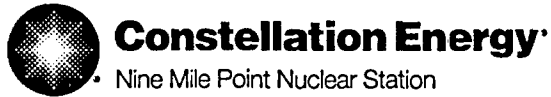


Timothy J. O'Connor  
Vice President

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315.349.1392  
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April 3, 2006

U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**ATTENTION:** Document Control Desk

**SUBJECT:** Nine Mile Point Nuclear Station  
Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410

Safety Evaluation Report (SER), With Open Items Related to the License Renewal of  
Nine Mile Point Nuclear Station, dated March 2006 – NMPNS Comments  
(TAC Nos. MC3272 and MC3273)

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By NRC letter dated March 3, 2006, Nine Mile Point Nuclear Station, LLC (NMPNS) received the Safety Evaluation Report (SER), With Open Items Related to the License Renewal of Nine Mile Point Nuclear Station.

NMPNS was afforded the opportunity to provide comments on the SER. Attachment (1) provides those comments that were considered technical in nature and should be considered for incorporation into the final SER. This letter contains no new regulatory commitments.

Should you have questions regarding the information in this submittal, please contact Peter Mazzaferro, NMPNS License Renewal Project Manager, at (315) 349-1019.

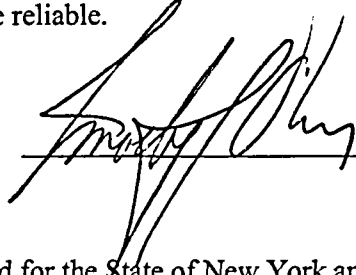
Very truly yours,

Timothy J. O'Connor  
Vice President Nine Mile Point

A107


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

I, Timothy J. O'Connor, begin duly sworn, state that I am Vice President Nine Mile Point, and that I am duly authorized to execute and file this submittal on behalf of Nine Mile Point Nuclear Station, LLC. To the best of my knowledge and belief, the statements contained in this document 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.

  
\_\_\_\_\_

Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Oswego, this 3<sup>rd</sup> day of April, 2006.

WITNESS my Hand and Notarial Seal:

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

4/3/06  
\_\_\_\_\_  
Date

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

TJO/MRF/sac

Attachments: (1) NMP Comments to Safety Evaluation Report (SER), With Open Items Related to the License Renewal of Nine Mile Point Nuclear Station, dated March 2006

cc: S. J. Collins, NRC  
T. G. Colburn, NRC  
N. B. Lee, NRC  
Resident Inspector, NRC  
J. P. Spath, NYSERDA

**ATTACHMENT (1)**

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**NMP COMMENTS TO SAFETY EVALUATION REPORT (SER),  
WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF  
NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006**

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## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
Section 1.7 and 3.0.3.2.16	1-10 and 3-83	NMPNS has commitments in ALRA Sections A1.4 & A2.4 (Commitments 22 & 20, respectively) that specifically address the license condition contained on this page. Additionally, it is noted that SER for BWRVIP-116 was issued on March 1, 2006. For this reason, NMPNS does not believe that the license condition is necessary.
Section 2.3A.2.2.1	2-50	The description for the Containment Spray System contains the system functions and configuration of the Core Spray System.
General	See Comment	<p>The following SER sections have inconsistencies with identifying the program attributes affected by program exceptions or enhancements stated in the amended LRA:</p> <ol style="list-style-type: none"> <li>1. Section 3.0.3.2.6 (page 3-44) - In the 1<sup>st</sup> sentence in the last paragraph on the page the identified enhancement was not made to the "Parameters Monitored/Inspected" program element. The enhancement was made to the "Detection of Aging Effects" program element.</li> <li>2. Section 3.0.3.2.7 (page 3-54) - The list of 3 bullets on this page are also applicable to the "Program Description", "Preventive Actions", and "Monitoring and Trending" program elements (NMP1L 1996 (item #25)).</li> <li>3. Section 3.0.3.2.7 (page 3-55) - The bulleted enhancement on this page is applicable to the "Acceptance Criteria" program element.</li> <li>4. Section 3.0.3.2.13 (page 3-69) - In the last paragraph on the page, the Halon/carbon dioxide exception applies to the "Detection of Aging Effects" program element, as opposed to the "Parameters Monitored/Inspection" element.</li> <li>5. Section 3.0.3.2.14 (page 3-73) - The 2nd bullet on this page is applicable to the "Program Description", as opposed to the "Scope of Program" program element (NMP1L 1996).</li> <li>6. Section 3.0.3.2.14 (pages 3-73 and 3-74) - The 4<sup>th</sup> bullet on page 3-73 and the 2<sup>nd</sup> bullet on page 3-74 are both an NRC interpretation of the NFPA 25, Section 5.3.1 enhancement from NMP1L 1996; however, neither is identified in the ALRA as affecting the program element of "Preventive Actions" or "Parameters Monitored/Inspected", as stated in the SER.</li> <li>7. Section 3.0.3.2.15 (page 3-78) - The 6th and 7th bullets on this page were not added to the indicated program elements. The additions were to the "Preventive Actions" and "Detection of Aging Effects" program elements (NMP1L 1996).</li> </ol>

