February 11, 2005

LICENSEE: Constellation Energy Group, Inc.

FACILITY: Nine Mile Point Nuclear Station, Units 1 and 2

SUBJECT: SUMMARY OF A CONFERENCE CALL HELD ON JANUARY 27, 2005, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND THE CONSTELLATION ENERGY GROUP INC. CONCERNING THE REVIEW FOR THE NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (TAC NOS. MC3272 AND MC3273)

The U.S. Nuclear Regulatory Commission staff and representatives of Constellation Energy Group Inc. (CEG or the applicant) held a conference call on January 27, 2005, to discuss questions pertaining to the Nine Mile Point Nuclear Station, Units 1 and 2 (NMP) license renewal application (LRA).

The conference call was useful in further clarifying the intent of the staff's followup questions to the applicant responses (ADAMS ML050060182) to the staff RAIs (ADAMS ML043280670). On the basis of the discussion, the applicant was able to better understand the staff's questions. No staff decisions were made during the meeting, and the applicant agreed to provide information for clarification in their final responses.

Enclosure 1 provides a list of the meeting participants. Enclosure 2 contains a listing of the staff's followup questions and the applicant's corresponding proposed responses which were used as discussion material during the telephone conference.

/RA/

N. B. (Tommy) Le, Senior Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos.: 50-220 and 50-410

Enclosures: As stated

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BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND
CONSTELLATION ENERGY GROUP, INC.

JANUARY 27, 2005

Participants	**Affiliation**
Tommy Le	U.S. Nuclear Regulatory Commission (NRC)
Angelo Stubbs	NRC
Cliff Marks	ISL Incorporated (ISL)
Jon Woodfield	ISL
Peter Mazzaforro	Constellation Energy Group (CNG)
Mike Fallins	CNG
George Wrobel	CNG
Dennis Vandeputte	CNG

Enclosure 1

REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR NINE MILE POINT UNITS 1 AND 2 (NMP 1 AND NMP 2)

January 27, 2005

The staff has previously sent the following followup questions (e.g., Followup Items) to the applicant. The applicants provided the staff with their draft responses for use as discussion material. The staff held a telephone conference with the applicant on January 27, 2005, to discussion the staff's Followup Items questions. The relevant staff's Followup Items questions, the applicant's responses to the staff's original RAIs are provided below:

NINE MILE POINT NUCLEAR STATION UNITS 1 AND 2
Followup Items For Balance of Plant Section

1. **Followup Item 2.3.3.A.2-2**
2. **Followup Item 2.3.3.A.4-2**
3. **Followup Item 2.3.3.A.16-1**
4. **Followup Item 2.3.3.A.16-6**
5. **Followup Item 2.3.3.A.19-1**
6. **Followup Item 2.3.3.B.5-4**
7. **Followup Item 2.3.3.B.17-2**
8. **Followup Item 2.3.3.B.22-1**
9. **Followup Item 2.3.3.B.25-2**
10. **Followup Item 2.3.4.A3-2**
11. **Followup Item 2.3.4.B.4-2**

Reference: Applicant's Responses to NRC RAIs, NMP1L1905, date December 22, 2004 (ADAMS ML050060182)

1. RAI 2.3.3.A.2-2 **(Followup Item 2.3.3.A.2-2)**

10 CFR 54, Section 54.4(b) states that the intended functions that these systems, structures and components must be shown to fulfill in 10 CFR 54.21 are those functions that are the bases for including them within the scope of license renewal as specified in paragraphs (a)(1) through (a)(3) of this section.

The LRA table associated with the circulating water system includes the component type "circulating water gates" and assigns the intended function "NSR Functional Support." In order to complete its review, the staff needed more information about this intended function for components in circulating water system components. The staff requested that the applicant provide further explanation of the intended function "NSR Functional Support" in order to verify that the safety systems and components (SSCs) with this intended function meet the requirements of paragraphs (a)(1), (a)(2) or (a)(3) of Section 54.4 of 10 CFR 54.

Applicant's Response and Staff's Comment

In its response, dated December 22, 2004, the applicant stated that per LRA Table 2.0-1, NSR functional support (NSF) is defined as "provide non-safety related (NSR) functional support to satisfy License Renewal Criterion 2 or 3 (applies only to NSR equipment, including pressure

boundaries)." As applied to the circulating water gates, they are non-safety-related components that support a circulating water system intended function to maintain screenhouse forebay level and temperature.

