



Constellation Energy

Nine Mile Point Nuclear Station

P.O. Box 63
Lycoming, NY 13093

November 17, 2005
NMP1L 2001

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

Summary of Commitment Changes

Gentlemen:

This letter forwards a summary of regulatory commitment changes requiring NRC notification made in accordance with the guidance contained in NEI 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0, during the period October 1, 2004, to October 1, 2005. The attachment to this letter identifies each change, includes a brief statement of the basis for the change and identifies the source document from which the commitment was made.

If you have any questions regarding this submittal, please contact me at (315) 349-1041.

Sincerely,

James A. Hutton
Director Licensing

JAH/RF/sac
Attachment

cc: Mr. S. J. Collins, NRC Regional Administrator, Region I
Mr. L. M. Cline, NRC Senior Resident Inspector
Mr. T. G. Colburn, Senior Project Manager, NRR (2 copies)

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**Attachment
Nine Mile Point Units 1 and 2
2005 Summary of Regulatory Commitment Changes**

2005 Change No. 1

UNIT: Nine Mile Point Unit 1 (NMP1)

Commitment:

Upon installation of the new Emergency Core Cooling System (ECCS) suction strainers, the NMP1 In-service Inspection (ISI) Program will be changed to add suction strainer inspections as an augmented ISI program plan exam with a frequency of each refueling outage.

Source Document:

Niagara Mohawk Power Corporation (NMPC) letter dated November 4, 1996, "NRC Bulletin 96-03, 'Potential Plugging Of Emergency Core Cooling Suction Strainers By Debris In Boiling-Water Reactors'."

Revised Commitment:

The NMP1 In-Service Inspection (ISI) Program will be changed to schedule ECCS suction strainer inspections as an augmented ISI Program plan exam during torus desludge activities only (every other refueling outage).

Justification for Change:

Since installation of the NMP1 ECCS suction strainers in 1999, the strainers have been visually inspected each refueling outage using underwater divers as part of the torus cleaning (2001 and 2003). As a result of these visual inspections, no foreign material was found adhered to the strainers and no structural integrity anomalies were identified. Based on the analysis of the weight of corrosion products collected and removed from the torus over those refueling outages, suction strainer inspections may be performed every other refueling outage, beginning with Refueling Outage 19 in 2007.

**Attachment
Nine Mile Point Units 1 and 2
2005 Summary of Regulatory Commitment Changes**

2005 Change No. 2

UNIT: NMP1

Commitment:

Implement the Motor Operating Valve (MOV) Periodic Verification of Design Basis Capability Program as described in the Boiling Water Reactor Owners' Group Topical Report NEDC-32719, Revision 2. The Program requires all subject valves to be tested at least within a 10 year period.

Source Document:

NMPC letter dated November 19, 1998, "Response to Safety Evaluation-Joint Owners' Group Program Periodic Verification of Motor-Operated Valves." This letter was submitted in response to NRC Generic Letter (GL) 96-05, "Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves."

Revised Commitment:

Implement the Program Elements described in Topical Report NEDC-32719, Revision 2 (one time exemption taken, see justification below). This commitment change allowed a one-time testing deferral for Containment Isolation Motor Operated Valve (CIMOV) 110-127.

Justification for Change:

The required 10 year test interval for the CIMOV 110-127 was exceeded by 4 weeks to allow the testing to take place during Refueling Outage 18 (2005). Based on significant margin for degradation, trended by the periodic testing, it was determined that the 4 week delay would not have an impact on the valve's capabilities.

**Attachment
Nine Mile Point Units 1 and 2
2005 Summary of Regulatory Commitment Changes**

2005 Change No. 3

UNIT: NMP1

Commitment:

Based on NRC Safety Evaluation Report (SER) dated August 11, 1994, regarding the NMP1 torus, the following actions need to be performed at the designated frequencies as delineated in the SER in order to assure the structural adequacy of the torus for continued plant operation.

1. Perform ultrasonic testing (UT) thickness measurements of the six thinnest bays every six months.
2. Remove the installed torus corrosion monitoring coupons every outage to perform corrosion rate calculations.

Source Documents:

NMPC letter dated January 12, 1989, NMP1L 0343, and NRC SER dated August 11, 1994, "Approval of Reduction Factors for Condensation Oscillation Loads in Nine Mile Point Nuclear Station Unit No. 1 (NMP1) Torus."

Revised Commitment:

1. Perform ultrasonic testing (UT) thickness measurements of the six thinnest bays every year.
2. Remove the installed torus corrosion monitoring coupons every six years to perform corrosion rate calculations.

Justification for Change:

Based on the measured corrosion rates of corrosion monitoring coupons since Refueling Outage 13 (1995) and the corrosion rates of the actual torus shell since August 1994, it is clear that the governing corrosion rate of the torus shell has been from the actual UT measurements and not the corrosion rates of the coupons. Therefore, not removing the coupons from the torus during Refueling Outage 18 for the purpose of corrosion rate monitoring and extending the removal frequency to six years will have an insignificant effect on the overall capability of the torus shell to perform its intended design function. Additionally, based on adequate existing margins for minimum wall thicknesses of the six thinnest torus bays, the UT thickness measurements will be performed on a yearly frequency, rather than every six months.

**Attachment
Nine Mile Point Units 1 and 2
2005 Summary of Regulatory Commitment Changes**

2005 Change No. 4

UNIT: NMP1

Commitment:

Restrict the operation of the Smoke Purge system to its intended design function (smoke removal) and ensure the system is only tested when the Control Room Emergency Ventilation (CREV) system is not required to be operable.

Source Document:

NMP1 Licensee Event Report (LER) 97-07 dated September 15, 1997, "Potential Control Room Emergency Ventilation System Operation Outside the Design Basis due to Inadequate Evaluation."

Revised Commitment:

Restrict the operation of the Smoke Purge system to its intended design function (smoke removal) and ensure the system is only tested or otherwise operated when the CREV system is not required to be operable.

Justification for Change:

This change maintains the commitment intention of not operating the Smoke Purge system when the CREV system is required to be operable as described in LER 97-07.