

10 CFR 50.90

NMP2L2667

February 6, 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.3 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 J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Supplemental Information No. 2 for Nine Mile Point Nuclear Station, Unit 2, to Adopt TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,' Revision 2," dated January 12, 2018

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.

By letter dated January 12, 2017 (Reference 2), Exelon submitted supplemental information to address changes to Section 3.3.5.2.

Attachment 1 to this letter provides two proposed TS marked-up pages that clarifies specific information previously provided in References 1 and 2. For TS page 3.3.5.2-5, Attachment 1 includes a markup showing note (d) removed from Function 3.b, HPCS Pump Discharge Pressure High (Bypass), from TS Table 3.3.5.2-1 (page 2 of 2). Also, note (d) is removed in

its entirety from the bottom of the table. This Supplement Information No. 3 supersedes the markup provided in Reference 2. The updated clean page for TS page 3.3.5.2-5 will be provided upon NRC request to support the Safety Evaluation.

In addition, Attachment 1 includes a markup showing note (d) deleted from Function 5.b, Reactor Vessel Water Level – Low, Level 3 and from the bottom of TS page 3.3.6.1-10, TS Table 3.3.6.1-1, page 5 of 5. This Supplement Information No. 3 supersedes the markup provided in Reference 1. The clean page provided in Reference 1 for this TS page correctly shows note (d) removed and no further clarification is needed.

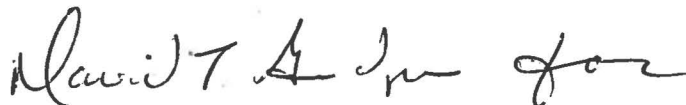
Exelon has reviewed the information supporting a finding of no significant hazards consideration and the environmental consideration provided to the NRC in Reference 1. The supplemental information provided in this letter does not affect the bases for concluding that the proposed license amendment does 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 the 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 6th day of February 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.3

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

PROPOSED TECHNICAL SPECIFICATION MARKED-UP PAGE

TS Pages

3.3.5.2-5

3.3.6.1-10

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	≤ 209.3 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 ₂ O
c. HPCS Pump Discharge Pressure-High (Bypass)	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 Trp 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, Level 2	(c)	2 in one Trp 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

Delete

Delete note (d) per Supplement No. 3

Table 3.3.6.1-1 (page 5 of 5)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. RHR SDC System Isolation (continued)					
b. Reactor Vessel Water Level – Low, Level 3	3,4,5	2 ^{trip}	J	SR 3.3.6.1.1 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5 SR 3.3.6.1.6	≥ 157.8 inches
c. Reactor Vessel Pressure – High	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 148 psig
d. Reactor Building Pipe Chase Area Temperature – High	3	1 per area	F	SR 3.3.6.1.1 SR 3.3.6.1.3 SR 3.3.6.1.5 SR 3.3.6.1.6	
El. ≈ 319 ft.					≤ 144.5°F
El. ≈ 292 ft.					≤ 140.5°F
El. ≈ 266 ft.					≤ 140.5°F
El. ≈ 227 ft.					≤ 140.5°F
e. Reactor Building General Area Temperature – High	3	1 per area	F	SR 3.3.6.1.1 SR 3.3.6.1.3 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 134°F
f. Manual Initiation	1,2,3	4	G	SR 3.3.6.1.6	NA

Delete per
Supplement No. 3

(d) Only one trip system required in MODES 4 and 5 with RHR Shutdown Cooling System integrity maintained.

Delete per
Supplement No. 3