



**Constellation Energy**

Nine Mile Point Nuclear Station

P.O. Box 63  
Lycoming, NY 13093

July 14, 2005  
NMP1L 1960

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

**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 Renewal Application – Clarification to Responses to Previously  
Answered NRC Requests for Additional Information (TAC Nos. MC3272  
and MC3273)

Gentlemen:

By letter NMP1L 1962, dated July 14, 2005, Nine Mile Point Nuclear Station, LLC (NMPNS) submitted an amended License Renewal Application (LRA) and requested that the formal NRC review that was temporarily suspended recommence at the earliest time practicable. This temporary suspension was a result of our letter NMP1L 1933, dated March 3, 2005, that requested a grace period to develop and implement a recovery plan designed to address several NRC issues. The NRC granted the request in a letter dated March 7, 2005, and the recovery plan was presented to the NRC staff in a meeting held on March 30, 2005.

During the recovery plan implementation, several tasks modified work that had been previously completed. As a result of these changes, a number of earlier RAI responses were modified or superceded. Attachment 1 lists the specific responses affected by this process. Where applicable, the more recent information has been appropriately incorporated into the amended LRA and is referenced in the editorial features of the included “road map.” This “road map” concept is explained in the cover letter for the amended LRA (NMP1L 1962) and was discussed with the NRC staff in our meeting on June 9, 2005. In addition to incorporating the results of the responses in the amended LRA, we believe it is appropriate to specifically address these modified or superceded responses in a separate letter to assure all information is current and accurate. Attachment 2 summarizes those responses.

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Any commitments associated with the information contained in this submittal have been incorporated into the amended LRA and summarized in Appendix A thereof.

If you have any questions about this submittal, please contact David Dellario, NMPNS License Renewal Project Manager, at (315) 349-7141.

Very truly yours,



James A. Spina  
Vice President Nine Mile Point

JAS/JJ/sac



**ATTACHMENT 1**

**Nine Mile Point Nuclear Station (NMPNS)**

**NRC Requests for Additional Information (RAI)**

**List of RAIs Modified or Superseded by Recovery Project Tasks**

RAI Number	Letter (NMP1L)	Letter Date	Status
16	1900	12/17/2004	RAI response uses term "NSR Functional support." LRA modified to "NSR Structural support" subsequent to this RAI.
2.1-2 R0	1904	12/22/2004	RAI response was modified by RAI 2.1-1 in NMP1L 1922 dated 1/31/2005.
2.1-2 R1	1922	1/31/2005	RAI response replaces response provided in NMP1L 1904 dated 12/22/2004.
2.1-4 R0	1904	12/22/2004	Portions are superseded by response to RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.1-4 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1904 dated 12/22/2004.
2.1-7 R0	1904	12/22/2004	RAI response was modified in RAI 2.1-7 in NMP1L 1922 dated 1/31/2005.
2.1-7 R1	1922	1/31/2005	RAI response replaces response provided in NMP1L 1904 dated 12/22/2004.
2.3.3.A.02-2 R0	1905	12/22/2004	RAI response was modified in RAI 2.3.3.A.2-2 in NMP1L 1927 dated 2/11/2005.
2.3.3.A.02-2 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.A.09-07 R0	1899	12/17/2004	RAI response was modified in RAI NMP1L 1927 dated 2/11/2005. RAI response uses term "NSR Functional support." LRA modified to "NSR Structural support" subsequent to this RAI.
2.3.3.A.09-07 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1899 dated 12/17/2004.
2.3.3.A.09-08	1899	12/17/2004	No change to RAI response is required. B2.1.20, One-Time Inspection Program, was modified subsequent to this RAI.
2.3.3.A.09-14	1899	12/17/2004	B2.1.17, Fire Water System Program, was modified after this RAI response. No technical changes to the response. RAI not referenced but change is correct.
2.3.3.A.16-1 R0	1905	12/22/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.A.16-1 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.A.16-6 R0	1905	12/22/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.A.16-6 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.

