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Constellation Energy
Nine Mile Point Nuclear Station

July 23, 2007

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

ATTENTION: Document Control Desk

SUBJECT: Nine Mile Point Nuclear Station
Unit No. 2; Docket No. 50-410

License Amendment Request Pursuant to 10 CFR 50.90: Revision of Service Water and Ultimate Heat Sink Temperature Requirements – Technical Specification 3.7.1 – Supplemental Information in Response to NRC Request for Additional Information (TAC No. MD4031)

REFERENCE: (a) Letter from T. J. O'Connor (NMPNS) to Document Control Desk (NRC), dated January 4, 2007, License Amendment Request Pursuant to 10 CFR 50.90: Revision of Service Water and Ultimate Heat Sink Temperature Requirements – Technical Specification 3.7.1

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits supplemental information requested by the NRC in support of a previously submitted application for amendment to Nine Mile Point Unit 2 (NMP2) Renewed Operating License NPF-69. The initial application, dated January 4, 2007 (Reference a) proposed to revise NMP2 Technical Specification 3.7.1, "Service Water (SW) System and Ultimate Heat Sink (UHS)." The supplemental information, provided in Attachment (1) to this letter, responds to a request for additional information that was provided in an email from the NRC to NMPNS on July 5, 2007 and was subsequently discussed in a telephone conference call between NRC and NMPNS staff members on July 9, 2007.

This supplemental information does not affect the No Significant Hazards Determination analysis provided by NMPNS in Reference (a). Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this supplemental information to the appropriate state representative. Attachment (2) provides a list of regulatory commitments contained in this submittal.

A001

NRR

Should you have any questions regarding the information in this submittal, please contact T. F. Syrell, Licensing Director, at (315) 349-5219.

Very truly yours,

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

I, Keith J. Polson, being duly sworn, state that I am Vice President Nine Mile Point, and that I am duly authorized to execute and file this supplemental information 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 23rd day of July, 2007.

WITNESS my Hand and Notarial Seal:

Notary Public

My Commission Expires: 11/12/2010
Date

TONYA L. JONES
Notary Public in the State of New York
Oswego County Reg. No. 01JO6083354
My Commission Expires 11/12/2010

KJP/DEV

Attachment: (1) Nine Mile Point Unit 2 – Supplemental Information Regarding Proposed Revision to Technical Specification 3.7.1
(2) List of Regulatory Commitments

cc: S. J. Collins, NRC
M. J. David, NRC
Resident Inspector, NRC
J. P. Spath, NYSERDA

ATTACHMENT (1)

NINE MILE POINT UNIT 2

SUPPLEMENTAL INFORMATION REGARDING

PROPOSED REVISION TO TECHNICAL SPECIFICATION 3.7.1

ATTACHMENT (1)

NINE MILE POINT UNIT 2
SUPPLEMENTAL INFORMATION REGARDING
PROPOSED REVISION TO TECHNICAL SPECIFICATION 3.7.1

By letter dated January 4, 2007, Nine Mile Point Nuclear Station, LLC (NMPNS) submitted a license amendment request (LAR) to revise Nine Mile Point Unit 2 (NMP2) Technical Specification (TS) 3.7.1, "Service Water (SW) System and Ultimate Heat Sink (UHS)." This attachment provides supplemental information in response to a request for additional information that was provided in an email from the NRC to NMPNS on July 5, 2007 and was subsequently discussed in a telephone conference call between NRC and NMPNS staff members on July 9, 2007. The NRC request is repeated (in italics), followed by the NMPNS response to each of the four parts of the request.

NRC Request

LAR Section 4.1.1.3, "Control Building Chillers" states, "Placing a fifth SW pump in operation, together with pre-planned actions to manage SW system flow rates and heat loads, ensures that sufficient SW flow to the control building chillers is available to meet accident analysis assumptions when the UHS temperature is > 82 °F and ≤ 84 °F. Thus, control building design basis temperatures can be met for all operating and postulated accident conditions at a UHS temperature of 84 °F." However, it is the NRC staff's understanding that there may be insufficient SW flow to the control building chillers to ensure required chiller performance with a UHS temperature of 82 °F.

