Nine Mile Point Nuclear Power Station, Unit 1
Subsequent License Renewal Application

Pre-Submittal Meeting
September 11, 2025

Constellation®

Introductions

Speakers

Chris Wilson – License Renewal Director

Sarah Brochu – License Renewal Engineering Manager

Participants

Ryan Carey – LR Site Lead

Lydia S. Dworakowski – Licensing Lead

Dennis Flores – Project Manager

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Agenda

- Introductions
- General Plant Information
- 10 CFR Part 54 Safety Application Approach
  - Scoping and Screening
  - Aging Management Review
  - Aging Management Programs
  - TLAA and Exemption Identification
  - Operating Experience
  - AMP Summary and Notable Exceptions
- AMP Tiering
- Lessons Learned
- Project Management
- Schedule and Closing Remarks
- Questions and Answers

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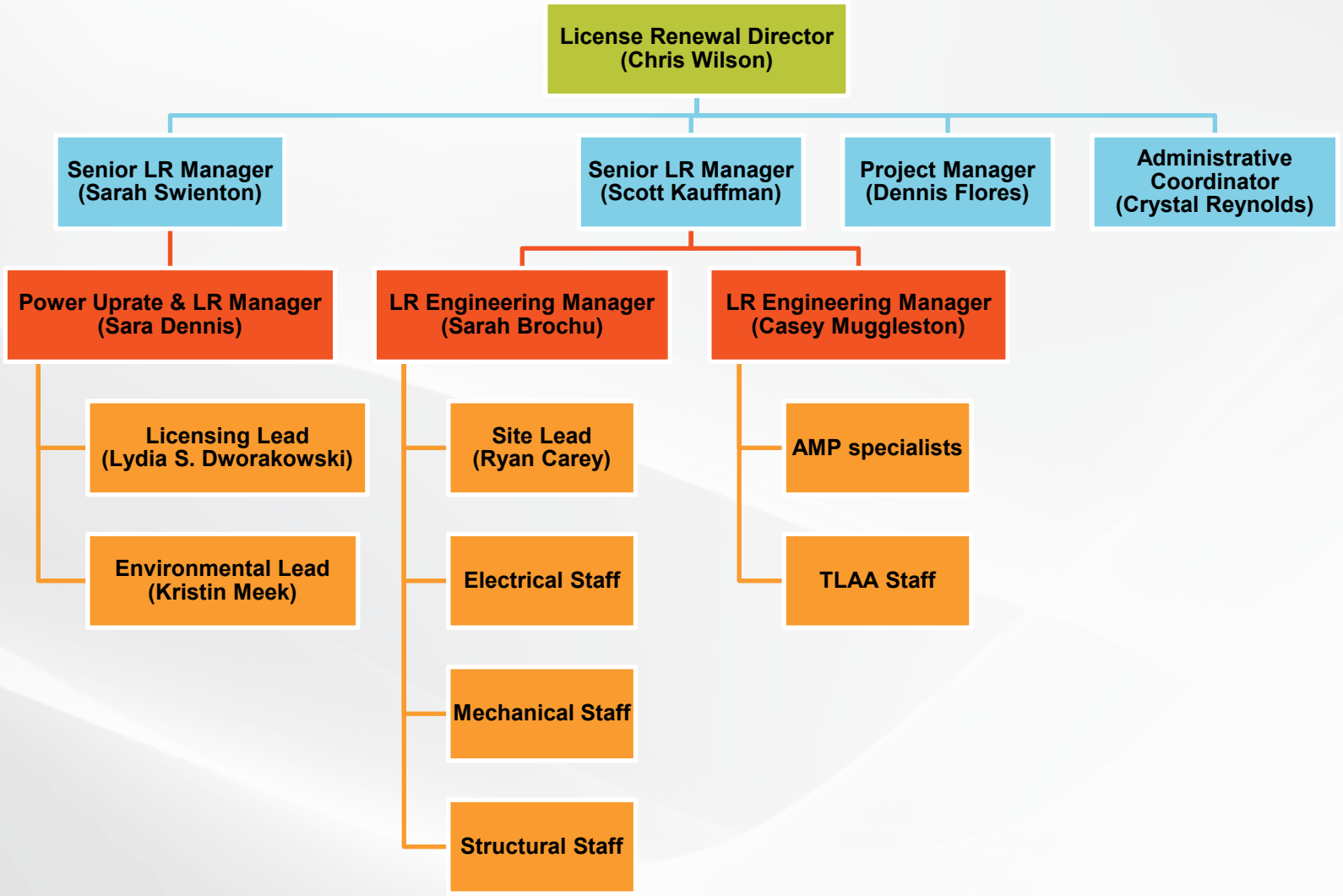
Nine Mile Point, Unit 1 SLR Project Team



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General Plant Information

Nine Mile Point Nuclear Power Station, Unit 1 (NMP1)

- Dual unit BWR site with different designs
- Unit 1 is a General Electric Type 2 Reactor with a Mark I Containment (Wet)
- Provisional Operating License No. DPR-17 issued on August 22, 1969
- Full-Term Operating License No. DPR-63 issued on December 26, 1974
- Rated core thermal power of 1850 MWt
- Ultimate Heat Sink: Lake Ontario
- The site is approximately 846 acres, located along the shore of Lake Ontario in Oswego County, New York

