



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 17, 2009

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. 1, ALTERNATIVE FOR THE REPAIR AND
INSERVICE INSPECTION OF CONTROL ROD DRIVE STUB TUBES FOR THE
LICENSE RENEWAL PERIOD OF EXTENDED OPERATION (TAC NO. MD9604)

Dear Mr. Polson:

By letter dated August 29, 2008, Nine Mile Point Nuclear Station, LLC, submitted for Nuclear Regulatory Commission (NRC) staff review and approval, Relief Request 11SI-02 for Nine Mile Point Unit No. 1 (NMP1). The relief request would allow the use of American Society of Mechanical Engineers, *Boiler and Pressure Vessel Code* (ASME Code), Section XI, Code Case N-730, "Roll-Expansion of Class 1 Control Rod Drive [CRD] Bottom Head Penetrations in BWRs," as an alternative permanent repair for CRD housing penetrations that may exhibit leakage during the license renewal period of extended operation (i.e., from August 23, 2009 to August 22, 2029) or for the re-roll expansion of any previously roll expanded CRD housing that exhibits a repeat occurrence of leakage.

The NRC staff is reviewing the submittal and has determined that additional information is needed to support its review. Enclosed is the NRC staff's request for additional information (RAI). The RAI was discussed with your staff on February 3 and 19, 2009, and it was agreed that your response would be provided within 60 days from the date of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard V. Guzman".

Richard V. Guzman, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure:
RAI

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

NINE MILE POINT NUCLEAR STATION, UNIT NO. 1

REQUEST TO UTILIZE AN ALTERNATIVE

FOR THE REPAIR AND INSERVICE INSPECTION OF CONTROL ROD DRIVE STUB TUBES

FOR THE LICENSE RENEWAL PERIOD OF EXTENDED OPERATION

DOCKET NO. 50-220

The Nuclear Regulatory Commission (NRC) staff is reviewing the Nine Mile Point Nuclear Station (NMPNS or the licensee) submittal for Nine Mile Point Unit No. 1 (NMP1) dated August 29, 2008. The NRC staff has determined that additional information requested below will be needed to support its review.

In its proposed alternative for repair of control rod drive stub tubes, the licensee requested in Alternative 1A to apply the American Society of Mechanical Engineers, *Boiler and Pressure Vessel Code* (ASME Code), Section XI, Code Case N-730, "Roll-Expansion of Class 1 Control Rod Drive [CRD] Bottom Head Penetrations in BWRs." In Alternative 2A, the licensee requested to apply ASME Code, Section XI, Code Case N-730, but with the exception to perform the post-roll expansion VT-2 examination at approximately 900 pounds-per-square inch (psig) prior to returning NMP1 to full power operation. ASME Code Case N-730 requires a post-repair leakage test at the operating pressure. As the basis for the proposed alternatives (1A and 2A), the submittal references both Title 10 to *Code of Federal Regulations* (10 CFR), Section 50.55a(a)(3)(i) related to demonstrating an acceptable level of quality and safety as well as Section 50.55a(a)(3)(ii) related to demonstrating hardship. Please clarify which regulatory basis is being applied for each alternative when responding to the questions below.

RAI-1. For proposed Alternative 1A, provide additional basis for using ASME Code Case N-730 instead of the ASME Code, Section XI, requirements by addressing the 4 considerations of the evaluation stated in Section 5 of the ASME Code Case N-730. If a generic evaluation is available, demonstrate that the generic evaluation is applicable to NMP1.

RAI-2. For proposed Alternative 2A, provide the basis for using ASME Code Case N-730 with the exception of performing a leakage test at 900 psig, instead of the ASME Code, Section XI, requirements. If 10 CFR 50.55a(a)(3)(ii) is the applicable regulatory basis, as discussed during the teleconference between NRC and licensee staff on February 19, 2009, provide a more detailed justification to support your use of 10 CFR 50.55a(a)(3)(ii) and, in particular, the following referenced items in your original submittal:

- Basis for Relief (ii) states, "[i]nspections of CRD stub tubes for leakage during a system leakage test at the nominal operating pressure (~1030 psig) associated with 100% rated reactor power cannot be performed during a normal plant startup,

Enclosure

due to the excessive temperature and radiological exposure conditions to which the NDE [nondestructive examination] examiners performing the visual VT-2 examinations would be exposed in the primary containment.” Provide justification to support this statement as a hardship.

- Basis for Relief (iii) states, “[t]his special test usually takes one full day of plant outage time, and the additional valve lineups and system reconfigurations necessary to support this special test impose an additional challenge to the affected systems.” Provide justification to support this statement as a hardship.

March 17, 2009

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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING NINE MILE POINT NUCLEAR STATION, UNIT NO. 1, ALTERNATIVE FOR THE REPAIR AND INSERVICE INSPECTION OF CONTROL ROD DRIVE STUB TUBES FOR THE LICENSE RENEWAL PERIOD OF EXTENDED OPERATION (TAC NO. MD9604)

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Sincerely,

/RA/

Richard V. Guzman, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-220

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RAI

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Accession No.: ML090710108 *RAI with concurrence provided by e-mail. No substantial changes made. NRR-058

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