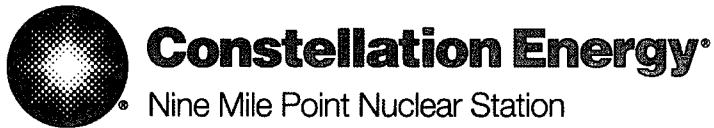


Sam Belcher  
Vice President-Nine Mile Point

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Lycoming, New York 13093  
315.349.5200  
315.349.1321 Fax



July 6, 2009

U. S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

**ATTENTION:** Document Control Desk

**SUBJECT:** Nine Mile Point Nuclear Station, LLC  
Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410

Supplemental Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

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- REFERENCES:**
- (a) NRC Generic Letter 2008-01, dated January 11, 2008, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"
  - (b) Letter from R. V. Guzman (NRC) to K. J. Polson (NMPNS), dated September 17, 2008, "Nine Mile Point Nuclear Station, Unit No. 1 – Re: 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,' Proposed Alternative Course of Action (TAC No. MD7848)"
  - (c) Letter from K. J. Polson (NMPNS) to Document Control Desk (NRC), dated October 14, 2008, "Nine Month Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems'"

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 (Reference a) to request that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling Systems, Residual Heat Removal System, and Containment Spray System, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

As requested in Reference (b), please find attached the Nine Mile Point Nuclear Station, LLC (NMPNS) supplemental response to the nine month response letter (Reference c). This supplemental response is being submitted within 90 days of startup from the Nine Mile Point, Unit 1, spring 2009 refueling outage in which the deferred actions were completed.

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NRR

Document Control Desk

July 6, 2009

Page 2

NMPNS has concluded that the subject systems at Nine Mile Point Units 1 and 2 (NMP1 and NMP2), are operable and that NMP1 and NMP2 are currently in compliance with the licensing basis documentation and applicable regulations, including 10 CFR 50 Appendix B, Criteria III, V, XI, XVI and XVII, with respect to the concerns outlined in GL 2008-01 regarding managing gas accumulation in these systems.

Attachment 1 to this letter contains the remaining information for the subject systems that was requested within 90 days following the startup from the spring 2009 refueling outage at NMP1. Attachment 1 also provides descriptions of evaluations that took place at NMP2 as a result of continuing testing of the subject systems.

Attachment 2 lists new regulatory commitments identified in this submittal.

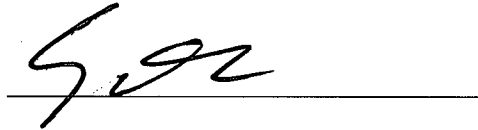
Should you have any questions regarding this submittal, please contact T. F. Syrell, Licensing Director, at (315) 349-5219.

Very truly yours,

A handwritten signature in black ink, appearing to be 'T. F. Syrell', written in a cursive style.

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

I, Sam Belcher, being duly sworn, state that I am Vice President-Nine Mile Point, and that I am duly authorized to execute and file this response 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 6<sup>th</sup> day of July, 2009.

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

SLB/RJC

Attachments: 1) Nine Mile Point Units 1 and 2 Supplemental Response to NRC GL 2008-01  
2) List of Regulatory Commitments

cc: R. V. Guzman, NRC Project Manager  
S. J. Collins, NRC Regional Administrator, Region I  
NRC Resident Inspector

**ATTACHMENT 1**

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**NINE MILE POINT UNITS 1 AND 2**  
**SUPPLEMENTAL RESPONSE TO NRC GL 2008-01**

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**ATTACHMENT 1**  
**NINE MILE POINT UNITS 1 AND 2 SUPPLEMENTAL RESPONSE TO NRC GL 2008-01**

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This attachment provides the Supplemental Response to Generic Letter (GL) 2008-01 for actions that were deferred until the next Nine Mile Point Unit 1 (NMP1) refueling outage as requested by the NRC in Reference (a). This attachment also describes the results of additional Ultrasonic Testing (UT) at Nine Mile Point Unit 2 (NMP2), compensatory actions to ensure operability and future design changes for corrective action.

Within this attachment there are descriptions of:

1. The results of evaluations that were performed pursuant to Generic Letter 2008-01 on previously incomplete activities at NMP1, i.e., system piping walk downs.
2. Additional corrective actions determined to be necessary to assure system operability and compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license with respect to the subject systems, including a schedule and a basis for that schedule.

The original conclusions documented in the nine-month response (Reference b) with respect to the licensing basis evaluation, testing evaluations, and corrective action evaluations have not changed.

**A. EVALUATION RESULTS**

1. During the spring 2009 refueling outage at NMP1, walk downs were done in the drywell. The results are listed below by system:

Shutdown Cooling

A 0.8" negative slope was found on one pipe of shutdown cooling. A UT was performed showing no voids in the pipe. No further action is required.

Core Spray

In the Core Spray System a ½" high point was found that could cause a maximum of 1% to 2% void in the portion of the discharge piping where the high point exists. This has been analyzed and will not affect system operability. Follow-up UTs found no voids in any of the Core Spray piping. No further action is necessary.

2. At NMP2, follow-up UTs were completed with two areas indicating voids. One area was the suction piping on the Low Pressure Core Spray (CSL) system. The other was the suction piping on the Residual Heat Removal (RHR) system. Both systems are operable based on voids not exceeding bounding values. On-going UT inspections and compensatory actions are being taken when action limits are reached to ensure voiding affecting pump operability is not reached or exceeded. When action limits are reached, the pumps are run to remove voids. An evaluation into the cause of the voiding in the CSL and RHR piping will be completed by November 15, 2009 and design changes will be implemented to minimize the voiding, if necessary, by the end of the spring 2010 refueling outage. Nine Mile Point Nuclear Station, LLC (NMPNS) will inform the NRC of any design changes determined to be necessary.

**ATTACHMENT 1**  
**NINE MILE POINT UNITS 1 AND 2 SUPPLEMENTAL RESPONSE TO NRC GL 2008-01**

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Conclusion

NMPNS has concluded that the subject systems at NMP1 and NMP2 are operable and are currently in compliance with the licensing basis documentation and applicable regulations, including 10 CFR 50 Appendix B, Criteria III, V, XI, XVI and XVII, with respect to the concerns outlined in GL 2008-01 regarding managing gas accumulation in these systems.

**REFERENCES:**

- (a) Letter from R. V. Guzman (NRC) to K. J. Polson (NMPNS), dated September 17, 2008, "Nine Mile Point Nuclear Station, Unit No. 1 – Re: 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,' Proposed Alternative Course of Action (TAC No. MD7848)"
- (b) Letter from K. J. Polson (NMPNS) to Document Control Desk (NRC), dated October 14, 2008, "Nine Month Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems'"

**ATTACHMENT 2**

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**LIST OF REGULATORY COMMITMENTS**

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**ATTACHMENT 2**  
**LIST OF REGULATORY COMMITMENTS**

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**List of Regulatory Commitments**

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

Direct questions regarding these commitments to T. F. Syrell, Licensing Director, at (315) 349-5219.

<b>REGULATORY COMMITMENT</b>	<b>DUE DATE</b>
NMPNS will evaluate the cause of the voiding in the Nine Mile Point 2 (NMP2) Core Spray Low (CSL) and Residual Heat Removal (RHR) systems and determine what design changes, if any, will be required. The required design changes will be implemented by the end of the spring 2010 refueling outage.	11/15/09
NMPNS will send a supplemental response to the NRC by 12/15/09 informing them of the design changes that will be implemented to minimize the voiding of CSL and RHS piping and the completion dates, if any.	12/15/09