RAI Number	Letter (NMP1L)	Letter Date	Status
2.3.3.A.19-1 R0	1905	12/22/2004	RAI response was modified in NMP1L 1027. Drawing/scoping issue. No change to RAI response is required.
2.3.3.A.19-1 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.A.22-2	1905	12/22/2004	RAI T3.1-1 in NMP1L 1919 commits NMP to a Bolting Integrity Program (GALL XIM18, LRA B2.1.36) which supersedes this response.
2.3.3.A.4-2	1922	1/31/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.B.05-4 R0	1905	12/22/2004	RAI response was modified in NMP1L 1922 dated 1/31/2005.
2.3.3.B.05-4 R1	1922	1/31/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.B.13-01 R0	1899	12/17/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.B.13-01 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1899 dated 12/17/2004.
2.3.3.B.13-22	1899	12/17/2004	RAI response uses term "NSR Functional support." LRA modified to "NSR Structural support" subsequent to this RAI.
2.3.3.B.13-23 R0	1899	12/17/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.B.13-23 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1899 dated 12/17/2004.
2.3.3.B.13-25 R0	1899	12/17/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.B.13-25 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1899 dated 12/17/2004.
2.3.3.B.13-26 R0	1899	12/17/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.B.13-26 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1899 dated 12/17/2004.
2.3.3.B.13-29	1899	12/17/2004	B2.1.17, Fire Water System Program, was modified after this RAI response. No technical changes to the response. RAI not referenced but change is correct.
2.3.3.B.17-2 R0	1905	12/22/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.B.17-2 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.B.22-1 R0	1905	12/22/2004	RAI response was modified in NMP1L 1922 dated 1/31/2005.

RAI Number	Letter (NMP1L)	Letter Date	Status
2.3.3.B.22-1 R1	1922	1/31/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.B.25-2 R0	1905	12/22/2004	RAI response was modified in NMP1L 1927 dated 2/11/2005.
2.3.3.B.25-2 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.3.B.27-2	1905	12/22/2004	Portions are superseded by responses to RAIs 2.1-4, 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
2.3.3.B.27-3	1905	12/22/2004	Portions are superseded by responses to RAIs 2.1-4, 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
2.3.3.B.27-4	1905	12/22/2004	Portions are superseded by responses to RAIs 2.1-4, 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
2.3.4.A.3-2 R0	1905	12/22/2004	RAI response was modified in NMP1L 1927. Minor change. RAI response uses term "NSR Functional support." LRA modified to "NSR Structural support" subsequent to this RAI.
2.3.4.A.3-2 R1	1927	2/11/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.3.4.B.4-2 R0	1905	12/22/2004	RAI response was modified in NMP1L 1922 dated 1/31/2005.
2.3.4.B.4-2 R1	1922	1/31/2005	RAI response replaces response provided in NMP1L 1905 dated 12/22/2004.
2.4.A-1 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4.A-2 R0	1913	1/10/2005	Portions are superseded by responses to RAIs 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
2.4.A-3 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4.A-4 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4.A-5 R0	1913	1/10/2005	Portions are superseded by responses to RAIs 2.1-4, 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
2.4.A-6 R0	1913	1/10/2005	Portions are superseded by responses to RAIs 2.1-4, 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
2.4.A-7 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4.B-1 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.

RAI Number	Letter (NMP1L)	Letter Date	Status
2.4.B-2 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4.B-3 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4.B-4 R0	1913	1/10/2005	RAI response was modified in NMP1L 1958 dated 7/15/2005.
2.4.B-5 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4.B-6 R0	1913	1/10/2005	RAI response was modified in NMP1L 1958 dated 7/15/2005.
2.4.B-7 R0	1913	1/10/2005	RAI response was modified in RAI 2.1-4 in NMP1L 1958 dated 7/15/2005.
2.4-1 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1913 dated 1/10/2005.
3.1.1-20	1958	7/15/2005	Modifies response provided to RAI 3.1.2.C.4-08 in NMP1L 1909 dated 1/3/2005.
3.1.1-21	1958	7/15/2005	Modifies response provided to RAI CRDRL R1 in NMP 1L 1927 dated 2/11/2005.
3.1.2.C.4-01 R0	1909	1/3/2005	RAI response was modified in NMP1L 1958 dated 7/15/2005.
3.1.2.C.4-01 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1909 dated 1/3/2005.
3.1.2.C.4-03	1909	1/3/2005	RAI T3.1-1 in NMP1L 1919 commits NMP to a Bolting Integrity Program (GALL XIM18, LRA B2.1.36) which supersedes this response.
3.1.2.C.4-08	1909	1/3/2005	Superseded by the responses to RAIs 3.1.1-20 and 3.1.2-21 in NMP1L 1958 dated 7/15/2005.
3.1.2.C.4-09	1909	1/3/2005	Response modified by RAI B2.1.19-1 in NMP1L 1928, dated Response modified by RAIs B2.1.19-1 and BWRVIP-1 in MP1L 1928, dated 2/14/2005, which provide details for BWRVIP.
3.1.2-01	1928	2/14/2005	Response modified in NMP1L 1960. NMP will implement final ASME code change or provide an alternative plan for NMP1 stub tubes at least 1 year prior to the expiration of the current operating license.
3.2-01	1902	12/21/2004	RAI T3.1-1 in NMP1L 1919 commits NMP to a Bolting Integrity Program (GALL XIM18, LRA B2.1.36) which supersedes this response.

