

From: [Marshall, Michael](#)
To: [\[Licensee\] Ron Reynolds \(Exelon\)](#)
Cc: [Wolniak, Denise J:\(Exelon Nuclear\)](#); [Danna, James](#)
Subject: NINE MILE POINT NUCLEAR STATION, UNIT 1 – REQUEST FOR ADDITIONAL INFORMATION RE: REVIEW OF LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-582 (EPID L-2020-LLA-0276)
Date: Tuesday, April 20, 2021 1:27:00 PM

Hello Ron:

By letter dated December 18, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20353A401), Exelon Generation Company, LLC (the licensee) requested changes to the technical specifications (TS) for Nine Mile Point Nuclear Station, Unit 1 (Nine Mile Point 1) by license amendment request (LAR). The proposed changes would revise the TSs related to reactor pressure vessel (RPV) water inventory control (WIC) based on Technical Specifications Task Force (TSTF) Traveler TSTF-582, Revision 0, "RPV WIC Enhancements" (TSTF-582) (ADAMS Accession No. ML19240A260), and the associated NRC staff safety evaluation of TSTF-582 (ADAMS Accession No. ML20219A333).

The U.S. Nuclear Regulatory Commission staff has reviewed the information provided in the LAR and has determined that additional information is needed to complete its review. The request for additional information was discussed with you on April 16, 2021, and it was agreed that your response would be provided within 45 days of the date of this email.

RAIs

The regulation Section 50.36(c)(2) of Title 10 of the *Code of Federal regulations* (10 CFR) requires that TS include limiting conditions for operation (LCOs). Per 10 CFR 50.36(c)(2) (i), LCOs "are the lowest functional capability or performance levels of equipment required for safe operation of the facility." The regulation also requires that when an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TS until the condition can be met.

The regulation at 10 CFR 50.36(c)(3) requires that TS include items in the category of surveillance requirements, which are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

1. The adaptation of the TSTF-582, which is based on the standard TS (STS), to the custom TSs used at Nine Mile Point 1 is unclear in the LAR. Please provide a comparison (e.g., crosswalk) of the changes in the STS found in TSTF-582 versus the proposed changes to Nine Mile Point 1 custom TS. This should include discussion of items that are in TSTF-582 but are not proposed in this LAR, as well as items that are specific to Nine Mile Point 1 TS but not in TSTF-582. Clearly identify the location of the changes in each document (e.g., LCO number and items changed.)
2. Section 2.2 of Attachment 1 to the LAR describes optional changes and variations. However, there are other variations in the TS markup pages that are not listed. For those items not included in Section 2.2 of the LAR, please identify and explain all variations from TSTF-582, including:
 - a. Editorial or administrative variations (all numbering/ wording that differs from

TSTF-582 but does not change requirements)

- b. Design variations (explain where Nine Mile Point 1's design does not match the design assumed in TSTF-582 and why it is applicable)
 - c. Technical variations (a requirement that differs from that in TSTF-582 or in the current Nine Mile Point 1 TS.)
3. In the LAR, a list of improvements from TSTF-582 was discussed on pages 2 and 3 of Attachment 1. For numbers 5 and 6, please provide more detail of the proposed changes to Nine Mile Point 1 TS and how they compare to what is stated in TSTF-582.
 4. On Nine Mile Point 1 TS markup page 247c, please explain why "Manual" is a separate parameter from primary coolant isolation. Also, there are no annotations next to it like the other parameters. Which Table 3.6.2m notes apply to "Manual" when it is inoperable?
 5. LAR appears to be missing information identified in TSTF-582. In the LAR, it appears that the equivalent for TSTF-582 STS 3.3.5.2 Action A is proposed TS 3.6.2m Table Note (c) which states:

With the number of Operable channels less than required by the Minimum Number of Operable Instrument Channels per Operable Trip System requirement, either

1. Place the inoperable channel(s) in the trip condition,
- or
2. Take the Action required by Specification 3.6.2 a for that parameter.

Please explain the apparent discrepancy between TSTF-582 STS 3.3.5.2 and proposed TS 3.6.2m Table Note (c). Additionally, correct or provide technical justification for this variation from TSTF-582.

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

Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

301-415-2871

Docket No. 50-220