

July 5, 2007

Mr. Keith J. Polson
Vice President Nine Mile Point
Nine Mile Point Nuclear Station, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: SUPPLEMENTAL REQUEST FOR ADDITIONAL INFORMATION REGARDING
NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2, PROPOSED
SITE EMERGENCY PLAN CHANGE (TAC NOS. MD2989 AND MD2990)

Dear Mr. Polson:

By letter dated April 26, 2007, Nine Mile Point Nuclear Station, LLC responded to the Nuclear Regulatory Commission (NRC) staff's request for additional information (RAI) dated February 26, 2007, regarding a proposed change to the Nine Mile Point Site Emergency Plan (SEP). The proposed SEP change, requested in your letter dated August 31, 2006, would eliminate the existing requirement for augmenting the on-shift Emergency Response Organization staff within 30 minutes.

The NRC staff has reviewed the information provided in that response and has determined that further information is needed to complete its review. Enclosed is the NRC staff's supplemental RAI. A draft of the RAI was provided to your staff on June 19, 2007, and it was agreed that your response would be provided within 60 days from the date of this letter.

Sincerely,

/RA/

Marshall J. David, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and 50-410

Enclosure:
RAI

cc w/encl: See next page

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SUPPLEMENTAL REQUEST FOR ADDITIONAL INFORMATION

NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2

PROPOSED SITE EMERGENCY PLAN CHANGE

The Nuclear Regulatory Commission (NRC) staff has performed its review of your April 26, 2007, response to the NRC staff's request for additional information (RAI) dated February 26, 2007, regarding a proposed change to the Nine Mile Point Site Emergency Plan (SEP). The proposed SEP change, requested in your letter dated August 31, 2006, would eliminate the existing requirement for augmenting the on-shift Emergency Response Organization (ERO) staff within 30 minutes. As a result of that review, we have determined that further information is required to adequately evaluate the acceptability of the proposed change. Please explain/provide the following information, as noted below:

Clarification of Response to RAI 3:

- a. EPIP-EPP-20, "Emergency Notifications," step 3.1.1, states, "The SSS/ED shall direct a Radwaste (Unit 1) or Auxiliary Operator to report to Control Room to act as Communications Aide." Attachment (1) of the proposed change, Section 5.1.1 "Major Functional Area: Notification/Communications" states, "This function is currently initiated by the Shift Manager and performed by a dedicated auxiliary operator (Communications Aide)." RAI 3 response Table 1 indicates that this is performed by the "Fire Brigade Leader/Communications Aide (RO or NLO)." Which is correct?

Clarification of Response to RAI 6:

- a. Attachment (1) of the proposed change, Section 5.1.1 "Major Functional Area: Notification/Communications" states in the analysis, "Typically, only additional information would be relayed to the offsite agencies within the time period of 30 to 60 minutes as most offsite agencies take at least 1 hour to activate and staff their organizations." What are the activation times for these offsite agencies during normal working hours?
- b. Attachment (1) of the proposed change, Section 5.1.1 "Major Functional Area: Notification/Communications" states in the conclusion, "In addition, direction and control of any 30-minute augmented resources need to be performed by on-shift resources (i.e., the SM/ED). This may represent an additional burden on the SM/ED without commensurate benefit." Describe how having an additional communicator in the control room is an additional burden to the SM/ED without commensurate benefit with respect to Attachment 2 of EPIP-EPP-20.
- c. Have the offsite agencies reviewed and/or commented on the proposed changes to the Nine Mile Point SEP?
- d. Attachment (1) of the proposed change, Section 5.1.2.d "Major Task: Chemistry/Radiochemistry" states in the analysis, "The function of the on-shift technician

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is to assure reactor water chemistry is monitored and maintained as required by Technical Specifications. ... At NMP, EALs associated with chemistry sample results are provided which are based upon Technical Specification LCO values. The SM/ED will compare existing values to the EALs and if conditions match or exceed the EAL, declare the emergency." EPIP-EPP-08, "Off-site Dose Assessment and Protective Action Recommendations," lists the primary responsibilities for the Chemist as "perform release rate assessments, obtain meteorological data, and develop PARs, prior to EOF activation. In addition, if an unmonitored release is suspected, assist the SM/ED in dispatching an radiation protection (RP) technician." Is this section's analysis and conclusion accurate to these duties?

- e. Attachment (1) of the proposed change, Section 5.1.2.b "Major Task: Off-site surveys and On-site (Out of Plant) surveys" states in the analysis, "NMP procedure EPIP-EPP-08 utilizes the results of offsite surveys in the dose assessment process, but only after the EOF is activated and the dose assessment staff is fully augmented." This is inconsistent with EPIP-EPP-08, Section 3.1.1.e, "Obtain meteorological data using Attachment 3 (repeat every 15 minutes). **NOTE** A release (tube leak) from the Emergency Condenser (EC) Vent is considered an unmonitored atmospheric release. An out of plant survey is needed to determine actual Release Rate." Is this section's analysis and conclusion accurate to these duties?
- f. Attachment (1) of the proposed change, Section 5.1.2.c "Major Task: In-plant Surveys" states in the current staffing requirement, "The function of in-plant surveys is to determine dose rates in areas prior to dispatching damage and repair teams to assure the safety of these personnel." It goes on further to state with respect to electronic alarming dosimetry in the analysis, "Hence, any radiation monitoring or controls that would be provided to personnel entering the plant for mitigative actions (prior to full ERO augmentation) is accommodated by the current dosimetry system, without staff augmentation." The NMP Unit Nos. 1 and 2 Technical Specifications require, "Except for individuals qualified in radiation protection procedures, entry into such [high radiation areas] areas shall be made only after dose rates in the area have been established and entry personnel are knowledgeable of them." If so, how will personnel performing mitigative actions enter high radiation areas without RP technician coverage?
- g. Attachment (1) of the proposed change, Section 5.1.5. "Major Functional Area: Protective Actions (In-Plant)" states in the conclusion, "All required radiation protection functions are accommodated within the requisite time frames using on-shift resources, and any anticipated tasks can be handled by that resource." Is this section's analysis and conclusion accurate based on a review of all applicable procedures related to the responsibilities of the on-shift RP technicians during emergencies?