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
<p>General (Continued)</p>		<p>8. Section 3.0.3.2.21 (page 3-96) - In the last paragraph on the page, the identified enhancement in the 1st sentence is not identified as being applicable to the "Parameters Monitored/Inspected", "Detection of Aging Effects", and "Acceptance Criteria" program elements. Likewise, the identified enhancement in the 2nd sentence is not identified as being applicable to the "Parameters Monitored/Inspected" and "Detection of Aging Effects" program elements.</p> <p>9. Section 3.0.3.2.27 (page 3-115) - Add the program elements of "Program Description" and "Parameters Monitored/Inspected" to the two that are listed. The 1st identified enhancement should be identified as applying to the "Program Description" and "Preventive Actions" program elements only. The 2nd identified enhancement is applicable to the "Program Description" and "Parameters Monitored/Inspected" program elements only. The 3rd and 4th enhancements are applicable to the "Detection of Aging Effects" program element only.</p> <p>10. Section 3.0.3.3.1 (page 3-119) - The 2nd full paragraph on this page addresses the "Scope of Program" program element although it doesn't specifically state this. Additionally, in the discussion of this paragraph, per the ALRA, the "Preventive Actions" and "Parameters Monitored/Inspected" program elements should also have been identified.</p> <p>11. Section 3.0.3.3.1 (page 3-120) - Item (2) "Preventive Actions", has the incorrect enhancement included in its discussion. The enhancement to "list parameters to be monitored" belongs with Item (3) "Parameters Monitored/inspected" on this page and the next. The correct enhancement for Item (2) is to "Specifically list those activities credited for aging management."</p>
<p>Section 3.0.3.1.6</p>	<p>3-19</p>	<p>In the 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs under "Staff Evaluation", hardness measurements are described in the program discussion. These measurements will be administered by the Selective Leaching Program and not the Buried Piping and Tanks Inspection Program.</p>
<p>Section 3.0.3.2.6</p>	<p>3-44</p>	<p>The 1st sentence of the last paragraph references Commitments 37 and 38 for NMP1 and NMP2, respectively, and mentions the control rod drive return line nozzle thermal sleeves; however, neither of the noted commitments includes CRDRL information.</p>

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
Section 3.0.3.2.6	3-51	A new sentence has been added to ALRA for Unit 2 (Section A2.1.13 and B2.1.8) in NMP1L 2007 (RAI 3.1.2.A-1) that is not detailed in the 1 <sup>st</sup> paragraph of the "UFSAR and USAR Supplement" section. This addition details the management of loss of material for the carbon steel vessel instrumentation penetrations.
Section 3.0.3.2.7	3-54	The description on the 2nd and 3rd lines of this page relative to the Containment Spray System is inaccurate. The Containment Spray System has its own raw water cooling water system that is not associated with the Circulating Water System. This discussion was edited in NMP1L 1996 (Item #28); however, the SER section does not include this ALRA change.
Section 3.0.3.2.8	3-57	The 3 <sup>rd</sup> paragraph implies that NMP1 and NMP2 Commitment 15 includes an enhancement to replace mechanical seals every 10 years. This enhancement is applicable to NMP1 only.
Section 3.0.3.2.9	3-60	NMP1L 1996 added an enhancement for meeting the "Monitoring and Trending" program element to the Boraflex Monitoring Program. The enhancement corresponds to the 2nd item in NMP1 Commitment #16 and should be added to the "Staff Evaluation" discussion on this page.
Section 3.0.3.2.11	3-66	The 1 <sup>st</sup> bullet in the middle of the page, the text states: "...expand the scope and frequency of...", whereas the enhancement in the ALRA states that this should read as follows: "...expand the scope, periodicity, and inspection techniques of...".
Section 3.0.3.2.14	3-73	The 2 <sup>nd</sup> to last paragraph includes the phrase "enhancement to increase the frequency", which implies this is part of the program commitments. However, the program commitments, as described in ALRA Appendices A and B, do not include this enhancement.