The staff commented that the applicant's response does not describe what systems the circulating water gates functionally support in addition to maintaining screenhouse for bay level and temperature.

Applicant's Draft Response: The circulating water gates, and their support structure, direct the flow of water from Lake Ontario (the ultimate heat sink) into and out of NMP1. The water coming into NMP1 is used for the circulating water, service water, emergency service water, fire water and containment spray raw water systems. There is also a cross-tie gate that allows for tempering of the intake water during cold weather conditions. The gates and their support structure support the safety-related functions of the emergency service water and containment spray raw water systems. They also support the fire protection function for the fire water system. As such, the gates must remain in their fully open position unless manually throttled for tempering. This function is included in the 'catch-all' function for NSR components we call 'NSR Functional Support'.

2. RAI 2.3.3.A.4-2 **(Followup Item 2.3.3.A.4-2)**

The license renewal drawings for the compressed air system do not show air cylinders that are the actuators for valves, as being subjected to an AMR. This is based on the assumption that the valves will go to their fail safe position on loss of air pressure. This would be true for single acting air cylinders with springs. But for double acting cylinders, one of the cylinders requires air pressure to affect valve repositioning to its fail safe position. Therefore, the double acting cylinders have a pressure boundary function. The staff asked the applicant to provide the basis for excluding the double acting cylinders from being subject to an aging management review (AMR).

Applicant's Response and Staff's Comment

In its response, dated December 22, 2004, the applicant stated that NMPNS agrees that safety-related, double acting actuators are in-scope for license renewal and subject to AMR for a "Pressure Boundary" intended function. The subject actuators will be identified, and an AMR of those actuators will be performed. LRA revisions to incorporate the AMR results, and any other associated LRA changes, will be submitted to the NRC by February 28, 2005.

Although the applicant concurred that safety-related, double acting actuators are in-scope for license renewal and subject to an AMR for a "Pressure Boundary" intended function, the staff commented that it will need the applicant's February 28, 2005 intended submital to complete its review regarding this followup item.

Applicant's Draft Response: The formal response to this RAI will be submitted by 1/31/05. NMP1 has double acting actuators on valves in the Containment Spray, Reactor Building Closed Loop Cooling (RBCLC), and Spent Fuel Pool Cooling Systems. The valves in the CS and SFP systems fail in their fail-safe position. These actuators are in-scope but do not require an AMR. The valve in the RBCLC system has a safety function for throttling and, therefore, the

actuators require an AMR. The formal response will include the appropriate changes to the LRA.

3. RAI 2.3.3.A.16-1 **(Followup Item 2.3.3.A.16-1)**

The LRA states that the radioactive waste system components subject to an AMR are the drywell equipment drain tanks, the reactor building equipment drain tank, the drywell equipment drain pumps, the reactor building equipment drain pump, and the piping and associated isolation valves upstream of the tanks for the drains leading to the tanks that are within the scope of license renewal. Also, two drywell equipment drain tanks are shown on one license renewal drawing for the radioactive waste system as being subject to an AMR. However, these tanks are shown on another license renewal drawing as not being subject to an AMR. The staff requested that the applicant clarify this inconsistency. The staff also asked the applicant to identify the piping and associated isolation valves of the drywell equipment drain tanks and the reactor building equipment tank that are within the scope of license renewal and are subject to an AMR. The staff asked the applicant to justify the exclusion of others from the scope of license renewal and from being subject to an AMR in accordance with the requirements of 10 CFR 54.4(a) and 10 CFR 54.21(a)(1), respectively.

Applicant's Response and Staff's Comment

In its response dated, December 22, 2004, the applicant stated that both drywell equipment drain tanks (DWEDT) and the reactor building equipment drain tank (RBEDT) are subject to AMR. License renewal drawing LR-18045-C, sheet 7, should show all three of those tanks in red. The three pumps associated with these three tanks and their associated piping are in-scope for license renewal and subject to AMR for criterion 10 CFR 50.54.4(a)(2) only. For this reason, per license renewal drawing convention, these components would not be shown in red on the license renewal drawing.

