



200 Energy Way
Kennett Square, PA 19348
www.constellation.com

RS-26-125
NMP2L2960

10 CFR 50.90

August 18, 2026

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: License Amendment Request - Change to Nine Mile Point Unit 2 Surveillance Requirement 3.6.1.3.12

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Constellation Energy Generation, LLC (CEG), requests Nuclear Regulatory Commission (NRC) approval of proposed change to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License (RFOL) No. NPF-69 for Nine Mile Point Nuclear Station, Unit 2 (NMP2). The proposed change updates the TS Surveillance Requirement (SR) 3.6.1.3.12 for Main Steam Isolation Valve (MSIV) leakage testing to align the allowed maximum Main Steam Line (MSL) leakage to the assumptions in the Analysis of Record (AOR) for evaluation of Loss of Coolant Accident (LOCA) radiological dose using Alternative Source Term (AST) methodology.

The proposed change has been approved by the NMP2 Plant Operations Review Committee in accordance with the requirements of the CEG Quality Assurance Program.

Once approved, the amendment shall be implemented within 60 days.

There are no regulatory commitments contained in this submittal.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), CEG is notifying the State of New York of this application for license amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions concerning this submittal, please contact Jesse Brown at (267) 533-6355.

License Amendment Request
Change to Nine Mile Point Unit 2 Surveillance Requirement 3.6.1.3.12
Docket No. 50-410
August 18, 2026
Page 2

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 18th day of August 2026.

Respectfully,
**Knowles,
Justin W**

Digitally signed by
Knowles, Justin W
Date: 2026.08.18
09:06:11 -04'00'

Justin W. Knowles
Sr. Manager – Licensing
Constellation Energy Generation, LLC

Attachments:

1. Evaluation of Proposed Change
2. Proposed Technical Specifications Change (Markup)
3. Proposed Technical Specifications Bases Change (Markup) (For Information Only)

cc: USNRC Region I, Regional Administrator
USNRC Senior Resident Inspector – NMP
USNRC Project Manager, NRR – NMP
A. L. Peterson, NYSERDA
A. Kincaid, NYSPSC

ATTACHMENT 1

License Amendment Request

Nine Mile Point Nuclear Station, Unit 2 Renewed Facility Operating License No. NPF-69 NRC Docket No. 50-410

EVALUATION OF PROPOSED CHANGE

Subject: License Amendment Request - Change to Nine Mile Point Unit 2 Surveillance Requirement 3.6.1.3.12

1.0 SUMMARY DESCRIPTION

2.0 DETAILED DESCRIPTION

2.1 System Design and Operation

2.2 Current Facility Operating License and Technical Specification Requirements

2.3 Proposed Change

3.0 TECHNICAL EVALUATION

3.1 Local Leak Rate Testing (LLRT)

3.2 Alternative Source Term (AST) Loss of Coolant Accident (LOCA) Dose

3.3 Environmental Qualification (EQ)

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

4.2 Precedent

4.3 No Significant Hazards Consideration

4.4 Conclusions

5.0 ENVIRONMENTAL CONSIDERATION

6.0 REFERENCES

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Constellation Energy Generation, LLC (CEG), requests Nuclear Regulatory Commission (NRC) approval of proposed change to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License (RFOL) No. NPF-69 for Nine Mile Point Nuclear Station, Unit 2 (NMP2). The proposed change updates the TS Surveillance Requirement (SR) 3.6.1.3.12 for Main Steam Isolation Valve (MSIV) leakage testing to align the allowed maximum Main Steam Line (MSL) leakage to the assumptions in the Analysis of Record (AOR) for evaluation of Loss of Coolant Accident (LOCA) radiological dose using Alternative Source Term (AST) methodology.

2.0 DETAILED DESCRIPTION

2.1 System Design and Operation

The four main steam lines (MSLs), which penetrate the drywell, are automatically isolated by the Main Steam Isolation Valves (MSIVs). There are two MSIVs on each MSL, one inside containment (i.e., inboard) and one outside containment (i.e., outboard). The MSIVs are functionally part of the primary containment boundary and leakage through these valves provides a potential leakage path for fission products to bypass secondary containment and enter the environment as a ground level release. Maintaining the combined leakage below the approved Alternative Source Term (AST) Loss of Coolant Accident (LOCA) design basis radiological dose calculation assumptions maintains the dose consequences below the 10 CFR 50.67, Accident source term, limits.

