

10 CFR 50.90

NMP2L2794

January 11, 2022

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: Supplemental Information to Support Review of Nine Mile Point Nuclear Station, Unit 2, License Amendment Request to Adopt TSTF-582, Revision 0

- References:
1. Letter from D. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Application to Revise Technical Specifications to Adopt TSTF-582, Revision 0 'Reactor Pressure Vessel Water Inventory Control (RPV WIC) Enhancements," dated September 30, 2021
 2. Letter from R. Guzman (Senior Project Manager, U.S Nuclear Regulatory Commission) to R. Reynolds (Exelon),"Request for Additional Information RE: LAR to Revise TSs to Adopt TSTF-582, Revision 0 (EPID L-2021-LLA-0176," dated November 16, 2021
 3. Letter from D. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, " Response to Request for Additional Information by the Office of Nuclear Reactor Regulation to Support Review of Nine Mile Point Nuclear Station, Unit 2, License Amendment Request to Adopt TSTF-582, Revision 0," dated December 16, 2021

By letter dated September 30, 2021 (Reference 1), Exelon Generation Company, LLC (Exelon) requested to change The Nine Mile Point Unit 2 (NMP2) Technical Specifications (TS). The proposed amendment request would modify NMP2 TS to adopt the changes described in Technical Specification Task Force (TSTF) Traveler TSTF-582, Revision 0, "Reactor Pressure Vessel Water Inventory Control (RPV WIC) Enhancements."

On November 8, 2021, the U.S. Nuclear Regulatory Commission (NRC) identified a draft request for additional information (RAI) necessary to complete the review. On November 15, 2021, a clarification teleconference was held between NRC and Exelon personnel. On

November 16, 2021 (Reference 2), the NRC issued to Exelon a formal RAIs. Exelon responses to the RAIs were submitted on December 16, 2021 (Reference 3). Per discussion with the NRC Senior Project Manager on 1/6/22, it was determined that additional clarification to the RAI responses was needed. This additional clarification provides the previously submitted TS markups for TS 3.6.1.3 (submitted in Reference 1) that were omitted from the RAI responses (Reference 3) and further clarification to the TS markup for TS 3.8.2.1.

Attachment 1 to this letter describes the supplemental information changes. Attachment 2 contains the TS markups for TS 3.6.1.3 following the guidance in TSTF-582, Revision 0, and the TS markup for SR 3.8.2.1 to clarify the Note following the guidance in TSTF-583-T. Attachment 3 contains the TS Bases markups for TS 3.6.1.3 (for information only).

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 Ron Reynolds at 610-765-5247.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11th day of January 2022.

Respectfully,



David T. Gudger
Senior Manager - Licensing
Exelon Generation Company, LLC

Attachment 1: Supplemental Information - Change Description
Attachment 2: Supplemental Information - Technical Specification Marked Up Pages
Attachment 3: Supplemental Information - Technical Specification Bases Marked Up Pages

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

ATTACHMENT 1

Supplemental Information –
Change Description

CHANGE DESCRIPTION

The following two changes are described below and are supported by the supplemental information in Attachments 2 and 3.

1. As stated in TSTF-582 for the correction of TS 3.6.1.3, the Modes of Applicability for TS 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," are Modes 1, 2, and 3, and when the associated instrumentation is required to be operable per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation." During the implementation of TSTF-542 (Amendment 168), NMP2 TS 3.3.6.1 were revised to relocate applicability Modes 4 and 5 from Table 3.3.6.1-1 to TS 3.3.5.2. As a result of the TSTF-542 change, all instruments required by LCO 3.3.6.1 are applicable in Modes 1, 2, or 3. Therefore, the changes to TS 3.6.1.3, as described in TSTF-582, as optional for a BWR/6, are applicable to NMP2 and are included in Attachment 2. Attachment 3 provides the Bases changes for TS 3.6.1.3 (for information only).
2. The Note for NMP2 TS SR 3.8.2.1 listing the SRs not required to be performed is a subset of the SRs listed in SR 3.8.2.1. The Note is revised to remove SRs 3.8.1.13 and 3.8.1.16 as these SRs are not required to be met. This revision is provided in the TS markups in Attachment 2.

ATTACHMENT 2

Supplemental Information –
Technical Specification Marked Up Pages

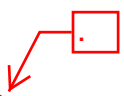
TS Marked Up Pages

3.6.1.3-1
3.6.1.3-9
3.8.2-4

3.6 CONTAINMENT SYSTEMS

3.6.1.3 Primary Containment Isolation Valves (PCIVs)

LCO 3.6.1.3 Each PCIV and each Secondary Containment Bypass Leakage Valve shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3, 
~~When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation."~~

ACTIONS

-----NOTES-----

1. Penetration flow paths may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by PCIVs.
4. Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding overall containment leakage rate acceptance criteria.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. -----NOTE----- Only applicable to penetration flow paths with two or more PCIVs. ----- One or more penetration flow paths with one PCIV inoperable except due to leakage not within limit.</p>	<p>A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p> <p><u>AND</u></p>	<p>4 hours except for main steam line</p> <p><u>AND</u></p> <p>8 hours for main steam line</p>

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. (continued)	E.3 Perform SR 3.6.1.3.6 for the resilient seal purge exhaust valves closed to comply with Required Action E.1.	Once per 92 days
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met in MODE 1, 2, or 3.	F.1 Be in MODE 3. <u>AND</u> F.2 Be in MODE 4.	12 hours 36 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, or E not met for PCIV(s) required to be OPERABLE during MODE 4 or 5.	G.1 Initiate action to restore valve(s) to OPERABLE status.	Immediately