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General Plant Information

Overview of Initial License Renewal

- Initial License Renewal Application submitted on May 27, 2004; Renewed Operating License issued on October 31, 2006
- NMP1 entered PEO on August 22, 2009
- IP 71003 Phase IV completed on December 20, 2019 (ML20044D074)
- Renewed Operating License expires on August 22, 2029

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General Plant Information

Major Plant Structures

1. Reactor Building
2. Turbine Building
3. Waste Disposal Building
4. Screen and Pump House
5. Diesel Generator Building
6. Administrative and Administrative Extension Buildings
7. Radwaste Solidification and Storage Building
8. Lake Ontario (UHS)
9. Stack
10. ISFSI Pad (shared)
11. Offgas Building
12. Switchyard

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10 CFR Part 54 Safety Application Approach

Regulatory Guidance

- The Subsequent License Renewal Application (SLRA) format and content is based on:
  - **NUREG-2192**, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants," Revision 1
  - **NUREG-2191**, "Generic Aging Lessons Learned For Subsequent License Renewal (GALL-SLR) Report," Revision 1
  - **Regulatory Guide 1.188**, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," Revision 2

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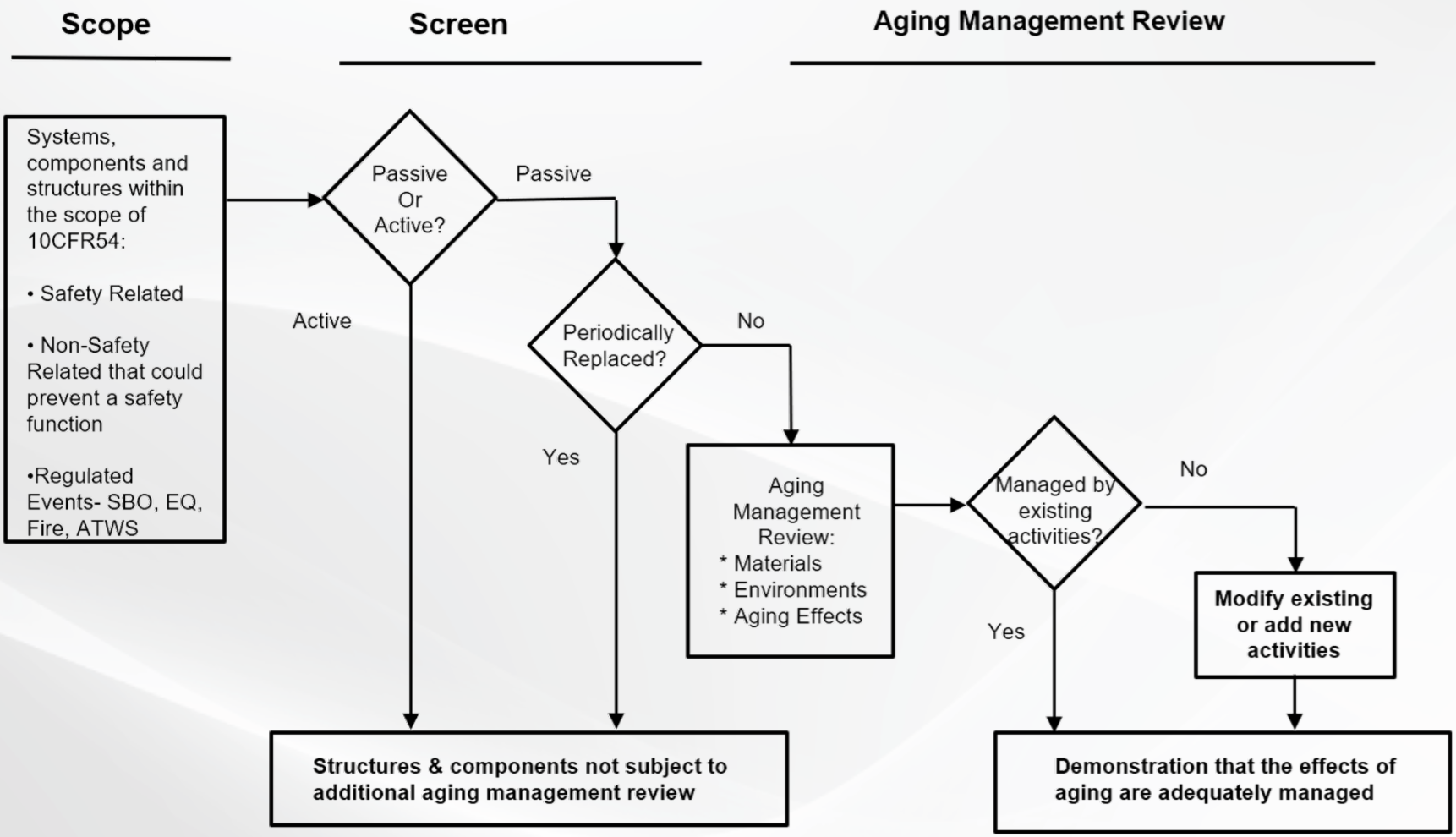
10 CFR Part 54 Safety Application Approach



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10 CFR Part 54 Safety Application Approach

