

**From:** [Marshall, Michael](#)  
**To:** [\[Licensee\] Ron Reynolds \(Exelon\); "Kristensen, Kenneth J.\(GenCo-Nuc\)"](#)  
**Cc:** [James Danna \(James.Danna@nrc.gov\)](#)  
**Subject:** NINE MILE POINT, Unit 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING EMERGENCY TECH SPEC CHANGE RE HPCS COMPLETION TIME (L-2018-LLA-0491)  
**Date:** Friday, December 07, 2018 11:22:00 AM

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Hello Ron,

By letter dated December 6, 2018 (Agencywide Documents and Access Management System Accession No. ML18340A142), Exelon Generation Company, LLC, (Exelon), submitted a license amendment request (LAR) for Nine Mile Point Nuclear Station, Unit 2 (Nine Mile Point 2), to modify the completion time for an inoperable high pressure core spray (HPCS) system from 14 days to 35 days. Also, the request, if approved, would change dates for surveillance requirements that are due to be performed on protected equipment during the extended period until after the HPCS diesel generator (DG) has been replaced. Exelon has requested that the LAR be processed under emergency circumstances pursuant to Section 91(a)(5) of Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR 50)

The Nuclear Regulatory Commission (NRC) staff has determined that additional information is needed to complete its review of the request. Below is the NRC staff's request for additional information. The request for additional information was discussed with you and other representatives of Exelon on December 7, 2018, and it was agreed that your response would be provided on December 7, 2018.

### **Requests for Additional Information**

1. In accordance with 10 CFR 50.90, licensees must fully describe proposed changes in license amendment request. In the third paragraph of page two of the letter dated December 6, 2018, Exelon indicates that the proposed change to the completion time for an inoperable high pressure core spray system would be a one-time extension. However, neither the amendment request nor the footnote on technical specification (TS) mark-up page 3.5.1-1 explicitly indicate that the revised completion time is a one-time change and could be mistakenly interrupted as a permanent – not a one-time change. Clarify whether the amendment request is for a one-time extension, and describe any necessary changes to the footnote.
2. In accordance with 10 CFR 50.90, licensees must fully describe proposed changes in license amendment request. On pages 11 and 12 of the license amendment request, Exelon list the surveillance requirements (SRs) that may be delayed until January 11 or 18, 2019 to support replacement of the HPCS DG. The frequencies for these SRs are controlled by the Surveillance Frequency Control Program (SFCP) at Nine Mile Point 2. Because the frequencies of these SRs are controlled by the SFCP, the current surveillance interval is not included in Nine Mile Point Technical Specifications, so the magnitude of the proposed delay for each SR is unclear. For each of the SRs listed on page 11 and 12, provide:
  - a. The current surveillance frequency.
  - b. The date that the surveillance is scheduled to be completed during the replacement of the HPCS DG, including the 25 percent grace permitted by Nine

Mile Point 2 TS.

3. The requirements in 10 CFR 50.36(c)(2)(i) "Limiting conditions for operation" states, in part, that limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. Each remedial (or required) action has a completion time associated with it. Exelon is proposing to extend the completion time for an inoperable HPSC DG from 14 days to 35 days, which is a 21 day extension. Additional details concerning the HPSC DG is needed to determine whether the requested extension is appropriate. Provide timeline major activities (e.g., arrival of replacement, installation of replacement, testing or replacement) to be completed as part of the HPSC DG replacement and justify that the additional time is appropriate.
4. The requirements in 10 CFR 50.36(c)(3), "Surveillance requirements," state in part that calibration are necessary to ensure quality of components and that facility operation will be within safety limits and limiting conditions of operation met. It is unclear if Functions 2.e, 2.f, 2.g, and 2.h, which are part of SR 3.3.5.1.5 - Channel Calibration, will drift out of calibration during the proposed extension.
  - a. Please provide the time period used for determining total drift in the uncertainty calculation associated with the allowable value for each function.
  - b. Please provide the total accumulated time from the last calibration until the end of the proposed calibration interval for each function.
  - c. Please provide a brief description of the available margin in the uncertainty calculation, and the amount used to address the additional time in the proposed surveillance interval extension.

Best Regards,  
Michael L. Marshall, Jr.  
Senior Project Manager

Plant Licensing Branch I  
Division of Operating Reactor Licensing  
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301-415-2871

Docket No. 50-410