

November 16, 2005

Mr. James A. Spina
Vice President Nine Mile Point
Nine Mile Point Nuclear Station, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: NINE MILE POINT NUCLEAR STATION - NRC LICENSE RENEWAL
INSPECTION PLAN

Dear Mr. Spina:

On March 4, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed the principal portion of an inspection of your application for renewal of the Nine Mile Point Nuclear Station (NMPNS), Units 1 and 2 license. An interim inspection report was forwarded to you on June 9, 2005 documenting the inspection observations which were discussed on March 4, 2005, with Mr. Tim O'Connor and other members of your staff and contained the results of an additional on-site inspection conducted during the week of April 4, 2005 and communicated to your staff on April 25, 2005.

As stated in our June 9, 2005 letter the NRC determined it would be necessary to complete our inspection of your application for a renewed license subsequent to the completion of the quality enhancements that you proposed. Please find attached to this letter our plan to perform that inspection.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document management system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Marvin D. Sykes, Chief
Engineering Branch 1
Division of Reactor Safety

Docket Nos. 50-220, 50-410
License Nos. DPR-63, NPF-69

Enclosure: License Renewal Inspection Plan

Mr. James A. Spina

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Mr. James A. Spina

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ENCLOSURE

Nine Mile Point Nuclear Station LICENSE RENEWAL INSPECTION PLAN

I PURPOSE

This plan specifies the inspection of issues raised during a license renewal inspection conducted during the period February 14 - 18 and February 28 -March 4, 2005 (Interim Report 05000220/20050006 and 05000410/2005006). The prior inspection identified weaknesses in two broad areas: an inconsistent application of methodology related to compliance with 10CFR54.4(a)(2) and programs supporting aging management that were either incomplete or indeterminate. This plan defines the scope of the inspections planned to verify that Nine Mile Point Nuclear Station's license renewal program is in compliance with the requirements of the rule and is consistent with the license renewal application of Nine Mile Point Nuclear Station LLC and the staff's safety evaluation of Nine Mile Point Nuclear Station LLC's license renewal application for the areas previously identified as inconsistent, incomplete, or indeterminate.

II OBJECTIVES

The overall objective of this plan is to verify there is reasonable assurance that the effects of aging will be adequately managed so that the intended function(s) of structures, and components, for which an aging management review is required, will be maintained consistent with the current licensing basis during the period of extended operation. The prior inspection was unable to arrive at that conclusion in the areas identified in the interim report. Region I will implement the license renewal inspection plan at Nine Mile Point Nuclear Station to verify that Nine Mile Point Nuclear Station LLC meets the requirements of the rule and has implemented license renewal programs and activities consistent with the rule, the license renewal application, and the staff's safety evaluation report on the license renewal application.

III INSPECTION ACTIVITIES

Inspection Procedure (IP) 71002, "License Renewal Inspections," will be the primary procedure used to inspect Nine Mile Point Nuclear Station's implementation of the requirements of the rule. The latest revision of IP 71002 can be reviewed by accessing <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/ip71002.pdf>

Scoping and Screening The inspection will focus on the methodology used by the applicant to determine which non-safety systems are within the scope of the license renewal. This will be accomplished by walk-downs of accessible portions of selected systems and structures to identify observable inconsistencies in the scoping and screening activities. Any aging effects on the systems and structures that are not covered in the license renewal application will be noted for inclusion in the Aging Management portion of the inspection.

Aging Management Programs The inspection team will inspect the aging management programs identified in Section VI of this plan focusing on the previously identified problems. The inspection team will examine records for existing aging management

programs to evaluate the programs' effectiveness and will review plans for new aging management programs. The inspection team will then document the team's findings on the effectiveness of the aging management programs to maintain the systems' and structures' intended function(s) consistent with the current licensing basis for the period of extended operation.

IV INSPECTION SCOPE

The Nine Mile Point Nuclear Station's license renewal inspection activities will be implemented through an on-site inspection.

1. The inspection is planned to take one week at Nine Mile Point Nuclear Station, however the level of detail reviewed to determine the status of the prior issues may require additional time either at the site or while in the Regional Office. One inspection man-week will focus on the scoping and screening processes as it relates to non-safety systems that affect safety systems. The inspection will verify non-safety systems have been included or excluded consistent with the rule, Nine Mile Point Nuclear Station's methodology, and the staff's evaluation of Nine Mile Point Nuclear Station's methodology. The inspection will verify there is reasonable assurance that Nine Mile Point Nuclear Station's scoping and screening processes have identified the non-safety systems, structures, and components for which an aging management review is required consistent with the requirements of the rule.
2. The remainder of the inspection resources will focus on the aging management programs previously identified as incomplete and listed in Section VI of this plan. This inspection will examine each of the identified aging management programs and compare the programs against actual past results.
2. If open inspection items warrant a third inspection, the team will followup on previous inspection activities and may inspect Nine Mile Point Nuclear Station's actions on any SER open items requested by NRR. This inspection may also include portions of the license renewal application updated by the applicant as a result of recent plant modifications.

V INSPECTION RESOURCES

The inspection will need the following inspection resources:

1. Inspectors
 - C One team leader
 - C Two inspectors, or more, from the region
2. Skills

The inspection team needs a cross-section of skills, including mechanical, material, civil/structural, and electrical engineering skills.

