



**Constellation Energy**

Nine Mile Point Nuclear Station

P.O. Box 63  
Lycoming, New York 13093

October 22, 2004  
NMP1L 1876

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

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**SUBJECT:** Nine Mile Point Units 1 and 2  
Docket Nos. 50-220 and 50-410  
Facility Operating License Nos. DPR-63 and NPF-69  
  
Summary of Commitment Changes

Gentlemen:

This letter forwards a summary of regulatory commitment changes requiring NRC notification made in accordance with NEI-99-04, "Guidelines for Managing NRC Commitment Changes," during the period October 1, 2003, to October 1, 2004. The attachment identifies each change, includes a brief statement of the basis for the change and identifies the source document from which the commitment was made.

There are no new commitments in this letter.

Sincerely,

M. Steven Leonard  
General Supervisor, Licensing

SL/JH/jm  
Attachment

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

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## Attachment

### Nine Mile Point Nuclear Station, LLC 2004 Summary of Regulatory Commitment Changes

#### 2004 Change No. 1

UNIT: Nine Mile Point Unit 1 (NMP1)

*Commitment:*

Conduct a visual internal and external inspection of suppression pool structure for evidence of damage in instances where one or more relief valve(s) fails to reseat properly or discharges to the suppression pool for an extended period of time.

*Source Document:*

Niagara Mohawk Power Corporation (NMPC) letter dated December 3, 1974; Response to Regulatory Operations Bulletin 74-14 – BWR Relief Valve Discharge to Suppression Pool

*Revised Commitment:*

Nine Mile Point Nuclear Station, LLC (NMPNS) is eliminating the requirement to perform the internal inspection of the NMP1 torus following an instance where one or more of the electromatic relief valves (ERVs) fail to reseat properly or discharge to the torus for an extended period.

*Justification for Change:*

Subsequent to NMPC's response to NRC Bulletin 74-14, modifications were performed which enhanced the ability of the torus structure to withstand the dynamic forces associated with the type of event described in the bulletin. On June 12, 1986, the NRC issued NMP1 Technical Specification (TS) Amendment No. 86. This amendment revised the TS to allow ERV testing at full reactor power. In its Safety Evaluation Report supporting the TS change, the NRC stated that the torus, associated piping, and submerged structures were evaluated for such an event initiated at greater than normal reactor pressures, and that the resulting stresses were within allowable limits. The NRC also recognized that the consequences of a stuck open safety relief valve had been previously evaluated and demonstrated to meet the acceptable limits for NMP1. No requirement for inspection of the suppression pool following the ERV testing was described within the NRC Safety Evaluation Report.

## Attachment

### Nine Mile Point Nuclear Station, LLC 2004 Summary of Regulatory Commitment Changes

#### 2004 Change No. 2

UNIT: NMP1

*Commitment:*

Licensee Event Report 89-002 committed to revising plant preventative maintenance procedures to assure that daily transformer checks include verification that transformer air space heaters are working properly. This revision was included in a plant procedure for switchyard and transformer daily inspection.

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*Source Document:*

NMP1 Licensee Event Report 89-002, "Automatic Initiation of Reactor Building Emergency Ventilation Due to Loss of I&C Bus 130," dated April 7, 1989.

*Revised Commitment:*

Plant procedures have been revised to perform inspections of transformers, including space heaters, on a weekly basis rather than daily.

*Justification for Change:*

The purpose of the original commitment was to establish a procedural requirement for verifying the proper operation of transformer air space heaters. The daily frequency was established as part of incorporating the requirement into existing plant procedures that checked transformers on a daily basis.

Review has determined that a daily inspection frequency is far more conservative than industry standards and recommended good maintenance practices. The inspection frequency has been revised for consistency with industry standards.

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**Attachment**

**Nine Mile Point Nuclear Station, LLC  
2004 Summary of Regulatory Commitment Changes**

**2004 Change No. 3**

**UNIT: Nine Mile Point Units 1 and 2**

***Commitment:***

In response to Generic Letter 90-03, NMPC committed to procedural revisions to the licensee vendor interface program to strengthen the interface with the Nuclear Steam Supply System (NSSS) vendor and to expand the program to include non-NSSS vendors of other key safety-related equipment.

***Source Document:***

NMPC letter NMP1L 0638, dated January 30, 1992, "Implementation of Vendor Interface Program in Accordance with Generic Letter 90-03 Guidance."

***Revised Commitment:***

The dedicated vendor interface procedure is deleted. Alternate contact means such as the use of General Electric Service Information Letters, Technical Information Letters and interface with equipment owners' groups will be employed instead.

***Justification for Change:***

Results of vendor contacts made via the dedicated vendor interface program over the preceding five year period were reviewed. No changes of significance to the maintenance or operation of the equipment resulting from the vendor interface program were identified. It was determined that no more information was obtained via the vendor interface program than could be realized through normal contacts such as those identified above.