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Constellation Energy Group

Nine Mile Point
Nuclear Station

August 11, 2003
NMP1L 1752

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

SUBJECT: Nine Mile Point Units 1 and 2
Docket Nos. 50-220 and 50-410
License Nos. DPR-63 and NPF-69

Response to NRC Generic Letter 2003-01

Gentlemen:

On June 12, 2003, the NRC issued Generic Letter (GL) 2003-01, "Control Room Habitability," requesting all addressees to submit information demonstrating that the control rooms at their facilities comply with the current licensing and design bases, and applicable regulatory requirements, and that suitable design, maintenance, and testing control measures are in place for maintaining this compliance.

GL 2003-01 requested that the above information be forwarded within 180 days of the issuance date of the GL. Alternatively, for addressees who cannot meet this schedule, GL 2003-01 requested a 60-day response describing the addressee's proposed alternative course of action, the basis for its acceptability, and the schedule for completion. Attachment 1 to this letter provides the 60-day response for Nine Mile Point Nuclear Station Units 1 and 2. Attachment 2 provides a list of all regulatory commitments contained within this correspondence, including a schedule for completion.

Very truly yours,

Peter E. Katz

Peter E. Katz
Vice President Nine Mile Point

PEK/IAA/bjh
Attachments

cc: Mr. H. J. Miller, Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)

A102

ATTACHMENT 1
RESPONSE TO GENERIC LETTER (GL) 2003-01
NINE MILE POINT NUCLEAR STATION UNITS 1 AND 2

I. INTRODUCTION

Nine Mile Point Nuclear Station, LLC (NMPNS) has determined that the actions requested in items 1, 2, and 3 of Generic Letter (GL) 2003-01 cannot be completed within the requested 180-day schedule. Consistent with the GL, this Attachment describes the proposed alternative course of action and the basis for acceptability. The information provided applies to both Nine Mile Point Units 1 and 2 (NMP1 and NMP2) unless specified otherwise. The schedule for completion of all regulatory commitments made in this Attachment is included in Attachment 2.

II. PROPOSED ALTERNATIVE COURSE OF ACTION

The proposed alternative course of action consists of the following activities:

- Perform tracer gas testing for each mode of ventilation system operation.

  Supporting tasks:

  1. Perform design reviews, physical walkdowns, and evaluation of the control room envelope to determine inleakage vulnerability. Repair areas of vulnerability and prepare for tracer gas testing.

  2. Prepare contingency plans with interim compensatory measures to be implemented if inleakage is found to exceed licensed/design values.

- Prepare and submit NMP1/NMP2 responses to items 1(a), 1(b), 1(c), 2, and 3 of GL 2003-01. Include disposition of findings, results, and any discrepancies identified by the reviews, walkdowns, evaluations, and testing performed; a schedule for completing remaining corrective actions; and a schedule for retiring compensatory measures.

  Supporting tasks:

  1. Confirm the existing licensing and design bases with respect to control room habitability.

  2. Evaluate impact of measured inleakage on control room habitability (radiological, hazardous chemical, and smoke). (A qualitative smoke evaluation is included in the proposed course of action, consistent with NEI 99-03, Revision 1, "Control Room Habitability Guidance," and is expected to provide additional insights into smoke mitigation strategies in the control room.) Implement necessary repairs and/or corrective actions.

3. Perform control room boundary and/or component repairs/modifications as necessary. Conduct inleakage retest as necessary.

4. If necessary, revise existing radiological and hazardous chemical calculations. In lieu of revising existing radiological calculations, NMPNS may use the methodology and the alternative source term (AST) as defined in 10 CFR 50.67 and described in Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors."

5. Establish an ongoing program to ensure control room envelope integrity, consistent with NEI 99-03, Revision 1, including the preparation of implementing procedures.

- Upon NRC approval of Technical Specification Task Force traveler TSTF-448, "Control Room Habitability," evaluate its applicability to NMP1 and NMP2. Prepare and submit Technical Specification (TS) amendment requests based on this evaluation, as required.

III. BASIS FOR ACCEPTABILITY OF PROPOSED COURSE OF ACTION

The proposed course of action is acceptable based on the following considerations:

- The following initial tasks will be completed by March 31, 2004: selection of a qualified vendor for the tracer gas testing; performance of the initial design reviews, physical walkdowns, and evaluation and preconditioning of the control room envelope; and performance of the tracer gas test. This plan will help ensure that adequate manpower remains available to support preparations for the NMP2 spring 2004 refueling outage (RFO9).

- The following additional tasks will be completed by December 31, 2004: plant-specific evaluations, analyses, and control room repairs/modifications as necessary; disposition of the findings, results, and any discrepancies; and response to items 1(a), 1(b), 1(c), 2, and 3 of GL 2003-01.

- Generic TS requirements for consideration and use by the industry concerning control room habitability (TSTF- 448) have not yet been approved by the NRC.

- Operators at NMP1 and NMP2 will continue to have access to self-contained breathing apparatus (SCBA) for protection against a hazardous chemical or a smoke release. Operators at NMP1 will continue to have access to potassium iodide tablets as a compensatory measure for protection against a radiological release (reference Niagara Mohawk Power Corporation letter NMP1L 1323, dated May 23, 1998). Operators have been trained in the proper use of these protective measures.

- The area surrounding NMP is not heavily industrialized and is not a high traffic area for hazardous chemicals (by road, rail, or lake transportation). A review of local environs around NMP is regularly performed to satisfy 10CFR50.71(e) requirements, and significant changes or new hazards are evaluated. The survey data from the James A. FitzPatrick (JAF) nuclear power plant's updated Control Room Habitability report of March 2, 1995, were previously considered for the potential effects of a hazardous chemical release on NMP1 and NMP2 control room operators. These survey data are applicable because the JAF nuclear power plant is located adjacent to the NMP site. The results of these efforts continue to indicate that the NMP control rooms will remain habitable in the event of a postulated hazardous chemical release.

- The potential effects of smoke on control room habitability were considered for both NMP1 and NMP2 as part of Appendix R fire protection analyses. Equipment is available to protect control room personnel, and control room personnel have been trained to cope with the effects of smoke.

IV. SUMMARY

In summary, the proposed course of action will enable NMPNS to address NRC concerns in a thorough, effective, and planned manner; evaluate and implement the potential use of AST in existing radiological calculations; and submit any required TS amendment requests for maintaining and verifying long-term control room habitability.

ATTACHMENT 2

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Nine Mile Point Nuclear Station, LLC (NMPNS) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

REGULATORY COMMITMENT	DUE DATE
1. Perform tracer gas testing for each mode of ventilation system operation.	March 31, 2004
2. Prepare and submit the Nine Mile Point Unit 1 and Unit 2 responses to items 1(a), 1(b), 1(c), 2, and 3 of Generic Letter 2003-01. Include disposition of findings, results, and any discrepancies identified by the reviews, walkdowns, evaluations, and testing performed; a schedule for completing remaining corrective actions; and a schedule for retiring compensatory measures.	December 31, 2004
3. Prepare and submit Technical Specification amendment requests, as required.	December 31, 2004, or within 6 months of NRC approval of TSTF-448, whichever is later.