



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

November 9, 2015

Mr. Bryan C. Hanson
President and Chief Nuclear Officer
Exelon Nuclear
Nine Mile Point Nuclear Station, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT 1 - REQUEST FOR ADDITIONAL
INFORMATION REGARDING ADOPTION OF TECHNICAL SPECIFICATION
TASK FORCE TRAVELER-425 (CAC NO. MF6061)

Dear Mr. Hanson:

By application dated May 12, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15134A232), Exelon Generation Company, LLC (the licensee) requested an amendment to the Nine Mile Point Nuclear Station, Unit 1 (NMP1) Renewed Facility Operating License. The proposed license amendment would adopt Technical Specification Task Force Traveler-425 (TSTF-425), Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk Informed TSTF] Initiative 5b," dated March 18, 2009 (ADAMS Accession No. ML090850642).

The Nuclear Regulatory Commission (NRC) staff has reviewed the information provided and has determined that additional information is needed to complete its review. Enclosed is the NRC staff's request for additional information (RAI). The RAI was discussed with your staff on October 16, 2015, and October 26, 2015, and it was agreed that your response would be provided within 30 days from the date of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Alyx Chereskin".

Alexander N. Chereskin, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure:
RAI

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

NINE MILE POINT NUCLEAR STATION, LLC

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-220

NINE MILE POINT NUCLEAR STATION, UNIT 1

LICENSE AMENDMENT REQUEST TO ADOPT

TECHNICAL SPECIFICATION TASK FORCE TRAVELER-425

By application dated May 12, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15134A232), Exelon Generation Company, LLC (the licensee) submitted a License Amendment Request (LAR) to revise the technical specifications (TS) for Nine Mile Point, Unit 1 (NMP-1). The LAR proposed to adopt the Technical Specification Task Force traveler (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b," dated March 18, 2009 (ADAMS Accession No. ML090850642).

During the application review, the Nuclear Regulatory Commission (NRC) staff identified the following requests for additional information (RAIs):

Technical Specifications Branch (STSB) RAI-1

As part of this LAR submittal, several surveillance requirement (SR) frequency changes were proposed in Table 4.6.2a, "INSTRUMENTATION THAT INITIATES SCRAM," (page 201) of the NMP-1 TS. The proposed SR frequency revisions for parameters two through four have a superscript of (1). The NRC staff was unable to locate this note in the TS.

As discussed during the clarification call held on October 26, 2015, provide the supporting note for the proposed change, and modify the submittal as needed to correct the superscript.

STSB RAI-2

As part of this LAR submittal, SR frequency changes were proposed for two channel calibrations in Item (9)(b)(i) from Table 4.6.2a of the NMP-1 TS. The NRC staff was unable to tell the difference between the two calibrations that are being performed on different intervals (i.e., per week and per month). When the calibration frequencies are moved to the surveillance frequency control program (SFCP), generic wording will replace these two frequencies, which will potentially remove the ability of a reader of the TS to discern that this item contains two discrete calibrations.

Since the SRs are both linked to item (9)(b)(i) from Table 4.6.2a, explain (1) how the SRs are different, (2) how this difference will be tracked in the SFCP, and (3) how it will be clear in the

Enclosure

TS that this item pertains to two discrete calibrations. If necessary, modify the submittal as appropriate to address these concerns.

STSB RAI-3

On TS bases page 98 submitted by the licensee, the following is stated, "Reactor water samples are analyzed daily to ensure that reactor water quality remains within the BWR water chemistry guidelines." The NRC staff could not determine whether these reactor water samples were the same ones referenced in SR 4.2.3, "COOLANT CHEMISTRY." Explain the difference between the SR 4.2.3 frequency and this bases description. If necessary, modify the submittal as appropriate.

STSB RAI-4

In Attachment-3, "Proposed Technical Specification and Bases Page Changes," of the LAR submittal, the licensee requests to incorporate control of the SR 4.2.7.d frequency (page 109) into the SFCP. The current verbiage of this SR indicates that its performance is event driven. Specifically, it is performed "At least once per plant cold shutdown;" therefore, the event driving the SR performance is a cold shutdown. The licensee states that this LAR submission is in accordance with TSTF-425, Revision 3, which explicitly excludes purely event driven SRs from being eligible for incorporation into the SFCP.

