

April 19, 2006

Mr. Timothy J. O'Connor
Vice President
Nine Mile Point Nuclear Station, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF NINE
MILE POINT NUCLEAR STATION, UNITS 1 AND 2, AMENDED LICENSE
RENEWAL APPLICATION (TAC NOS. MC3272 AND MC3273)

Dear Mr. O'Connor:

On December 20, 2005, Constellation Energy Group, Inc. (CEG), submitted its annual update for the amended license renewal application (ALRA) for Nine Mile Point Nuclear Station, Unit 1 (NMP1). The annual update is required by 10 CFR 54.21(b). The NRC staff is reviewing the information contained in the annual update, and has identified, in the enclosure, area where additional information is needed to complete the review.

The staff requests that you provide your response within 30 days from the date of this letter. If you have any questions regarding this letter or if circumstances result in your need to revise the response date, please contact me by telephone at 301-415-1458 or via e-mail at nbl@nrc.gov.

Sincerely,

/RA/

N. B. (Tommy) Le, Senior Project Manager
License Renewal Branch B
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and 50-410

Enclosure:
As stated

cc w/encl: See next page

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Letter to Timothy J. O'Connor from Ngoc Le dated April 19, 2006

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**NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2 (NMP1 AND NMP2)
AMENDED LICENSE RENEWAL APPLICATION (ALRA)
REQUEST FOR ADDITIONAL INFORMATION (RAI) - BATCH 7**

TIME-LIMITED AGING ANALYSIS 4.7.5: RWCW WELD OVERLAY FATIGUE
FLAW GROWTH EVALUATIONS (NMP1 ONLY)

RAI 4.7.5A-1

On January 23, 2006, the staff held a conference call (ADAMS Accession No. ML060890579) with Constellation Energy Group (CEG, the applicant) to discuss the basis for approving Time-Limited Aging Analysis (TLAA) 4.7.5, "Reactor Water Cleanup Weld Overlay Fatigue Flaw Growth Evaluations (NMP 1 Only)." Consistent with the discussion, the staff has stated that the most appropriate basis for approving TLAA 4.7.5 would be to credit an acceptable inspection based aging management program (AMP) for the management of intergranular stress corrosion cracking (IGSCC) in the reactor water cleanup (RWCW) system welds 33-FW-22 and 33-FW-23A and their repair overlays. This is permissible under the acceptance criteria of 10 CFR 54.21(c)(1)(iii). The applicant stated that it will consider revising the information to its letter dated December 20, 2005, and will amend the letter, per information provided by the staff during the January 23, 2006, phone call, to credit inspections as an AMP for accepting TLAA 4.7.5 under 10 CFR 54.21(c)(1)(iii).

This RAI requests that CEG address the following staff concerns in its upcoming amended letter, if ultrasonic testing (UT) is credited as an AMP for accepting TLAA 4.7.5 under 10 CFR 54.21(c)(1)(iii):

- A. Clarify that, pursuant to 10 CFR 54.21(c)(1)(iii), CEG is crediting AMP B2.1.6, "BWR Stress Corrosion Cracking Program" and the augmented UT examination program, as specified in Topical Report BWRVIP-75-A, "Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules [April 2002]," for Category E austenitic stainless steel piping welds as the basis for managing IGSCC in RWCW welds 33-FW-22 and 33-FW-23A and their corresponding overlay repairs. Note that those austenitic steel pipe welds have been repaired with austenitic stainless steel weld overlays.
- B. Revise the NMP1 specific version of AMP B2.1.6, "BWR Stress Corrosion Cracking Program," to include the following enhancements to program attributes:¹

- (1) [Scope of Program]: Enhancement to include the overlay repairs on RWCW welds 33-FW-22 and 33-FW-23A within the scope of the AMP.

¹CEG has identified that AMP B2.1.6, "BWR Stress Corrosion Cracking Program," is an AMP that is consistent with the program attributes in AMP XI.M7, "BWR Stress Corrosion Cracking," with an exception.

ENCLOSURE

- (2) [Detection of Aging Effects]: Enhancement to specify that site-qualified UT techniques will be used to monitor RWCU welds 33-FW-22 and 33-FW-23A for further evidence of cracking and for flaw growth into weld metal deposits for the overlays. The staff recommends that enhancement of the program attribute be consistent with CEG's commitments that were made in response to GL 88-01, "NRC Position on IGSCC in BWR Austenitic Piping [January 15, 1988]," and commitments made to implement the recommended guidelines of Topical Report BWRVIP-75-A.
- (3) [Monitoring and Trending]: Enhancement to establish a conservative applicant based re-inspection frequency for performing the UT examinations of the overlays in RWCU welds 33-FW-22 and 33-FW-23A. The staff recommends that enhancement of the program attribute be consistent with CEG's commitments that were made in response to GL 88-01 and commitments made to implement the recommended guidelines of Topical Report BWRVIP-75-A.
- (4) [Operating Experience]: Enhancement of the program attribute to specify that CEG performed the most recent UT examinations of the RWCU welds 33-FW-22 and 33-FW-23A in 2003 and to summarize the results of the 2003 UT inspections.