The Primary Containment Leak Rate Test Program (PCL RTP) governs the testing requirements of all MSIVs. Local Leak Rate Tests (LLRT) are performed every refueling outage. MSIV tests are performed by local pressurization. MSIVs are designed to close in ≥ 3 seconds to prevent pressure transients and ≤ 5 seconds to contain fission products and ensure the core is not uncovered following a MSL break.

2.2 Current Facility Operating License and Technical Specification Requirements

The NMP2 TS 3.6.1.3, Primary Containment Isolation Valves (PCIVs), Surveillance Requirement (SR) 3.6.1.3.12 currently states:

Verify leakage rate through each MSIV is ≤ 39 scfh [standard cubic feet per hour] when tested at ≥ 25 psig [pounds per square inch gauge].*

* During Cycle 21, leakage rate through one MSIV may exceed 39 scfh provided the leakage rate is ≤ 83 scfh and the leakage rate through all four main steam lines is ≤ 155 scfh.

TS specify this SR is to be performed at a frequency in accordance with the 10 CFR 50 Appendix J, Primary Reactor Containment Leakage Testing for Water-Cooled Reactors, Testing Program Plan.

2.3 Proposed Change

The proposed change updates TS SR 3.6.1.3.12 for MSIV leakage testing to align the allowed maximum MSL leakage to the assumptions in the Analysis of Record (AOR) for evaluation of LOCA radiological dose using AST methodology. This will allow NMP2 determination of TS 3.6.1.3, Primary Containment Isolation Valves (PCIVs), operability in accordance with AOR assumptions.

Because the AOR performs computations based on MSL leakage, not individual MSIV leakage, the proposed SR changes the requirement for maximum leakage to be based on MSL leakage. Because the AOR assumes both a maximum single MSL and maximum total MSL leakage, SR limits are placed on each of those values. The limits specified in the updated proposed SR 3.6.1.3.12, 79 standard cubic feet per hour (scfh) for a single MSL and 158 scfh for the combined MSIV leakage rate for all four MSLs, are equivalent to the assumed MSL leakage in the AOR, adjusted for the lower test pressure described in References 6.1 and 6.2 and approved in Reference 6.3. When a single MSIV in a line exceeds the 79 scfh requirement, a condition report is generated, and remediation is controlled by the corrective action program to restore compliance.

A similar license amendment request (LAR) was previously proposed as part of an emergent one-time cycle-specific amendment by application dated March 16, 2026 (Reference 6.8). The permanent change portion of the submittal was removed from the request in supplement letter dated March 18, 2026 (Reference 6.9) to only include the emergent one-time change required to support plant startup.

The proposed change includes a revision to the Cycle 21 specific allowable leakage "" note to align with the change from MSIV leakage to MSL leakage.

The proposed change is shown in the TS markup in Attachment 2. The TS Bases markup is provided for information only in Attachment 3.

3.0 TECHNICAL EVALUATION

The proposed change in MSIV/MSL leak rate limits were evaluated for impacts associated with 10 CFR 50.67 and 10 CFR 50.49, Environmental qualification of electric equipment important to safety for nuclear power plants, compliance. The conclusion of the evaluation is that the current design bases remain bounding for the proposed change. The following discussion provides a summary of the evaluation.

3.1 Local Leak Rate Testing (LLRT)

MSIV LLRT currently uses a single acceptance criterion for operability of each single MSIV that ensures the individual and total leakage for all MSLs remains below the values assumed in the current AST LOCA radiological dose AOR. The guidance in NEI 94-01, Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J (Reference 6.6), calculates the minimum pathway at all times when containment operability is required. This request is to align with the requirements of 10 CFR Part 50, Appendix J, to record the leakage through the pathway and not each specific valve in the pathway. To assess the leak rate of the

containment the actual leakage is measured through both the inboard and outboard MSIV. Therefore, the leakage requirement through the MSIVs should follow the same rationale.

