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Nine Mile Point Nuclear Station

December 17, 2009

U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTENTION: Document Control Desk

SUBJECT: Nine Mile Point Nuclear Station
Unit No. 1; Docket No. 50-220

License Amendment Request Pursuant to 10 CFR 50.90: Relocation of Pressure and Temperature Limit Curves to the Pressure and Temperature Limits Report – Response to NRC Request for Additional Information (TAC No. ME0817)

- REFERENCES:**
- (a) Letter from K. J. Polson (NMPNS) to Document Control Desk (NRC), dated March 3, 2009, License Amendment Request Pursuant to 10 CFR 50.90: Relocation of Pressure and Temperature Limit Curves to the Pressure and Temperature Limits Report
 - (b) Letter from R. V. Guzman (NRC) to S. L. Belcher (NMPNS), dated November 23, 2009, Request for Additional Information Regarding Nine Mile Point Nuclear Station, Unit No. 1, Relating to License Amendment Request Re: Relocation of Pressure and Temperature Limit Curves to the Pressure and Temperature Limits Report (TAC No. ME0817)

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits supplemental information requested by the NRC in support of a previously submitted request for amendment to Nine Mile Point Unit 1 Renewed Facility Operating License DPR-63. The initial request, dated March 3, 2009 (Reference a), proposed to modify Technical Specification (TS) Sections 3.2.1 and 3.2.2 by replacing the existing reactor vessel heatup and cooldown rate limits and the pressure and temperature limit curves with references to the Pressure and Temperature Limits Report (PTLR). The proposed amendment would also add a new TS

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definition for the PTLR and would revise the Administrative Controls section of the TS to add new administrative requirements for the PTLR. The supplemental information, provided in Attachments 1 and 2 to this letter, responds to the request for additional information documented in the NRC's letter dated November 23, 2009 (Reference b).

This supplemental information does not affect the No Significant Hazards Determination analysis provided by NMPNS in Reference (a). Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this supplemental information to the appropriate state representative. 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,



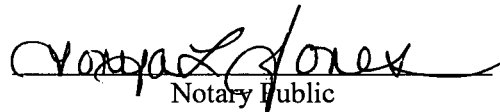
STATE OF NEW YORK :
: TO WIT:
COUNTY OF OSWEGO :

I, Thomas A. Lynch, being duly sworn, state that I am the Nine Mile Point Plant General Manager, and that I am duly authorized to execute and file this supplemental information 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 17th day of December, 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

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Document Control Desk

December 17, 2009

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- Attachments:
1. Nine Mile Point Unit 1 – Response to NRC Request for Additional Information Regarding the Proposed Relocation of Pressure and Temperature Limit Curves to the Pressure and Temperature Limits Report
 2. Revision to Proposed Change to Technical Specification Page 358 (Markup)

cc: S. J. Collins, NRC
R. V. Guzman, NRC
Resident Inspector, NRC
A. L. Peterson, NYSERDA

ATTACHMENT 1

NINE MILE POINT UNIT 1

**RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE PROPOSED RELOCATION OF THE
PRESSURE AND TEMPERATURE LIMIT CURVES
TO THE PRESSURE AND TEMPERATURE LIMITS REPORT**

ATTACHMENT 1

NINE MILE POINT UNIT 1 RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION REGARDING THE PROPOSED RELOCATION OF THE PRESSURE AND TEMPERATURE LIMIT CURVES TO THE PRESSURE AND TEMPERATURE LIMITS REPORT

By letter March 3, 2009, Nine Mile Point Nuclear Station, LLC (NMPNS) requested an amendment to the Nine Mile Point Unit 1 (NMP1) Renewed Operating License DPR-63. The proposed amendment would modify the Technical Specifications (TSs) by relocating the pressure and temperature limit curves to the Pressure and Temperature Limits Report (PTLR). This attachment provides supplemental information in response to the request for additional information (RAI) documented in the NRC's letter dated November 23, 2009. The NRC request is repeated (in italics), followed by the NMPNS response.

RAI

The Nuclear Regulatory Commission (NRC) staff has reviewed the Nine Mile Point Nuclear Station (NMPNS) submittal dated March 3, 2009. The NRC staff has determined that additional information requested below will be needed to complete its review. As indicated in NRC letter dated November 2, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML092151016), to the Technical Specification (TS) Task Force Traveler (TSTF) regarding a staff position taken on TSTF-419, Revision 0, there is a generic concern related to the inclusion of revision numbers and dates in the Pressure and Temperature Limits Report (PTLR) References Section of the TSs. Specifically, the removal of the Topical Report revision numbers or approval dates from the TS in accordance with the subject TSTF Travelers does not provide a direct link to specific TS numerical values relocated to the PTLR, since there is no reference to a specific methodology. The NRC staff has determined that relaxation of TS Topical Report documentation from the guidance provided in Generic Letter 96-03 is not appropriate. Therefore, the NRC staff no longer supports the position reflected in TSTF Traveler 419, Revision 0.

In light of the November 2, 2009, letter, and in light of the fact that NMPNS is requesting to implement TSTF-419 during continued generic discussions regarding TSTF-419, the NRC staff requests NMPNS to provide a revised TS page(s) for NMP1 providing the PTLR References Section, citing NRC-approved methodology that includes revision numbers and dates.

Response

The revised TS page requested by the NRC is provided in Attachment 2. In the "Insert 2" for TS page 358, the reference to document SIR-05-044-A is revised by adding the revision number and date, thereby fully identifying the specific methodology used to develop the NMP1 PTLR. The revision is indicated by a vertical bar drawn in the right hand margin of the Insert 2 page.

The methodology described in SIR-05-044-A, Revision 0, dated April 2007, has previously been reviewed and accepted by the NRC, as discussed in the NMPNS license amendment request letter dated March 3, 2009.

ATTACHMENT 2

**REVISION TO PROPOSED CHANGE TO
TECHNICAL SPECIFICATION PAGE 358 (MARKUP)**

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
 - 1. NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," U.S. Supplement, (NRC approved version specified in the COLR).
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as shutdown margin (SDM), transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

6.6.6 Special Reports

Special reports shall be submitted within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. – f. (Deleted)
- g. Sealed Source Leakage In Excess Of Limits, Specification 3.6.5.2 (Three months).
- h. Accident Monitoring Instrumentation Report, Specification 3.6.11.a (Table 3.6.11-2, Action 3 or 4) (Within 14 days following the event).

6.6.7

Insert 2

INSERT 2 (for TS Page 358; New Section 6.6.7)

6.6.7 Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)

- a. RCS pressure and temperature limits for heatup, cooldown, low temperature operation, criticality, and inservice leakage and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:
 1. Limiting Condition for Operation Section 3.2.1, "Reactor Vessel Heatup and Cooldown Rates."
 2. Limiting Condition for Operation Section 3.2.2, "Minimum Reactor Vessel Temperature for Pressurization."
 3. Surveillance Requirement Section 4.2.2, "Minimum Reactor Vessel Temperature for Pressurization."
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following document:
 1. SIR-05-044-A, "Pressure-Temperature Limits Report Methodology for Boiling Water Reactors," Revision 0, April 2007.
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.