UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 9, 2010

Mr. Samuel L. Belcher
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. 2 – RE: EXTENSION OF COMPLETION TIME FOR INOPERABLE DIESEL GENERATOR, ELECTRICAL ENGINEERING REVIEW (TAC NO. ME3736)

Dear Mr. Belcher:

By letter dated March 30, 2010, as supplemented on June 1, 2010, Nine Mile Point Nuclear Station, LLC (NMPNS) submitted a license amendment for Nine Mile Point, Unit No. 2 (NMP2). The proposed amendment would modify NMP2 Technical Specification (TS) Section 3.8.1, "AC Sources - Operating," to extend the Completion Time for an inoperable Division 1 or Division 2 diesel generator (DG) from 72 hours to 14 days. The proposed amendment represents a risk-informed licensing change.

The Nuclear Regulatory Commission (NRC) staff is reviewing the information provided in those letters 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 October 14 and 28, and November 9, 2010, and it was agreed that your response would be provided by December 30, 2010.

Sincerely,

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

Docket No. 50-410

Enclosure:
As stated

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REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR

LICENSE AMENDMENT REQUEST (LAR) RE: EXTENSION OF COMPLETION TIME FOR

INOPERABLE DIESEL GENERATOR

ELECTRICAL ENGINEERING REVIEW

NINE MILE POINT NUCLEAR STATION, LLC

NINE MILE POINT NUCLEAR STATION, UNIT NO. 2

DOCKET NO. 50-410

By letter dated March 30, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100900460), as supplemented by letter dated June 1, 2010 (ML101600452), Nine Mile Point Nuclear Station, LLC (NMPNS or the licensee) submitted an LAR for Nine Mile Point, Unit No. 2 (NMP2) requesting changes to the Technical Specifications (TSs) to extend the allowable completion time from 72 hours to 14 days when one emergency diesel generator (DG) is inoperable. The NRC staff is reviewing the LAR and has determined that additional information as requested below will be needed to support its review.

1. In the LAR dated March 30, 2010, the licensee stated that the proposed amendment would modify TS Section 3.8.1, "AC Sources - Operating," to extend the Completion Time (CT) for an inoperable Division 1 or Division 2 DG from 72 hours to 14 days. The detailed description of the proposed change, Section 2.1 in the LAR, has the following statement:

   The proposed amendment includes the following revision to TS 3.8.1:

   TS 3.8.1 Condition A (One required offsite circuit inoperable) - revise the third Completion Time for Required Action A.3 (Restore required offsite circuit to OPERABLE status):

   From: "6 days from discovery of failure to meet LCO [limiting condition for operation]"
   To: "17 days from discovery of failure to meet LCO"

   Provide justification for the change related to TS 3.8.1 Condition A.

2. In its letter dated June 1, 2010 (Response to NRC Acceptance Review Comments Item No. 7), the licensee provided justification for the extended CT based on a 2-year inspection and 6-year overhaul. Since the licensee has provided justification for the allowed outage time (AOT) extension for 8 days and considering the proposed 2 days to account for uncertainties, the licensee is requested to provide a revised TS for an extension of 10 days (i.e. 8 plus 2 days).

3. During the period of the extended CT (14 days), the NRC staff expectation is that sufficient defense-in-depth for the onsite power system is provided. Therefore, a supplemental AC (alternating current) source should be provided for the DG under

maintenance for the plant to be in cold shutdown. The capacity of the source should be adequate to support a design basis loss-of-offsite power (LOOP) and station blackout (SBO) loads. The licensee has proposed to use the high-pressure core spray (HPCS) DG as an alternate power source for plant shutdown with some plant modifications for operation of HPCS diesel generator. The NRC staff has the following questions related to this application of the HPCS DG.

a. In LAR Section 3.1.1, item 4, the licensee proposed using the diesel driven fire water pump to provide a source of cooling water to the HPCS DG in the event it is used for plant shutdown upon loss of onsite and offsite power. Provide details on the support systems required for the diesel driven water pump to operate for an extended duration. Specifically, address the capability of the DC control power system and fuel oil requirements.

b. In LAR Section 3.1.1, item 2, the licensee proposed a 60 kVA portable generator as a temporary back-up source of AC power to either Division 1 or Division 2 battery charger, so that the SBO coping can be extended beyond the 4 hours. Provide details on the frequency of the surveillance testing of the portable diesel generator and a time line for aligning this power source to the battery chargers.

c. In the NMP2 Updated Safety Analysis Report (USAR), Table 8.3-5 and Table 8.3-6 provides the maximum total load for LOOP with unit trip condition as 3083 kW for Division 1 (and 3009 kW for Division 2). The licensee has determined the net Division 3 DG load (when cross-connected to Division 1 or Division 2 emergency bus) is reduced to 2748 kW. Provide the basis for removing one service water (SW) pump for a design basis LOOP condition as specified in USAR tables. Also provide details on any procedurally required loads that are manually added to bring the plant to a cold shutdown.

d. The acceptance criteria for HPCS DG loading per TS SR 3.8.1.12 (a) is 2730kW. Provide results from surveillance testing that validate the capability of Division 3 (HPCS) DG to support the higher postulated LOOP loads.

e. The USAR Section 8.3.1.1.2 states that the HPCS DG cannot maintain the voltage and frequency within 75 and 90 percent, respectively, during initial loading. For the specific core spray pump load this was acceptable. Provide details on voltage and frequency deviations when the HPCS DG is manually loaded with plant cold shutdown loads, and the capability of running loads to withstand the voltage/frequency perturbations.

4. Since the extended CT is based on implementing compensatory measures and administrative controls in accordance with the configuration risk management program when entering an extended CT, as listed in the regulatory commitments, the TSs should be revised such that if any regulatory commitment, including the operability of the HPCS and its support systems, such as the diesel-powered fire pump motors, is not met during the extended CT period, the CT will revert back to 72 hours from the time of noncompliance. Provide the revised TS(s) as necessary.

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