RAI Number	Letter (NMP1L)	Letter Date	Status
3.2-05	1902	12/21/2004	No change to RAI response is required. B2.1.10, Open-cycle Cooling Water System Program, was modified subsequent to the RAI response. No change in intent.
3.2-11	1902	12/21/2004	RAI T3.1-1 in NMP1L 1919 commits NMP to a Bolting Integrity Program (GALL XIM18, LRA B2.1.36) which supersedes portions of this response.
3.3.2.A-03.1	1920	1/26/2005	Portions are superseded by response RAI 3.5.1-20 in NMP1L dated 7/15/2005.
3.3.2.A-04.1	1920	1/26/2005	Portions are superseded by responses to RAIs 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
3.3.2.A-17.1	1920	1/26/2005	Portions are superseded by responses to RAIs 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
3.3.2-2	1920	1/26/2005	Portions are superseded by responses to RAIs 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
3.4-03	1902	12/21/2004	No change to RAI response is required. Editorial difference: RAI added "Aluminum alloy" but LRA reads "Aluminum alloys containing copper or zinc as the primary alloying elements."
3.4-05	1902	12/21/2004	RAI T3.1-1 in NMP1L 1919 commits NMP to a Bolting Integrity Program (GALL XIM18, LRA B2.1.36) which supersedes portions of this response.
3.4-07	1902	12/21/2004	Portions are superseded by responses to RAIs 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.
3.5.B-02	1913	1/10/2005	Superseded by RAI 3.5.1-20 in NMP1L 1958 dated 7/15/2005.
3.6.2.C-03 R0	1912	1/10/2005	RAI response was modified in NMP1L 1958 dated 7/15/2005.
3.6.2.C-03 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1912 dated 1/10/2005.
3.6.2.C-10	1912	1/10/2005	Program B2.1.34, Non-Segregated Bus Inspection Program, was modified subsequent to this response. Modified program requires 6 year inspections interval versus 10 year interval specified in this response.
3.6.2.C-11	1912	1/10/2005	Program B2.1.34, Non-Segregated Bus Inspection Program, was modified subsequent to this response.

RAI Number	Letter (NMP1L)	Letter Date	Status
3.6.2.C-12	1912	1/10/2005	Program B2.1.34, Non-Segregated Bus Inspection Program, was modified subsequent to this response. Modified program requires 6 year inspections interval versus 10 year interval specified in this response.
4.3.1-3 R0	1891	12/6/2004	Portions are superseded by response to RAI 4.3.1-3 in NMP1L 1958 dated 7/15/2005.
4.3.1-3 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1891 dated 2/6/2004.
4.6.2-1 R0	1891	12/6/2004	RAI response was modified in RAI 4.6.2-1 in NMP1L 1958 dated 7/15/2005.
4.6.2-1 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1891 dated 2/6/2004.
4.7.2-1 R0	1915	1/14/2005	RAI response was modified in NMP1L 1958 dated 7/15/2005.
4.7.2-1 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1915 dated 1/14/2005.
4.7.2-2 R0	1915	1/14/2005	RAI response was modified in NMP1L 1958 dated 7/15/2005.
4.7.2-2 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1915 dated 1/14/2005.
Audit 003	1880	10/29/2005	Response modified in NMP1L 1960. B2.1.2, Boraflex Monitoring Program, is an existing program that, upon enhancement, will be consistent with the ten elements of Aging Management Program XI.M22, "Boraflex Monitoring," specified in NUREG-1801.
Audit 004, 5, 6, 7, 8, 9, 147	1880	10/29/2005	Response modified in NMP1L 1960. B2.1.2, Boraflex Monitoring Program, is an existing program that, upon enhancement, will be consistent with the ten elements of Aging Management Program XI.M22, "Boraflex Monitoring," specified in NUREG-1801.
Audit 018, 23, 24, 25, 54, 60, 62, 63, 66	1880	10/29/2005	Subsequent to RAI response, B2.1.2, Water Chemistry Program was modified to read "determine concentration of monitored species."
Audit 032	1880	10/29/2005	Minor revisions to response as described in RAI 3.6.2.C-3 in NMP1L 1958 dated 7/15/2005.
Audit 100, 101, 102, 103 and 104	1888	11/19/2004	No change to RAI response is required. B2.1.15, BWR Reactor Water Cleanup System Program, was modified subsequent to this RAI.

