

From: Alyse L. Peterson [alp@nyserda.org]
Sent: Tuesday, December 09, 2008 11:45 AM
To: Richard Guzman
Cc: Jack P. Spath; paul_eddy@dps.state.ny.us; "Stephen M. Gavitt" <smg03@health.state.ny.us>; "Timothy Rice" <tbrice@gw.dec.state.ny.us>; Andrew Feeney; John Sipos
Subject: RE: NRC request for State Consultation for License Amendment Request - Nine Mile Point Unit No. 1 and 2 (NMP 1 and 2)

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Rich,

We have reviewed the referenced 6/24/08 license amendment request for Nine Mile Point Units 1 & 2 and offer the following comments.

The ability to compound the 25% grace period is a significant concern. If the licensee takes advantage of the full 25% grace period each time an inspection is due, a 2-year surveillance becomes a de facto 30 month surveillance. Within the 10-year Inservice Testing period an inspection could now be done only four times instead of five. The basic concept of a 25% grace period is acceptable from a scheduling and conflict management perspective, however it should still be the goal of each station to conduct all surveillances within the stated frequency period without using any of the grace allowance. Use of the grace period should be the exception rather than the rule. To monitor this, the licensee should be required to track and trend the surveillances that are completed within the normal frequency and those completed during the grace period. If the trend shows an increase in the number of surveillances being performed in the grace period rather than the normal frequency, the licensee should be required to assess the reasons for this trend and provide corrective actions to move surveillance tests back into the normal inspection frequency.

Sincerely,

Alyse Peterson, P.E.
Senior Project Manager
Nuclear Coordination and Radioactive Waste Policy
NYSERDA
17 Columbia Circle
Albany, NY 12233-6399
t 518-862-1090 x3274
f 518-862-1091

From: Richard Guzman [mailto:Richard.Guzman@nrc.gov]
Sent: Tuesday, December 02, 2008 10:28 AM
To: Alyse L. Peterson
Cc: Jack P. Spath
Subject: NRC request for State Consultation for License Amendment Request - Nine Mile Point Unit No. 1 and 2 (NMP 1 and 2)

Alyse,

The NRC staff is preparing for issuance, the following License Amendment:

1. NMP Units 1 and 2 Revision to TSs Administrative Control Section for the Inservice Testing Program

Date of Submittal: June 24, 2008

Federal Register Notice: October 7, 2008 (73 FR 58675)

Brief Description:

The amendments would revise the TSs by (1) replacing the references to Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code with references to the ASME Code for Operation and Maintenance, and (2) revising the allowance to extend Inservice Testing (IST) frequencies by 25% to clearly state that the allowance is applicable to IST frequencies of 2 years or less. The proposed changes are based on TS Task Force (TSTF) Standard Technical Specification Change Traveler 479-A, Revision 0, "Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less."

Please let me know if there are any comments from the State related to the above amendment requests which I project for issuance in the mid to late December timeframe. For more information on the above amendments, you can refer to the Federal Register notice indicated above. Please let me know if you have any questions.

Thanks,

Rich Guzman
Sr. Project Manager
US NRC
NRR/DORL
301-415-1030
Richard.Guzman@nrc.gov

E-mail Properties

Mail Envelope Properties (636C67B366068442AC5897B38307CCD41F685EF8)

Subject: RE: NRC request for State Consultation for License Amendment Request -
Nine Mile Point Unit No. 1 and 2 (NMP 1 and 2)

Sent Date: 12/09/2008 11:45:22 AM

Received Date: 12/09/2008 11:45:22 AM

From: Alyse L. Peterson

Created By: alp@nyserda.org

Recipients:

Richard.Guzman@nrc.gov (Richard Guzman)

Tracking Status: None

jps@nyserda.org (Jack P. Spath)
Tracking Status: None
paul_eddy@dps.state.ny.us (paul_eddy@dps.state.ny.us)
Tracking Status: None
smg03@health.state.ny.us ("Stephen M. Gavitt")
Tracking Status: None
tbrice@gw.dec.state.ny.us ("Timothy Rice")
Tracking Status: None
andrew.feeney@semo.state.ny.us (Andrew Feeney)
Tracking Status: None
John.Sipos@oag.state.ny.us (John Sipos)
Tracking Status: None

Post Office:
albexchange01.nyserda.org

Files	Size	Date & Time
MESSAGE	23287	12/09/2008

Options
Expiration Date:
Priority: olImportanceNormal
ReplyRequested: False
Return Notification: False

Sensitivity: olNormal
Recipients received: Follow up. Start by Thursday, December 11, 2008. Due by Thursday, December 11, 2008