- Utilized NEI 17-01, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 for Subsequent License Renewal Rule," Revision 0
- Comprehensive Scoping & Screening was performed
- Aging Management Reviews (AMRs)
  - Identification of Potential Aging Effects
  - Identification of Aging Effects Requiring Management
  - Review of Operating and Maintenance History
  - Identification of Aging Management Programs
- Aging Management Programs (AMPs)
  - Goal is to maximize consistency with GALL-SLR, Revision 1
- Time Limited Aging Analyses (TLAAs)
  - Keyword search of licensing basis documents to identify potential TLAAs
  - Comparison of the identified NMP1 potential TLAAs to SLR guidance documents and other SLR applicants
  - Review of applicable BWRVIP documents
- Operating Experience
  - Initial review period: January 2016 through May 2024; a gap review will be performed prior to submittal
  - Used Artificial Intelligence to search Corrective Action Program and identify issues with potential aging effects, previously used for Dresden SLRA
  - No new aging effects identified to date

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10 CFR Part 54 Safety Application Approach

AMPs applicable to NMP1(1)

- NMP1 will have 45 AMPs
  - 35 are existing programs
  - 16 existing programs will be enhanced for SLR purposes
  - 10 are new programs
  - No site-specific AMPs

		AMPs Consistent with GALL	AMPs with Enhancement(s) Only	AMPs with Exception(s) Only	AMPs with Exception(s) and Enhancement(s)	Plant Specific AMPs
Existing	35	18	8	1	8	0
New	10	6	0	4	0	0
Total AMPs	45					

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

New AMPs[1]		
Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (XI.M12)	Outdoor and Large Atmospheric Metallic Tanks (XI.M29)	One-Time Inspection (XI.M32)
Selective Leaching (XI.M33)	ASME Code Class 1 Small-Bore Piping (XI.M35)	External Surfaces Monitoring of Mechanical Components (XI.M36)
Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components (XI.M38)	Internal Coatings/Linings for in scope Piping, Piping Components, Heat Exchangers, and Tanks (XI.M42)	Electrical Insulation for Inaccessible Instrumentation and Control Cables Not Subject to EQ (XI.E3B)
Electrical Insulation for Inaccessible Low Voltage Power Cables Not Subject to EQ (XI.E3C)		

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

AMPs with Exceptions[1]		
Water Chemistry (XI.M2)	Flow Accelerated Corrosion (XI.M17)	Fire Water System (XI.M27)
Outdoor and Large Atmospheric Metallic Tanks (XI.M29)	Fuel Oil Chemistry (XI.M30)	One-Time Inspection (XI.M32)
Selective Leaching (XI.M33)	Buried and Underground Piping and Tanks (XI.M41)	ASME Section XI, Subsection IWE (XI.S1)
Masonry Walls (XI.S5)	Structures Monitoring (XI.S6)	Inspection of Water-Control Structures Associated with Nuclear Power Plants (XI.S7)
Electrical Insulation for Inaccessible Low Voltage Power Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (XI.E3C)		

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

Notable Exceptions[1]		
AMP	**NUREG-2191 Requirement**	**Requested Exception**
Outdoor and Large Atmospheric Tanks (XI.M29)	For large aluminum tanks on concrete which are subject to loss of material, perform volumetric inspections from the inside surface for each 10-year period starting 10 years before the subsequent period of extended operation.	NMP1 condensate storage and surge tanks (CSSTs) are indoor, aluminum tanks supported by a concrete base to be managed by one-time volumetric inspections of the tank bottom from the inside surface prior to the period of extended operation.
Fuel Oil Chemistry (XI.M30)	Fuel oil tanks are drained and cleaned, the internal surfaces visually inspected (if physically possible) and volumetrically inspected if evidence of degradation is observed during visual inspection, or if visual inspection is not possible.	The diesel driven fire pump fuel oil storage tank will not be internally inspected. This is a double wall fiberglass tank and the interstitial space between the primary and secondary storage tank wall is equipped with a leak detection system that continuously monitors for inner tank leakage and alarms locally if leakage is detected prompting corrective action. Chemistry sampling ensures that contaminants detrimental to the integrity of the storage tank are maintained within acceptance criteria.

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

Notable Exceptions[1]		
AMP	**NUREG-2191 Requirement**	**Requested Exception**
Buried and Underground Piping and Tanks (XI.M41)	For buried polymeric piping, visual inspections of buried polymeric piping in accordance with Table XI.M41-2.	The buried polymeric piping will not be inspected. Buried portions of this piping are entirely encased inside of a PVC pipe sleeve with the space between the pipe and sleeve filled with sand. Degradation of the pipe is not expected with the protective sleeve and layer of sand in between.
	For safety-related buried piping, backfill is to be consistent within industry standards for aggregate size and distance from the component.	For the NMP1 emergency diesel generator system, the aggregate size meets the specified size, however distance of the safety related fill around the components is shorter than the requirement. This difference is not expected to have any impact on damaging the coating on the piping.

