

From: [Guzman, Richard](#)
To: thomas.loomis@exeloncorp.com
Cc: [Reynolds, Ronnie J.:\(Exelon Nuclear\)](#); [Danna, James](#)
Subject: Nine Mile Point Nuclear Station, Unit 2 - REQUEST FOR ADDITIONAL INFORMATION, Alternative Request GV-RR-10 (EPID L-2021-LLR-0066)
Date: Tuesday, November 02, 2021 4:01:54 PM
Attachments: [image001.png](#)

Tom,

On October 25, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff sent Exelon Generation Company, LLC (Exelon, the licensee) the subject Request for Additional Information (RAI) as a draft e-mail. The RAI relates to the licensee's Alternative Request GV-RR-10 dated September 8, 2021 (ADAMS Accession No. ML21251A491), proposing to revise the testing frequency of excess flow check valves for Nine Mile Point Nuclear Station, Unit 2.

On October 26, 2021, you indicated that a clarification call was not necessary to respond to the information request. Updated below is the official RAI. As we discussed, please respond to this RAI no later than December 7, 2021. A publicly available version of this message will be placed in the NRC's official recordkeeping system (ADAMS). Please contact me if you have any questions in regard to this request.



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From: Guzman, Richard
Sent: Monday, October 25, 2021 10:01 AM
To: thomas.loomis@exeloncorp.com
Cc: Reynolds, Ronnie J.:(Exelon Nuclear) <Ronnie.Reynolds@exeloncorp.com>
Subject: Nine Mile Point Unit 2 - DRAFT Request for Additional Information, Alternative Request GV-RR-10 (EPID L-2021-LLR-0066)

Hi Tom,

By letter dated September 8, 2021 (ADAMS Accession No. ML21251A491), Exelon Generation Company, LLC submitted Alternative Request GV-RR-10, associated with the Inservice Testing Program for Nine Mile Point Nuclear Station, Unit 2, proposing to revise the testing frequency of excess flow check valves. The NRC staff has determined that additional information is needed to complete its review, as described in the request for additional information (RAI) shown below. This RAI is identified as DRAFT at this time to confirm your understanding of the information needed by the NRC staff to complete its

evaluation. If you'd like to have a clarification call, please let me know and I will coordinate availabilities w/the NRC technical staff. I would like to hold the call within the next two weeks, if needed, as I plan to issue the questions as official no later than November 8th.

=====FINAL=====

REQUEST FOR ADDITIONAL INFORMATION

ALTERNATIVE REQUEST GV-RR-10

FOURTH 10-YEAR INTERVAL INSERVICE TESTING INTERVAL

EXELON GENERATION COMPANY, LLC

NINE MILE POINT NUCLEAR STATION, UNIT NO. 2

DOCKET NO. 50-410

EPID L-2021-LLR-0066

On September 8, 2021, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21251A491), Exelon Generation Company, LLC (Exelon, the licensee), submitted Alternative Request GV-RR-10, Excess Flow Check Valves (EFCVs), for Nine Mile Point Nuclear Station, Unit 2 (NMP2) (Reference 1). In Alternative Request GV-RR-10, Exelon proposed that specific NMP2 EFCVs be tested on a representative sampling basis (i.e., approximately 20 percent every refueling outage), with all EFCVs tested at least once within a 10-year interval, rather than the current interval of 24 months.

The NRC staff has determined that additional information is needed to complete its review, as described in the request for additional information (RAI) shown below.

1. In Alternative Request GV-RR-10, Exelon references BWROG Topical Report NEDO-32977-A (Reference 2) in support of the proposed testing frequency for specific EFCVs. Exelon states that the NMP2 test experience is consistent with the findings in the BWROG NEDO-32977-A. However, Alternative Request GV-RR-10 does not discuss the safety evaluation (SE) dated March 14, 2000 (Reference 3), describing the NRC staff review of BWROG NEDO-32977-A. In the SE, the NRC staff concluded that the topical report was acceptable for reference in support of the relaxation of EFCV surveillance testing, subject to specific conditions stated in the SE. In Alternative Request GV-RR-10, Exelon does not discuss the conditions specified by the NRC staff in Section 4.0, "Conclusion," of the SE for the acceptability of BWROG NEDO-32977-A. The NRC staff requests that Exelon describe its actions to address the conditions specified in the SE for the acceptability of BWROG NEDO-32977-A to support Alternative Request GV-RR-10 for NMP2.
2. Alternative Request GV-RR-10, Section 5, "Proposed Alternative and Basis for Use," states in part that industry experience, as documented in BWROG Topical Report

NEDO-32977-A, indicates the ECFVs have a very low failure rate, and that NMP2 test experience is consistent with the findings in the BWROG NEDO-32977-A. The BWROG topical report specifies that corrective action programs must evaluate equipment failures and establish appropriate corrective actions. Alternative Request GV-RR-10 does not discuss the NMP2 corrective action program with respect to EFCV performance. Exelon is requested to describe the NMP2 corrective action program related to EFCV performance, and to specify the corrective actions that will be taken if a test or operating failure occurs with an EFCV within the scope of Alternative Request GV-RR-10. For example, see the SE dated March 10, 2005 (ADAMS Accession No. ML050690239), describing the NRC staff review of Alternative Request RR-03 for a similar proposal for EFCV surveillance testing applicable to Susquehanna Steam Electric Station, Units 1 and 2.

References:

1. Letter from Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission (NRC), 10 CFR 50.55a Alternative Request No. GV-RR-10, at Nine Mile Nuclear Station, Unit 2 (NMP2), dated September 8, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21251A491).
2. General Electric (GE) Boiler Water Reactor Owners Group (BWROG) Topical Report NEDO-32977-A/821-00658-01, "Excess Flow Check Valve Testing Relaxation," June 2000 (ADAMS Accession No. ML003729011).
3. NRC reviewed BWROG Topical Report NEDO-32977-A and issued a safety evaluation (SE) on March 14, 2000 (ADAMS Accession No. ML003691722).

=====FINAL=====