



RS-16-089

July 1, 2016

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Nine Mile Point Nuclear Station, Unit 2  
Renewed Facility Operating License No. NPF-69  
NRC Docket No. 50-410

Subject: Report of Full Compliance with March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements For Mitigation Strategies For Beyond-Design-Basis External Events," dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012
4. Letter from M. G. Korsnick (CENG) to Document Control Desk (NRC), Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 26, 2012
5. Letter from M. G. Korsnick (CENG) to Document Control Desk (NRC), Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013
6. Letter from M. G. Korsnick (CENG) to Document Control Desk (NRC), Supplement to Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated March 8, 2013
7. Letter from E. D. Dean (CENG) to Document Control Desk (NRC) Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 27, 2013

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8. Letter from M. G. Korsnick (CENG) to Document Control Desk (NRC), February 2014 Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 27, 2014
9. Letter from M. G. Korsnick (CENG) to Document Control Desk (NRC), August 2014 Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 26, 2014
10. Letter from M. G. Korsnick (CENG) to Document Control Desk (NRC), February 2015 Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 19, 2015
11. Exelon Generation Company, LLC, Fifth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2015, Nine Mile Point Nuclear Station, Unit 2 (RS-15-219)
12. Exelon Generation Company, LLC, Sixth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2016, Nine Mile Point Nuclear Station, Unit 2 (RS-16-029)
13. NRC letter from J. S. Bowen (NRC) to J. A. Spina (CENG), Nine Mile Point Nuclear Station, Units 1 and 2 – Interim Staff Evaluation Relating to Overall Integrated Plans in Response to Order EA-12-049, (Mitigation Strategies) (TAC Nos. MF1129 and MF1130), dated December 19, 2013
14. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012
15. Exelon Generation Company, LLC letter to USNRC, Response to March 12, 2012, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, Enclosure 5, Recommendation 9.3, Emergency Preparedness – Staffing, Requested Information Items 1, 2, and 6 - Phase 2 Staffing Assessment, dated December 4, 2015, Nine Mile Point Nuclear Station, Unit 2 (RS-15-271)
16. Letter from J. Paige (NRC) to P. M. Orphanos (EGC), Nine Mile Point Nuclear Station, Units 1 and 2 – Report for the Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC Nos. MF1129, MF1130, MF1131, and MF1132), dated April 28, 2015
17. Letter from J. Paige (NRC) to B. C. Hanson (EGC), Nine Mile Point Nuclear Station, Unit 2 – Report for the Onsite Audit Regarding Implementation of Mitigating Strategies Related to Orders EA-12-049 (CAC No. MF1130), dated February 4, 2016

On March 12, 2012, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued Order EA-12-049, “Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond-Design-Basis External Events,” (Reference 1) to Exelon Generation Company, LLC (EGC), previously Constellation Energy Nuclear Group, LLC (Exelon, the licensee) for Nine Mile Point Nuclear Station, Unit 2. Reference 1 was immediately effective and directed EGC to

develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an Overall Integrated Plan (OIP) pursuant to Section IV, Condition C. Reference 2 endorsed industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the EGC initial status report regarding mitigation strategies. References 5 and 6 provided the Nine Mile Point Nuclear Station, Unit 2 OIP.

Reference 1 required submission of a status report at six-month intervals following submittal of the OIP. References 7, 8, 9, 10, 11, and 12 provided the first, second, third, fourth, fifth, and sixth six-month status reports, respectively, pursuant to Section IV, Condition C.2, of Reference 1 for Nine Mile Point Nuclear Station, Unit 2.

The purpose of this letter is to provide the report of full compliance with the March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond-Design-Basis External Events (Order Number EA-12-049) (Reference 1) pursuant to Section IV, Condition C.3 of the Order for Nine Mile Point Nuclear Station, Unit 2.

Nine Mile Point Nuclear Station, Unit 2 has developed, implemented, and will maintain the guidance and strategies to maintain or restore core cooling, containment function, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event in response to Order EA-12-049. The information provided herein documents full compliance for Nine Mile Point Nuclear Station Unit 2, with Reference 1.

