



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

December 14, 2022

LICENSEE: Constellation Energy Generation, LLC

FACILITY: Nine Mile Point Nuclear Station, Unit 1

SUBJECT: SUMMARY OF NOVEMBER 3, 2022, MEETING WITH CONSTELLATION ENERGY GENERATION, LLC TO DISCUSS PLANNED LICENSE AMENDMENT REQUESTS TO ADOPT TSTF-505, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES – RITSTF INITIATIVE 4B," AND 10 CFR 50.69, "RISK-INFORMED CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS AND COMPONENTS FOR NUCLEAR POWER REACTORS," AT NINE MILE POINT NUCLEAR STATION, UNIT 1 (EPID L-2022-LRM-0087)

On November 3, 2022, an observation meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Constellation Energy Generation, LLC (CEG, the licensee) via Microsoft TEAMS meeting application. The purpose of the meeting was to discuss the licensee's planned license amendment requests (LARs) to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-505, "Provide Risk-Informed Extended Completion Times – RITSTF [Risk-Informed TSTF] Initiative 4b," and Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.69, "Risk-informed categorization and treatment of structures, systems and components (SCC) for nuclear power reactors," at Nine Mile Point Nuclear Station, Unit 1 (NMP1).

The meeting notice and agenda, dated October 20, 2022, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML22305A595. A list of attendees is provided as an enclosure to this meeting summary.

The licensee presented information (ML22301A013) regarding its planned license amendment requests (LARs). The licensee's presentation included an overview of its planned LARs to adopt risk-informed completion times based on TSTF-505-A, Revision 2, and 10 CFR 50.69 risk-informed categorization of SSCs based on Nuclear Energy Institute 00-04.

The NRC staff queried the licensee throughout the presentation and discussed the following:

- The NRC staff noted that one of the licensee's listed plant-specific variances from TSTF-505 (on slide 4 of the licensee's presentation) was not applicable to the model required actions in NUREG-1433 and to confirm that all proposed variances in the LAR are appropriately applied to the correct NUREG. The licensee indicated that all proposed variations specific to NMP1 are still in final technical review and will be verified prior to submission of the application. The licensee also acknowledged that the high-pressure core spray system is applicable to NUREG-1434 and that the stated variation was in error (i.e., the high-pressure injection system is applicable to NMP1).

- In reference to the licensee's discussion on fire probabilistic risk assessment (PRA) model technical adequacy, the NRC staff suggested that the application include changes NMP1 made since completing its transition to the National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants." The licensee stated that the model has been peer reviewed to Regulatory Guide 1.200, Revision 2 and the facts and observation (F&O) closure review has been performed. The licensee intends to discuss four open finding F&Os in their submittal.
- The NRC staff inquired about the overall steps involved in the licensee's proposed seismic penalty method and emphasized the use of plant-specific information in supporting the licensee's method. The staff asked whether the penalty factor is a configuration-specific penalty or a general seismic penalty. The licensee explained that the penalty is the same penalty factor applied for other applicable CEG plant applications. Regarding external hazards, extreme wind or tornado/missiles, the licensee explained that they intend to submit a high winds safe shutdown equipment list for the 10 CFR 50.69 application. The licensee also noted that while its screening review for this hazard is still being finalized, the preliminary approach is to apply the progressive screening (PS3) criterion (design basis event mean frequency of less than 1E-5/year and the mean conditional core damage probability is less than 0.1).
- The NRC staff inquired about the licensee's external hazards screening process for seismic risk and requested that the licensee confirm in their application that while NMP1 may satisfy the EPRI Tier 1 plant criteria, the licensee should confirm in their application that seismic risk is low relative to total risk. The licensee explained that they have looked at relative risk for seismic for NMP1 (similar to the approach they took for Nine Mile Point Nuclear Station, Unit 2) and confirmed that core damage frequency is very low. The licensee indicated that large early release frequency is also low and similar to the results of Clinton Power Station. Specifically, the licensee explained that the seismic relative risk contribution was comparable to that used for the 10 CFR 50.69 LAR for Clinton, which was recently reviewed and approved by the NRC staff (ML21090A193).
- The NRC staff inquired about the licensee's FLEX (diverse and flexible mitigation strategies) equipment whether it was credited and requested if credited, to provide description in the LAR. The licensee explained that they do have modeled FLEX components (e.g., portable pumps, portable diesel generators and battery chargers) and intend to provide a detailed explanation of its impacts and of how each is credited in their application.
- The staff also asked if the licensee credits other fire PRA methods that may have not been fully updated over the years. The licensee explained that they have included the latest heat release rates and ignition frequencies from the applicable NUREG in their latest fire PRA update.

