February 25, 2003

Mr. John T. Conway
Vice President Nine Mile Point
Nine Mile Point Nuclear Station, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT NO. 1 - CORRECTION OF SAFETY EVALUATION SUPPORTING AMENDMENT NO. 179 - DIESEL GENERATOR ALLOWED OUTAGE TIME (TAC NO. MB4612)

Dear Mr. Conway:

On February 3, 2003, the Nuclear Regulatory Commission (NRC) staff issued the subject amendment in response to your application transmitted by letter dated March 27, 2002, as supplemented by letter dated October 7, 2002. The amendment revised portions of the Technical Specifications to extend the allowable outage time for an inoperable diesel generator from 7 days to 14 days.

Subsequent to the issuance, Mr. Clyde Mackaman of your staff pointed out a number of errors in the safety evaluation (SE) supporting the amendment. We agree that administrative errors had been inadvertently made, resulting in several inaccurate statements in the SE. Enclosed please find corrected pages 4 and 6 of the SE, with side bars highlighting the areas of correction. We apologize if these errors caused you any inconvenience.

Sincerely,

\RA

Peter S. Tam, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure: Corrected SE pages 4 and 6

cc w/encl: See next page

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Weather conditions will be considered so that no preplanned maintenance will be scheduled when severe weather conditions are expected.

Testing and maintenance of equipment, load dispatching, equipment availability will be considered.

Inasmuch as the licensee uses the CRMP to satisfy the requirements of the Maintenance Rule (10 CFR 50.65(a)(4)), the above measures that are necessary to manage the increase in risk from the proposed DG maintenance activities will be appropriately controlled.

NMP1 is a boiling-water reactor (BWR)/2 design with an emergency cooling system (isolation condensers), a core spray system, automatic depressurization system (ADS) electromatic relief valves (ERV) and a high pressure coolant injection system (the feedwater system is not credited in the LOCA analysis). There are 2 isolation condensers, 4 core spray pumps, 6 ERVs and 2 motor-driven feedwater pumps. Isolation condenser and ADS ERV operations are independent of AC power.

Since the NMP1 design does not include jet pumps, core cooling following a design basis recirculation line break relies solely upon core spray. Adequate spray cooling is thus defined to exist in NMP1 when design spray flow requirements (TS Section 3.1.4) are satisfied. The licensee confirmed that, for the proposed extended outage time of 14 days, requirements in the TSs will ensure core spray pump operability during the outage (i.e., there is no change in the licensing basis and TS requirements for the core spray system).

For long-term operation of the isolation condensers, the minimum water level in the shell side is maintained with 10,680 gallons of water. This is sufficient to provide about 8 hours of continuous system operation. This time is sufficient to restore additional makeup water from the two 200,000 gallon condensate storage tanks.

Thus, the systems described above are capable of maintaining NMP1 in a safe condition under all operating conditions, and defense-in-depth is maintained during the proposed extended DG AOT. The NRC staff finds the proposed change to extend the DG AOT from the current 7 days to 14 days to be acceptable as set forth above.

3.1.2 TS Sections 3.4.4, "Emergency Ventilation System" and 3.4.5, "Control Room Air Treatment System"

The licensee proposed to revise paragraph a. of both these sections by eliminating the phrase "and the diesel generators required for operation of such circuits." According to the current wording, the unit would be required to be shut down for an inoperable emergency ventilation system or control room air treatment system due solely to the inoperability of an emergency power source (i.e., the associated DG). This is contrary to the power source provisions of TS Section 3.0.1, which allows an inoperable system, subsystem, train, or device to be considered operable for satisfying the requirements of the applicable LCO when it is determined that the inoperability is solely because its emergency or normal power source is inoperable. The proposed change removes the DG operability requirement from the subject sections. The proposed change is necessary to accommodate the proposed extension of the DG AOT from 7 to 14 days, which the NRC staff has already found acceptable above. Therefore, the NRC staff finds the proposed change to Sections 3.4.4 and 3.4.5 acceptable on the basis that it has no presented in this application and, upon completion, should incorporate them into the next PRA update. The present updated PRA model incorporates the following:

– Plant-specific unreliability and unavailability data (Note: Failure data was evaluated through December 31, 2000, with a small gap in the 1991-1993 time frame between the IPE and the start of the institute of Nuclear Power Operations (INPO) Equipment Performance and Information Exchange System (EPIX). Unavailability is based on data between August 1, 1998, and July 31, 1999, which is considered representative). Specifically, DG and DFP unavailability data updated through December 31, 2001.

– Plant-specific initiating event data developed through December 31, 2001.

– Plant-specific configuration information (design and operation) as of December 31, 2000.

– Insights from several years of plant-specific applications utilizing the original IPE and IPEEE.

– Insights from NRC staff review comments.

Key safety-related goals of the licensee's PRA model development process were to:

– Understand the underlying plant risks and key sources of uncertainty.

– Develop a tool to quantify nuclear safety and support a comprehensive risk management program.

– Establish an in-house risk analysis capability to support plant decision-making.

An independent assessment of the licensee's PRA, using the self-assessment process as part of the BWROG peer review certification program, was completed to assure that the licensee's PRA was comparable to other PRA programs in use throughout the industry. The licensee's PRA was certified by the BWROG in June 1998 following an inspection and review by a PRA peer review certification team. The certification review results were documented and evaluated for inclusion in the licensee's last PRA model update. The review findings related primarily to improvements in the areas of guidance, documentation, models, and capturing of plant changes. Overall, the certification review provided high technical marks on the PRA, and there were no findings that significantly affected the PRA results. The certification team approved the suitability of the licensee's PRA for applications such as single TS actions if supported by deterministic evaluations.

3.2.2 PRA Model Maintenance

The PRA model is applied and controlled as defined in the licensee's administrative procedure NIP-REL-02, "Probabilistic Risk Assessment Program," and engineering department procedure NEP-REL-01, "Evaluations, Analysis, and Update of the Probabilistic Risk Assessment (PRA) Program." Ongoing assessments of the PRA model and reports are part of the normal duties of the PRA engineers. When a change to plant procedures, plant design, or operational data is identified that impacts the PRA model, the PRA engineer uses the guidance in the following

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