



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 17, 2009

Mr. Samuel L. Belcher
Vice President Nine Mile Point
Nine Mile Point Nuclear Station, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2, RESPONSE TO GENERIC LETTER 2008-01, "MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS," (TAC NOS. MD7848 AND MD7849)

Dear Mr. Belcher:

By letters dated October 14, 2008, and July 6, 2009, Nine Mile Point Nuclear Station, LLC, submitted responses to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," for Nine Mile Point Nuclear Station, Unit Nos. 1 and 2 (NMP1 and 2).

The Nuclear Regulatory Commission (NRC) staff is reviewing the responses and has determined that additional information is needed to support its review. Enclosed is the NRC staff's request for additional information (RAI). The RAI was discussed with your staff on August 14, 2009, and it was agreed that your response would be provided within 45 days from the date of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard V. Guzman".

Richard V. Guzman, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and 50-410

Enclosure:
As stated

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REQUEST FOR ADDITIONAL INFORMATION (RAI)
NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2
RESPONSE TO GENERIC LETTER (GL) 2008-01, "MANAGING GAS ACCUMULATION IN
EMERGENCY CORE COOLING, DECAY HEAT REMOVAL,
AND CONTAINMENT SPRAY SYSTEMS,"
DOCKET NOS. 50-220 AND 50-410

The Nuclear Regulatory Commission (NRC) staff is reviewing the subject Nine Mile Point Nuclear Station (NMPNS) responses dated October 14, 2008, and July 6, 2009. The NRC staff has determined that additional information requested below will be needed to complete its review. Guidance on the NRC staff's expectations is provided by Reference 1 which is generally consistent with Nuclear Energy Institute (NEI) guidance provided to industry in Reference 2 as clarified in later NEI communications. The NRC staff recommends that the licensee consult Reference 1 when responding to the following RAIs:

1. It is not clear what "Upon NRC approval of the TSTF Traveler" means. Clarify the schedule for review of the generic Technical Specifications and the possible submission of a License Amendment Request.
2. In Reference 4, it is stated that the "abnormal venting results or pipe void identification would be reported and evaluated in accordance with the Corrective Action Program (CAP) which ensures those conditions are evaluated for potential impact on the station..." Clarify the meaning of "potential impact" and how it is determined. Describe the actions to be taken if the evaluation determines that there will be an impact on the station.
3. Clarify whether the fill and vent procedures are able to ensure that gas was successfully vented and gas was not transported to a previously inspected high point.
4. In Reference 4, it is stated that "it is concluded that the voided section of piping is not adverse to the operation of the RHR [residual heat removal] system in the shutdown cooling mode." Clarify what is intended by "adverse to the operation" and describe the criteria used to determine what is "adverse to the operation." Discuss how the stated conclusions apply to other operational modes including expected accident conditions.
5. The licensee does not discuss the methods used to determine the volume of voids; nor are procedures concerning void volume determination mentioned as needed to be developed or revised. Clarify whether procedures to measure the volume of voids and to measure the amount of gas that is actually vented will be developed, or describe existing measurement procedures.

Enclosure

6. The licensee states that if a void is detected during surveillance testing or other activities, then it will be evaluated in accordance with the CAP. Clarify what is involved in evaluating a void in accordance with the CAP.
7. Training was not identified in GL 2008-01, but is considered to be a necessary part of applying procedures and other activities when addressing the issues identified in the GL. Briefly discuss training.
8. Justify the conclusion that a Froude number of less than 0.8 will ensure that air will not be ingested into the core spray and containment spray strainers with respect to the criteria of Reference 6.
9. Discuss the conclusions that voids will not be ingested from the torus with respect to Generic Issue 193 where this conclusion has not been generally substantiated.
10. Describe the procedures mentioned in Reference 4, section 3(b).

REFERENCES

1. Ruland, William H., "Preliminary Assessment of Responses to Generic Letter 2008-01, 'Managing Gas Accumulation in emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,' and Future NRC Staff Review Plans," NRC letter to James H. Riley, Nuclear Energy Institute, ML091390637, May 28, 2009.
2. Riley, James H., "Generic Letter (GL) 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Contain Spray Systems' Evaluation and 3 Month Response Template," Letter to Administrative Points of Contact from Director, Engineering, Nuclear Generation Division, Nuclear Energy Institute, Enclosure 2, "Generic Letter 2008-01 Response Guidance," March 20, 2008.
3. Case, Michael J., "NRC Generic Letter 2008-01: Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," Letter from Director, Division of Policy and Rulemaking, Office of Nuclear Reactor Regulation, NRC, ML072910759, January 11, 2008.
4. Polson, Keith J., "Nine Mile Point Nuclear Station, Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410, Nine-Month Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems'," Letter to Document Control Desk, NRC, from Vice President, Nine Mile Point, ML082900036, October 14, 2008.
5. Belcher, Sam, "Nine Mile Point Nuclear Station, LLC; Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410, Supplemental Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems'," Letter to Document Control Desk, NRC, from Vice President, Nine Mile Point, ML091950416, July 6, 2009.

6. Lyon, Warren C., U.S. Nuclear Regulatory Commission, "Revision 2 to NRC Staff Criteria for Gas Movement in Suction Lines and Pump Response to Gas," ML090900136, March 26, 2009.

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/RA/

Richard V. Guzman, Senior Project Manager
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Accession Number: ML092260328 *RAI provided by memo. No substantial changes made. NRR-058

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