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
Section 3.0.3.2.15	3-77	<p>Two exceptions are not identified in the SER section addressing the Fuel Oil Chemistry Program, as identified below:</p> <ol style="list-style-type: none"> <li>1. After the 2<sup>nd</sup> paragraph on the page, an exception is missing that was added in NMPNS letter NMP1L 2005, NMP-AI-151. This exception is to the addition of biocides, stabilizers, and corrosion inhibitor to the diesel fuel oil storage tanks.</li> <li>2. After the 4<sup>th</sup> paragraph on the page, an exception is missing. The exception is to the inspection of the internals of any fuel oil day tanks (NMPNS letter NMP1L 1996, #22).</li> </ol>
Section 3.0.3.2.15	3-77	The bullet on the bottom of this page should be deleted per NMP1L 1996.
Section 3.0.3.2.26	Various	The section appears to be missing reference to, and discussion of, several Fatigue Monitoring Program commitments, i.e., NMP1 - #11 (portions) and #10; NMP2 - #6, #8, #9, and #11; and Common - #5/4, 6/5, and #7/7 for NMP1/NMP2, respectively.
General	See Comment	Several SER sections identify NMPNS procedures by their number. NMPNS considers this undesirable since the procedure number could change in the future while the content is maintained in the new procedure. NMPNS recommends referring to the procedures as implementing procedures.
Section 3.0.3.3.3	3-138	This section does not include the enhancement identified in NMPNS letter NMP1L 1996 item #6 for the "Acceptance Criteria" program attribute.
Section 3.0.3.3.6	3-148	In the 4th paragraph of Item (2) Preventive Actions, the last sentence is incorrect. The last sentence of the paragraph should read as follows: "Application of preservatives and pesticides is <u>not</u> relied upon to prevent...".
Section 3.1A.2.2.2 and 3.1A.2.2.4	3-180 and 3-185	In the 1st full paragraph on these pages, change "32 years" to "23 years".

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
Section 3.1A.2.3.4 and 3.1B.2.3.4	3-196 and 3-230	<p>On page 3-196 (last sentence of the 1st full paragraph) and on page 3-230 (last sentence of the 3<sup>rd</sup> paragraph) it states: "One-Time Inspection, with exceptions (see Appendices B2.1.1 and B2.1.2)"; however, the listed Appendix B ALRA sections address the ISI (IWB, IWC, IWD) and Water Chemistry programs, respectively, and there are no exceptions claimed against the OTI Program. ALRA Tables 3.1.1.A-07 and 3.1.1.B-07 declare all three programs against the Table 1 rows; however, the later two programs are not discussed in this SER paragraph. It is unclear, therefore, whether the intention was to mention them or not, since the entire discussion, programmatically, addresses OTI.</p> <p>Additionally, the 2<sup>nd</sup> full paragraph on page 3-196 and the 4<sup>th</sup> paragraph on page 3-230 require updates based on the response to a-RAI 3.1.2.A-1 in NMPNS letter NMP1L 2007, dated 12/7/05.</p>
Section 3.2A/B and 3.3A/B	See Comment	<p>In the following SER tables the "AMP in ALRA" and the "Staff Evaluation" column information should be updated as follows:</p> <ul style="list-style-type: none"> <li>• Table 3.2A-1, 4<sup>th</sup> row on page 3-236 for Item Number 3.2.1.A-12 : ALRA Table 3.2.1.A and Table 3.2.2.A-1 credit the OCCW System Program for the NMP1 Containment Spray System, which has its own, dedicated OCCW System (NMP1L 1996).</li> <li>• Table 3.2B-1, 6<sup>th</sup> row on page 3-260 for Item Number 3.2.1.B-13 : ALRA Table 3.2.2.B-5 credits the Closed Cycle Cooling Water Program for RHR HXs (NMP1L 1996).</li> <li>• Table 3.3A-1, 5<sup>th</sup> row on page 3-284 for Item Number 3.3.1.A-10 : Row was credited for Boral in the NMP1 SFP utilizing the OTI and WCC Programs (NMP1L 1996).</li> <li>• Table 3.3A-1, 1<sup>st</sup> row on page 3-286 for Item Number 3.3.1.A-20 : The entry for the AMP in ALRA should be "Fire Protection Program (B2.1.16)" and the "Not applicable" in the "Staff Evaluations" column should be replaced with "Consistent with GALL, which recommends no further evaluation (see Section 3.3A.2.1)". This information is included in the ALRA.</li> <li>• Table 3.3.B-1, last row on page 3-345 for Item Number 3.3.1.B-10 : Row was credited as consistent with GALL, except the Water Chemistry and OTI are credited (NMP1L 1996).</li> <li>• Table 3.3.B-1, 3<sup>rd</sup> row on page 3-346 for Item Number 3.3.1.B-13 : The "AMP in ALRA" entry should be the "Water Chemistry Control Program (B2.1.2)" and the "Not Applicable" needs to be removed from the "Staff Evaluation" column and replaced with "Consistent with GALL, which recommends no further evaluation (See Section 3.3B.2.1)." The 2<sup>nd</sup> paragraph in this column should remain. This information is included in the ALRA.</li> </ul>



## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
Section 3.2A/B and 3.3A/B <i>(Continued)</i>		<ul style="list-style-type: none"> <li>• Table 3.3B-1, 6<sup>th</sup> row on page 3-346 for Item Number 3.3.1.B-13 : Column entries should align to those for Item Number 3.3.1.B-16 in SER Table 3.3A-1. This information is included in the ALRA.</li> <li>• Table 3.3B-1, 3<sup>rd</sup> row on page 3-347 for Item Number 3.3.1.B-20 : The entry for the "AMP in ALRA" column should be "Fire Protection Program (B2.1.16)" and the "Not applicable" in the "Staff Evaluations" column should be "Consistent with GALL, which recommends no further evaluation (see Section 3.3A.2.1)." The 2nd paragraph in this column should remain. This information is included in the ALRA.</li> <li>• Table 3.3B-1, 6th row on page 3-347 for Item Number 3.3.1.B-23 : The "AMP in ALRA" should be "None" and the "Staff Evaluations" column entry should be replaced with "Not Applicable". Above ground tanks are managed by the Systems Walkdown Program" (NMP1L 2005).</li> </ul>
General - 3.2B	See Comment	<p>The following comments are associated with the changes made to the AERM of cumulative fatigue damage (CFD) in NMPNS letter NMP1L 2005:</p> <ol style="list-style-type: none"> <li>1. Section 3.2A.2.3.3 (page 2-254) - In the 1st paragraph following the bulletized listing, delete "because cumulative fatigue damage of this component is evaluated in ALRA Section 4.3" from the end of the sentence. CFD was removed as an applicable AERM.</li> <li>2. Section 3.2B2.1.1 (page 3-263) - The 2nd paragraph of this section does not indicate that CFD was deleted as an AERM for Flexible Hoses.</li> <li>3. Section 3.2B.2.3.2 (page 3-270) - In the 1st paragraph following the bulletized listing, delete the last sentence since CDF has been removed as an applicable AERM.</li> <li>4. Section 3.2B.2.3.2 (page 3-271) - In the 1st paragraph, continued from the previous page, delete the last sentence since CDF has been removed as an applicable AERM.</li> <li>5. Section 3.2B.2.3.3 (page 3-272) - In the 1st &amp; 3rd paragraphs following the bulletized listing, delete the last sentence since CDF has been removed as an applicable AERM.</li> <li>6. Section 3.2B.2.3.4 (page 3-274) - In the 1st &amp; 2nd paragraphs following the bulletized listing, delete the last sentence since CDF has been removed as an applicable AERM.</li> <li>7. Section 3.2B.2.3.5 (page 3-277) - In the 1st &amp; 3rd paragraphs following the bulletized item, delete the last sentence since CDF has been removed as an applicable AERM.</li> </ol>

