

This letter forwards proprietary information in accordance with 10 CFR 2.390. The balance of this letter may be considered non-proprietary upon removal of Attachments 4 and 5.

Sam Belcher
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August 28, 2009

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

Response to Acceptance Review Comments Re: License Amendment Request for
Extended Power Uprate (TAC No. ME1476)

- REFERENCES:**
- (a) Letter from K. J. Polson (NMPNS) to Document Control Desk (NRC), dated May 27, 2009, License Amendment Request (LAR) Pursuant to 10 CFR 50.90: Extended Power Uprate
 - (b) Letter from R. V. Guzman (NRC) to S. L. Belcher (NMPNS), dated July 15, 2009, Nine Mile Point Nuclear Station, Unit No. 2 –Acceptance Review of License Amendment Request Re: Extended Power Uprate (TAC No. ME1476)

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits revised and supplemental information in support of a previously submitted request for amendment to Nine Mile Point Unit 2 (NMP2) Renewed Operating License (OL) NPF-69. The request, dated May 27, 2009 (Reference a), proposed an amendment to increase the power level authorized by OL Section 2.C.(1), Maximum Power Level, from 3467 megawatts-thermal (MWt) to 3988 MWt. By letter dated July 15, 2009 (Reference b), the NRC forwarded comments required to be addressed prior to the staff's completion of the acceptance review for the amendment request. The attached information is provided to address the two NRC information requests reiterated below.

1. "Provide a table or summary of the minimum alternating stress ratios at CLTP conditions without filtering the NMP2 plant noise (i.e., LF signal) based on the actual results from the revised analysis of record.

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2. Provide a table or summary of the minimum alternating stress ratios at EPU conditions without filtering the NMP2 plant noise based on the actual results from the revised analysis of record; and demonstrate that the minimum alternating stress ratio at EPU conditions is not less than 2.0 at the governing locations of the steam dryer.”

The NMP2 steam dryer minimum alternating stress ratio has been re-evaluated with the low flow (LF) noise included. The minimum alternating stress ratios are found in Tables 9a and 9b of Attachment 4, Continuum Dynamics Incorporated (CDI) Report 09-26P and are applicable for both the current licensed thermal power (CLTP) and extended power uprate (EPU) conditions. The analyses contained therein demonstrate that the minimum alternating stress ratio remains above 2.08 at all frequency shifts for the maximum EPU condition of 120% of the original licensed thermal power (OLTP).

The re-evaluation of the steam dryer included a revision to the loads definition report in Attachment 5, CDI Report 08-08P. Table 3.2 identifies specific exclusion frequencies related to extraneous noise and Main Steam Line pipe vibration frequencies that are removed in the re-evaluation. This approach is consistent with previously NRC-approved steam dryer EPU analyses. Attachment 5 includes the revised load definition and the sample limit curves that reflect the inclusion of LF noise.

When the LF noise is included, an additional closure plate modification to the steam dryer is required, the welds on the lifting rod braces require additional reinforcement, and several additional locations required sub-modeling. The closure plates will have reinforcement strips added to stiffen them as described in Appendix A of CDI Report 09-26P. The sub-modeling locations and additional welds are identified in Table 7 of CDI Report 09-26P.

Attachments 4 and 5 are considered by CDI to contain proprietary information exempt from disclosure pursuant to 10 CFR 2.390. Therefore, on behalf of CDI, NMPNS hereby makes application to withhold these attachments from public disclosure in accordance with 10 CFR 2.390(b)(1). An affidavit executed by CDI detailing the reasons for the request to withhold the proprietary information is provided in Attachment 1. Attachments 2 and 3 provide non-proprietary versions of the reports in Attachments 4 and 5.

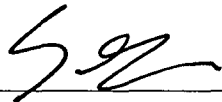
Should you have any questions regarding the information in this submittal, please contact T. F. Syrell, Licensing Director, at (315) 349-5219.

Very truly yours,



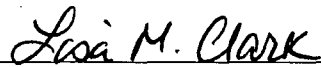
STATE OF NEW YORK :
: TO WIT:
COUNTY OF OSWEGO :

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 28 day of August, 2009.

