Exelon Generation

200 Exelon Way
Kennett Square, PA 19348

www.exeloncorp.com

10 CFR 50.90

NMP2L2664

January 12, 2018

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 No.2 for Nine Mile Point Nuclear Station, Unit 2, to Adopt TSTF-542, " Reactor Pressure Vessel Water Inventory Control," Revision 2

References:

1. Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Revise Technical Specifications to Adopt TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,' Revision 2," dated February 28, 2017

2. Letter from M. Marshall (Senior Project Manager, U.S Nuclear Regulatory Commission) to Mr. B. Hanson (Exelon Generation Company, LLC), "Nine Mile Point Nuclear Station, Unit 2-Request for Additional Information Regarding License Amendment Concerning Reactor Pressure Vessel Water Inventory Control (CAC No. MF9357)," dated October 10, 2017

3. Letter from J. Barstow (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-542, Revision 2, Reactor Pressure Vessel Water Inventory Control," dated November 3, 2017

4. Public Meeting Announcement, "Meeting with Technical Specifications Task Force (TSTF) RE: TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,' " dated October 27, 2017

5. Supplemental Information for Nine Mile Point Nuclear Station, Unit 2, to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2, dated December 27, 2017

By letter dated February 28, 2017 (Reference 1), Exelon Generation Company, LLC (Exelon) requested to change the Nine Mile Point Nuclear Station, Unit 2 (NMP2) Technical Specifications (TS). The proposed amendment request would revise NMP2 TS by replacing the existing specifications related to Operations with a Potential for Draining the Reactor Vessel with revised requirements for Reactor Pressure Vessel Water Inventory Control to protect Safety Limit 2.1.1.3.

On October 10, 2017, the U.S. Nuclear Regulatory Commission (NRC) provided a Request for Additional Information (RAI) (Reference 2). On November 3, 2017, Exelon submitted to the NRC the RAI response (Reference 3).

On October 27, 2017, a public meeting was held by the NRC and the Boiling Water Reactor Owners Group (BWROG) to discuss a proposed TSTF-542 variation affecting BWR/5 and 6 plants. As noted in the NRC Public Meeting Announcement (Reference 4), the details of the proposed variation were provided in ADAMS Accession Number ML17289A902.

By letter dated December 27, 2017 (Reference 5), Exelon submitted supplemental information to address the proposed variation provided in ADAMS Accession Number ML17289A902.

Attachment 1 to this letter provides the proposed TS marked-up pages that clarifies specific information previously provided in References 1, 3, and 4. This supplement supersedes the markup TS page 3.3.5.2-2 from Reference 1. Also, this supplement supersedes TS markup page 3.3.5.2-4 provided in RAI responses to Questions RAI-3 and RAI-4 provided in Reference 3. Finally, this supplement superseded TS page 3.3.5.2-5 provided in Reference 5.

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 supplemental information provided in this letter does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. Furthermore, the supplemental information provided in this letter 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.

With the supplemental information provided in Attachment 1 to this letter, Exelon requests approval of the proposed amendment by March 1, 2018. The requested approval date supports the implementation of TSTF-542 prior to the start of the refueling outage. Once approved, the amendment shall be implemented no later than the start of NMP2 2018 refueling outage.

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 12th day of January 2018.

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

Attachment 1: Proposed Technical Specification 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 No.2

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

PROPOSED TECHNICAL SPECIFICATION MARKED-UP PAGES

TS Pages

3.3.5.2-2

3.3.5.2-4

3.3.5.2-5

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. As required by Required Action A.1 and referenced in Table 3.3.5.2-1.	D.1 Declare HPCS system inoperable. OR D.2 Align the HPCS pump suction to the suppression pool.	1 hour Delete per Supplement No. 2 1 hour
~~E. As required by Required Action A.1 and referenced in Table 3.3.5.2-1.~~	~~E.1 Declare HPCS system inoperable.~~ ~~AND~~ ~~Restore channel to OPERABLE status.~~	~~1 hour~~ ~~24 hours~~
~~F~~ E. As required by Required Action A.1 and referenced in Table 3.3.5.2-1.	~~F.1~~ E.1 Restore channel to OPERABLE status.	24 hours
~~G~~ F. Required Action and associated Completion Time of Condition C, D, ~~E,~~ or ~~F~~ not met.	~~G.1~~ F.1 Declare associated ECCS injection/spray subsystem inoperable.	Immediately