The applicant in its respond further clarified that, two additional lines coming into the RBEDT should be indicated in red. These are the equipment drains' line coming into the tank from the right (a continuation flag should show "LR-RWS" on both sides of the flag) and the hydraulic scram system line coming into the tank from the left (a continuation flag should show "LR-CRD" on the side pointing away from the tank and LR-RWS pointing toward the tank). None of the other RBEDT inputs have intended functions associated with their respective systems that would bring those drain lines into scope for license renewal. In addition, the applicant in its response stated that drawing LR-18045-C, sheet 7A provides no additional information to that shown on sheet 7; therefore, it should be disregarded.

The applicant also stated that on drawing LR-18045-C, sheet 7, the piping and components shown in black that contain liquid and are in containment, the reactor building, the radwaste solidification and storage building, the turbine building, and the waste disposal building are in-scope for license renewal and subject to AMR to meet criterion 10 CFR 54.4(a)(2), since these liquid containing components are in the vicinity of safety-related components. However, these components are highlighted in red on the license renewal drawings, because they are within scope and subject to AMR for the 10 CFR 54.4(a)(2) criterion only.

The applicant also identified is an inadvertent omission in LRA Section 2.3.3.A.16. The last sentence on page 2.3-91 should include containment in the list of structures for which

radioactive waste system NSR piping, fittings, and equipment are in-scope for license renewal and subject to AMR.

Although, the applicant clarified that both the drywell equipment drain tanks (DWEDT) and the reactor building equipment drain tank (RBEDT) are subject to AMR, the staff commented that the applicant did not justify the exclusion of the piping and associated isolation valves' inputs to the RBEDT and DWEDTs from being in scope and subject to an AMR. In addition, the applicant stated that license renewal drawing LR-18045-C, sheet 7A does not add any information to LR-18045-C, sheet 7 and should be disregarded. However, the applicant did not explain the inconsistency between these two sheets.

Applicant's Draft Response: The lines providing inputs to the DWEDT and RBEDT are non-safety related lines. Therefore, they do not meet the (a)(1) criterion. However, since they contain water, at least some of the time, they do meet the (a)(2) criterion and are subject to AMR. These lines are included in the component type 'NSR piping, fittings, and equipment'. NMP committed to provide a new drawing (LR-18045-C, Sheet 7) that correctly displayed the portions in-scope of license renewal for (a)(1) and (a)(2).

4. RAI 2.3.3.A.16-6 **(Followup Item 2.3.3.A.16-6)**

License renewal drawings show the pressure and level instruments' drain lines and their associated components (fittings and valves) tie into the pipeline which runs to RBEDT. That pipeline is shown on these drawings as being within the scope of license renewal and being subject to an AMR. Also, another license renewal drawing shows a pipeline which connects fuel pool cooling system drains to the reactor building drain tanks, as being subject to an AMR. However, one of the previous license renewal drawings shows that pipeline as being excluded from being subject to an AMR. Also, this pipeline is not highlighted in red on that license renewal drawing, although an AMR boundary flag shows it as being within the scope of RWS. Further, this AMR boundary flag indicates that a portion of the pipeline from the fuel pool cooling drains on a license renewal drawing is within the scope of the compressed air system (CAS).

In order to complete its review, the staff requested that the applicant

a. Provide drawings or descriptive information that shows how the instrumentation drains header connects to the fuel pool cooling system drain's pipeline.

b. Provide drawings or descriptive information that clearly identifies portions of the radioactive waste system to RBEDT which is within the scope of license renewal and subject to an AMR, and to eliminate inconsistencies between the above-mentioned drawings.

Applicant's Response and Staff's Comment

a. In its response dated, December 22, 2004, the applicant stated that the instrument drain headers identified in the RAI do not connect to the fuel pool cooling system drain's pipeline. The applicant further explained that for NMP Unit 1, the line identification is not a unique piping component number. Using the line identification legend shown on license renewal drawing LR-18000-C, sheet 1, the line identifier "89-2-C" indicates a

pipe in system 89 (RWS) that is 2 inches in diameter and made of carbon steel. Therefore, this identification applies to every 2-inch, carbon steel line in system 89 (RWS) regardless of its function. This identification does not, therefore, imply a connection between the identically designated piping segments described in this RAI.