EGC's response to the NRC Interim Staff Evaluation (ISE) open and confirmatory items identified in Reference 13 have been addressed and closed as documented in References 7, 8, 9, 10, 11, and 12, and below, and are considered complete pending NRC closure. OIP open items have been addressed and closed as documented in References 7, 8, 9, 10, 11, and 12, and below, and are considered complete pending NRC closure. EGC's response to the NRC audit questions and additional audit open items have been addressed and closed as documented in Reference 16, and below, and are considered complete pending NRC closure. The following tables provide completion references for each OIP open item, NRC ISE open or confirmatory item, and NRC Audit Report open item.

**Overall Integrated Plan Open Items**

<b>OIP Open Item</b>	<b>Completion Response Reference</b>
OIP Open Item No. 1	Reference 8
OIP Open Item No. 2	Reference 10
OIP Open Item No. 3	Reference 11
OIP Open Item No. 4	Reference 12
OIP Open Item No. 5	Reference 7
OIP Open Item No. 6	Reference 12
OIP Open Item No. 7	Deleted – Addressed in Reference 9
OIP Open Item No. 8	Reference 10

OIP Open Item	Completion Response Reference
OIP Open Item No. 9	Addressed with this submittal as provided below
OIP Open Item No. 10	Addressed with this submittal as provided below
OIP Open Item No. 11	Reference 9
OIP Open Item No. 12	Reference 12
OIP Open Item No. 13	Reference 12
OIP Open Item No. 14	Reference 10
OIP Open Item No. 15	Reference 10
OIP Open Item No. 16	Reference 10
OIP Open Item No. 17	Reference 10
OIP Open Item No. 18	Reference 11
OIP Open Item No. 19	Reference 11
OIP Open Item No. 20	Reference 12
OIP Open Item No. 21	Reference 11
OIP Open Item No. 22	Reference 10
OIP Open Item No. 23	Addressed with this submittal as provided below
OIP Open Item No. 24	Reference 10
OIP Open Item No. 25	Reference 12
OIP Open Item No. 26	Deleted – Addressed in Reference 11
OIP Open Item No. 27	Reference 12
OIP Open Item No. 28	Reference 12
OIP Open Item No. 29	Reference 12
OIP Open Item No. 30	Reference 12
OIP Open Item No. 31	Reference 12
OIP Open Item No. 32	Reference 10
OIP Open Item No. 33	Reference 11
OIP Open Item No. 34	Deleted – Addressed in Reference 11
OIP Open Item No. 35	Reference 11
OIP Open Item No. 36	Deleted – Addressed in Reference 10
OIP Open Item No. 37	Reference 12
OIP Open Item No. 38	Reference 12
OIP Open Item No. 39	Deleted – Addressed in Reference 9
OIP Open Item No. 40	Deleted – Addressed in Reference 7
OIP Open Item No. 41	Deleted – Addressed in Reference 7
OIP Open Item No. 42	Reference 11
OIP Open Item No. 43	Reference 10
OIP Open Item No. 44	Reference 11
OIP Open Item No. 45	Deleted – Addressed in Reference 7
OIP Open Item No. 46	Reference 11
OIP Open Item No. 47	Reference 12
OIP Open Item No. 48	Reference 10
OIP Open Item No. 49	Deleted – Addressed in Reference 9
OIP Open Item No. 50	Deleted – Addressed in Reference 9
OIP Open Item No. 51	Deleted – Addressed in Reference 9
OIP Open Item No. 52	Addressed with this submittal as provided below
OIP Open Item No. 53	Addressed with this submittal as provided below
OIP Open Item No. 54	Addressed with this submittal as provided below

<b>OIP Open Item</b>	<b>Completion Response Reference</b>
OIP Open Item No. 55	Addressed with this submittal as provided below
OIP Open Item No. 56	Addressed with this submittal as provided below
OIP Open Item No. 57	Addressed with this submittal as provided below
OIP Open Item No. 58	Addressed with this submittal as provided below
OIP Open Item No. 59	Addressed with this submittal as provided below
OIP Open Item No. 60	Deleted – Addressed in Reference 7
OIP Open Item No. 61	Reference 12

#### **Interim Staff Evaluation Open Items**

<b>ISE Open Item</b>	<b>Completion Response Reference</b>
Item No. 3.1.1.3.A	Reference 12
Item No. 3.2.3.B	Reference 12
Item No. 3.2.3.C	Reference 10