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

Notable Exceptions[1]		
AMP	**NUREG-2191 Requirement**	**Requested Exception**
ASME Section XI, IWE (XI.S1)	Steel, stainless steel, and dissimilar metal weld pressure-retaining components that are subject to cyclic loading but have no current fatigue analysis, are monitored for cracking and are supplemented with surface examination (or other applicable technique) in addition to visual examination to detect cracking.	NMP1 has performed a fatigue waiver analysis in accordance with the ASME Code to demonstrate that the drywell and associated penetrations do not require a detailed fatigue analysis through the subsequent period of extended operation. This analysis does not include penetrations for high-temperature process lines as those penetrations will require aging management in accordance with the guidance in XI.S1 ASME Section XI, IWE.
Masonry Walls (XI.S5) Structures Monitoring (XI.S6) Inspection of Water-Control Structures Associated with Nuclear Power Plants (XI.S7)	In general, all structures are monitored on an interval not to exceed five years.	The inspection frequency for normally inaccessible areas due to high radiation, including primary containment, main steam tunnel, heater bays, and the condenser bays, may exceed five years as they will be inspected every third refueling outage.

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

AMPs Not Applicable (Does Not Include PWR Specific AMPs)[1]		
Concrete Containment Tendon Prestress (X.S1)	Boraflex Monitoring (XI.M22)	BWR Reactor Water Cleanup System (XI.M25)
High Density Polyethylene (HDPE) Piping and Carbon Fiber Reinforced Polymer (CFRP) Repaired Piping (XI.M43)	Fuse Holders (XI.E5)	High Voltage Insulators (XI.E7)
ASME Section XI, Subsection IWL (XI.S2)		

(1) – Preliminary Information

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AMP Tiering

	Generic Tiering	NMP1(1)
Confirmation	15	18
Modified	14	19
Standard	16	8
Total	45	45

(1) – Suggested AMP Tiering

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AMP Tiering

NMP1 AMP Tiering(1)		
Standard	**Modified**	**Confirmation**
Mechanical	Mechanical	Mechanical
XI.M26	X.M1	**X.M2***
XI.M27	**XI.M9***	**XI.M1***
XI.M33	XI.M18	**XI.M2***
XI.M41	XI.M20	XI.M3
	XI.M23	**XI.M4***
Structural	XI.M24	**XI.M7***
XI.S6	XI.M29	**XI.M8***
XI.S7	**XI.M35***	**XI.M12***
	XI.M36*	**XI.M17***
Electrical	XI.M40	**XI.M21A***
X.E1	**XI.M42***	**XI.M30***
XI.E1		**XI.M31***
	Structural	**XI.M32***
	XI.S3*	**XI.M38***
	XI.S8*	XI.M39
	Electrical	Structural
	XI.E2*	**XI.S1***
	XI.E3A*	XI.S4
	XI.E3B*	XI.S5
	XI.E3C*	
	XI.E4	
	XI.E6*	

(1) – Suggested AMP Tiering
(*) – Fleet-wide Program

Constellation

Lessons Learned

- Lessons learned from previous Constellation and industry license renewal projects are being utilized in the NMP1 SLR Project
- In particular, lessons learned from the recent Clinton and Dresden license renewal projects will be leveraged, such as:
  - Managing resources given concurrent projects
  - Standardizing reviews from project to project to avoid variances
  - Reviewing recent Breakout Questions, Supplements, and RAIs for generic applicability
  - Utilizing the Tiered Approach for categorizing AMP reviews
  - Successful utilization of Constellation SharePoint as the ePortal for sharing documents
  - Populating the ePortal consistent with that required for the Tiered Approach
  - Assigning unique tracking numbers for Document Requests vs Breakout Questions
  - Submitting timely Supplements to minimize the number of RAIs
  - Portal letter clarity on the portal open duration
- Constellation is a strong advocate of working with the NRC staff to enable an efficient review using tools such as: Audits, Tiering, and the use of an electronic portal
- Constellation is open to NRC feedback on a collaborated review process to support efficiency efforts

Constellation

Lessons Learned

- Constellation has extensive aging management experience
  - ✓ 20 of 21 units have renewed operating licenses
  - ✓ 15 units are operating in the period of extended operation
  - ✓ Fleet level AMPs previously evaluated in SERs

- Constellation participates in NEI and EPRI initiatives related to License Renewal and Long-Term Operations
  - ✓ Using Best Practices to number AMR data tables to facilitate the review process

- The Constellation NMP1 SLR Project Team consists of experienced technical personnel

- Current NRC Expectations and SRP Guidance
  - — Constellation reviews Breakout Questions, RAIs/RCIs, and Supplements associated with recent license renewal applications to ensure consistency with current NRC expectations and SRP guidance

- An External Review of the SLRA will be performed

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Project Management

- The SLRA, including the Environmental Report (ER), will be submitted via the NRC Electronic Information Exchange (EIE)
- The Constellation SharePoint will be utilized as the ePortal to support NRC review
  - Documentation uploaded to the ePortal will be consistent with the Tiered Approach
- Constellation Licensing Lead will coordinate with the NRC PM
- Audit Support
  - Constellation will work with the NRC PM to establish and manage the schedules
  - Constellation will track NRC audit questions, requests, and the responses in a database
  - Site Lead will coordinate plant walkdowns and other on-site activities
- Supplements
  - Constellation will submit timely Supplements, as needed, to optimize efficiency and reduce the number of RAIs
- RAI Responses
  - Constellation will submit timely responses to NRC requests for additional information

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Schedule and Closing Remarks