RAI Number	Letter (NMP1L)	Letter Date	Status
Audit 126	1880	10/29/2005	No change to RAI response is required. NMP did adopt GALL Program XI.E2 for Non-EQ Electrical Cables Used in Instrumentation Circuits Program. See LRA Section B2.1.30.
Audit 131	1880	10/29/2005	Response modified in NMP1L 1960. NMP not required to have a Medium Voltage Cable Program.
Audit 148	1880	10/29/2005	Response modified by changes to LRA Section B2.1.6, BWR Stress Corrosion Cracking Program.
Audit 156 (For VFLD)	1892	12/6/2004	NMP1L 1927, dated 2/11/2005, provides response on this subject (except for VFLD). Response replaces response provided in NMP1L 1880 and 1888. Position on VFLD is explained in NMP1L 1960.
Audit 156 (VFLD)	1927	2/11/2005	NMP1L 1927, dated 2/11/2005, provides response on this subject (except for VFLD). Response replaces response provided in NMP1L 1880 and 1888. Position on VFLD is explained in NMP1L 1960.
Audit 156 R0	1880	10/29/2005	NMP1L 1927, dated 2/11/2005, provides response on this subject (except for VFLD). Response replaces response provided in NMP1L 1880 and 1888. Position on VFLD is explained in NMP1L 1960.
Audit 156 R1	1888	11/19/2004	NMP1L 1927, dated 2/11/2005, provides response on this subject (except for VFLD). Response replaces response provided in NMP1L 1880 and 1888. Position on VFLD is explained in NMP1L 1960.
Audit 156 R2	1927	2/11/2005	NMP1L 1927, dated 2/11/2005, provides response on this subject (except for VFLD). Response replaces response provided in NMP1L 1880 and 1888. Position on VFLD is explained in NMP1L 1960.
B2.1.11-2 R0	1915	1/14/2005	Response clarified in NMP1L 1958 dated 7/15/2005.
B2.1.11-2 R1	1958	7/15/2005	RAI response replaces response provided in NMP1L 1915 dated 01/14/2005.
B2.1.19-1	1928	2/14/2005	Supersedes portions of response in RAI 3.1.2.C.4-09 in NMP1L 1909 dated 1/3/2005.
B2.1.33-1	1901	12/17/2004	Portions are superseded by responses to RAIs 2.1-4, 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated 7/15/2005.

RAI Number	Letter (NMP1L)	Letter Date	Status
B2.1.33-2	1901	12/17/2004	No change to RAI response is required. B2.1.33, Systems Walkdown Program, was modified subsequent to the RAI response. No change in intent.
B2.1.33-4	1901	12/17/2004	No change to RAI response is required. B2.1.33, Systems Walkdown Program, was modified subsequent to the RAI response. No change in intent.
B2.1.33-5	1901	12/17/2004	No change to RAI response is required. B2.1.33, Systems Walkdown Program, was modified subsequent to the RAI response. No change in intent.
CRDRL R1	1927	2/11/2005	Supplemented by the response to RAI 3.1.1-21 in NMP1L 1958 dated 7/15/2005.

## **ATTACHMENT 2**

### **Nine Mile Point Nuclear Station (NMPNS)**

#### **Clarification of Responses Related To:**

- 1. Vessel Flange Leak Detection Line (VFLDL)**
- 2. Non-EQ Inaccessible Medium Voltage Cable Program**
- 3. Bolting Integrity Program**
- 4. Boraflex Monitoring Program**
- 5. Control Rod Stub Tubes**

**Vessel Flange Leak Detection Line:**

The NMP1 Vessel Flange Leak Detection Line (VFLDL) has been re-classified as 'Within the Scope of License Renewal' (WSLR). Classification of the NMP1 VFLDL as WSLR reverses the NMP position previously stated in letters NMP1L 1888 dated November 19, 2004, NMP1L 1892 dated December 6, 2004, and NMP1L 1927 dated February 11, 2005.