NEI 94-01 also requires the maximum pathway leakage to be less than the limit prior to entering a mode where containment integrity is required following a refueling outage or a shutdown that included leak rate testing of the MSIVs. This will ensure margin is maintained to the total allowable leak rate for the MSIVs in the AOR.

The current licensing basis for MSIV LLRT is documented in NMP2 Updated Safety Analysis Report (USAR) Section 6.2, "CONTAINMENT SYSTEMS." This section states that the MSIVs shall be Type C tested in accordance with 10 CFR Appendix J. If this proposed amendment is approved, the USAR will be updated to reflect the change to the TS limits for MSIV/MSL leakage. An emergent one-time cycle-specific change to the allowable leakage was approved for the current cycle by letter dated March 20, 2026 (Reference 6.10).

The maximum path leakage is utilized and verified to be acceptable prior to entering a Reactor Mode where containment is required to be operable. The use of maximum path ensures that a single failure of any MSIV in the MSL will not result in exceeding the TS requirement, supporting analyzed limits.

Minimum path acceptance criterion is only used for As-Found testing and is performed in a Reactor Mode where Containment is not required for the MSIVs. For example, when testing the containment penetrations two values are used when assessing the leak rate of the penetration. The As-Found leak rate is based on the minimum pathway and the As-Left leak rate is based on the maximum pathway.

When the unit is shut down and the leak rate is measured, both the inboard and outboard MSIVs are closed. This verifies the valves were operable during the cycle so single failure is not required to be assessed during the As-Found leak rate measurement. Prior to startup, to address the potential for a single failure, the maximum pathway leakage is used to verify leakage is below the TS allowable leakage.

3.2 Alternative Source Term (AST) Loss of Coolant Accident (LOCA) Dose

The current AST LOCA AOR is consistent with the previous analysis submitted for the most recent NMP2 AST amendment (References 6.4 and 6.7). The analysis models leakage through two of the four main steam lines, with one MSIV open in each. Of the two MSLs, one is considered to be faulted. With one MSIV closed and one open as assumed in the AOR, MSL leakage and MSIV leakage as equivalent. The leakage rate modeled in the current AOR is 100 scfh in each of the two modeled lines (200 scfh total), measured at 40 psig. Using the adjustments described in References 6.1 and 6.2 and approved in Reference 6.3, these AOR leakages can be converted to the TS conditions with the following equation:

$$Q_2 = Q_1 \frac{\sqrt{\Delta P_2}}{\sqrt{\Delta P_1}}$$

Q_1 = Analysis Leakage Rate

Q_2 = TS Leakage Rate

ΔP_1 = Analysis Backpressure

ΔP_2 = TS Backpressure

The value of 100 scfh measured at 40 psig is equivalent to 79 scfh at the SR 3.6.1.3.12 test pressure of 25 psig and the value of 200 scfh measured at 40 psig is equivalent to 158 scfh at the SR 3.6.1.3.12 test pressure of 25 psig.

	Single MSL Leakage	Total MSL Leakage	Assumed Backpressure
Current TS	39 scfh	--	25 psig
AOR	100 scfh	200 scfh	40 psig
Proposed TS	79 scfh	158 scfh	25 psig

Based on the equivalence of these MSL leakage values, the proposed permanent TS change to SR 3.6.1.3.12 is consistent with the AST LOCA radiological dose AOR. The change to Cycle 21 specific note from 39 scfh to 79 scfh and from MSIV to MSL is also consistent and aligns the note with the revised SR.

3.3 Environmental Qualification (EQ)

The EQ program has been evaluated for both chemical-mechanical and radiological impacts from MSL leakage. The total MSL leakage is reduced so the limiting moisture and heat deposition on the equipment of the AOR would remain bounding. The zone radiation calculations model a total of 200 scfh (at 40 psig) evenly across all MSLs, which was determined to be appropriate EQ modeling. The proposed change in MSL leakage distribution does not impact these results and conclusions. Therefore, there is no impact to the EQ program from MSL leakage as long as the total leak rate does not exceed 200 scfh (at 40 psig). The impact of the proposed change to the required environmental qualification margins was considered. Based on the proposed changes in maximum MSL leakage, the margins associated with the requirements of 10 CFR 50.49(e)(8) are not impacted.