The staff commented that the applicant's response does not explain why there is no connection between the pipelines in question.

b. In its response dated, December 22, 2004, the applicant stated that the depiction of the input lines to the RBEDT on drawing LR-18045-C, Sheets 7 and 7A, that are contrary to the above-referenced description are drafting errors. AMR boundary flag designators contrary to this description, including the ones referencing the CAS, are also drafting errors.

Similar to the response to RAI 2.3.3.A.16-1, the applicant further stated that drawing LR-18045-C, sheet 7A, provides no additional information to that shown on sheet 7 and should, therefore, be disregarded.

Although the applicant stated that the depictions of the input lines to the RBEDT on drawing LR-18045-C, Sheets 7 and 7A, are contrary to the above-referenced description due to drafting errors, the staff commented that the applicant's response did not adequately identify which of the license renewal drawings are correct. In addition, the applicant stated that license renewal drawing LR-18045-C, sheet 7A does not add any information to LR-18045-C, sheet 7 and should be disregarded.

Applicant's Draft Response: NMPNS admits that errors were made between LR-18045-C, Sheets 7 and 7A. The intention of the statement to disregard sheet 7A was to not make any changes to it and describe the corrections for sheet 7 only. A new sheet 7 will be submitted that will be properly marked. NMP committed to provide a new drawing (LR-18045-C, Sheet 7) that correctly displayed the portions in-scope of license renewal for (a)(1) and (a)(2).

5. RAI 2.3.3.A.19-1 **(Followup Item 2.3.3.A.19-1)**

A license renewal drawing shows oil coolers for the clean-up pumps to be within the "CU" system boundary and requiring an AMR. The LRA table associated with the reactor water cleanup system lists heat exchangers as a component type. However, the AMR table associated with this system does not include heat exchangers with a lubricating oil environment. The AMR section of the LRA for this system does not list lubricating oil as an environment to which the reactor water cleanup system is exposed. The staff requested that the applicant confirm that the clean-up pump oil coolers have been properly evaluated within the LRA or justify their exclusion from being subject to an AMR.

Applicant's Response and Staff's Comment

In its response dated December 22, 2004, the applicant stated that the license renewal drawing in question, LR-18009-C, sheet 1, shows the cooling water side of the heat exchangers as being subject to AMR. This is because of the "Pressure Boundary" intended function for the reactor building closed loop cooling system. The shell side of the heat exchanger is not safety-related so it is not shown as in-scope for license renewal (depicted in black on the

drawing), and the heat exchanger itself does not have a license renewal intended function of heat transfer. Therefore, the drawing boundary flags are incorrect and the "LR-CU" side of each of those flags should be solid blue. The applicant further explained that consistently with LRA Section 2.3.3.A.19, the pump oil coolers are in-scope for license renewal and subject to AMR to meet criterion 10 CFR 54.4(a)(2), since they are NSR equipment containing liquid in the vicinity of safety-related components, therefore, they are not identified in red. The applicant added that the only heat exchanger within the reactor water cleanup (CU) system that is subject to AMR for criterion 10 CFR 54.4(a)(1) is the non-regenerative heat exchanger, which does not have a lube oil environment.

In its response, the applicant stated that the pump oil cooler is in-scope and subject to an AMR to meet criterion 10 CFR 54.4(a)(2), however, the LRA Tables 2.3.3.A.19 and 3.3.3.A-17 do not include heat exchangers with the intended function to prevent failure from affecting SR equipment in a lubricating oil environment. In its response, the applicant also stated that the drawing boundary flags are incorrect and the "LR-CU" side of each of those flags should be solid blue. The staff commented that the applicant's response does not appear to be correct, since the oil cooler tubes are in-scope of license renewal with the pressure boundary intended function for the reactor building closed loop cooling system.

Applicant's Draft Response: The RWCU pump oil coolers are in-scope since they are pressure boundaries for the RBCLC system. As such, only the end covers, tube sheets and tubes exposed to RBCLC water are in-scope. The external surface of the tubes exposed to the lubricating oil is in-scope but has no aging effects requiring management. The RWCU table will be revised. NMP stated that it had originally omitted the external surface of the tubes but will be revising the LRA to include it.