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
Section 3.2B.2.3.4	3-274 and 3-275	In the 1st line on both pages, change "nickel-based alloy" to "wrought austenitic stainless steel", as identified in NMPNS letter NMP1L 2005.
Section 3.3A.2.2.10	3-300	The 2nd paragraph of this page needs to be re-written to address the incorporation of AERMs for Boral and the requisite AMPs for their aging management as addressed in NMPNS letter NMP1L 1996.
Section 3.3A.2.3.8 and 3.3B.2.3.13	Various	These sections of the SER do not address/incorporate changes made relative to the NMP1 and NMP2 Fire Detection and Protection Systems that were included in the ALRA and NMPNS supplemental letters NMP1L 1958, 1996, 2005, and 2009.
Section 3.3B.2.1	3-349	The following sections should be added to Section 3.3B.2.1 <ol style="list-style-type: none"> <li>1. "Crack initiation and growth due to stress corrosion cracking" to address item 3.3.1.B-13 (3rd row in Table 3.3B-1, P. 3-346), which is consistent with the GALL.</li> <li>2. "Loss of material due to general corrosion and wear" to address item 3.3.1.B-16 (6th row in Table 3.3B-1, P. 3-346), which is consistent with the GALL. The correlating SER section for NMP1 is 3.3A.2.1.4.</li> <li>3. "Loss of material due to wear; hardening and shrinkage due to weathering" to address item 3.3.1.B-20 (3rd row in Table 3.3B-1, P. 3-347), which is consistent with the GALL. The correlating SER section for NMP1 is 3.3A.2.1.5.</li> </ol>
Section 3.3B.2.2.10	3-359	The AMR changes relative to Boraflex and Boral identified in NMPNS letter NMP1L 1996 have not been incorporated into this SER section.
Section 3.3B.2.3.14	3-375	There is inconsistency in the last 2 paragraphs on the page and an error of omission in the last paragraph. The indication in the next to last paragraph that some of the assignments of the OTI Program were replaced by the PM Program is correct; however, the OTI Program was omitted from the last paragraph and should have been included. These paragraphs are also missing the Selective Leaching Program, as listed for pumps in ALRA Table 3.3.2.B-14 (see NMPNS letter NMP1L 2004).

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (S) or Table (T)	SER Page Number	SER Comment
Table 3.5A-1 and 3.5B-1	3-434 and 3-467	<p>The following SER tables should be revised as detailed:</p> <ul style="list-style-type: none"> <li>• Table 3.5A-1, 2<sup>nd</sup> row on page 3-434 for Item Number 3.5.1.A-29 : ALRA is consistent with the GALL; however, the Fire Protection Program is also credited with managing the aging of component supports for hose reels. List the Fire Protection Program in addition to the Structures Monitoring Program (NMP1L 2005).</li> <li>• Table 3.5B-1, 7<sup>th</sup> row on page 3-467 for Item Number 3.5.1.B-13 : Row is no longer applicable (NMP1L 2005, NMP-AI-001).</li> </ul>
Section 3.5A.2.1 and 3.5B.2.1	3-435 and 3-471	<p>For those AMR results that are consistent with the GALL Report (LRA Notes A through E), the following changes are recommended:</p> <ul style="list-style-type: none"> <li>• Section 3.5A.2.1 on page 3-435, as reflected in ALRA Sections 3.5.2.A and 3.5.2.C, remove reference to the Protective Coating Monitoring and Maintenance Program.</li> <li>• Section 3.5B.2.1 on page 3-471, as reflected in ALRA Sections 3.5.2.B and 3.5.2.C, remove reference to the Boraflex Program (removed from NMP2 as credited AMP), ASME Section IX, Subsection IWL, and the Protective Coating Monitoring and Maintenance Program. The One-Time Inspection Program should be added to this listing, as reflected in ALRA Table 3.5.2.B-7.</li> </ul>
Section 3.6.2.1	3-507	<p>For those AMR results that are consistent with the GALL Report, for which further evaluation is not recommended (ALRA Notes A and C), the bulleted list at the top of the page should have the following programs added, as reflected in ALRA Section 3.6.2.C-3: Appendix J Program and ASME Section XI, ISI Subsection IWE Program</p>
Section 3.6.2.3.1	3-510	<p>For those AMR results that are not consistent or not addressed in the GALL Report (Notes H and J ), the "Electrical and I&amp;C Systems Cable and Connectors" listing should only list the following two component types, as reflected in ALRA Table 3.6.2.C-1:</p> <ul style="list-style-type: none"> <li>• conductor connectors</li> <li>• fuse holders</li> </ul>