The MSIVs are designed to close and be leak-tight to isolate the primary reactor coolant system and containment during the worst conditions of pressure, temperature, and steam flow following a break in the main steam line outside containment. The equipment and components potentially impacted by the modified MSL leak rate are located in the main steam tunnel and turbine building, downstream of the MSLs. The normal service environmental conditions in the main steam tunnel or turbine building are due to the fluid flowing through the MSLs when the MSIVs are open and thus not impacted by allowing increased leakage past the closed valve. The bounding accident temperature and pressure profiles in the main steam tunnel and turbine building are associated with a high energy line break (HELB) in the steam tunnel. When the modified MSL leakage is considered, the HELB temperature and pressure profile in these zones continues to bound the LOCA profile. Additionally, the accident humidity in these zones is already assumed to be 100%. Therefore, the proposed change in allowable MSL leakage would contribute no additional environmental impact to equipment qualified for use in the main steam tunnel or the turbine building.

Because there is no change to EQ design basis temperatures, pressure, humidity, or radiation values, the proposed change in MSL leakage has no impact on non-safety related equipment

whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions by the safety-related equipment.

No components are required to be added to the EQ equipment list due to the proposed change in allowable MSL leakage.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. CEG has determined that the proposed change does not require any exemptions or relief from the following current applicable regulations and regulatory requirements, which were reviewed in making this determination:

- 10 CFR 50.36, Technical Specifications
- 10 CFR 50.49, Environmental qualification of electric equipment important to safety for nuclear power plants
- 10 CFR 50.67, Accident source term
- 10 CFR 50, Appendix A, General Design Criterion 16 - Containment design
- 10 CFR 50, Appendix A, General Design Criterion 56 - Primary containment isolation
- 10 CFR 50, Appendix J, Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors
- Regulatory Guide 1.183, Revision 0, Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors

The proposed change is consistent with the applicable regulations and regulatory guidance.

4.2 Precedent

The following precedents are applicable to this submittal:

- In Reference 6.4, the U.S. NRC granted NMP2 an amendment that increased the allowed leakage rate through individual MSIVs consistent with an updated NMP2 AST LOCA analysis. The proposed change in this request is consistent with the updated NMP2 AST LOCA analysis.
- In Reference 6.5, the U.S. NRC granted Limerick Generating Station, Units 1 and 2, an amendment that allowed LLRT to verify leak rates through each main steam line instead of through each MSIV. The proposed change in this request makes an equivalent change to NMP2 TS.
- In Reference 6.10, the U.S. NRC granted Nine Mile Point, Unit 2, an amendment allowing a one-time increase in main steam isolation valve allowable leakage that relied on limits consistent with the updated NMP2 AST LOCA AOR.

4.3 No Significant Hazards Consideration

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Constellation Energy Generation, LLC (CEG), requests Nuclear Regulatory Commission (NRC) approval of proposed change to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License (RFOL) No. NPF-69 for Nine Mile Point Nuclear Station, Unit 2 (NMP2). The proposed change updates the TS Surveillance Requirement (SR) 3.6.1.3.12 for Main Steam Isolation Valve (MSIV) leakage testing to align the allowed maximum Main Steam Line (MSL) leakage to the assumptions in the Analysis of Record (AOR) for evaluation of Loss of Coolant Accident (LOCA) radiological dose using Alternative Source Term (AST) methodology.

Constellation Energy Generation, LLC (CEG) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The change to use Main Steam Line (MSL) leakage instead of individual Main Steam Isolation Valve (MSIV) leakage and the associated limits has been assessed against the radiological consequence analysis of the Loss of Coolant Accident (LOCA). Based on the results of the assessment, it has been demonstrated that, with the requested change, the dose consequences of the currently approved LOCA analysis remain bounding and are within the acceptance criteria provided by the NRC for use with the Alternative Source Term (AST) methodology in 10 CFR 50.67.

The proposed change to use MSL leakage limits does not involve a physical change to any plant structure, system, or component. As a result, no new failure modes of the MSIVs have been introduced.