The licensee stated that it will submit separate applications for TSTF-505 and 10 CFR 50.69. The licensee expects to submit both LARs by the end of December 2022 and will request approval within 1 year.

Members of the public were not in attendance. No regulatory decisions or commitments were made at the meeting. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-1030, or by email at Richard.Guzman@nrc.gov.

/RA/

Richard V. Guzman, Senior Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

NOVEMBER 3, 2022, MEETING BETWEEN THE

NUCLEAR REGULATORY COMMISSION

AND CONSTELLATION ENERGY GENERATION, LLC

REGARDING PLANNED LICENSE AMENDMENT REQUEST TO ADOPT TSTF-505,

“RISK-INFORMED EXTENDED COMPLETION TIMES – RITSTF INITIATIVE 4b”

AND 10 CFR 50.69, “RISK-INFORMED

CATEGORIZATION AND TREATMENT

OF STRUCTURES, SYSTEMS AND COMPONENTS

FOR NUCLEAR POWER REACTORS,” FOR

FOR NINE MILE POINT NUCLEAR ONE, UNIT 1

<u>ATTENDEES</u>	<u>AFFILIATION/ORGANIZATION</u>
Brian Wittick	U.S. Nuclear Regulatory Commission (NRC)
Rich Guzman	NRC
Mihaela Biro	NRC
Jonathan Evans	NRC
Alexander Schwab	NRC
Jeff Circle	NRC
Jigar Patel	NRC
Jay Robinson	NRC
Wesley Wu	NRC
Henry Wagage	NRC
Andrea Russell	NRC
Khadijah West	NRC
Chris Jackson	NRC
Fred Forsaty	NRC
Gurjendra Bedi	NRC
Robert Hsu	NRC
Steve Wyman	NRC
Adakou Foli	NRC
Vijay Goel	NRC
Hang Vu	NRC
Ming Li	NRC
Bob Davis	NRC
Karen Sida	NRC

Enclosure

<u>ATTENDEES</u>	<u>AFFILIATION/ORGANIZATION</u>
Bart Fu	NRC
John Tsao	NRC
Dan Widrevitz	NRC
Carol Moyer	NRC
Kamishan Martin	NRC
Jeff Stone	Constellation Energy Generation, LLC (Constellation)
Suzanne Loyd	Constellation
Ron Reynolds	Constellation
Jeremy Aiello	Constellation
Brandon Schultz	Constellation
Denise Wolniak	Constellation
Dan Morley	Constellation
Don Vanover	Jensen Hughes (Contractor to Constellation)
Jeff Schappaugh	Jensen Hughes
Bob Kirchner	Jensen Hughes
Arfa Butt	Jensen Hughes
Rob Michel	Jensen Hughes
Chris Pupek	Jensen Hughes
Chris Seip	Jensen Hughes
Leo Shanley	Jensen Hughes
Ed Parsley	Jensen Hughes
David Passehl	Jensen Hughes
Kevin Huynh	Jensen Hughes

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	GBedi, NRR	

ADAMS Accession Nos.:

Meeting Summary: ML22346A000

Meeting Notice: ML22305A595

Meeting Presentation: ML22301A013

***by email**

OFFICE	NRR/DORL/LPL1/PM*	NRR/DORL/LPL1/LA*	NRR/DRA/APLA/BC*
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OFFICE	NRR/DORL/LPL1/BC*	NRR/DORL/LPL1/PM*	
NAME	HGonzalez	RGuzman	
DATE	12/14/2022	12/14/2022	

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