

NMP1 Adoption of TSTF-334

NRC Pre-submittal Meeting

August 6, 2020



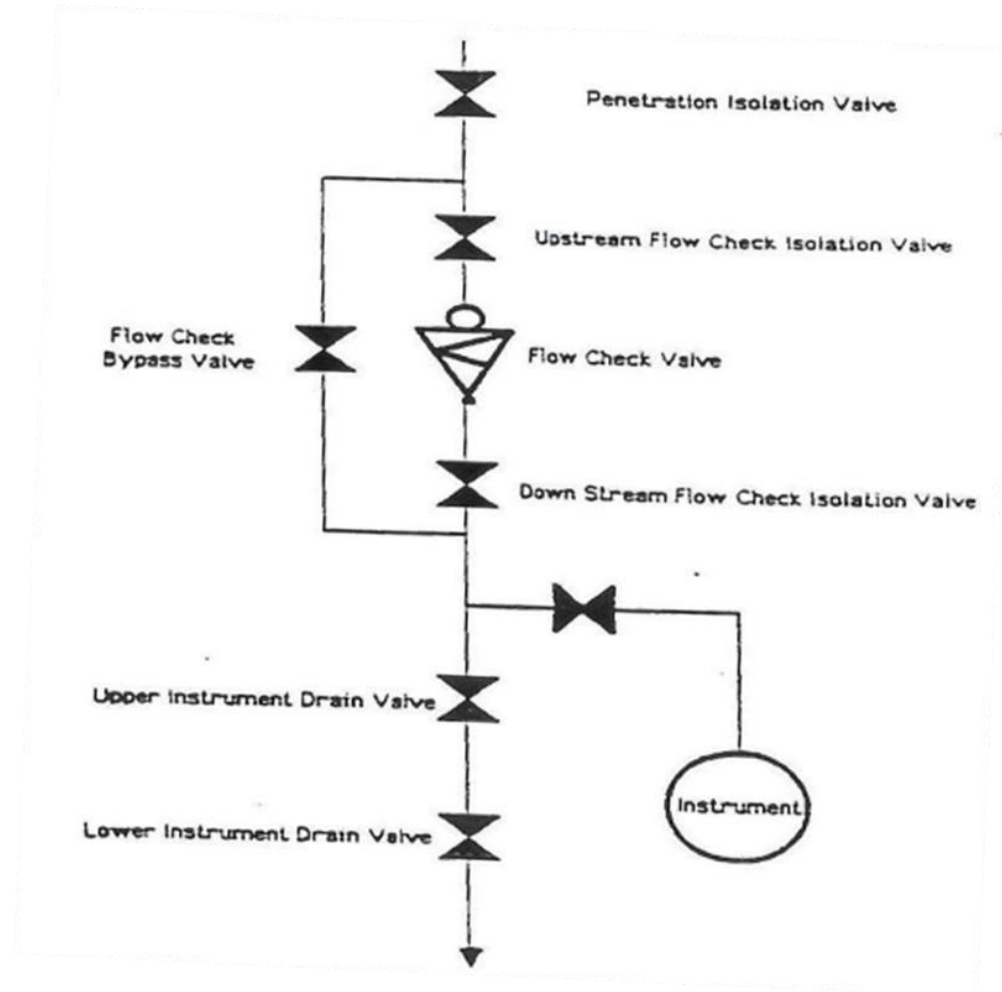
Background / Current Condition

- Nine Mile Point Unit 1 (NMP1) is pursuing a license amendment request and a relief request to adopt Technical Specification Task Force (TSTF) TSTF-334, "Relaxed Surveillance Frequency for Excess Flow Check Valve Testing," Revision 2.
- NMP1 identifies Excess Flow Check Valves as instrument-line flow check valves. This is an administrative variation to the TSTF nomenclature.
- NMP1 currently tests 100% of it's instrument-line flow check valve population each refuel outage.
- The proposed change will test a representative sample (i.e., approximately 20 percent) of instrument-line flow check valves each refuel outage such that each instrument-line flow check valve will be tested at least once every 10 years (nominal) as described in TSTF-334.
- The reduced testing associated with this proposed change will result in an increase in the availability of the associated instrumentation during outages and will result in dose savings without significantly impacting the health and safety of the public while continuing to provide an acceptable level of quality and safety.

NMP1 Instrument-Line Flow Check Valve Design

NMP1 utilizes two makes of EFCVs:

- Marotta (original equipment manufacturer (OEM))
- Dragon (replacement make)
- NMP1 does not utilize a separate in-line restricting orifice.



NMP1 Analysis

- The analysis will demonstrate the criteria of TSTF-334 that:
 - The licensee has a program to account for potential changes in EFCV failure rates
 - The operational impact of an EFCV failing to close during rupture of an instrument line has been acceptably addressed by existing plant design
 - The radiological consequences of a failure of an EFCV to close after an instrument line rupture is bounded by analysis

NMP1 Variations to TSTF-334, Revision 2

- The NMP1 Technical Specifications (TS) does not use the term "Excess Flow Check Valve," instead it uses "Instrument-line flow check valve." This variation is administrative and does not affect the applicability of TSTF-334, Revision 2, to the NMP1 TS.

Questions