Therefore, please provide the following information:

Part a

A discussion and technical justification of any procedural or hardware modifications necessary to ensure that "... control building design basis temperatures can be met for all operating and postulated accident conditions at a UHS temperature of 84 °F," as stated in the LAR.

Response

No hardware changes are required to implement the LAR. To maintain the station design basis consistent with the LAR, NMPNS will utilize our Design Change Process to identify and incorporate plant documentation and procedure changes necessary to reflect that the current UHS temperature averaging provisions (approved in License Amendment No. 113 dated May 7, 2004) are being replaced by a single maximum temperature of 84°F. The current SW system operating procedure already contains limits on minimum SW flow requirements for the control building chillers. These limits and other procedural guidance will be modified or added, as necessary, to assure that sufficient flow is provided to the chillers to meet accident analysis assumptions for operation at 84°F UHS temperature, as further discussed in the responses to Parts b and c below.

Part b

A discussion and technical justification of the "... pre-planned actions to manage SW system flow rates and heat loads ... ," as stated in the LAR.

Response

Certain pre-planned actions to manage SW system flows and heat loads are already incorporated into the SW system operating procedure. These include: (1) adjusting SW flows to the heat exchangers in the Reactor Building Closed Loop Cooling (RBCLC) and Turbine Building Closed Loop Cooling (TBCLC) systems; (2) opening the valves (2SWP*V222A, V222B) in the SW lines that bypass the temperature control valves (TCV) located downstream of each chiller; and (3) increasing chilled water outlet temperature to 50°F. An additional action that could be taken would be to adjust cooling tower make-up flows. All of these actions are within the station's design and license basis.

Managing the flows to the RBCLC and TBCLC heat exchangers (non-essential loads) to within design flow rates is of prime importance. The operating procedures will be modified to provide more specific guidance such that SW system flows are maintained consistent with system design requirements. A procedural requirement to periodically monitor the SW flow rate to the control building chillers when elevated UHS temperatures are being experienced will also be added.

The procedural guidance described above establishes a pre-accident SW system operational configuration that assures that the control building chillers will operate as designed and that control building design basis temperatures will be met for all operating and postulated accident conditions at a UHS temperature of 84°F. No post-accident operator actions are required to assure adequate SW flow to the control building chillers.

Part c

A discussion of how placing a fifth SW pump in operation will ensure the required SW flow to the control building chillers, in light of indications that the SW system operational configuration is different than the design configuration.

Response

Operating a fifth SW pump when the UHS temperature exceeds 82°F (required by both the current Technical Specifications and by the LAR) provides additional flow capacity to the system. However, as previously noted, NMPNS has determined that better SW system flow management is required to sustain required flows to the control building chillers. The existing pre-planned actions together with the procedure modifications described above assure that adequate post-accident SW flow is delivered to the operating control building chiller(s) assuming a single active failure of an operating SW pump or the single active failure of a chiller.

Part d

The plan and schedule to ensure that all actions necessary to satisfy the LAR statement "Thus, control building design basis temperatures can be met for all operating and postulated accident conditions at a UHS temperature of 84°F" will be completed consistent with the implementation schedule for this amendment.

Response

Upon approval of the LAR, NMPNS will utilize our Design Change Process to update our design and license basis documentation as well as the applicable operating procedures to replace the current UHS temperature averaging provisions (License Amendment No. 113) with a maximum UHS temperature of 84°F. All required actions, including the operating procedure modifications previously discussed, will be completed within the 90-day implementation period requested in the original LAR submitted by NMPNS letter dated January 4, 2007.

ATTACHMENT (2)

LIST OF REGULATORY COMMITMENTS

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

REGULATORY COMMITMENT	DUE DATE
The Design Change Process will be utilized to identify and incorporate plant documentation and procedure changes necessary to reflect that the current UHS temperature averaging provisions (approved in License Amendment No. 113 dated May 7, 2004) are being replaced by a single maximum temperature of 84°F. The operating procedure changes will include more specific guidance such that service water (SW) system flows are maintained consistent with system design requirements. The changes will also include revised limits on minimum SW flow requirements for the control building chillers and a requirement to periodically monitor the SW flow rate to the control building chillers when elevated UHS temperatures are being experienced.	90 days following NRC approval of the license amendment request.