WITNESS my Hand and Notarial Seal:



Notary Public

My Commission Expires:

9/12/09

Date

LISA M. CLARK
Notary Public in the State of New York
Oswego County Reg. No. 01CL6029220
My Commission Expires 9/12/09

SLB/JJD

Attachments:

1. Affidavit Justifying Withholding Proprietary Information in CDI Reports 09-26P, Rev. 0 and 08-08P, Rev. 2
2. CDI Report 09-26NP (Non-Proprietary), Stress Assessment of Nine Mile Point Unit 2 Steam Dryer at CLTP and EPU Conditions, Rev. 0
3. CDI Report 08-08NP (Non-Proprietary), Acoustic and Low Frequency Hydrodynamic Loads at CLTP Power Level on Nine Mile Point Unit 2 Steam Dryer to 250 Hz, Rev. 2
4. CDI Report 09-26P (Proprietary), Stress Assessment of Nine Mile Point Unit 2 Steam Dryer at CLTP and EPU Conditions, Rev. 0
5. CDI Report 08-08P (Proprietary), Acoustic and Low Frequency Hydrodynamic Loads at CLTP Power Level on Nine Mile Point Unit 2 Steam Dryer to 250 Hz, Rev. 2

cc: NRC Regional Administrator, Region I
NRC Resident Inspector
NRC Project Manager
NYSERDA (w/o Attachments 4 and 5)

ATTACHMENT 1

**AFFIDAVIT JUSTIFYING WITHHOLDING PROPRIETARY
INFORMATION IN CDI REPORTS 09-26P, REV. 0 AND 08-08P, REV. 2**



Continuum Dynamics, Inc.

(609) 538-0444 (609) 538-0464 fax

34 Lexington Avenue Ewing, NJ 08618-2302

AFFIDAVIT

Re: C.D.I. Report 08-08P "Acoustic and Low Frequency Hydrodynamic Loads at CLTP Power Level on Nine Mile Point Unit 2 Steam Dryer to 250 Hz," Revision 2; and
C.D.I. Report 09-26P "Stress Assessment of Nine Mile Point Unit 2 Steam Dryer at CLTP and EPU Conditions," Revision 0

I, Alan J. Bilanin, being duly sworn, depose and state as follows:

1. I hold the position of President and Senior Associate of Continuum Dynamics, Inc. (hereinafter referred to as C.D.I.), and I am authorized to make the request for withholding from Public Record the Information contained in the documents described in Paragraph 2. This Affidavit is submitted to the Nuclear Regulatory Commission (NRC) pursuant to 10 CFR 2.390(a)(4) based on the fact that the attached information consists of trade secret(s) of C.D.I. and that the NRC will receive the information from C.D.I. under privilege and in confidence.
2. The Information sought to be withheld, as transmitted to Constellation Energy Group as attachments to C.D.I. Letter No. 09128 dated 26 August 2009, C.D.I. Report 08-08P "Acoustic and Low Frequency Hydrodynamic Loads at CLTP Power Level on Nine Mile Point Unit 2 Steam Dryer to 250 Hz," Revision 2; and C.D.I. Report 09-26P "Stress Assessment of Nine Mile Point Unit 2 Steam Dryer at CLTP and EPU Conditions," Revision 0.
3. The Information summarizes:
 - (a) a process or method, including supporting data and analysis, where prevention of its use by C.D.I.'s competitors without license from C.D.I. constitutes a competitive advantage over other companies;
 - (b) Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;
 - (c) Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs 3(a), 3(b) and 3(c) above.

4. The Information has been held in confidence by C.D.I., its owner. The Information has consistently been held in confidence by C.D.I. and no public disclosure has been made and it is not available to the public. All disclosures to

third parties, which have been limited, have been made pursuant to the terms and conditions contained in C.D.I.'s Nondisclosure Secrecy Agreement which must be fully executed prior to disclosure.

5. The Information is a type customarily held in confidence by C.D.I. and there is a rational basis therefore. The Information is a type, which C.D.I. considers trade secret and is held in confidence by C.D.I. because it constitutes a source of competitive advantage in the competition and performance of such work in the industry. Public disclosure of the Information is likely to cause substantial harm to C.D.I.'s competitive position and foreclose or reduce the availability of profit-making opportunities.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to be the best of my knowledge, information and belief.

Executed on this 26 day of August 2009.



Alan J. Bilanin
Continuum Dynamics, Inc.

Subscribed and sworn before me this day: August 26, 2009


Eileen P. Burmeister, Notary Public

EILEEN P. BURMEISTER
NOTARY PUBLIC OF NEW JERSEY
MY COMM. EXPIRES MAY 6, 2012