

From: [Guzman, Richard](#)
To: [Reynolds, Ronnie J.:\(Exelon Nuclear\)](#)
Cc: [Danna, James](#)
Subject: Nine Mile Point Unit 2 - REQUEST FOR ADDITIONAL INFORMATION Re: LAR to Revise TSs to Adopt TSTF-582, Revision 0 (EPID L-2021-LLA-0176)
Date: Tuesday, November 16, 2021 3:56:24 PM

Ron,

On November 8, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff sent Exelon Generation Company, LLC (Exelon, the licensee) the subject Request for Additional Information (RAI) as a draft e-mail. The RAI relates to the Exelon's September 30, 2021, license amendment request (ADAMS Accession No. ML21273A017) for Nine Mile Point Nuclear Station, Unit 2 (NMP2) proposing changes to the NMP2 Technical Specifications related to reactor pressure vessel (RPV) water inventory control (WIC) based on Technical Specifications Task Force (TSTF) Traveler TSTF-582, Revision 0, "RPV WIC Enhancements" (TSTF-582) (ADAMS Accession No. ML19240A260).

On November 15, 2021, the NRC staff and Exelon held a conference call to discuss clarifications on the draft RAI. Updated below is the official (final) RAI. As we discussed, please respond to this RAI within 30 days of this e-mail communication, or no later than December 17, 2021. A publicly available version of this message will be placed in the NRC's official recordkeeping system (ADAMS). Please contact me if you have any questions in regard to this request.



Richard V. Guzman
Senior Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
Office: O-9C7 | Phone: (301) 415-1030
Richard.Guzman@nrc.gov

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REQUEST FOR ADDITIONAL INFORMATION
ADOPTION OF TSTF-582, "RPV WIC ENHANCEMENTS"
EXELON GENERATION COMPANY, LLC
NINE MILE POINT NUCLEAR STATION, UNIT 2
DOCKET NO. 50-410
(EPID: L-2021-LLA-0176)

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INTRODUCTION

By letter dated September 30, 2021 (Agencywide Documents Access and Management

System (ADAMS) Accession No. ML21273A017), Exelon Generation Company, LLC (the licensee) requested changes to the technical specifications (TSs) for Nine Mile Point Nuclear Station, Unit 2 (NMP2) by license amendment request (LAR). The proposed changes would revise the TSs related to reactor pressure vessel (RPV) water inventory control (WIC) based on Technical Specifications Task Force (TSTF) Traveler TSTF-582, Revision 0, "RPV WIC Enhancements" (TSTF-582) (ADAMS Accession No. ML19240A260), and the associated NRC staff safety evaluation of TSTF-582 (ADAMS Accession No. ML20219A333). During its review of the LAR, the NRC staff identified the need for additional information.

REGULATORY BASIS

The regulation at Title 10 to the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(2) requires that TSs include limiting conditions for operation (LCOs). Per 10 CFR 50.36(c)(2) (i), LCOs "are the lowest functional capability or performance levels of equipment required for safe operation of the facility." The regulation also requires that when an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TS until the condition can be met.

The regulation at 10 CFR 50.36(c)(3) requires that TSs include items in the category of surveillance requirements (SRs), which are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

REQUEST FOR ADDITIONAL INFORMATION

Section 2.2 of Attachment 1 to the LAR describes optional changes and variations (a few of the items identified as variations are included in the NUREG-1434 mark-up for TSTF-582). However, there are other variations in the TS markup pages that are not listed. The NRC staff identified items that were not included in Section 2.2 of the LAR. Please provide technical justification for the following variations from TSTF-582.

1. NMP2 TS 3.3.5.2 (RPV WIC Instrumentation):

- - a. Condition A was not deleted, and Condition B and Required Actions were not renumbered as A.
 - b. Note 1 above the TS 3.3.5.2 SRs has edits that are different.
 - c. The Table 3.3.5.2-1 column headings "Conditions Referenced from Required Action A.1" and "Surveillance Requirements" and the associated contents are not deleted in total.

2. NMP2 TS 3.5.2 (RPV WIC):

- - a. The licensee proposed to delete the existing Note for NMP2 SR 3.5.2.6 which states, "Not required to be met for ECCS pumps aligned for shutdown cooling." TSTF-582 equivalent (NUREG-1434), SR 3.5.2.6 does not have this Note.
 - b. The revision of the SR 3.5.2.6 wording is different from TSTF-582.

- c. Standard TSs (STS) SR 3.5.2.8 (Verify the required ECCS [emergency core cooling system] injection/spray subsystem actuates on a manual initiation signal) is revised in TSTF-582 to verify manual operation capability. Conversely in the LAR, the licensee proposed to delete NMP2 SR 3.5.2.8, which is a plant-specific version of the aforementioned SR.

For licensee consideration:

The NRC staff notes that there are associated editorial and formatting changes that were not proposed in NMP2 Table 3.3.5.2-1, (e.g., "(page 1 of 2)", "(continued)", etc.). These changes are not required, but may improve the final TS pages after the TSTF-582 changes are applied. The staff also notes that TSTF-583-T, Revision 0, "TSTF-582 Diesel Generator Variation" (ADAMS Accession No. ML20248H330) is an associated traveler to TSTF-582 that includes a change in TS 3.3.8.1 and makes additional changes to TS 3.8.2.

The licensee may consider adopting TSTF-583-T, Revision 0, to this LAR on an optional basis. As an example of a combined application of TSTF-582 and TSTF-583, see Edwin I. Hatch, Units Nos. 1 and 2 LAR (ADAMS Accession No. ML20241A240) and NRC license amendment (ADAMS Accession No. ML20294A076).

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