



Constellation Energy

Nine Mile Point Nuclear Station

P.O. Box 63
Lycoming, New York 13093

June 17, 2004
NMP1L 1839

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
Facility Operating License Nos. DPR-63 and NPF-69

License Amendment Requests Concerning Revision to the Reactor Pressure Vessel Material Surveillance Programs - Response to Request for Additional Information (TAC Nos. MC1758 and MC1759)

Gentlemen:

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits supplemental information requested by the NRC in support of previously submitted applications for amendment to Nine Mile Point Unit 1 (NMP1) Operating License DPR-63 and Nine Mile Point Unit 2 (NMP2) Operating License NPF-69. The initial applications, dated January 9, 2004 (letters NMP1L 1804 and NMP2L 2109), proposed to replace the current plant-specific reactor pressure vessel (RPV) material surveillance program for each unit with the Boiling Water Reactor Vessel and Internals Project (BWRVIP) Integrated Surveillance Program (ISP). In response to a NRC staff email requesting additional information, and as discussed in a telephone conference call on May 27, 2004, NMPNS provides the following supplemental information. This information does not affect the No Significant Hazards Consideration analyses provided in the January 9, 2004 NMPNS letters.

In a Safety Evaluation (SE) dated February 1, 2002, the NRC concluded that the ISP proposed by the BWRVIP, if implemented in accordance with the conditions of the NRC SE, is an acceptable alternative to existing BWR plant-specific RPV surveillance programs for the purpose of maintaining compliance with the requirements of 10 CFR 50 Appendix H. The NRC SE indicated that the information submitted by licensees in their requests to replace existing plant-specific surveillance programs with the BWRVIP ISP must be sufficient for the staff to determine that:

“(2) if one methodology is used to determine the neutron fluence values for a licensee’s RPV and one or more different methodologies are used to establish the neutron fluence values for the ISP surveillance capsules which “represent” that RPV in the ISP, the results of these differing methodologies are compatible (i.e., within acceptable levels of uncertainty for each calculation).”

A008

Page 2
NMP1L 1839

NMPNS will satisfy the above-repeated NRC SE condition. Under the ISP, NMP1 and NMP2 are not identified as host plants. The representative materials for the NMP1 and NMP2 limiting RPV plate and weld materials, and their associated withdrawal schedules, are identified in BWRVIP-86-A, "BWR Vessel and Internals Project, Updated BWR Integrated Surveillance Program (ISP) Implementation Plan," dated October 2002. In the event that the neutron fluence methodologies used to establish neutron fluence values for the ISP surveillance capsules that represent the NMP1 and NMP2 RPVs in the ISP differ from the NRC-approved NMPNS neutron fluence methodology, the results of the differing methodologies will be evaluated and resolved to assure that the results are compatible.

Attachment 1 to this letter provides a list of the regulatory commitments associated with this submittal. Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this supplemental information to the appropriate state representative.

Very truly yours,



James A. Spina
Vice President Nine Mile Point

JAS/DEV/bjh

ATTACHMENT 1

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
<p>NMPNS will satisfy the following condition stated in the NRC Safety Evaluation dated February 1, 2002:</p> <p>“(2) if one methodology is used to determine the neutron fluence values for a licensee’s RPV and one or more different methodologies are used to establish the neutron fluence values for the ISP surveillance capsules which “represent” that RPV in the ISP, the results of these differing methodologies are compatible (i.e., within acceptable levels of uncertainty for each calculation).”</p> <p>In the event that the neutron fluence methodologies used to establish neutron fluence values for the ISP surveillance capsules that represent the NMP1 and NMP2 RPVs in the ISP differ from the NRC-approved NMPNS neutron fluence methodology, the results of the differing methodologies will be evaluated and resolved to assure that the results are compatible.</p>	<p>Following NRC approval and NMPNS implementation of the license amendments allowing NMP1 and NMP2 participation in the BWRVIP ISP.</p>