6. RAI 2.3.3.B.5-4 **(Followup Item 2.3.3.B.5-4)**

The license renewal drawings do not show the air cylinders as part of the license renewal boundary. This is based on the assumption that the valves will go to their fail safe position on loss of air pressure. This would be true for single acting air cylinders with springs. But for double acting cylinders, one of the cylinders requires air pressure to affect valve repositioning to its fail safe position. Therefore, the double acting cylinders have a pressure boundary function. The staff requested that the applicant provide the basis for excluding the double acting cylinders from being subject to an AMR.

Applicant's Response and Staff's Comment

In its response dated December 22, 2004, the applicant stated that NMP Nuclear Station agrees that safety-related, double acting actuators are in-scope for license renewal and subject to AMR for a "Pressure Boundary" intended function. The subject actuators will be identified, and an AMR of those actuators will be performed. LRA revisions to incorporate the AMR results, and any other associated LRA changes, will be submitted to the NRC by February 28, 2005.

Although the applicant concurred that safety-related, double acting actuators are in-scope for license renewal and subject to an AMR for a "Pressure Boundary" intended function, the staff commented that it will need the applicant's February 28, 2005 intended submital to complete its review regarding this followup item.

Applicant's Draft Response: The formal response to this RAI will be submitted by January 31, 2005. Only the standby gas treatment (GT) and main steam (MS) systems at NMP2 contain double acting cylinders that are in-scope. The GTS actuators do require an AMR and the table will be revised according. The MS Isolation Valve actuators do not require an AMR since the valves are equipped with a closing spring which causes the valves to fail close, their safety function position.

7. RAI 2.3.3.B.17-2 **(Followup Item 2.3.3.B.17-2)**

The system description section of the LRA section associated with the hot water heating system list components subject to an AMR. The list includes the non-safety-related piping, fittings, and equipment containing liquid in the control room building, reactor building (secondary containment), radwaste building, screenwell building, standby gas treatment building, and turbine building. No license renewal drawings were provided for this system. In order to complete its review, the staff requested that the applicant provide information that describes the boundaries of this system and confirms that there are no other components subject to an AMR.

Applicant's Response and Staff's Comment

In its response, dated December 22, 2004, the applicant stated consistent with license renewal drawing convention, marked-up license renewal drawings were not provided for systems where the only system intended function was to meet the 10 CFR 54.4(a)(2) criterion. The applicant further stated that the components subject to an AMR for this system include the non-safety-related piping, fittings, and equipment containing liquid or steam physically located in the control room building, radwaste building, reactor containment (secondary containment), screenwell building, standby gas treatment and turbine building. The applicant also referred to the diagram that was provided with the response to RAI 2.3.3.B.16-1, and stated that the system description from LRA Section 2.3.3.B.17, in conjunction with the diagram, provides an adequate description of the components that are subject to AMR.

The staff commented that the applicant's response does not describe the safety-related components in the radwaste building with which hot water heating system components can interact.

Applicant's Draft Response: The methodology employed for determining what NSR systems and components are in-scope was based on the building the system/component was located in. This approach is conservative in that it brings into scope many more components than would be required if detailed walkdowns were performed. As such, NMPNS did not specifically identify which SR components the hot water heating system could interact with. If this information is needed, a walkdown will be performed to provide it.

8. RAI 2.3.3.B.22-1: **(Followup Item 2.3.3.B.22-1)**

The LRA section associated with the radiation monitoring system states that:

> The NMP Unit 2 radiation monitoring system is designed to initiate appropriate manual or automatic protective action to limit the potential release of radioactive materials from the reactor vessel, primary and secondary containment, and fuel

storage areas if predetermined radiation levels are exceeded in major/process effluent streams, and to provide main control room personnel with radiation level indication throughout the course of an accident. The radiation monitoring system consists of a computer-based digital radiation monitoring system, a computer-based gaseous effluent monitoring system, and main steam line radiation monitors.

