Constellation Energy
Nine Mile Point Nuclear Station

P.O. Box 63
Lycoming, NY 13093

January 11, 2006
NMP1L 2015

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

Amended License Renewal Application (ALRA) – Responses to NRC Requests for Additional Information – Sections 3.4 and 4.7 (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.

In a letter dated December 23, 2005, the NRC requested additional information regarding ALRA Sections 3.4 and 4.7.

The NMPNS responses to these requests for additional information are provided in Attachment 1. Attachment 2 provides a resultant new regulatory commitment.

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

Very truly yours,

Timothy J. O'Connor
Vice President Nine Mile Point

TJO/MSL/sac

A107

STATE OF NEW YORK :
: TO WIT:
COUNTY OF OSWEGO :

I, Timothy J. O'Connor, 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.

Timothy J. O'Connor
Vice President Nine Mile Point

Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Oswego, this 1 day of January, 2006.

WITNESS my Hand and Notarial Seal:

SANDRA A. OSWALD
Notary Public, State of New York
No. 01OS6032276
Qualified in Oswego County
Commission Expires 10-25-09

Sandra A. Oswald
Notary Public

My Commission Expires: 10/25/09

10/25/09
Date

Attachments:

1. Responses to NRC Requests for Additional Information – ALRA Section 4.7.1 and Table 3.4.1.A
2. New regulatory commitment

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

Responses to NRC Requests for Additional Information (RAIs) Regarding Amended License Renewal Application (ALRA) Section 4.7.1 and Table 3.4.1.A

This attachment provides the Nine Mile Point Nuclear Station, LLC (NMPNS) responses to the RAIs contained in the NRC letter dated December 23, 2005. Each RAI is repeated, followed by the NMPNS response for Nine Mile Point Unit 1 (NMP1) and/or Nine Mile Point Unit 2 (NMP2), as applicable.

REACTOR PRESSURE VESSEL (RPV) BIOLOGICAL SHIELD – NMP UNIT 2 ONLY

aRAI 4.7.1B-1

With respect to time-limited aging analyses (TLAA) 4.7.1 on the RPV Biological Shield, for NMP2, please provide a calculation using an NRC-approved fluence methodology that will not invalidate your original fracture mechanics analysis (i.e., fluence will be less that 1E17 n/cm^2). The methodology that is referred to in the amended LRA has not been reviewed and approved by the staff. Otherwise, the applicant could submit a commitment indicating that the calculation/methodology will be submitted to the staff for review and approval 2 years prior to the period of extended operation.

Response

NMPNS will perform a fluence analysis for the period of extended operation (PEO) using plant specific methodology that is consistent with Reg. Guide 1.190. This methodology has been approved by the NRC as part of the NMP1 and NMP2 Pressure-Temperature Curve analysis review. The fluence analysis will establish whether or not the maximum fluence at the Biological Shield Wall or the fluence at the shield wall flaws, on which the ALRA Section 4.7.1 TLAA is based, is below the threshold value above which neutron embrittlement is considered to be an issue (10^{17} n/cm^2). NMPNS will submit the summary of this analysis to the NRC for review and approval no later than two years prior to entry into the PEO. Based on the results of this analysis, the submittal will also include revised ALRA Sections 4.7.1 and A2.2.5.1, and any other supporting analysis, as applicable.

ALRA Section A2.4 (ALRA p. A2-39) is revised to add new Item 39 as follows:

ITEM	COMMITMENT	SOURCE	SCHEDULE
39	No later than two years prior to entry into the PEO, NMP will submit, for NRC review and approval, the summary of the Reg. Guide 1.190 based analysis that determines the maximum neutron fluence at the NMP2 Biological Shield Wall or at the shield wall flaw locations that are the basis for the ALRA Section 4.7.1 TLAA. The submittal will include revised ALRA Sections 4.7.1 and A2.2.5.1, and any other supporting analysis, as applicable.	LRA Section 4.7.1 and Appendix A2.2.5.1	October 31, 2024

TABLE 3.4.1.A AGING MANAGEMENT PROGRAM FOR STEAM AND POWER CONVERSION SYSTEMS

aRAI 3.4.1.A-1

In the NMP ALRA Table 3.4.1.A Items 3.4.1.A-09 and 3.4.1.A-10, the applicant states that these items are not applicable because "All other heat exchangers are of a different material (copper alloys or stainless steel) and do not have this aging effect/mechanism." However, both copper alloy and stainless steel are subjected to the aging effects of pitting and crevice corrosion. Please explain the discrepancy provided under the discussion columns of the table.

Response

NMPNS has reviewed the in-scope heat exchangers in the NMP1 and NMP2 Steam and Power Conversion Systems and concluded that none are cooled by open or closed-cycle cooling water systems. Additionally, since neither Item 3.4.1.A-09, Item 3.4.1.A-10, Item 3.4.1.B-09, nor Item 3.4.1.B-10 is included as a "Table 1 Item" column entry in any of the ALRA Type 2 ("Summary of Aging Management Evaluation") Tables, the "Discussion" column entries for these four (4) Table 3.4.1.A/B Items should be revised. The "Discussion" column entries for Items 3.4.1.A-09 and 3.4.1.A-10 (ALRA pp. 3.4-24 and -25) are, therefore, revised to read as follows:

"Not applicable for the following reasons:

- The NMP1 condenser hotwell is evaluated in Item 3.4.1.A-02.
- These components are not subject to an AMR in the NMP1 Steam and Power Conversion Systems."

The "Discussion" column entries for Items 3.4.1.B-09 and 3.4.1.B-10 (ALRA pp. 3.4-27 and -28) are revised to read as follows:

"Not applicable for the following reasons:

- The NMP2 condenser hotwell is evaluated in Item 3.4.1.B-02.
- These components are not subject to an AMR in the NMP2 Steam and Power Conversion Systems."

ATTACHMENT 2

The following table identifies an action committed to by Nine Mile Point Nuclear Station, LLC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

ALRA Section	ALRA Commitment #	Commitment Text	New or Revised	Due Date
A2.4	39	No later than two years prior to entry into the PEO, NMP will submit, for NRC review and approval, the summary of the Reg. Guide 1.190 based analysis that determines the maximum neutron fluence at the NMP2 Biological Shield Wall or at the wall flaw locations that are the basis for the ALRA Section 4.7.1 TLAA. The submittal will include revised ALRA Sections 4.7.1 and A2.2.5.1, and any other supporting analysis, as applicable.	New	October 31, 2024