

10 CFR 50.90

NMP2L2639

February 17, 2017

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: Supplement to License Amendment Request - Proposed Revision to
Technical Specification in Response to GE Energy - Nuclear 10 CFR Part 21
Safety Communication SC05-03

- References:
1. License Amendment Request - Proposed Revision to Technical Specification in Response to GE Energy - Nuclear 10 CFR Part 21 Safety Communication SC05-03, dated December 13, 2016
 2. Nine Mile Point Nuclear Station, Unit 2 – Supplemental Information Needed for Acceptance of Requested Licensing Action RE: Amendment to Reduce Steam Dome Pressure in Reactor Core Safety Limits (CAC NO. MF8942), dated January 31, 2017

By letter dated December 13, 2016 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a request to amend the Technical Specifications, Appendix A, of Renewed Facility Operating License No. NPF-69 for Nine Mile Point Nuclear Station, Unit 2 (NMP2). The proposed amendment would reduce the Technical Specification (TS) Safety Limit for the reactor steam dome pressure specified in TS 2.1.1.1 and TS 2.1.1.2 as well as increase the Allowable Value specified in TS Table 3.3.6.1-1, Function 1b, Main Steam Line Pressure-Low.

On January 27, 2017, e-mail from Mr. Michael Marshall, Senior Project Manager, Division of Operating Reactor Licensing to Mr. Ron Reynolds (Exelon) transmitted a request for supplemental information needed to complete the Nuclear Regulatory Commission (NRC) acceptance review of Reference 1. On January 31, 2017, a clarification call was held to clarify information requested in the e-mail. The formal request was transmitted by the NRC to Exelon via letter dated January 31, 2017 (Reference 2).

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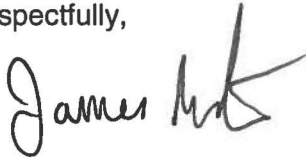
The Attachment to this letter contains the requested information. The response in the Attachment supplements the calculation provided in Attachment 4 of Reference 1.

There are no regulatory commitments contained in this letter.

Should you have any questions concerning 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 17th day of February 2017.

Respectfully,



James Barstow
Director, Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Request for Supplemental Information

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

ATTACHMENT
Request for Supplemental Information
License Amendment Request
Reactor Core Safety Limits
Docket No. 50-410

SUPPLEMENTAL INFORMATION NEEDED
AMENDMENT REQUEST TO REDUCE STEAM DOME PRESSURE
IN REACTOR CORE SAFETY LIMITS
EXELON GENERATION COMPANY, LLC
NINE MILE POINT NUCLEAR STATION, UNIT 2
DOCKET NO. 50-410

By letter dated December 13, 2016 (Agencywide Documents Access and Management System Accession No. ML 16348A368), Exelon Generating Company, LLC (the licensee) submitted a license amendment request for the Nine Mile Point Nuclear Station, Unit 2. The proposed amendment would reduce the steam dome pressure safety limit from 785 pounds per square inch gauge (psig) to 700 pounds per square inch absolute (psia) in Technical Specifications (TSs) 2.1.1.1 and 2.1.1.2, and increase the main steam line pressure low allowable value from ≥ 746 psig to ≥ 814 psig in TS 3.3.6.1-1.

The U.S. Nuclear Regulatory Commission staff has reviewed the licensee's application and concluded that the following information associated with the calculation of instrument setpoint values is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of the regulatory requirements for ensuring that instrument setpoints are initially within, and remain within, the TS limits.

The proposed amendment should include the following:

- (1) Description of the methodology used for the calculation, including a listing of regulatory guidance and standards that the methodology conforms.
- (2) Description of the assumptions or changes in assumptions for the calculation, including the bases for new or changed assumptions.
- (3) Description of the types of errors (e.g., instrument errors, environmental errors (including harsh environments), electromagnetic interference/radio frequency interference errors, power supply errors, process errors, measurement and test errors, drift, etc.).
- (4) Description of how the errors are combined to meet the setpoint methodology.
- (5) Provide the calculated error for each loop device and the value of the total loop uncertainty (total loop error).
- (6) Provide the values of as-left tolerance and as-found tolerance and how errors outside the acceptable range are handled.

Exelon Response:

- (1) The methodology used for the setpoint calculation was developed in accordance with NEDC-31336, "General Electric Setpoint Methodology." NEDC-31336 is the original methodology used. Nine Mile Point Unit 2 (NMP2) is committed to Regulatory Guide 1.105. Both the methodology and commitment to Regulatory Guide 1.105 are described in Section 7.1.2.3 of the NMP2 Updated Safety Analysis Report.
- (2) There are no changes to assumptions within the setpoint calculation. The analytical limit input was changed from 720 psig to 805 psig. The new analytical limit of 805 psig was developed using the guidance in NEDC-33743P, "BWR Owners' Group, Reload Analysis and Core Management Committee, SC05-03 Analysis Report."
- (3-5) There are no changes to the types of errors or how the errors are combined from that in the original Main Steam Line Pressure-Low isolation calculation. The errors are combined as described in NEDC-31336, "General Electric Setpoint Methodology." The Allowable Value and setpoint are adjusted upward based on the increase in the analytical limit.
- (6) The Main Steam Line Pressure-Low isolation as-found tolerance and as-left tolerance are nominally ± 4 psig. If the trip is outside of the required tolerance value, the channel is adjusted to within tolerance, the Shift Manager and I&C Supervision are notified and an Issue Report is entered into the Corrective Action Program.