LRA Section 2.3.3.B.22 regarding the NMP Unit 2 radiation monitoring system states that "portion of the system consists of off-line gas and liquid monitors which consist of piping, filters, pumps, sampler/detectors, valves, and instruments." The applicant did not identify the radiation monitoring system components that are in scope of license renewal due to 10CFR54.4(a)(1) and 10CFR54.4(a)(2). Furthermore, a license renewal drawing for the NMP Unit 2 radiation monitoring system was not provided to show the portions of this system containing components within the scope of license renewal. The staff asked the applicant to identify the components of the radiation monitoring system that are in-scope of license renewal in accordance with the requirements of 10CFR54.4(a)(1) and 10CFR54.4(a)(2), and justify the exclusion of these components from being subject to an AMR in accordance with the requirements of 10 CFR 54.21(a)(1).

Applicant's Response and Staff's Comment

In its response, dated December 22, 2004, the applicant concurred that safety-related radiation monitors and their inclusive mechanical components are in-scope for license renewal and subject to AMR for a "Pressure Boundary" intended function. The applicant stated the subject components that perform the license renewal intended function would be identified, an AMR of those components will be performed and LRA revisions to incorporate the AMR results, and any other associated LRA changes, would be submitted to the NRC by February 28, 2005.

Although the applicant concurred that safety-related radiation monitors and their mechanical components with a pressure boundary intended function are in-scope, the staff commented that it will need the applicant's February 28, 2005 intended submital to complete its review regarding this followup item.

Applicant's Draft Response: The formal response for this RAI will be submitted by January 31, 2005. The LRA is being revised to identify that filters, piping and fittings, pumps and valves in the radiation monitoring system require an AMR. The results concluded that for those components exposed to raw water (service water rad monitors), the aging effect is loss of material and they will be managed by the PM program.

9. RAI 2.3.3.B.25-2 **(Followup Item 2.3.3.B.25-2)**

The introduction to NMP Unit 2 UFSAR Table 3.9B-2 states that this table lists the major safety-related components in the plant. Item W and X identify the reactor water cleanup system pumps and the reactor water cleanup heat exchangers respectively, as part of this table however, neither of these components is highlighted on a license renewal drawing as being within the scope of license renewal and subject to an AMR. Also, the LRA table associated with the reactor water cleanup system does not include the component type pumps or heat exchangers. The staff believes that these components meet criterion 10 CFR 54.4(a)(1) and should require an AMR according to 10 CFR 54.21(a)(1). The applicant was requested to

justify the exclusion of these components from the scope of license renewal and from requiring an AMR.

Applicant's Response and Staff's Comment

In its response, dated December 22, 2004, the applicant stated that NMP Unit 2 UFSAR Table 3.2-1 describes in additional detail the portions of the reactor water cleanup system that perform a safety function and are, therefore, in-scope for license renewal for criteria 10 CFR 54.4(a)(1) or (a)(3). The reactor water cleanup system pumps and heat exchangers are not safety-related per NMP Unit 2 UFSAR Table 3.2-1 or the NMP Unit 2 master equipment list, and are not required for a safe shutdown of the reactor. The applicant concluded that consistent with 10 CFR 54.4(b), these components do not support any system intended functions pursuant to 10 CFR 54.4(a)(1) or (a)(3).

The applicant further clarified that the non-safety-related liquid filled piping and components shown in black on license renewal drawing LR-37B-0 are in-scope for license renewal and subject to AMR for criterion 10 CFR 54.4(a)(2), since all of these components are located in the reactor building in the vicinity of safety-related components. However, these components are not highlighted on the license renewal drawing because they are in-scope for license renewal and subject to AMR for criterion (a)(2) only.

The staff commented that the applicant's response does not explain why reactor water cleanup heat exchangers and pumps are listed in NMP Unit 2 UFSAR Table 3.9B-2 as the major safety-related component in the plant, if they are not safety-related. The staff also commented that in accordance with NMP UFSAR Table 3.2-1, reactor water cleanup heat exchangers and pumps are classified as ASME Safety Class 3, and this differs from the applicant's response.

Applicant's Draft Response: NMPNS acknowledges a discrepancy between different sections of the NMP2 USAR. The RWCU pump and heat exchangers are non-safety related components but were evaluated as ASME Section III, Safety Class 3 components. NMP applied design criteria above that are required based upon its safety classification. USAR Section 3.9B.3.1.14 states:

"The RWCU pump and regenerative and non-regenerative heat exchangers are not part of a safety system and are not designed to Category I requirements.
The requirements of ASME Boiler and Pressure Vessel Code, Section III, Safety Class 3 components are used as guidelines in evaluating the RWCU system pump and heat exchanger components. The loading conditions, stress criteria, and calculated and allowable stresses are summarized in Tables 3.9B-2w and 3.9B-2x."