- The NMP1 SLRA will be consistent with GALL-SLR, Revision 1 to the greatest extent possible
- The NMP1 SLRA will be consistent with industry practices and lessons learned from recent LRs/SLRs to meet NRC requirements
- Constellation will submit a high-quality application that can support an efficient staff review
- The NMP1 SLRA is on track to be submitted on the target date of **March 25, 2026**

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Questions

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R.E. Ginna Nuclear Power Plant
Subsequent License Renewal Application

Pre-Submittal Meeting

September 11, 2025

Constellation®

Introductions

Speakers

Chris Wilson– License Renewal Director

Julian Laverde– License Renewal Engineering Manager

Participants

George Wrobel– LR Site Lead

Iba Ello-Fletcher – Licensing Lead

Dennis Flores– Project Manager

Constellation

Agenda

- Introductions
- General Plant Information
- 10 CFR Part 54 Safety Application Approach
  - Scoping and Screening
  - Aging Management Review
  - Aging Management Programs
  - TLAA and Exemption Identification
  - Operating Experience
  - AMP Summary and Notable Exceptions
- AMP Tiering
- Lessons Learned
- Project Management
- Schedule and Closing Remarks
- Questions and Answers

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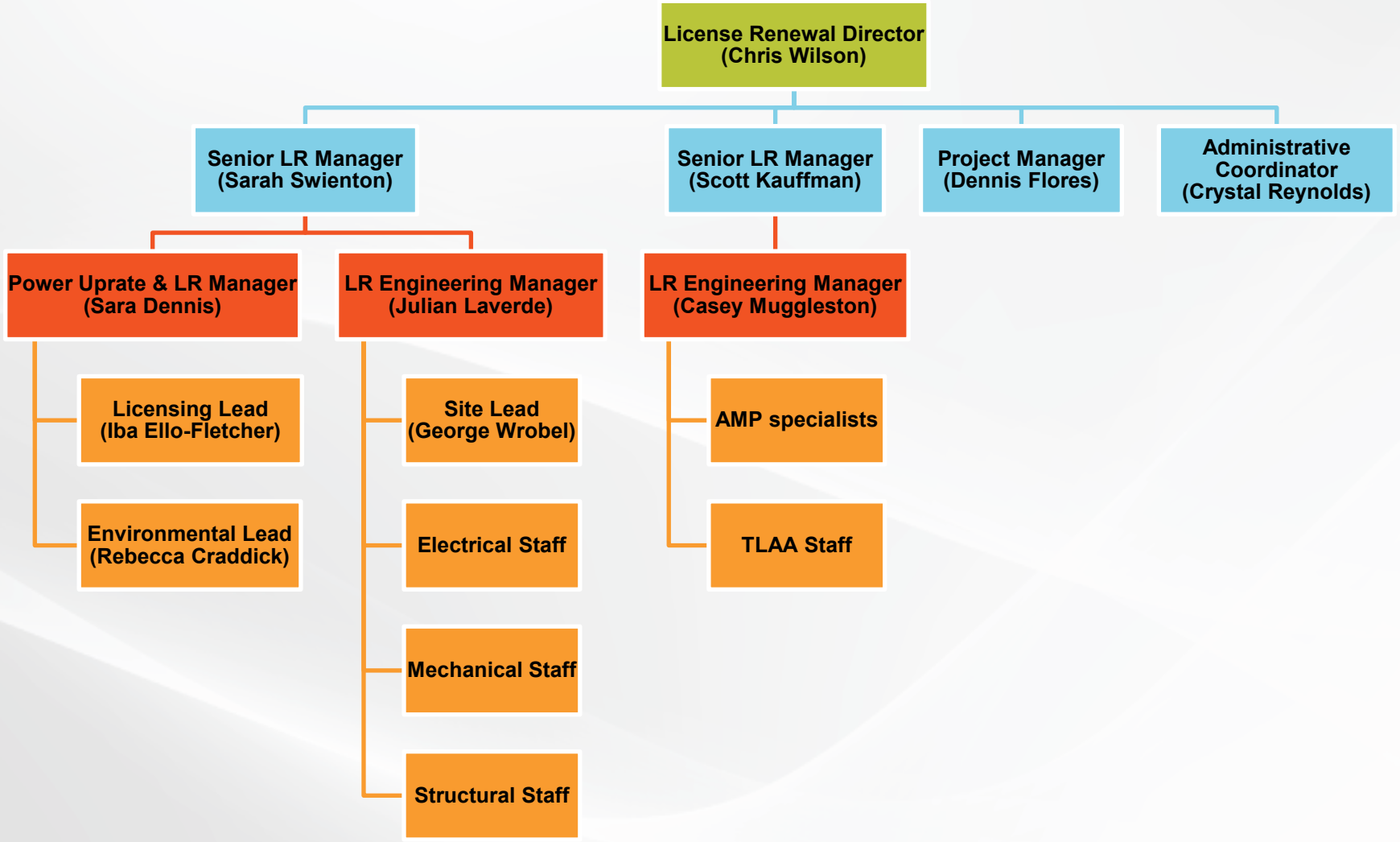
R.E. Ginna Nuclear Power Plant SLR Project Team