#### **Interim Staff Evaluation Confirmatory Items**

<b>ISE Confirmatory Item</b>	<b>Completion Response Reference</b>
Item No. 3.1.1.1.A	Reference 11
Item No. 3.1.1.2.A	Reference 10
Item No. 3.1.1.4.A	Reference 10
Item No. 3.2.1.1.A	Reference 11
Item No. 3.2.1.1.B	Reference 11
Item No. 3.2.1.1.C	Reference 11
Item No. 3.2.1.1.D	Reference 11
Item No. 3.2.1.1.E	Reference 11
Item No. 3.2.1.2.A	Reference 12
Item No. 3.2.2.A	Reference 11
Item No. 3.2.3.A	Reference 12
Item No. 3.2.4.2.A	Reference 12
Item No. 3.2.4.4.A	Reference 12
Item No. 3.2.4.4.B	Reference 10 and updated with this submittal as provided below
Item No. 3.2.4.6.A	Reference 10
Item No. 3.2.4.8.A	Reference 12
Item No. 3.2.4.8.B	Reference 10
Item No. 3.2.4.9.A	Reference 10
Item No. 3.2.4.10.A	Reference 10
Item No. 3.4.A	Reference 10
Item No. 3.4.B	Reference 10

**NRC Audit Report Open Items**

<b>Audit Open Item</b>	<b>Completion Response Reference</b>
ISE OI 3.2.3.B	References 12 and 17
ISE CI 3.1.1.1.A	References 11 and 17
ISE CI 3.1.1.2.A	References 10 and 17
ISE CIs 3.2.1.1.A, 3.2.1.1.B, 3.2.1.1.C, 3.2.1.1.D, and 3.2.1.1.E	References 11 and 17
ISE CI 3.2.1.2.A	References 12 and 17
ISE CI 3.2.2.A	References 11 and 17
ISE CIs 3.2.3.A, 3.2.4.2.A, and SE Review Item 5	References 12 and 17
ISE CI 3.4.B, AQ 16, and AQ 17	References 11 and 17
AQ 1 and AQ 2	Reference 17
SE Review Item 1	Reference 17
SE Review Item 6	Reference 17
ISE CI 3.2.4.10.A	References 10 and 17
ISE CI 3.2.4.2.A	Addressed with this submittal as provided below
AQ 20	Addressed with this submittal as provided below

The table below documents the completion of the final remaining open actions as identified in Reference 12, and above. As stated above, EGC provides the response for the following items and considers them to be complete for Nine Mile Point Nuclear Station, Unit 2.

<b>Item</b>	<b>Description</b>	<b>Status</b>
OIP Open Item No. 9  Perform an evaluation of the Uninterruptible Power Supply (UPS) strategy and design and implement as required or formalize the use of the small portable gas generators (communication strategies).	NMP2 current capability for on-site communications utilizes hand-held 450MHz radios in the radio-to-radio or 'talk-around' mode with sound powered phones as a backup to meet FLEX requirements. Small portable generators that are stored in the FLEX Storage Building will be used to recharge radio batteries as needed. The evaluation of the Uninterruptible Power Supply (UPS) strategy for the NMP radio system is complete. A design change is in progress to install Uninterruptible Power Supplies for support of the NMP Radio Communication system. This communication upgrade will be complete by 12/31/2016 to meet Rec 9.3 Communications	<u>Complete</u>