The radiological consequences of the analyzed LOCA have been evaluated using the plant licensing basis for this accident. The evaluation concludes that the currently approved LOCA analysis bounds the proposed Technical Specification change. Adequate margin to the regulatory limits specified in 10 CFR 50.67 for control room and offsite doses is still available.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The change does not affect the design or operation of any component in the facility such that new or different equipment failure modes are created. When a single MSIV in a line exceeds the NMP2 criteria for Local Leak Rate Test (LLRT) leakage results, a condition report is generated, and remediation is controlled by the corrective action program to restore compliance.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change will not cause a significant reduction in the margin of safety considering operability will be determined by the single main steam line in which there are two independent and redundant MSIVs, because only one is needed to maintain the safety function associated with main steam isolation. Therefore, the proposed updated TS SR 3.6.1.3.12 requirement to verify individual and total MSL leakage rate limits ensures the MSIVs remain within their design to limit the effect of radioisotopes exiting the primary containment.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, CEG concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of no significant hazards consideration is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined the proposed change qualifies for a categorical exclusion from environmental review in accordance with 10 CFR 51.22. The proposed action is confined to changes to surveillance, inspection, or testing requirements as described in 10 CFR 51.22(d)(1). The proposed action does not disturb any previously undisturbed ground and there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, does not result in a significant increase in individual or cumulative public or occupational radiation exposure, and does not result in a significant increase in the potential for or consequences from radiological accidents. Therefore, pursuant to 10 CFR 51.22, neither an environmental assessment nor an environmental impact statement is required.

6.0 REFERENCES

- 6.1 Letter from Justin W. Knowles (Constellation Energy Generation, LLC) to U.S. NRC, "Exemption Request from Certain Requirements of 10 CFR 50, Appendix J, for Nine Mile Point Nuclear Station, Unit 2, License Amendment Request to Revise Surveillance Requirement (SR) 3.6.1.3.12 to a Reduced Test Pressure and Corresponding Leakage Rate for Main Steam Isolation Valves," dated January 29, 2025 (ADAMS Accession No. ML25029A181)
- 6.2 Letter from Justin W. Knowles (Constellation Energy Generation, LLC) to U.S. NRC, "Response to Request for Additional Information for License Amendment Request to Revise Surveillance Requirement (SR) 3.6.1.3.12 to a Reduced Test Pressure and Corresponding Leakage Rate for Main Steam Isolation Valves," dated June 9, 2025 (ADAMS Accession No. ML25155B825)
- 6.3 Letter from Richard V. Guzman (U.S. NRC) to Mr. Christopher H. Mudrick, Sr. (Constellation Energy Generation, LLC), "NINE MILE POINT NUCLEAR STATION, UNIT 2 - ISSUANCE OF AMENDMENT NO. 201, REVISION OF SURVEILLANCE REQUIREMENT TO A REDUCED TEST PRESSURE AND CORRESPONDING LEAKAGE RATE FOR MAIN STEAM ISOLATION VALVES (EPID L-2025-LLA-0019)," dated February 4, 2026 (ADAMS Accession No. ML26008A004)
- 6.4 Letter from Michael L. Marshall, Jr. (U.S. NRC) to Mr. Bryan C. Hanson (Exelon Generation Company, LLC), "NINE MILE POINT NUCLEAR STATION, UNIT 2 - ISSUANCE OF AMENDMENT NO. 182 TO CHANGE ALLOWABLE MAIN STEAM ISOLATION VALVE LEAK RATES (EPID L-2019-LLA-0115)," dated October 20, 2020 (ADAMS Accession No. ML20241A190)
- 6.5 Letter from Rachael Davis (U.S. NRC) to David P. Rhoades (Constellation Energy Generation, LLC), "LIMERICK GENERATING STATION, UNITS 1 AND 2 – ISSUANCE OF AMENDMENT NOS. 266 AND 228 RE: MODIFICATION TO TECHNICAL SPECIFICATION 3.6.1.2 AND MAIN STEAM ISOLATION VALVE LEAKAGE REQUIREMENTS (EPID L-2024-LLA-0115)," dated March 31, 2025 (ADAMS Accession No. ML25070A201)
- 6.6 NEI 94-01 Revision 2-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," dated October 2008 (ADAMS Accession No. ML100620847)
- 6.7 Letter from David T. Gudger (Exelon Generation Company, LLC) to U.S. NRC, "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 Increase Allowable MSIV Leakage Rates," dated May 14, 2020 (ADAMS Accession No. ML20135G951)
- 6.8 Letter from Justin W. Knowles (Constellation Energy Generation, LLC) to U.S. NRC, "Emergency License Amendment Request - Changes to Nine Mile Point Unit 2 Surveillance Requirement 3.6.1.3.12," dated March 16, 2026 (ADAMS Accession No. ML26075A037)