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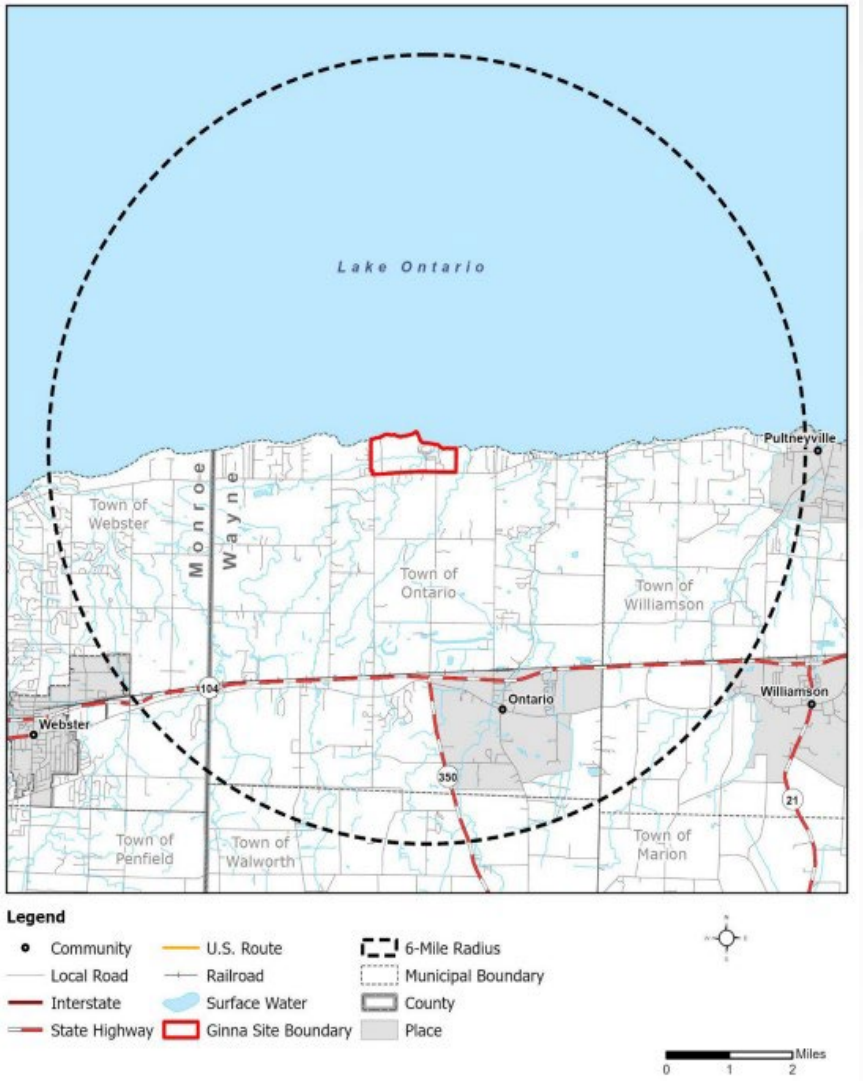
General Plant Information

R.E. Ginna Nuclear Power Plant (Ginna)

- A single unit Westinghouse two-loop Pressurized Water Reactor with Large Dry Containment
- Full-Term Operating License No. DPR-18 issued on December 10, 1984, superseded Provisional Operating License No. DPR-18 issued on September 19, 1969
- Ultimate Heat Sink: Lake Ontario
- The site is approximately 426 acres, located on the south shore of Lake Ontario in Wayne County, near Rochester, New York



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General Plant Information

Core Power History

- Current rated core thermal power of 1775 MWt
  - 1969: 1300 MWt initial
  - 1972: 1520 MWt Power Uprate
  - 2006: 1775 MWt Power Uprate

Overview of Initial License Renewal

- Initial License Renewal Application was submitted on August 1, 2002; Renewed Operating License issued on May 19, 2004
- Ginna entered PEO on September 19, 2009
- IP 71003 Phase IV completed on March 22, 2019 (ML19126A012)
- Renewed Operating License expires on September 18, 2029

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General Plant Information

Major Plant Structures

1. Containment Building
2. Turbine Building
3. Auxiliary Building
4. Administrative Building
5. Diesel Generator Building
6. Screenhouse Building
7. Main Access Facility
8. Switchyard
9. Lake Ontario (UHS)
10. Training Center
11. Meteorological Tower
12. Canister Preparation Building
13. ISFSI Pad

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10 CFR Part 54 Safety Application Approach