USAR Section 5.4.8 provides the description of the RWCU System and states that the portions of the system from the RPV to the outboard isolation valves are SR and the remainder of the system is NSR.

10. RAI 2.3.4.A.3-2 **(Followup Item 2.3.4.A3-2)**

LRA Table 2.3.4.A.3-1 includes the following component types as being subject to an AMR: filters/strainers, flow elements, flow indicators, and flow orifices. However, the intended function assigned to these components is "NSR Functional Support." LRA Table 2.0-1

identifies intended functions that are applicable to these components that are not identified in LRA Table 2.3.4.A.3-1. Aging management to ensure that the component level intended functions can be performed is necessary to ensure that the system level intended functions can be maintained. The intended functions include “filtration” and “flow restriction.” The applicant was asked to describe how the intended functions for these components are assigned and evaluated.

Applicant’s Response and Staff’s Comment

In its response dated December 22, 2004, the applicant stated that because a component performs a particular function, such as filtration for a filter or flow restriction for a flow orifice, it does not mean that the function is an intended function for license renewal. A component function would only be considered an Intended Function (IF) if failure of that component would cause the failure of a system IF. Failure of the "filtration" or "flow restriction" functions for the above mentioned components would not prevent the NMP Unit 1 feedwater/high pressure coolant injection system from performing its' IF. Therefore, the only IF credited for these components is "NSR Functional Support" as identified in LRA Table 2.3.4.A.3-1.

The staff commented that the applicant’s response does not explain what do ”intended functions” and "NSR Functional Support" represent and how it is applied to all the component types in the feedwater/high pressure coolant injection system including filters/strainers, flow elements, flow indicators, and flow orifices.

Applicant’s Draft Response: The ‘NSR Functional Support’ is a ‘catch all’ function for NSR components and NMPNS recognizes that this has caused confusion. Clarification will be provided to identify what the intended function is for the component types identified. In some cases only a pressure boundary function may apply and in others the pressure boundary and filter/flow restriction may apply, depending on what is required for the system to perform its intended functions.

Note: During the telephone conference call, NMP provided more detailed information regarding the function of some of the components in the feedwater/HPCI system. For the condensate demineralizers, in particular, they have a filtering function to maintain water quality during normal feedwater operation. However, for the feedwater/HPCI function, filtering is not required and the demineralizers will have only a pressure boundary function for license renewal. NMP stated that the system/component function would be provided for each of the component types listed in the LRA for the feedwater/HPCI system.

11. RAI 2.3.4.B.4-2 **(Followup Item 2.3.4.B.4-2)**

License renewal drawings LR-1E-0 and LR-1F-0 show the inboard and outboard MSIVs, respectively, for each of the four main steam lines. These valves perform a safety-related function (system isolation) and are shown as requiring an AMR on the drawings. However, the pneumatic actuators for these valves are not shown to require an AMR. Since the actuators are required to affect operation of the MSIVs, the staff believes they should likewise be subject to an AMR. The applicant was asked to justify exclusion of the MSIV actuators from requiring an AMR.

Applicant's Response and Staff's Comment

In its response, dated December 22, 2004, the applicant stated that the MSIV pneumatic actuators are within the scope of license renewal and subject to AMR for a pressure boundary intended function. The applicant further stated that AMR of these actuators will be performed and LRA revisions to incorporate the AMR results and any other associated LRA changes will be submitted by February 28, 2005.

Although the applicant adequately explains that the MSIV pneumatic actuators in question are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to an AMR in accordance with 10 CFR 54.21(a), the staff commented that the applicant's intended LRA revisions to incorporate the AMR results and any other associated LRA changes have not been provided.

Applicant's Draft Response: The formal response to this RAI will be submitted by January 31, 2005. The MSIV actuators contain a closing spring even though they are double acting. As such, the valve fails to its safe position (closed) upon loss of air. Therefore, the actuator does not perform a pressure boundary intended function.

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