

# CENG<sup>SM</sup>

a joint venture of



NINE MILE POINT  
NUCLEAR STATION

August 1, 2013

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

**ATTENTION:** Document Control Desk

**SUBJECT:** Nine Mile Point Nuclear Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
Docket Nos. 50-220 and 50-410

Revised Commitment to Flood Hazard Reevaluation Report

**REFERENCES:**

- (a) Letter from E. J. Leeds (NRC) and M. R. Johnson (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status, dated March 12, 2012, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident.
- (b) Letter from J. A. Spina (CENG) to Document Control Desk (NRC), dated March 12, 2013, Flood hazard Reevaluation Report.

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Reference (a). Enclosure 2 of Reference (a) contains specific requested actions, requested information, and required responses associated with Recommendation 2.1 for flooding reevaluations. On March 12, 2013 Nine Mile Point Unit 1 (NMP1) and Nine Mile Point Unit 2 (NMP2) provided the flood hazard reevaluation in Reference (b).

The purpose of this letter is to provide a revision to commitments contained in Reference (b) as it pertained to the NMP1 and NMP2 flood hazard reevaluation using updated flooding hazard information and present-day regulatory guidance and methodologies.

The report provided in Attachment 1 of Reference (b) described the approach, methods, and results from the reevaluation of flood hazards at NMP1 and NMP2. Additionally, the cover letter of Reference (b) provided specific detail addressing the proposed interim actions to address any higher flooding hazards,

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relative to the current NMP1 and NMP2 design basis. Reference (b) described the interim actions to be taken including:

*“Revise station procedures to direct installation of temporary flood protection equipment such as sandbags, inflatable dams, or similar devices at the two (2) NMP1 Diesel Generator building roll-up doors and associated Power Board 103 room, one (1) Battery Board 11 room, one (1) Battery Board 12 room, and one (1) Valve Board 11 room exterior doors, and at the NMP2 three (3) Control Building, two (2) Electrical Tunnel, and three (3) Standby Gas Treatment room exterior doors, during a flood event. This action will be entered into the station Corrective Action Program with a completion date of August 1, 2013.”*

During the implementation walkdown phase, it was determined that the three (3) NMP2 Standby Gas Treatment (SBGT) room exterior doors did not require temporary flooding protection to address any higher flooding hazards. The NMP2 SBGT room does not contain equipment required to achieve safe-shutdown conditions. As such, the three (3) exterior doors to the NMP2 SBGT room were removed from the list of doors requiring temporary flooding protection.

In addition, the implementation walkdown identified several additional doors that require temporary flooding protection to address higher flooding hazards. Seven (7) interior doors at NMP1, and three (3) exterior and (3) interior doors at NMP2 were added to the list of doors requiring temporary flooding protection to prevent water ingress. The following is the list of additional doors requiring temporary flooding protection:

- Three (3) interior doors for NMP1 Aux Control Room access from Turbine Building 261 foot elevation were added to the list of doors requiring protection to prevent water ingress from the turbine building into the Auxiliary Control Room which is required for safe shutdown of the unit.
- Two (2) interior doors were added for the NMP1 Diesel Generator and associated Power Board rooms to prevent water ingress from the turbine building into these rooms.
- Two (2) interior doors were added for the NMP1 Battery Board 11 and 12 rooms to prevent water ingress from the turbine building to these rooms.
- Three (3) Doors for the NMP2 Standby Gas Treatment Rooms were removed from the original list of doors requiring flood protection because the equipment in these rooms are not required to support or implement safe shutdown of the unit.
- One (1) exterior door for the NMP2 West Electrical Tunnel was added to the list of doors requiring protection to prevent water ingress.
- One (1) interior door for the NMP2 South Electric Tunnel was added to the list of doors requiring protection to prevent water ingress from interior flooding.
- One (1) interior door was added to the list for the NMP2 Control Building Northwest was added to the list of doors requiring protection to prevent water ingress from building interior flooding.

The interim actions for the additional doors listed have been implemented and proceduralized.

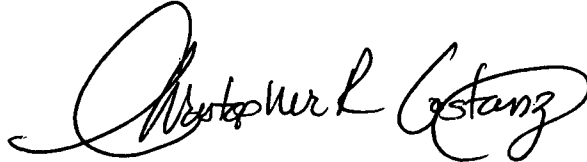
This letter provides notification of a revision to a regulatory commitment as identified above. Nine Mile Point has obtained the necessary temporary flood protection equipment, appropriate procedures were revised, and reasonable simulation practices were used to validate the procedures. As such, this regulatory commitment as revised is considered to be complete.

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If there are any questions regarding this submittal, please contact Theresa Darling, acting Director - Licensing, at 315-349-5219.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 1, 2013.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher R. Costanzo". The signature is fluid and cursive, with the first name "Christopher" being the most prominent part.

Christopher R. Costanzo

CRC/SGD

cc: B. K. Vaidya, NRC  
M. C. Thadani, NRC  
W. M. Dean, NRC  
Resident Inspector, Nine Mile Point