Regulatory Guidance

- The Subsequent License Renewal Application (SLRA) format and content is based on:
  - **NUREG-2192**, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants," Revision 1
  - **NUREG-2191**, "Generic Aging Lessons Learned For Subsequent License Renewal (GALL-SLR) Report," Revision 1
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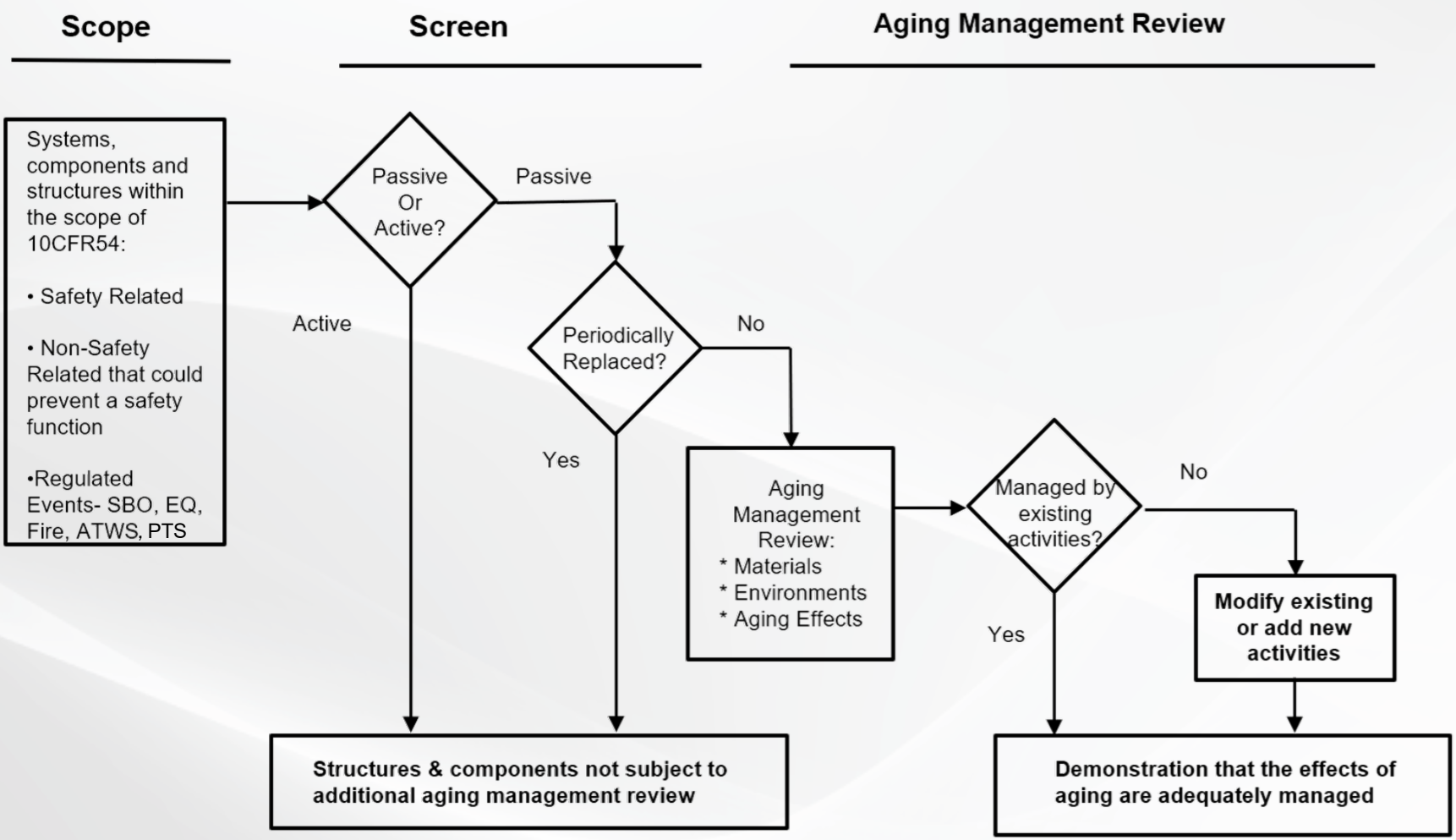
10 CFR Part 54 Safety Application Approach



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10 CFR Part 54 Safety Application Approach

- Utilized NEI 17-01, “Industry Guideline for Implementing the Requirements of 10 CFR Part 54 for Subsequent License Renewal Rule,” Revision 0
- Comprehensive Scoping & Screening was performed
- Aging Management Reviews (AMRs)
  - Identification of Potential Aging Effects
  - Identification of Aging Effects Requiring Management
  - Review of Operating and Maintenance History
  - Identification of Aging Management Programs
- Aging Management Programs (AMPs)
  - Goal is to maximize consistency with GALL-SLR, Revision 1
- Time Limited Aging Analyses (TLAAs)
  - Keyword search of licensing basis documents to identify potential TLAAs
  - Comparison of the identified Ginna potential TLAAs to SLR guidance documents and other SLR applicants
  - Review of applicable Material Reliability Program (MRP) reports
- Operating Experience
  - Initial review period: 01/01/2016 through 05/15/2024; will perform gap review prior to submittal
  - Used Artificial Intelligence to search Corrective Action Program and identify issues with potential aging effects, previously used for Dresden SLRA
  - No new aging effects identified to date

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10 CFR Part 54 Safety Application Approach

AMPs applicable to Ginna(1)

- Ginna will have 48 AMPs
  - 45 are existing programs
  - 24 existing programs will be enhanced for SLR purposes
  - 3 are new programs
  - No site-specific AMPs

		AMPs Consistent with GALL-SLR	AMPs with Enhancement(s) Only	AMPs with Exception(s) Only	AMPs with Exception(s) and Enhancement(s)	Plant Specific AMPs
Existing	45	20	16	1	8	0
New	3	3	0	0	0	0
Total AMPs	48					

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

New AMPs[1]
One-Time Inspection (XI.M32)
ASME Code Class 1 Small-Bore Piping (XI.M35)
Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (XI.E6)