- 6.9 Letter from Justin W. Knowles (Constellation Energy Generation, LLC) to U.S. NRC, "Supplement to Emergency License Amendment Request - Changes to Nine Mile Point Unit 2 Surveillance Requirement 3.6.1.3.12," dated March 18, 2026 (ADAMS Accession No. ML26077A153)
- 6.10 Letter from Richard V. Guzman (U.S. NRC) to Mr. Christopher H. Mudrick, Sr. (Constellation Energy Generation, LLC), "NINE MILE POINT NUCLEAR STATION, UNIT 2 - ISSUANCE OF AMENDMENT NO. 203, TECHNICAL SPECIFICATION CHANGE TO ALLOW A ONE-TIME INCREASE IN MAIN STEAM ISOLATION VALVE ALLOWABLE LEAKAGE RATE (EPID L-2026-LLA-0050)," dated March 20, 2026 (ADAMS Accession No. ML26077A001)

ATTACHMENT 2

License Amendment Request

**Nine Mile Point Nuclear Station, Unit 2
Renewed Facility Operating License No. NPF-69
NRC Docket No. 50-410**

Proposed Technical Specifications Change (Markup)

3.6.1.3-13

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.6.1.3.12 Verify leakage rate through each MSIV is ≤ 39 scfh when tested at ≥ 25 psig.* 79 and through all four main steam lines is ≤ 158 scfh	In accordance with 10 CFR 50 Appendix J Testing Program Plan
SR 3.6.1.3.13 Verify combined leakage rate through hydrostatically tested lines that penetrate the primary containment is within limits. main steam line 79	In accordance with 10 CFR 50 Appendix J Testing Program Plan

* During Cycle 21, leakage rate through one MSIV may exceed 39 scfh provided the leakage rate is ≤ 83 scfh and the leakage rate through all four main steam lines is ≤ 155 scfh.

ATTACHMENT 3

License Amendment Request

**Nine Mile Point Nuclear Station, Unit 2
Renewed Facility Operating License No. NPF-69
NRC Docket No. 50-410**

Proposed Technical Specifications Bases Change (Markup) (For Information Only)

B 3.6.1.3-19

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.1.3.12

The analyses in Reference 2 are based on leakage that is less than the specified leakage rate. Leakage through each ~~MSIV~~ must be ≤ 39 scfh when tested at 25 psig. The Frequency is required by the 10 CFR 50 Appendix J Testing Program Plan.

main steam line →

79

and leakage through all four main steam lines must be ≤ 158 scfh

SR 3.6.1.3.13

Surveillance of hydrostatically tested lines provides assurance that the calculation assumptions of Reference 1 are met. The acceptance criteria for the combined leakage of all hydrostatically tested lines is 1 gpm times the total number of hydrostatically tested PCIVs when tested at $\geq 1.10 P_a$ (43.73 psig). The combined leakage rates must be demonstrated in accordance with the leakage test Frequency required by the 10 CFR 50 Appendix J Testing Program Plan.

REFERENCES

1. Technical Requirements Manual.
2. USAR, Section 15.6.5.
3. USAR, Section 15.6.4.
4. USAR, Section 15.2.4.
5. 10 CFR 50.36(c)(2)(ii).
6. USAR, Section 6.2.4.3.2.
7. 10 CFR 50, Appendix J Option B.
8. H21C-106, "Unit 2 LOCA w/LOOP AST Methodology"