 of the draft SE to indicate that the change for the MSR Outlet Pressure parameter is to respan the associated loop instruments and revise alarm setpoints.
3	2.4.1, Suitability of Existing Instruments	63	Table 2.4-2 of the PUSAR originally indicated that for the Condensate Polisher Low Flow Alarm parameter, revised setpoints were required to support operation at EPU conditions. Subsequent evaluation has determined that a setpoint revision is not required. The NRC staff is requested to revise the table on page 63 of the draft SE to remove the Condensate Polisher Low Flow Alarm parameter entry.
4	2.4.1, Suitability of Existing Instruments	63	Table 2.4-2 of the PUSAR originally indicated that for the Condensate Polisher and Strainer ΔP parameter, revised setpoints were required to support operation at EPU conditions. Subsequent evaluation has determined that a setpoint revision is not required. The NRC staff is requested to revise the table on page 63 of the draft SE to remove the Condensate Polisher and Strainer ΔP parameter entry.

ATTACHMENT 1

COMMENTS REGARDING INFORMATION IN THE DRAFT NRC SAFETY EVALUATION

Comment No.	Draft SE Section No. and Title	Draft SE Page	Comment
5	2.4.1, Suitability of Existing Instruments	64	Table 2.4-2 of the PUSAR originally indicated that for the Main Steam Inlet Header Pressure parameter, replacement of transmitters, respan of the associated loop components, and a revised alarm setpoint were required to support operation at EPU conditions. Subsequent evaluation has determined that these changes are not necessary. The NRC staff is requested to revise the table on page 64 of the draft SE to remove the Main Steam Inlet Header Pressure parameter entry.
6	2.5.1.4, Fire Protection	76, 77	In the December 23, 2009 letter from NMPNS to the NRC, the NMPNS response to NRC staff Request for Additional Information RAI D1 indicated that there were no plant modifications that represented physical changes to plant fire protection equipment or systems to support EPU conditions. Subsequent installation scoping activities for two EPU modifications have identified the need for ancillary changes to fire protection systems. These are: (1) extending an existing sprinkler system to cover a new cable tray associated with the feedwater pump motor cable replacement modification; and (2) a minor relocation of existing sprinkler system piping to accommodate interferences associated with installation of the main transformer cooling upgrade modification. The NRC staff is requested to consider revising the SE to reflect these fire protection system changes.
7	2.5.2.3, Turbine Gland Sealing System	84	Section 2.5.2.3 of the PUSAR originally stated that no Turbine Gland Sealing System (TGSS) hardware changes were required to support operation at EPU conditions. A recent evaluation has determined that the calibrated span of the normal gland seal supply pressure indication instrument loop will need to be increased and the alarm setpoint revised. Section 2.5.2.3 of the draft SE states that no modifications are needed to support EPU conditions. The NRC staff is requested to consider revising the SE to reflect this instrumentation change.
8	2.8.4.4, Residual Heat Removal System	143	Section 2.8.4.4 of the PUSAR originally described the steam condensing mode (SCM) of operation of the residual heat removal (RHR) system. Subsequently, a plant modification has retired the SCM of RHR system operation, and the SCM is no longer available. The NRC staff is requested to revise the SE to reflect retirement of the SCM.