

P.O. Box 63 Lycoming, NY 13093

December 13, 2005 NMP1L 2008

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 (LRA) - Editorial Changes to Letter NMP1L 2005

and NMP1L 2007 (TAC Nos. MC3272 and MC3273)

# Gentlemen:

By letter dated July 14, 2005, Nine Mile Point Nuclear Station, LLC (NMPNS) submitted an Amended License Renewal Application (ALRA) for the operating licenses of Nine Mile Point Units 1 and 2.

On December 1 and 5, 2005, (letter numbers NMP1L 2005 and 2007), NMPNS submitted audit resolution items and Request for Additional Information responses for NRC staff use. In a telephone call held with NRC staff on December 7, 2005, NMPNS agreed to make three editorial changes to the material submitted by these letters. Attachments 1 and 2 of this letter provide replacement pages with the editorial corrections made and instructions for page and table replacement. This letter contains no new regulatory commitments.

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/MSL/sac

A107

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# STATE OF MARYLAND

TO WIT:

### **COUNTY OF ANNE ARUNDEL:**

I, James A. Spina, being duly sworn, state that I am Vice President Nine Mile Point, and that I am duly authorized to execute and file these responses on behalf of Nine Mile Point Nuclear Station, LLC. To the best of my knowledge and belief, the statements contained in this submittal are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other Nine Mile Point employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Japaes A. Spina

Vice President Nine Mile Point

WITNESS my Hand and Notarial Seal:

Notary Public

My Commission Expires:

June 27, 2007

#### Attachments:

- 1. Replacement for page 32 of Attachment 2 from NMP Letter NMP1L 2005, dated December 1, 2005.
- 2. ALRA Section 2.4, Commitments 12 and 13, replacements for the commitments identified in Attachment 2 of NMP Letter NMP1L 2007, dated December 5, 2005 and Attachment 3 of NMP Letter NMP1L 2005, dated December 1, 2005, respectively.
- 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
  - Mr. N. B. Le, License Renewal Project Manager, NRR
  - Mr. J. P. Spath, NYSERDA

# ATTACHMENT 1 to NMP1L 2008

This page is a replacement for page 32 of Attachment 2 from NMP Letter NMP1L 2005, dated December 1, 2005.

Audit Item	LRA Sect.	ALRA Change	
NMP-AI-175	T 3.1.1.A	Revise the last paragraph of line item 3.1.1.A-27 to read: "Program XI.M6 and Program XI.M9 are credited with managing cracking of the CRD Return Line Nozzle thermal sleeve due to SCC. Verification of the absence of nozzle cracking and thermal sleeve to flow shield weld cracking provides proof that the thermal sleeve intended function is not degraded."	
	T 3.1.2.A-1	On p. 3.1-45 for the Thermal Sleeve line item with the Notes column entry of "E, 58", add the BWR Vessel Internals Program to the Aging Management Program column.	
	A1.1.12	Add a new enhancement (p. A1-6) as follows: "NMP1 will perform an EVT-1 inspection of the thermal shield to flow shield starting in 2007 and proceeding at a 10 year frequency thereafter consistent with the ISI inspection interval."	
	A1.4	Add new Item 40 (p. A1-43) as follows: "NMP1 will perform an EVT-1 inspection of the thermal shield to flow shield weld starting in 2007 and proceeding at a 10 year frequency thereafter consistent with the ISI inspection interval."	
	B2.1.8	Add a new enhancement to the Detection of Aging Effects attribute (p. B3-24) as follows: "NMP1 will perform an EVT-1 inspection of the thermal shield to flow shield weld starting in 2007 and proceeding at a 10 year frequency thereafter consistent with the ISI inspection interval."	
NMP-AI-183	T 3.6.2.C-2	Revise the Non-Segregated Bus Insulators line items for the Cement and Metal Materials (p. 3.6-11) to replace the AERM centry of "None" with "Loss of Insulation Resistance"; the AMP column entry of "None" with "Non-Segregated Bus Inspect Program", and the Notes column entry of "None" with "J, 1".	
NMP-AI-184	T 3.6.2.C-4	Revise the 3 High Voltage Insulators line items to replace the AERM column entry of "None" with "Loss of Insulation Resistance"; the AMP column entry of "None" with "Preventive Maintenance Program", and the Notes column entry of "No with "J".	

# **ATTACHMENT 2 to NMP1L 2008**

The following, ALRA Section 2.4, Commitments 12 and 13, are one for one replacements of the same commitments that were identified in Attachment 2 of NMP Letter NMP1L 2007, dated December 5, 2005 and Attachment 3 of NMP Letter NMP1L 2005, dated December 1, 2005, respectively. These replacements are due to editorial changes.

Revisions to existing Amended License Renewal Application (ALRA) commitments are shown with *italics* for additions and <del>strikethroughs</del> for deletions.

ALRA Section	ALRA Commitment#	Commitment Text	New or Revised	Due Date
A2.4	12	NMPNS will either:(1) Install core plate wedges (as part of a proposed core shroud tie-rod repair) to eliminate the need for the enhanced inspections of the core plate hold-down bolts recommended by BWRVIP-25; or (2) Perform an analysis (incorporating detailed flux/fluence analyses and improved stress relaxation correlations) in accordance with BWRVIP-25 to demonstrate that the core plate hold-down bolts can withstand all normal, emergency, and faulted loads considering the effects of stress relaxation, until the end of the period of extended operation and submit it for staff review and approval 2 years prior to entering the period of extended operation.	Revised	August 22, 2007 Prior to NMP2 PEO

ALRA Section	ALRA Commitment #	Commitment Text	New or Revised	Due Date
A2.4	13	Enhance the BWR VIP to address (1) BWRVIP-18, 41 and 42 open items regarding the inspection of inaccessible welds for core spray, jet pump and low pressure coolant injection components, respectively. As such, NMPNS will implement the resolution of these open items as documented in the BWRVIP response and reviewed and accepted by the NRC; (2) The inspection and evaluation guidelines for steam dryers and access hole covers are currently under development by the BWRVIP committee. Once these guidelines are documented, and reviewed and accepted by the NRC, the actions will be implemented in accordance with the BWRVIP program; (3) The baseline inspections recommended in BWRVIP-47 for the BWR lower plenum components will be incorporated into the appropriate program and implementing documents; and (4) NMPNS will perform inspections of the guide beams similar (in inspection methods, scope and frequency of inspection) to the inspections specified in BWRVIP-47, "BWR Lower Plenum Inspection and Flaw Evaluation Guidelines," for the control rod guide tube components. The extent of examination and its frequency will be based on a ten percent sample of the total population, which includes all grid beam and beam-to-crevice slots, being inspected within 12 years of entry into the period of extended operation with five percent of the population being inspected within the first six years. The sample locations selected for examination will be in areas that are exposed to the highest neutron fluence. The top guide grid beam reinspection requirements will depend on the inspection results; however, at a minimum, the NMP BWRVIP program will follow the same guidance for the subsequent 12 year interval as defined for the initial 12 year baseline. A schedule for additional inspections of the top guide locations (using EVT 1 or techniques demonstrated to be appropriate in BWRVIP-03) will be incorporated into the appropriate program and implementing documents. A minimum of 10% of the locations will be inspected within 12 years of the beginn	Revised	Prior to NMP2 PEO