



**Constellation Energy**<sup>®</sup>

Nine Mile Point Nuclear Station

P.O. Box 63  
Lycoming, NY 13093

July 18, 2008

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

American Society of Mechanical Engineers (ASME) Code, Section XI, Inservice Inspection Program for the Third Ten-Year Inservice Inspection Interval and Associated 10 CFR 50.55a Requests – Supplemental Information in Response to NRC Request for Additional Information (TAC No. MD7688)

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**REFERENCE:** (a) Letter from G. J. Laughlin (NMPNS) to Document Control Desk (NRC), dated December 14, 2007, American Society of Mechanical Engineers (ASME) Code, Section XI, Inservice Inspection Program for the Third Ten-Year Inservice Inspection Interval and Associated 10 CFR 50.55a Requests

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits supplemental information requested by the NRC in support of a previously submitted request for alternative (No. 2ISI-007) under the provision of 10 CFR 50.55a(a)(3). This 10 CFR 50.55a request was included within the Nine Mile Point Unit 2 Third Ten-Year Inservice Inspection Plan and Schedule that was submitted by NMPNS letter dated December 14, 2007 (Reference a). The supplemental information, provided in the Attachment to this letter, responds to a request for additional information that was provided in an email from the NRC to NMPNS on June 16, 2008. This letter contains no new regulatory commitments.

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,

Gary Jay Laughlin  
Manager Engineering Services

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GJL/DEV

Attachment: Nine Mile Point Unit 2 – Supplemental Information Regarding Third Ten-Year Inservice  
Inspection Interval Request No. 2ISI-007

cc: S. J. Collins, NRC  
R. V. Guzman, NRC  
Resident Inspector, NRC

**ATTACHMENT**

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**NINE MILE POINT UNIT 2**  
**SUPPLEMENTAL INFORMATION REGARDING THIRD TEN-YEAR**  
**INSERVICE INSPECTION INTERVAL REQUEST NO. 2ISI-007**

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## ATTACHMENT

### NINE MILE POINT UNIT 2 SUPPLEMENTAL INFORMATION REGARDING THIRD TEN-YEAR INSERVICE INSPECTION INTERVAL REQUEST NO. 2ISI-007

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By letter dated December 14, 2007, Nine Mile Point Nuclear Station, LLC (NMPNS) submitted the Nine Mile Point Unit 2 (NMP2) Third Ten-Year Inservice Inspection (ISI) Plan and Schedule and associated 10 CFR 50.55a requests. 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 June 16, 2008, concerning request no. 2ISI-007 (alternate risk-informed ISI program). The NRC request is repeated (in italics), followed by the NMPNS response.

#### Request

*The submittal states that the risk-informed ISI (RI-ISI) program is a living program that was re-evaluated to support relief request 2ISI-007. In lieu of providing a description of its living program, the licensee references the description of the living program in Section 4 of its October 16, 2000, submittal, "Request for Authorization to Use Risk-Informed Inservice Inspection Alternative." One aspect of a living program that is not discussed in the referenced Section 4, is that the PRA used to periodically re-evaluate the RI-ISI program should be updated to reasonably reflect the current design, construction, operational practices, and operational experience of the plant.*

- (a) Please identify the version of the PRA used to develop the RI-ISI program proposed for the third interval.*
- (b) Please also confirm that that version of the PRA has been updated, as needed, to reasonably reflect the current design and operation of NMP2, and that changes identified but not yet modeled have been determined to not affect the proposed RI-ISI program.*

#### Response

The last RI-ISI program evaluation performed in December 2005, following completion of the second inspection period of the second ISI interval, used the probabilistic risk assessment (PRA) model that was current at that time (identified as U2BASER1). This model reasonably reflected the as-designed, as-operated plant at the time that the evaluation was performed. Assessments of plant changes that have occurred during 2006 and 2007 have not identified any PRA model or documentation changes that would have a significant impact on the proposed RI-ISI program for the third ten-year interval.