The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.7, SR 3.8.1.8, SR 3.8.1.12 and SR 3.8.1.14.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.2.1</p> <p>----- NOTES -----</p> <p>1. The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.7 through SR 3.8.1.9, SR 3.8.1.11 through SR 3.8.1.14, SR 3.8.1.16, and SR 3.8.1.17.</p> <p>2. SR 3.8.1.10 and SR 3.8.1.17 are not required to be met when associated ECCS subsystem(s) are not required to be OPERABLE per LCO 3.5.2, "RPV Water Inventory Control."</p> <p>-----</p> <p>For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, except SR 3.8.1.15 and SR 3.8.1.18, are applicable.</p>	<p>In accordance with applicable SRs</p>

The following SRs are applicable for AC sources required to be OPERABLE:

- SR 3.8.1.1
- SR 3.8.1.2
- SR 3.8.1.3
- SR 3.8.1.4
- SR 3.8.1.5
- SR 3.8.1.6
- SR 3.8.1.7
- SR 3.8.1.8
- SR 3.8.1.12
- SR 3.8.1.14

ATTACHMENT 3

Supplemental Information –
Technical Specification Bases Marked Up Pages

TS Bases Marked Up Pages

B 3.6.1.3-3
B 3.6.1.3-4
B 3.6.1.3-12

BASES

APPLICABLE
SAFETY ANALYSES
(continued)

PCIVs satisfy Criterion 3 of Reference 5.

LCO

PCIVs form a part of the primary containment boundary. The PCIV safety function is related to minimizing the loss of reactor coolant inventory and establishing the primary containment boundary during a DBA.

The power operated, automatic isolation valves are required to have isolation times within limits and actuate on an automatic isolation signal. The valves covered by this LCO are listed with their associated stroke times in Ref. 1.

The normally closed manual PCIVs are considered OPERABLE when the valves are closed and blind flanges in place, or open under administrative controls. Normally closed automatic PCIVs, which are required by design (e.g., to meet 10 CFR 50 Appendix R requirements) to be de-activated and closed, are considered OPERABLE when the valve is closed and de-activated. These passive isolation valves and devices are those listed in Reference 1. Purge valves with resilient seals, secondary containment bypass valves, MSIVs, and hydrostatically tested valves must meet additional leakage rate requirements. Other PCIV leakage rates are addressed by LCO 3.6.1.1, "Primary Containment," as Type B or C testing.

This LCO provides assurance that the PCIVs will perform their designed safety functions to minimize the loss of reactor coolant inventory and establish the primary containment boundary during accidents. In addition, the LCO ensures leakage through the secondary containment bypass leakage valves is within the limits assumed in the accident analysis. The secondary containment bypass leakage paths leakage rate limits are relocated to the TRM Table 3.6.1.3-1 and are maintained in accordance with the 10 CFR 50 Appendix J Testing Program Plan.

APPLICABILITY

In MODES 1, 2, and 3, a DBA could cause a release of radioactive material to primary containment. In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, PCIVs are not required to be OPERABLE and the primary containment purge valves are not required to be normally closed in MODES 4 and 5. ~~Certain valves are required to be OPERABLE when the associated~~

(continued)

BASES

APPLICABILITY
(continued)

~~instrumentation is required to be OPERABLE according to LCO 3.3.6.1, "Primary Containment Isolation Instrumentation." (This does not include the valves that isolate the associated instrumentation.)~~

ACTIONS

The ACTIONS are modified by a Note allowing penetration flow path(s) to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated operator at the controls of the valve, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for primary containment isolation is indicated.

A second Note has been added to provide clarification that, for the purpose of this LCO, separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable PCIV. Complying with the Required Actions may allow for continued operation, and subsequent inoperable PCIVs are governed by subsequent Condition entry and application of associated Required Actions.

The ACTIONS are modified by Notes 3 and 4. Note 3 ensures appropriate remedial actions are taken, if necessary, if the affected system(s) are rendered inoperable by an inoperable PCIV (e.g., an Emergency Core Cooling System subsystem is inoperable due to a failed open test return valve). Note 4 ensures appropriate remedial actions are taken when the primary containment leakage limits are exceeded. Pursuant to LCO 3.0.6, these ACTIONS are not required even when the associated LCO is not met. Therefore, Notes 3 and 4 are added to require the proper actions be taken.

A.1 and A.2

With one or more penetration flow paths with one PCIV inoperable, except for secondary containment bypass leakage rate, MSIV leakage rate, purge exhaust valve leakage rate, or hydrostatically tested line leakage rate not within limit, the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a

(continued)

BASES

ACTIONS

E.1, E.2, and E.3 (continued)

containment purge exhaust valve does not increase during the time the penetration is isolated. The normal Frequency for SR 3.6.1.3.6 is 184 days. Since more reliance is placed on a single valve while in this Condition, it is prudent to perform the SR more often. Therefore, a Frequency of once per 92 days was chosen and has been shown acceptable based on operating experience.

F.1 and F.2

If any Required Action and associated Completion Time cannot be met ~~in MODE 1, 2, or 3~~, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

~~G.1 and H.1~~

~~If any Required Action and associated Completion Time cannot be met for PCIV(s) required OPERABLE in MODE 4 or 5, the plant must be placed in a condition in which the LCO does not apply. Action must be immediately initiated to restore the valves to OPERABLE status. This allows RHR shutdown cooling to remain in service while actions are being taken to restore the valve.~~

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.3.1

This SR verifies that the 12 inch and 14 inch primary containment purge valves are closed as required or, if open, opened for an allowable reason.

(continued)