AMPs with Exceptions[1]		
Boric Acid Corrosion (XI.M10)	Flow-Accelerated Corrosion (XI.M17)	Closed Treated Water System (XI.M21A)
Fire Water System (XI.M27)	Fuel Oil Chemistry (XI.M30)	Selective Leaching (XI.M33)
Flux Thimble Tube Inspection (XI.M37)	Buried and Underground Piping and Tanks (XI.M41)	Concrete Containment Unbonded Tendon Prestress (X.S1)

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

Notable Exceptions[1]		
AMP	**NUREG-2191 Requirement**	**Requested Exception**
Closed Treated Water Systems (XI.M21A)	Chemistry parameters are monitored and testing frequency is in accordance with EPRI guidance	Some sampling parameters and frequency differ from EPRI guidance based on vendor recommendations, operating experience, and long-term chemistry trends showing no excursions
Fuel Oil Chemistry (XI.M30)	Biocide or corrosion inhibitors may be added as a preventive measure	Corrosion inhibitors, oil stabilizers, or biocides are not added to fuel oil. The program evaluates the need for addition of biocide or corrosion inhibitors if periodic testing indicates biological activity or evidence of corrosion. If biocide addition is required, increased fuel oil filter monitoring will occur
Buried and Underground Piping and Tanks (XI.M41)	Cathodic protection is supplied for reinforced concrete pipe, prestressed concrete cylinder pipe, and carbon steel pipe	Cathodic protection systems are not utilized on all in-scope buried piping and tanks
Concrete Containment Unbounded Tendon Prestress (X.S1)	The program periodically measures and evaluated tendon forces	Ginna has requested a relief request for the third Containment Inservice Inspection (CISI) Interval examination of containment post-tensioning components
	The measured prestress forces on common (control) tendons and tendons selected by random sampling of each tendon group using the lift-off or equivalent method	Ginna has not designated any common (control) tendon
	The estimated and measured prestress forces up to the current examination to be plotted against time for each tendon group	The estimated and measured prestress forces from the last re-tensioning up to the current surveillance are plotted against time for the vertical tendons

(1) – Preliminary Information

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10 CFR Part 54 Safety Application Approach

AMPs Not Applicable (Does Not Include BWR Specific AMPs)(1)
Boraflex Monitoring (XI.M22)
High Density Polyethylene (HDPE) Piping and Carbon Fiber Reinforced Polymer (CFRP) Repaired Piping (XI.M43)
Fuse Holders (XI.E5)
High Voltage Insulators (XI.E7)

(1) – Preliminary Information

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AMP Tiering

	Generic Tiering	Ginna(1)
Confirmation	16	20
Modified	16	22
Standard	16	6
Total	48	48

(1) – Suggested AMP Tiering

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AMP Tiering

Ginna AMP Tiering(1)		
Standard	**Modified**	**Confirmation**
Mechanical	Mechanical	Mechanical
XI.M27	XI.M18	X.M1
XI.M33	XI.M20	**X.M2***
XI.M41	**XI.M21A***	**XI.M1***
	XI.M24	**XI.M2***
Structural	XI.M26	XI.M3
XI.S6	XI.M29	**XI.M10***
	XI.M30*	**XI.M11B***
Electrical	**XI.M35***	**XI.M12***
X.E1	**XI.M36***	**XI.M16A***
XI.E1	XI.M37	*with MRP-227, R2-A*
	XI.M38*	**XI.M17***
	XI.M40	**XI.M19***
	XI.M42*	XI.M23
		XI.M31*
	Structural	**XI.M32***
	X.S1*	XI.M39
	XI.S3*	
	XI.S7	Structural
		XI.S1*
	Electrical	**XI.S2***
	XI.E2*	XI.S4
	XI.E3A*	XI.S5
	XI.E3B*	**XI.S8***
	XI.E3C*	
	XI.E4	
	XI.E6*	

(1) – Suggested AMP Tiering
(*) – Fleet-wide Program

Constellation

Lessons Learned

- Lessons learned from previous Constellation and industry license renewal projects are being utilized in the Ginna SLR Project
- In particular, lessons learned from the recent Clinton and Dresden license renewal projects will be leveraged, such as:
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Lessons Learned

- Constellation has extensive aging management experience
  - ✓ 20 of 21 units have renewed operating licenses
  - ✓ 15 units are operating in the period of extended operation
  - ✓ Fleet level AMPs previously evaluated in SERs
- Constellation participates in NEI and EPRI initiatives related to License Renewal and Long-Term Operations
  - ✓ Using Best Practices to number AMR data tables to facilitate the review process
- The Constellation Ginna SLR Project Team consists of experienced technical personnel
- Current NRC Expectations and SRP Guidance
  - — Constellation reviews Breakout Questions, RAIs/RCIs, and Supplements associated with recent license renewal applications to ensure consistency with current NRC expectations and SRP guidance
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Constellation

Schedule and Closing Remarks

- The Ginna SLR application will be consistent with GALL-SLR, Revision 1 to the greatest extent possible
- The Ginna SLRA will be consistent with industry practices and lessons learned from recent LRs/SLRs to meet NRC requirements
- Constellation will submit a high-quality application that can support an efficient staff review
- The Ginna SLRA is on track to be submitted on the target date of **June 17, 2026**

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Questions

Constellation