Based on the above discussion, provide a justification for deviating from the TSTF-425 requirements or, if necessary, modify the submittal as appropriate.

STSB RAI-5

On TS bases page 158 submitted by the licensee, it is indicated that the frequency for SR 4.3.6.b(4) [i.e., the leak rate test between the drywell and suppression chamber] is being transferred to the control of the SPCP, but, in contrast, TS page 154 of the LAR does not indicate that the frequency for this SR is being revised.

Provide a justification for this difference or if necessary, modify the submittal as appropriate.

STSB RAI-6

For TS tables 4.6.2a through 4.6.2l of the NMP-1 TS, there is a common note associated with this series of tables that appears several times. The note reads, "Only the trip circuit will be calibrated and tested at the frequencies specified in Table 4.6.2[a-l], the primary sensor will be calibrated and tested once per operating cycle." The LAR proposes to delete this note as part of the TSTF-425 adoption. The note provides an SR for the primary sensor along with a frequency, which will potentially not be accounted for if the note is deleted.

Explain how the primary sensor SR will be accounted for in the proposed revision of the TS or if necessary, modify the submittal as appropriate.

STSB RAI-7

In Attachment-3 of the LAR submittal, the licensee proposed to incorporate control of the SR 4.6.5.3 frequency (page 266) into the SFCP. The current verbiage of this SR indicates that its performance is event driven. Specifically, it is performed “within 31 days prior to being subjected to core flux;” therefore, the event driving the SR performance is the start-up sources being subjected to core flux. The licensee states that this LAR submission is in accordance with TSTF-425, Revision 3, which explicitly excludes purely event driven SRs from being eligible for incorporation into the SFCP.

Based on the above discussion, provide a technical justification for deviating from the TSTF-425 requirements or if necessary, modify the submittal as appropriate.

STSB RAI-8

In Attachment-3 of the LAR submittal, the licensee proposed to incorporate control of the following SR frequencies into the SFCP:

- Frequencies associated with individual SRs 4.1.3.e, 4.1.4.a, 4.2.5.b(1), 4.3.2.b, 4.3.6.c(2), 4.6.3.a, 4.6.12.b, 4.6.13.b and
- SR frequencies listed in the following tables: 4.6.2b (parameters: 2, 6, 7, 8), 4.6.2g (parameters: 6, 7), 4.6.2i (parameters: a, b), 4.6.11 (parameters: 3, 4, 5, 7, 8), 4.6.13-1 (parameters: Reactor Water Temperature, Torus Water Temperature, Emergency Condenser Water Level, Drywell Temperature, and “All Rods In” Light).

These SR frequencies contain verbiage (e.g., refueling outage, major refueling outage, refueling cycle), which indicates that SR performance is based on a refueling outage event. In the licensee’s submission it was unclear whether or not all of these SRs were frequency based or, possibly, purely event driven. For example, if performance of an SR is mandated every time the unit is transitioned to a plant shutdown condition during an operating cycle (i.e., not during a major refueling outage), then this SR would be considered purely event driven. The licensee states that this LAR submission is in accordance with TSTF-425, Revision 3, which explicitly excludes purely event driven SRs from being eligible for incorporation into the SFCP.

Based on the above discussion, address each of the aforementioned SR frequencies and indicate whether they are frequency based or purely event driven. If the SRs are purely event driven, justify their inclusion into the SFCP or if necessary, modify the submittal as appropriate.

November 9, 2015

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President and Chief Nuclear Officer
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SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT 1 - REQUEST FOR ADDITIONAL INFORMATION REGARDING ADOPTION OF TECHNICAL SPECIFICATION TASK FORCE TRAVELER 425 (CAC NO. MF6061)

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Sincerely,
/RA/
Alexander N. Chereskin, Project Manager
Plant Licensing Branch I-1
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