NMP1 classified the NMP1 VFLDL as WSLR as a result of the NMP NSR re-scoping efforts. Although the NMP1 VFLDL does not perform an RPV a pressure boundary function, leakage around the reactor vessel seal rings could accumulate in the VFLD line and cause cracking. Therefore, the VFLDL is considered to contain NSR systems and components whose failure could prevent satisfactory accomplishment of functions identified in 10 CFR 54.4(a)(1). Previously, the NMP1 VFLDL was considered out of scope because it is not part of the RPV pressure boundary.

The NMP LRA was revised to show that the NMP1 VFLDL is in-scope with cracking identified as an aging effect requiring management. Aging management for the NMP1 VFLDL is provided by the One-Time Inspection, Water Chemistry, and ASME Section XI programs.

The NMP2 VFLD was already classified as WSLR.

**Non-EQ Inaccessible Medium Voltage Cable Program:**

Program B2.1.31, Non-EQ Inaccessible Medium Voltage Cables (NUREG 1801, Program XI.E3), has been deleted from the NMP LRA because the scoping performed to develop the program determined that NMP has no inaccessible medium voltage cables subject to aging management review (AMR). NMP1 has no inaccessible medium voltage cables that are WSLR. NMP2 has no inaccessible medium voltage cables within the scope of license renewal that meet the criteria specified in NUREG 1801, Program XI.E3, for requiring aging management. Therefore, the program for non-EQ inaccessible medium voltage cables in LRA Section B2.1.31 is not required.

NMP LRA Appendix A, Sections A1.1.26 and A2.1.26 and Appendix B, Section B2.1.32 have been replaced with "There are no inaccessible medium voltage cables at NMP1 or NMP2 that meet the NUREG-1801, Section XI.E3 Program criteria for being subject to AMR; therefore, this program is not being implemented at NMP." Other sections of the NMP LRA have been revised accordingly.

**Bolting Integrity Program:**

NMP has revised the LRA to include Program B2.1.36, "Bolting Integrity" consistent with commitments made in letter NMP1L 1919 dated 1/20/2005. The NMP bolting integrity program is an existing program that will be enhanced, as described in LRA Section B2.1.36, to be consistent with NUREG-1801, Section X1.M18, Bolting Integrity, and the latest industry and regulatory License Renewal precedence. The enhanced bolting integrity program will be implemented prior to the start of the period of extended operation.

NMP LRA Appendix A, Sections A1.1.38 and A2.1.37 and Appendix B, Section B2.1.36 have been added to describe the NMP Bolting Integrity Program. Applicable sections of the NMP LRA have revised to credit the Bolting Integrity Program for aging management where appropriate.

**Boraflex Monitoring Program (NMP1 only):**

NMP has revised LRA Section B2.1.12, Boraflex Monitoring Program, to specify that the program for NMP1 will be enhanced to require periodic in-situ neutron attenuation testing and measurement of boron areal density to confirm the correlation of the conditions of test coupons to those of Boraflex racks that remain in use during the period of extended operation. After enhancement, the NMP1 Boraflex Monitoring Program will be consistent with the ten elements of Aging Management Program XI.M22, "Boraflex Monitoring," specified in NUREG-1801. The enhanced program will be implemented prior to the period of extended operation.

**Control Rod Drive Stub Tubes (NMP1 Only):**

NMP has revised LRA Section B2.1.8, BWR Vessel Internals Program (NUREG 1801, Program XI.M9), to clarify its positions related to the use of roll/expansion techniques for the repair of leaking NMP1 CRD stub tubes. In the response to RAI 3.1.2-1 in NMP1L 1928 dated 2/14/2005, NMP committed to implement a strategy whereby during the period of extended operation a leaking CRD stub tube penetration would be roll repaired. If, following the roll repair, this stub tube were to leak within acceptable limits, then a weld repair would be effected no later than one operating cycle following discovery of the leakage.

As acknowledged by the NRC in RAI 3.1.2-2, the ASME Code Committee is evaluating the acceptability of roll/expansion techniques as a permanent repair for CRD stub tubes. Therefore, NMP will follow the status of the proposed ASME Code change with respect to allowing roll/expansion techniques of CRD stub tubes, and will implement the final code change or provide an alternative plan for the repair of the NMP1 CRD stub tubes during the period of extended operation. If an alternative plan is proposed, it will be submitted at least 1 year prior to the expiration of the current operating license.