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (§ or Table (T))	SER Page Number	SER Comment
Section 3.6.2.3.2	3-511	<p>For those AMR results that are not consistent or not addressed in the GALL Report (Notes H and J), the 1<sup>st</sup> paragraph in the section should list only the following component types, as reflected in ALRA Table 3.6.2.C-2 (as modified in NMP1L 2005, NMP-AI-092):</p> <ul style="list-style-type: none"> <li>• non-segregated bus insulators</li> <li>• non-segregated bus</li> <li>• non-segregated bus connectors</li> <li>• non-segregated bus insulation</li> <li>• seals and gaskets</li> <li>• switchyard bus connectors</li> </ul> <p>Additionally, the bulleted list at the page bottom should also include only these component types. The component type discussion sections that follow the bulleted list need to be adjusted to list and contain details on only these component types shown on pages 3-511 (bottom page for "Electrical and I&amp;C Systems Non-Segregated Phase Bus") through 3-514 (top of page for "Switchyard Bus Connectors").</p>
Section 3.6.2.3.3	3-514	<p>For those AMR results that are not consistent with or are not addressed in the GALL Report (Notes F through J), the 1<sup>st</sup> paragraph in the section should not list "Transmission Conductors", as there are no aging effects requiring management for these component types, as reflected in ALRA Table 3.6.2.C-4.</p> <p>Additionally, the component type discussion section for "Transmission Conductors" on page 3-515 should, therefore, be removed from the SER section even though it correctly declares that there are no AERMs.</p>
Section 3.6.2.3.4	3-517	<p>For those AMR results that are not consistent or not addressed in the GALL Report (Notes F through J), the 1<sup>st</sup> paragraph in the section should not list any component types, as reflected in ALRA Table 3.6.2.C-3.</p> <p>Additionally, the component type discussion in the sections following the 1<sup>st</sup> paragraph should, therefore, be adjusted to not discuss applicable electrical penetration information.</p>

## ATTACHMENT (1)

### NMP COMMENTS TO SAFETY EVALUATION REPORT (SER), WITH OPEN ITEMS RELATED TO THE LICENSE RENEWAL OF NINE MILE POINT NUCLEAR STATION, DATED MARCH 2006

SER Section (§) or Table (T)	SER Page Number	SER Comment
Section 4.2.1.2	4-5	As noted at the end of the 2 <sup>nd</sup> full paragraph, the acceptance criteria that are specified in the BWRVIP-74-A report indicate that the maximum allowable reduction in USE value is 23.5 percent for the plates and 39 percent for the welds. These are noted as being applicable to BWR/3-6 plates and BWR/2-6 welds, respectively; however, the BWR/2 plate value is 29.5%.
Section 4.3.2.2	4-17	The value of 0.1 is the allowable fatigue usage for components within the break exclusion zone (defined in footnote on page 4.3-10 of the ALRA). The SER section description is not consistent with the ALRA description.
Section 4.6.1.2	4-30	NMPNS letter NMP1L 2009 changed the fatigue usage at the controlling location to 0.86 and the description of the controlling location from the "vent header support" to "vent header/vent pipe spherical intersection."
Sections 4.6 and 4.7	Various	The Staff evaluation of new TLAA's from annual update letter NMP1L 2009 needs to be added to the SER section. New TLAA's identified are the NMP2 Downcomer/ SRVDRL Fatigue TLAA (Section 4.6.6) and the NMP1 RWCW Weld Overlay Crack Growth Analysis (Section 4.7.5).
Appendix A	A-16	Common Commitments #15 should be unit specific since the descriptions in the ALRA are different for each unit. The existing common commitment reflects the NMP1 commitment. This commitment should be moved to the NMP1 commitment listing in SER Appendix A. The NMP2 commitment text is shown in ALRA Table A2.4 and should be added to the SER Appendix A list for NMP2.
Appendix A	A-14	SER common Commitment #2 has been submitted and completed in the below noted correspondence. This completion information should be reflected in SER Appendix A. <ul style="list-style-type: none"> <li>• NMP1L 2009, License Renewal Application – Annual Update Information Required by 10CFR54.21(b) (TAC Nos. MC3272 and MC3273)</li> <li>• NMP1L 2028, License Renewal Application – Second Submittal of Update Information per Requirement of 10CFR54.21(b) (TAC Nos. MC3272 and MC3273)</li> </ul>