The scope of the third inspection (and, thus, the resources) will depend on how many open issues remain from the previous inspection activities.

VI INSPECTION OPEN ITEMS

Inconsistent application of methodology related to compliance with 10CFR54.4(a)(2):

1) Verify the method used to follow the guidelines provided in NEI-95-10, Revision 5, Appendix F, Section 3, *Non-Safety SSCs Typically Identified in the Current Licensing Basis*.

a) Verify High Energy Line Break, Flooding, Missiles, and Cranes are correctly identified.

b) Review a sample of basis documents used in this portion of the application (USAR, Technical Specification, Maintenance Rule scoping documents, design documents, design drawings, docketed correspondence and the MEL (Q-list)) to determine if other topics exist that credit NSR SCCs for prevention or mitigation function in support of safe shutdown.

2) Verify the method used to apply NEI 95-10, Revision 5, Appendix F, Section 4, *Non-Safety SSCs Directly Connected to Safety-Related SSCs*, (except for those portions not endorsed by the NRC) was correctly applied in evaluating SSCs to determine those that satisfy the requirements of 10 CFR 54.4(a)(2).

a) Review the method used to specifically identify NSR structural interfaces.

b) For selected interfaces determine:

i) the first equivalent anchor was identified, and

ii) a smaller branch line was identified where the moment of inertia ratio of the larger pipe to the smaller pipe was equal to or greater than the original design basis ratio.

c) Review the criteria and records of walk-downs performed of the identified systems.

d) Independently walk-down selected systems to determine the criteria were appropriately applied

3) Verify the method used to apply NEI 95-10, Revision 5, Appendix F, Section 5, *Non-Safety SSCs Not Directly Connected to Safety-Related SSCs*, provides criteria for the scoping of plant NSR SSCs in proximity of SR SSCs.

a) Review the MEL (Q-list) to determine that locations (building, elevation, room) containing SR SSCs requiring a comprehensive walk-down were reasonably identified.

- b) Review the walk down criteria and related records of walk-downs.
- c) Interview personal that performed the walk downs to determine they were knowledgeable in plant layout, system design, and operation.
- d) Review selected inaccessible areas that were evaluated through the use of installed cameras, controlled drawing review, and/or evaluation/assessment by subject matter experts to determine that the applied approach was adequate.
- e) Independently walk-down selected systems to determine the criteria were appropriately applied

Programs supporting aging management that were either incomplete or indeterminate:

- 1) Review the basis documents for the "One-Time Inspection Program" to determine:
 - a) If the documents are complete and up-to-date
 - b) Identify SCCs covered by the program
- 2) Determine if oxygen injection, for the purpose of inhibiting corrosion in the reactor building closed loop cooling system, has been identified in the application as an exception to the recommendations in GALL
- 3) Determine if acceptance criteria and tolerances were established based on system design parameters (cracking, loss of material, and loss of heat transfer) for the closed-cycle cooling water system program. Review the actions taken to resolve DER 2005-848.
- 4) Determine if station procedures, used in maintaining the closed-cycle cooling water system, have been enhanced to formalize eddy current inspection and direct inspections for heat transfer surface fouling and loss of material.
- 5) If 3 and 4, above, have been corrected can a conclusion of reasonable assurance now be made for the closed-cycle cooling water system?
- 6) Has the Unit 1 service water systems erosion-corrosion program document been brought up-to-date as part of the actions taken to resolve DER 2005-841?
- 7) Review DER NM-2004-5028 and 5135 to determine if eddy current testing to detect aging effects in the Open-Cycle Cooling Water System has been included in the program documents and the GL 89-13 program. Review GAI-REL-04 to determine if the eddy current enhancements referred to have been formally included in the programs used to maintain the Open-Cycle Cooling Water System .
- 8) Determine if the thermal performance test, reference heat transfer rate criteria, for heat exchanger thermal performance testing has been corrected (see DER NM 2002-4792 for details) in the implementing procedures, to account for replacement

temperature control valve TCV-70-137.

9) Determine that procedure S-TDP-REL-0101 has been revised to incorporate aging management requirements (under DER NM 2004-5741/5118) for the Systems Walkdown Procedure.

10) Review NM 2005-787 to determine if administrative control of periodicity of implementation of the Systems Walkdown Procedure has been implemented.

11) Review training change order ENG-2003-71 to determine if training has been implemented to identify and detect aging using EPRI guidance for personnel implementing the Systems Walkdown Procedure.

12) Review the "Non-Environmentally Qualified (EQ) Electrical Cables and Connections Program" to determine if it is complete enough to arrive at a determination of reasonable assurance.

13) Review the "Non-EQ Fuse Holder Inspection Program" to ascertain if the program has been expanded to include an environmental stress of moisture in addition to the previously included stressors of heat and radiation. Further review the program to determine if there is reasonable assurance the program will adequately manage the affect of aging.

14) Determine if the fire door frame clearance inspection periodicity has been revised to conform to the GALL suggested period of two months or has the original NMP period of three months been identified as an exception to GALL to NRR staff.

15) Determine if the enhancement of including the masonry fire walls in the Turbine Building and Screen Houses in both units has been formalized in the "Structural Monitoring and Masonry Wall Program".