E

F

E

Revise per Supplement No. 2

Delete per Supplement No. 2

Revise per Supplement No. 2

Supplement No. 2
Attachment 1

Table 3.3.5.2-1 (page 1 of 2)
RPV Water Inventory Control Instrumentation

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems					
a	LPCS Differential Pressure-Low (Injection Permissive)	4, 5	1(a)	C	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 40 psid and ≤ 98 psid
b	LPCI A Differential Pressure-Low (Injection Permissive)	4, 5	1(a)	C	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 70 psid and ≤ 150 psid
c	LPCS Pump Discharge Flow-Low (Bypass)	4, 5	1 per pump (a)	~~F~~ E	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 1000 gpm and ≤ 1440 gpm
d	LPCI Pump A Discharge Flow-Low (Bypass)	4, 5	1 per pump (a)	~~F~~ E	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 770 gpm and ≤ 930 gpm
e	Manual Initiation	4, 5	1 per subsystem (a)	~~F~~ E	SR 3.3.5.2.3	N/A
2.	LPCI B and LPCI C Subsystems					
a	LPCI B and C Differential Pressure-Low (Injection Permissive)	4, 5	1(a)	C	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 70 psid and ≤ 150 psid
b	LPCI Pump B and LPCI Pump C Discharge Flow-Low (Bypass)	4, 5	1 per pump (a)	~~F~~ E	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 770 gpm and ≤ 930 gpm
c	Manual Initiation	4, 5	1 per subsystem	~~F~~ E	SR 3.3.5.2.3	N/A

(continued)

(a) Associated with an ECCS subsystem required to be OPERABLE by LCO 3.5.2, "Reactor Pressure Vessel Water Inventory Control."

RAI 4

Revise per Supplement No. 2

RAI 3

Revise per Supplement No. 2

Table 3.3.5.2-1 (page 2 of 2)
RPV Water Inventory Control Instrumentation

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3	High Pressure Core Spray (HPCS) System					
~~a.~~	~~Reactor Vessel Water Level High, Level 8~~	~~4, 5~~	~~1 (a)~~	~~E~~	~~SR 3.3.5.2.1~~ ~~SR 3.3.5.2.2~~	~~≤ 200.3 inches~~
~~b~~	Pump Suction Pressure-Low	4[(b)], 5[(b)]	1 (a)	D	SR 3.3.5.2.1 SR 3.3.5.2.2	≥94.5 inches H_2O
~~c~~	HPCS Pump Discharge Pressure-High (Bypass) (d)	4, 5	1 per pump (a)	~~F~~ E	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 220 psig
~~d~~	HPCS System Flow Rate-Low (Bypass)	4, 5	1 per pump (a)	~~F~~ E	SR 3.3.5.2.1 SR 3.3.5.2.2	> 580 gpm and ≤ 720 gpm
~~e~~	~~Manual Initiation (d)~~	~~4, 5~~	~~1 per Subsystem (a)~~	~~F~~	~~SR 3.3.5.2.3~~	~~N/A~~
4	RHR System Isolation					
a	Reactor Vessel Water Level-Low, Level 3	(c)	2 in one Trip system	B	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 157.8 inches
5	Reactor Water Cleanup (RWCU) System Isolation					
a	Reactor Vessel Water Level-Low Low, Level 2	(c)	2 in one Trip system	B	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 101.8 inches

(a) Associated with an ECCS subsystem required to be OPERABLE by LCO 3.5.2, "Reactor Pressure Vessel Water Inventory Control."
(b) When HPCS is OPERABLE for compliance with LCO 3.5.2, "RPV Water Inventory Control," and aligned to the condensate storage tank.
(c) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.
(d) The injection functions of Drywell Pressure-High ~~and Manual Initiation are~~ not required to be OPERABLE with reactor steam dome pressure less than 600 psig.

Delete
a.
b.
c.
Revise per Supplement No. 2
Delete
Delete
Delete
is