February 7, 2008

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING NINE MILE POINT NUCLEAR STATION, UNIT NO. 2, TWO INOPERABLE CONTROL ROOM AIR CONDITIONING SUBSYSTEMS (TAC NO. MD6352)

Dear Mr. Polson:

By letter dated July 30, 2007, Nine Mile Point Nuclear Station, LLC requested an amendment to the Nine Mile Point Nuclear Station, Unit No. 2 Renewed Facility Operating License. The requested license amendment would revise Technical Specification (TS) 3.7.3, "Control Room Envelope Air Conditioning (AC) System," to add an ACTION to the TS for two inoperable control room envelope AC subsystems. The proposed ACTION would allow 72 hours to restore one control room envelope AC subsystem to operable status and would require verification that the control room temperature remains < 90 ^{0}F every 4 hours.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information provided in that letter and has determined that additional information is needed to complete its review. Enclosed is the NRC staff's request for additional information (RAI). The RAI was discussed with your staff on January 11 and January 31, 2008, 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 No. 50-410

Enclosure:
RAI

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

NINE MILE POINT NUCLEAR STATION, UNIT NO. 2

TWO INOPERABLE CONTROL ROOM AIR CONDITIONING SUBSYSTEMS

The Nuclear Regulatory Commission (NRC) staff has performed its initial review of your July 30, 2007, license amendment request (LAR) to revise Nine Mile Point Nuclear Station, Unit No. 2 (NMP2) Technical Specification (TS) 3.7.3, "Control Room Envelope Air Conditioning (AC) System." The proposed revision would add an ACTION to the TS for two inoperable control room envelope AC subsystems. The proposed ACTION would allow 72 hours to restore one control room envelope AC subsystem to operable status and would require verification that the control room temperature remains < 90 ^{0}F every 4 hours.

You indicated in the LAR that the capability for the control room envelope AC system to perform its design function may still exist by having sufficient components operable from both subsystems to meet its safety function. This unique design consideration is reflected in the current NMP2 TS 3.7.3 and was approved by the NRC staff as part of the NMP2 conversion to the Standard TS. The LAR references TS Task Force (TSTF), Change Traveler TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems," which was approved for use by the NRC staff under the consolidated line item improvement process. However, in its generic evaluation of TSTF-477 and in its associated model safety evaluation (SE) published in the *Federal Register* (71 FR 75774; December 18, 2006), the NRC staff did not evaluate the unique design considerations posed by the NMP2 control room envelope AC subsystem. Therefore, the NRC staff requires the following additional information to adequately evaluate the acceptability of the proposed changes.

1. TSTF-477, Revision 3, Section 3.0, assumes a control room AC system that consists of two independent, redundant subsystems, providing cooling and heating of recirculated control room air. The LAR states, "Due to the design of the system, when both subsystems are inoperable, the capability for the Control Room Envelope AC System to perform its design function may still exist by having sufficient components operable from both subsystems to meet its safety function."

    a. Explain the design of the system including interfacing and support systems (e.g., power, instrumentation and controls, chilled water, and service water). Include a discussion of independence and redundancy.
    b. What is the safety function of the NMP2 control room envelope AC system?
    c. Provide explanations of how the capability for the system to perform its safety function may still exist when both subsystems are inoperable, assuming representative component and subsystem failures.
    d. Do procedures currently exist to guide plant staff in regaining system safety function?

2. Please explain the meaning of the following statement in Section 2.2 of the LAR, "The ability of the Control Room Envelope AC System to maintain control room envelope temperature within limits is an implicit assumption of the safety analysis evaluated in the Updated Safety Analysis Report (USAR) Chapter 6, Engineering Safety Features, and Chapter 15, Accident Analysis."

3. The TS 3.7.3 in Attachment (2) of the LAR contains the expressions, “Two control room envelope AC subsystems inoperable with safety function maintained …” and “Two control room envelope AC subsystems inoperable with safety function not maintained …” Please explain the meaning of both expressions and the process for determining which is applicable in a given circumstance.

4. Regarding proposed ACTION B. for TS 3.7.3 in Attachment (2) of the LAR:

   a. What specific safety function(s) is/are meant by the expression “… with safety function not maintained…?”
   b. What is the basis for the 90 ^{0}F limit proposed for new REQUIRED ACTION B.1?
   c. Does “Restore one control room envelop AC subsystem to OPERABLE status,” as proposed for new REQUIRED ACTION B.2, also include “Two control room envelope AC subsystems inoperable with safety function maintained,” as stated in current CONDITION A?

5. Regarding current NMP2 TS 3.7.2, “Control Room Envelope Filtration (CREF) System:”

   a. What components are shared between control room envelope AC subsystems and CREF subsystems?
   b. What shared components in TS 3.7.2 and TS 3.7.3 are required to remain operable with two control room envelop AC subsystems inoperable:

      - With safety function maintained?
      - With safety function not maintained?

   c. What would be the impact on TS 3.7.2 if the NRC staff were to approve the requested changes to TS 3.7.3?