

Constellation Energy

Nine Mile Point Nuclear Station

P.O. Box 63
Lycoming, New York 13093

July 16, 2004
NMP1L 1853

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

SUBJECT: Nine Mile Point Unit 1
Docket No. 50-220
License Amendment Request Pursuant to 10 CFR 50.90: Revision
of Intermediate Range Monitor Surveillance Frequency and
Relocation of Selected Instrumentation Requirements to a
Licensee-Controlled Document
TAC No. MC2734

Gentlemen:

By letter NMP1L 1828, dated April 19, 2004, Nine Mile Point Nuclear Station, LLC, (NMPNS) requested an amendment to Nine Mile Point Unit 1 (NMP1) Operating License DPR-63 that would revise Technical Specification (TS) 3/4.6.2, "Protective Instrumentation." The proposed changes would (1) establish an operating cycle (24-month) calibration surveillance frequency for the Intermediate Range Monitor (IRM) instrumentation, which would replace the current "prior to startup and normal shutdown" surveillance requirement, and (2) relocate the Limiting Conditions for Operation (LCOs) and Surveillance Requirements (SRs) for selected control rod withdrawal block instrumentation to the NMP1 Updated Final Safety Analysis Report (UFSAR).

In the letter, NMPNS had requested approval of the amendment application and issuance of the license amendment by January 31, 2005 to support plant shutdown for the Spring 2005 refueling outage (RFO18). As requested by the NRC Project Manager for Nine Mile Point, this letter is being submitted to formalize a previous verbal request that the NRC expedite review and approval of the amendment application to facilitate the planning for and efficient execution of a planned maintenance shutdown that is scheduled for October 2004. Due to recently received off-normal motor thrust bearing lube oil level indications for reactor recirculation pump (RRP) #15, it is currently planned to conduct a plant shutdown to determine the cause and effect repairs. RRP #15 has been removed from service since its continued operation could result in significant motor and/or pump damage, potentially including failure of the pump mechanical seal. Mechanical seal failure would cause reactor coolant leakage into the primary containment drywell that would exceed the TS leakage limit, requiring a plant shutdown. The TSs permit continued plant operation with four or three operating RRP's. However, overall plant reliability is reduced because a single failure of power board #11, which is the power

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source for the motor-generator sets for RRPs #11 and #12, would result in plant shutdown, since only RRPs #13 and #14 would remain operational. The TSs do not permit power operation with less than three operating RRPs. Therefore, it is highly desirable to repair RRP #15 and return it to service in order to restore operating margin and maximize plant reliability.

Approval of the subject license amendment application will eliminate having to perform the IRM and Source Range Monitor (SRM) calibrations prior to the plant shutdown for the repair of RRP #15 and then having to perform the calibrations again prior to startup following the repair. Each performance of these calibrations involves approximately 30 hours of potential outage critical path time. Given that these calibrations were last completed on April 28, 2004 during a previous planned maintenance shutdown, NMPNS believes that there would be no commensurate safety benefit provided by the considerable expenditure of the time and resources involved in re-performing the calibrations in October 2004. This conclusion is based on the justifications provided in the subject amendment application. Therefore, NMPNS requests approval of the application on an expedited schedule and issuance of the license amendment by October 1, 2004 to support the planned shutdown for the repair of RRP #15.

Very truly yours,




James A. Spina
Vice President Nine Mile Point

JAS/CDM/jm

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

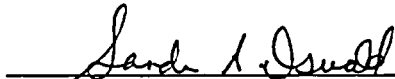
I, James A. Spina, being duly sworn, state that I am Vice President Nine Mile Point, and that I am duly authorized to execute and file this request on behalf of Nine Mile Point Nuclear Station, LLC. To the best of my knowledge and belief, the statements contained in this document are true and correct. 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.


James A. Spina
Vice President Nine Mile Point

Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Oswego, this 16th day of July, 2004.

WITNESS my Hand and Notarial Seal:

SANDRA A. OSWALD
Notary Public, State of New York
No. 01OS6032276
Qualified in Oswego County
Commission Expires 10/25/05


Notary Public

My Commission Expires: 10/25/05

7/16/04
Date

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