Item	Description	Status
	commitments for NMP.	
<p>OIP Open Item No. 10</p> <p>Perform an evaluation of the redundant power strategy for radio repeaters and design and implement modifications or programmatic changes as required.</p>	<p>The evaluation of the NMP Radio Communication system is complete. Modifications are underway to install Uninterruptible Power Supply (UPS) to support radio operations on site. This communication upgrade will be complete by 12/31/2016 to meet Rec 9.3 Communications commitments for NMP. In the interim, the hand-held 450MHz radios will be used in the radio-to-radio or 'talk-around' mode which does not rely on radio repeaters for functionality and meets the NMP2 FLEX on site communication requirements.</p>	<p><u>Complete</u></p>
<p>OIP Open Item No. 23</p> <p>Develop procedures/guidelines to address the criteria in NEI 12-06 to support existing symptom based strategies in the Emergency Operating Procedures (EOPs).</p>	<p>NMP2 Emergency Operating Procedures (EOPs) were upgraded to EPG/SAGs revision 03 and issued on May 2, 2016.</p> <p>FLEX Support Guidelines (FSG) have been developed and issued on or before May 6, 2016 for NMP2 in order to address the criteria in NEI 12-06 that support EOPs. They are as follows:</p> <ul style="list-style-type: none"> <li>• N2-SOP-01, Station Blackout/ELAP</li> <li>• N2-SOP-02, Station Blackout/ELAP Support Procedure</li> <li>• N2-DRP-FLEX-MECH, Emergency Damage Repair – BDB/FLEX Pump Deployment Strategy</li> <li>• N2-DRP-FLEX-ELEC, BDB/FLEX Generator Deployment Strategy</li> <li>• S-DRP-OPS-004, Refueling Diesel Driven Portable Equipment</li> </ul>	<p><u>Complete</u></p>
<p>OIP Open Item No. 52</p> <p>Design and implement a modification that provides for connection of a FLEX portable pump to makeup to the SFP.</p>	<p>The design change to provide a modification at NMP2 that will provide a make-up to the Spent Fuel Pool (SFP) with a FLEX portable pump (ECP-13-001035) was completed on May 4, 2016.</p>	<p><u>Complete</u></p>

Item	Description	Status
<p>OIP Open Item No. 53</p> <p>Implement a design change to install connections for FLEX portable pumps to RHR for both RHR 'A' and 'B'.</p>	<p>The design change to provide a modification at NMP2 that will provide a make-up to RHS 'A' and 'B' with a FLEX portable pump (ECP-13-001035) was completed on May 4, 2016.</p>	<p><u>Complete</u></p>
<p>OIP Open Item No. 54</p> <p>Implement a design change to install portable generator connections for 600 VAC primary (2EJS*US1) and alternate (2EJS*US3) busses.</p>	<p>The design change to provide a modification at NMP2 that will provide portable generator connections for 2EJS*US1 and 2EJS*US3 (ECP-13-001068) was completed on May 4, 2016.</p>	<p><u>Complete</u></p>
<p>OIP Open Item No. 55</p> <p>Revise procedures to provide reactor pressure control direction during an ELAP event.</p>	<p>NMP2 Emergency Operating Procedures (EOPs) were upgraded to EPG/SAGs Revision 03 and issued on May 2, 2016. Procedure OP-NM-101-111-1001 Transient Mitigation Guidelines was revised to include the pressure control strategy to be used during an ELAP event and was issued on April 29, 2016.</p>	<p><u>Complete</u></p>
<p>OIP Open Item No. 56</p> <p>Develop and implement procedure direction to ensure that the Main Turbine Hydrogen is vented prior to battery depletion.</p>	<p>NMP2 procedure N2-SOP-01, Station Blackout/ELAP has been revised to vent Main Turbine/Generator hydrogen as soon as the Turbine/Generator stops rotating or within two hours, break Main Condenser Vacuum and then vent hydrogen after the Turbine/Generator stops rolling, which is prior to battery depletion. This procedure was issued on May 2, 2016.</p>	<p><u>Complete</u></p>
<p>OIP Open Item No. 57</p> <p>Revise current EOPs to implement EOP actions necessary to support the strategy to</p>	<p>NMP2 Emergency Operating Procedures (EOPs) were upgraded to EPG/SAGs Revision 03 and issued on May 2, 2016. The changes made provide the allowance to stop emergency depressurization if RCIC is the only injection source to the RPV that is available, in order to</p>	<p><u>Complete</u></p>



