



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

October 21, 2019

Mr. Bryan C. Hanson
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2 – TEMPORARY
INSTRUCTION 2515/193 INSPECTION REPORT 05000220/2019013 AND
05000410/2019013

Dear Mr. Hanson:

On September 26, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Nine Mile Point Nuclear Station, Units 1 and 2 and discussed the results of this inspection with Mr. Todd Tierney, Plant Manager, and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspectors did not identify any finding or violation of more than minor significance.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Marc S. Ferdas, Team Leader
Technical Support and Assessment Team
Division of Reactor Projects

Docket Nos. 05000220 and 05000410
License Nos. DPR-63 and NPF-69

Enclosure:
As stated

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SUBJECT: NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2 – TEMPORARY
INSTRUCTION 2515/193 INSPECTION REPORT 05000220/2019013 AND
05000410/2019013 DATED OCTOBER 21, 2019

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000220 and 05000410

License Numbers: DPR-63 and NPF-69

Report Numbers: 05000220/2019013 and 05000410/2019013

Enterprise Identifier: I-2019-013-0013

Licensee: Exelon Generation Company, LLC

Facility: Nine Mile Point Nuclear Station, Units 1 and 2

Location: Oswego, NY

Inspection Dates: September 23, 2019 to September 26, 2019

Inspectors: S. Haney, Senior Project Engineer
C. Cahill, Senior Reactor Analyst
K. Mangan, Senior Reactor Inspector

Approved By: Marc S. Ferdas, Team Leader
Technical Support and Assessment Team
Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a Temporary Instruction 2515/193 inspection at Nine Mile Point Nuclear Station, Units 1 and 2 in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

2515/193 - Inspection of the Implementation of EA-13-109: Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions

Inspection of the Implementation of EA-13-109: Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (1 Sample)

- (1) Based on samples selected for review, the inspectors verified that the licensee satisfactorily implemented appropriate elements of the reliable hardened containment wetwell vent as described in the plant specific submittals and the associated safety evaluations (ADAMS Accession Nos. ML18355A737 - Unit 1 and ML18255A121 - Unit 2), and determined that the licensee was in compliance with NRC Order EA-13-109 Phase 1, "Reliable, Severe Accident Capable Wetwell Venting System" (ADAMS Accession No. ML13143A321).

The inspectors verified that the licensee satisfactorily:

- Installed the hardened containment vent system (HCVS) to meet the performance objectives outlined in Section A.1.1 of Attachment 2 to the Order EA-13-109;
- Installed the HCVS system with the design features specified in Section A.1.2 of Attachment 2 to the Order EA-13-109;
- Designed the HCVS to meet the quality standards described in Section A.2 of Attachment 2 to the Order EA-13-109;
- Developed and implemented adequate maintenance and testing of HCVS equipment to ensure their availability and capability;
- Developed and issued procedures to safely operate the HCVS using normal power supplies during extended loss of alternating current power (ELAP) and a postulated severe accident scenario, and integrated the procedures into existing plant procedures; and
- Trained their staff to assure personnel can proficiently operate the HCVS.

Based on samples selected for review, the inspectors verified that the licensee satisfactorily implemented appropriate elements of the reliable wetwell venting strategy as described in the plant specific submittals and the associated safety

evaluation (ADAMS Accession Nos. ML18355A737 - Unit 1 and ML18255A121 - Unit 2) and determined that the licensee was in compliance with NRC Order EA-13-109 Phase 2, "Reliable, Severe Accident Capable Drywell (or alternative strategy) Venting System" (ADAMS Accession No. ML13143A321).

The inspectors verified that the licensee satisfactorily developed a strategy making it unlikely that the licensee would need to vent from the containment drywell that includes the following:

- Implemented the severe accident water addition (SAWA)/severe accident water management (SAWM) systems as defined, and fulfilled functional requirements for installed and portable equipment.
- Installed and/or identified the previously-installed instrumentation necessary to implement SAWM.
- Developed and implemented adequate maintenance and testing of SAWA/SAWM equipment to ensure availability and capability.
- Developed and issued procedures to safely operate the SAWA/SAWM during an ELAP and during postulated severe accident scenario, and integrated their procedures into their existing plant procedures such that entry into and exiting from the procedures are clear when using existing plant procedures.
- Trained their staff to assure personnel can proficiently operate the HCVS during an ELAP and accident scenario.

The inspectors verified that any noncompliance with requirements and standards identified during the inspection were entered into the licensee's corrective action program.

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On September 26, 2019, the inspectors presented the Temporary Instruction 2515/193 inspection results to Mr. Todd Tierney, Plant Manager, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
2515/193	Calculations	A.10.1-P-051	Nitrogen Requirement for Operation of the HCVS Valves	0
		S14-54HX019	Spent Fuel Pool Heat Up During Severe Accident Resulting from an ELAP Event	0
		S22.4-201.13M002	HCVS Valve Motive Gas Supply Sizing	1
	Corrective Action Documents	AR 04137905 AR 04241162 AR 04274864 AR 04275007		
	Engineering Changes	ECP-13-000086		3
		ECP-17-000279		0
	Miscellaneous	CC-NM-118-1003	Nine Mile Point Nuclear Station Unit 1, Final Integrated Plan Document – Mitigating Strategies NRC Order EA-12-049	0
		CC-NM-118-1004	Nine Mile Point Nuclear Station Unit 2, Final Integrated Plan Document – Mitigating Strategies NRC Order EA-12-049	0
		CC-NM-118-1005	Final Integrated Plan HCVS Order EA-13-109 for Nine Mile Point Nuclear Power Station – Unit 1 (NMP1)	0
		CC-NM-118-1006	Final Integrated Plan HCVS Order EA-13-109 for Nine Mile Point Nuclear Power Station – Unit 2 (NMP2)	0
		N-NM-EP-FLEX-TECH	FLEX Related ERO Technical Training	0
		Report QR-351024565-1	Qualification Report for Absolyte GP VRLA Battery and A12B Series Battery Charger	2
		VENRPT-15-000013	Seismic Qualification Summary for Hardened Containment Vent Components	1
	Procedures	CC-NM-118	Site Implementation of Diverse and Flexible Coping Strategies (FLEX) and Spent Fuel Pool Instrumentation Program	3
		CC-NM-118-101	Beyond Design Basis Administrative Controls	00400
		EP-AA-124-F-03	FLEX Communications Equipment Testing and Inventorying of the Site and Site-Specific EOF Fixed and Portable Satellite System	C

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		N1-DRP-FLEX-ELEC	Emergency Damage Repair – BDB/FLEX Generator Deployment Strategy	00400
		N1-DRP-FLEX-MECH	Emergency Damage Repair – BDB/FLEX Plump Deployment Strategy	00700
		N1-EOP-4.1	Primary Containment Venting	1200.01
		N1-PM-M5	Monthly Checklist	00501
		N2-DRP-FLEX-ELEC	Emergency Damage Repair – BDB/FLEX Generator Deployment Strategy	00300
		N2-DRP-FLEX-MECH	Emergency Damage Repair – BDB/FLEX Plump Deployment Strategy	00500
		N2-EOP-6.21	Containment Venting	6
		N2-PM-M008	Monthly Checklist	01300
		S-DRP-COMM	BDBEE Communication Procedure	0
	Self-Assessments	AR 04249579		
	Work Orders	C93470077 C93632926 C93659488 C93660043 C93660263 C93671603 C93675035 C93689483		