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10 CFR 50.90

NMP2L2595
September 10, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Nine Mile Point Nuclear Station, Unit 2
Renewed Facility Operating License No. NPF-69
NRC Docket No. 50-410

Subject: Response to Request for Additional Information - "Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (Adoption of TSTF-425, Revision 3)"

References:

1. Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (Adoption of TSTF-425, Revision 3)," dated November 19, 2014.

2. Email from Brenda Mozafari (Licensing Project Manager, U.S. Nuclear Regulatory Commission) to Ronnie Reynolds and Enrique Villar (Exelon Generation Company, LLC), "Request for Additional Information - Exelon Generation, Nine Mile Point Nuclear Station, Unit 2 License Amendment Request to Revise Technical Specifications by Relocating Surveillance Frequencies to Licensee Control in Accordance with TSTF-425, Revision 3 Docket No. 50-410," dated August 27, 2015.

By letter dated November 19, 2014 (Reference 1) Exelon Generation Company, LLC (Exelon) requested to change the Nine Mile Point Unit 2 (NMP-2) Technical Specifications (TS). The proposed amendment request would modify NMP-2 TS by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."

On August 27, 2015 (Reference 2), the U.S. Nuclear Regulatory Commission (NRC) identified areas where additional information was necessary to complete the review. Additionally, on September 3, 2015, a clarification teleconference was held between NRC and Exelon personnel.

Attachment 1 to this letter contains the NRC's request for additional information immediately followed by Exelon's response.

Attachment 2 contains the revised Technical Specifications pages.

Exelon has reviewed the information supporting a finding of no significant hazards consideration and the environmental consideration provided to the NRC in Reference 1. The additional information provided in this response does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. Furthermore, the additional information provided in this response does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no commitments contained in this response.

If you should have any questions regarding this submittal, please contact Enrique Villar at 610-765-5736.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10th day of September 2015.

James Barstow
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1) Response to Request for Additional
2) Marked-up Technical Specifications Page

cc: USNRC Region I Regional Administrator w/attachments
USNRC Senior Resident Inspector - NMP "
USNRC Project Manager, NRR - NMP "
A. L. Peterson, NYSERDA "

ATTACHMENT 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
EXELON GENERATION COMPANY, LLC, NINE MILE POINT NUCLEAR STATION, UNIT 2

LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS BY RELOCATING SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL IN ACCORDANCE WITH TSTF-425, REVISION 3
DOCKET NO. 50-410

By letter dated November 19, 2014, (Agency-wide Documents Access and Management System (ADAMS) Accession No. 14329A353), Exelon Generation, submitted a License Amendment Request which proposed changes to the Technical Specifications (TSs) for Nine Mile Point Nuclear Station Unit 2 (NMP2). Specifically the licensee proposed to adopt U.S. Nuclear Regulatory Commission (NRC) approved Revision 3 to Technical Specification Task Force (TSTF) Standard Technical Specifications (STSs) Change traveler TSTF-425,"Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiatives 5b" which is an approved change to the STSs (ADAMS Accession No. ML090850642).

The proposed changes relocate specific surveillance frequencies to a licensee controlled program based on the approved methodology included in Nuclear Energy Institute 04-10, "Risk Informed TS Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."

The Nuclear Regulatory Commission's regulatory requirements related to the content of the TSs Surveillance Requirements (SR) are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) 10 CFR 50.36(c)(3).

During the staff's review of a change to ensure that the change is in accordance with 10 CFR 50.36 the staff uses NUREG-0800, Standard Review Plan, Chapter 16, TSs; NUREG-1433, STSs, General Electric BWR/4 Plants, Rev. 4; and the approved TSTF as guidance. According to this guidance the language in the proposed Technical Specification (TS) changes must be the same or equivalent to that in the current TS unless there is adequate technical or administrative reasoning supporting the change.

The questions contained in this Draft RAI are in addition to the RAI questions clarified on a call on June 3, 2015, and fully responded to on July 10, 2015.

TSB-RAI #1

NMP2 proposes to relocate the surveillance frequency for NMP SR 3.3.1.1.17 which is similar to STS SR 3.3.1.1.15. The specific surveillance frequency is marked up for relocation to the program. The associated note defining the 'n' term for determining the staggered test basis frequency is included in the approved TSTF markup. Explain whether NMP2 also intends to relocate the related Note 3, "For Function 5, 'n' equals 4 channels for the purpose of determining the STAGGERED TEST BASIS frequency," as marked in the TSTF-425 markups for STS SR 3.3.1.1.15 .

If so, a revised page including removal of Note 3 of NMP2 SR 3.3.1.1.17 should be submitted.

Exelon Response to TSB-RAI #1

Exelon intends to relocate the associated note (Note 3) defining the 'n' term for determining the staggered test basis frequency. The revised marked-up Technical Specifications (TS) page is included in Attachment 2.

TSB-RAI #2

The NRC staff noted that the licensee's proposed change to SR 3.6.1.1.2 is not the same as that in the approved TSTF. The NMP2 proposal relocates only the frequency following the NOTE after the AND contrary to the approved TSTF markup that only relocates the frequency prior to the AND. Justify how the frequency after the AND may be relocated to the surveillance frequency control program.

Exelon Response to TSB-RAI #2

Exelon will not be relocating the frequency following the NOTE after the AND in accordance with the approved TSTF marked-up. Therefore, Exelon withdraws the proposed change to SR 3.6.1.1.2 and TS page 3.6.1.1-2 will not contain any changes. The originally submitted marked-up page for TS Bases 3.6.1.1.2 remains unchanged since its description also applies to TS 3.6.1.1.3.

ATTACHMENT 2

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
EXELON GENERATION COMPANY, LLC, NINE MILE POINT NUCLEAR STATION, UNIT 2

LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS BY RELOCATING SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL IN ACCORDANCE WITH TSTF-425, REVISION 3
DOCKET NO. 50-410

Marked-up Technical Specifications Pages

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.17 ----------NOTES---------- 1. Function 2.f digital electronics are excluded. 2. For Functions 3 and 4, the sensor response time may be assumed to be the design sensor response time. 3. ~~For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency.~~ 4. For Function 9, the RPS RESPONSE TIME is measured from start of turbine control valve fast closure. ---------- Verify the RPS RESPONSE TIME is within limits.	~~24 months on a STAGGERED TEST BASIS~~

"Deleted"

INSERT 1