Item	Description	Status
<p>terminate emergency depressurization to preserve RCIC operation.</p>	<p>preserve the motive force necessary for RCIC operation.</p>	
<p>OIP Open Item No. 58</p> <p>Develop and implement procedures to provide direction for re-energizing the Solenoid Operated Valves (SOVs) and ensuring long term pneumatic supply during an ELAP.</p>	<p>Power to operate SRVs is from safety related batteries. FLEX generator deployment during Phase 2 ensures that the power for operation of SRVs is sustained. To provide for a long term pneumatic supply to SRVs, the following NMP2 procedures were revised to include direction for replenishment of SRV pneumatic receivers during an ELAP event. The procedures were issued on or before May 6, 2016</p> <ul style="list-style-type: none"> <li>• N2-SOP-01, Station Blackout/ELAP</li> <li>• N2-SOP-02, Station Blackout/ELAP Support Procedure</li> <li>• N2-DRP-FLEX-MECH, Emergency Damage Repair – BDB/FLEX Pump Deployment Strategy</li> </ul>	<p><u>Complete</u></p>
<p>OIP Open Item No. 59</p> <p>Develop procedures to implement the connection of a FLEX portable pump to makeup water to the SFP during an ELAP event to include both primary and alternate strategies.</p>	<p>NMP2 procedure N2-DRP-FLEX-MECH, Emergency Damage Repair – BDB/FLEX Pump Deployment Strategy was developed and issued on May 6, 2016. This procedure provides the actions necessary to deploy a FLEX portable pump to makeup water to the SFP during an ELAP event and includes both primary and alternate strategies.</p>	<p><u>Complete</u></p>
<p>ISE Confirmatory Item No. 3.2.4.4.B</p> <p>Follow-up of communication commitments as discussed in the staff analysis (ML13100A236) is required.</p>	<p>Communication equipment necessary to support FLEX strategy implementation at NMP2 is in place. Initial communication announcements to on-site personnel during a BDB external event will be via the Plant Paging and Announcement system which are battery backed-up. If the Plant Paging and Announcement system is not available for on-site communications, bullhorns are available in the FLEX Storage Building for use for notification of site personnel. Onsite communications can be performed using either</p>	<p><u>Complete</u></p>

Item	Description	Status
	<p>the installed sound powered phone system or the 450 MHz hand-held radios utilized in the 'talk-around' or radio-to-radio mode of operation. Offsite communications can be made utilizing portable satellite phones staged in each NMP Main Control Room and Technical Support Center. Spare batteries and battery chargers for portable communications equipment can be powered from the small portable generators that are stored in the FLEX Storage Building. The remaining NMP modifications for communication upgrades are scheduled to complete on or before December 31, 2016 as delineated in NRC Staff analysis document (ML13100A236) Table 1.</p>	
<p>NRC Audit Report            Open Item            ISE OI 3.2.4.2.A (SE            Tracker Item 15-A) -            Ventilation and EQ</p>	<p>The effects of loss of HVAC in an extended loss of AC power event are being addressed for both equipment operability and habitability and have been incorporated into the FLEX strategies. The environmental conditions in the areas that contain the critical equipment, which is relied upon by the operators, and in the areas where operators will require access, has been evaluated via review of existing calculations and/or development of new calculations. These areas include: Primary Containment, Secondary Containment, Control Building (Control Room and Battery Rooms), and RCIC Pump Room. Equipment operability and habitability are confirmed for all the concerned areas. To protect station personnel from the adverse effects of performing FLEX related mitigation actions in thermally elevated environments, an evaluation of the plant areas requiring access for mitigation actions was performed and compensatory actions or restrictions were identified and incorporated into procedures. The detailed response for this item has been provided on the ePORTAL for NRC staff review.</p>	<p><u>Complete</u></p>
<p>NRC Audit Report            Open Item AQ 20 (SE            Tracker Item 20-B) -            RCS Makeup</p>	<p>NMP2 is located on the southeastern shore of Lake Ontario, which is the ultimate heat sink for the plant. Nine Mile Point has chosen to use Lake Ontario as the primary water source throughout the ELAP/LUHS event. This allows the FLEX strategy to position the FLEX Pumps at a source</p>	<p><u>Complete</u></p>

Item	Description	Status
	<p>that can provide make-up water to the RPV, Primary Containment, and Spent Fuel Pool that is unlimited. When faced with the choice of injection of low quality water or no injection, the action will always be to inject low quality water which is consistent with EPRI Severe Accident Management Guidance Technical Basis Report (EPRI Report 1025295) Volume 2, Section DD. NMP2 EOPs require that injection sources be selected based on core and debris cooling requirements, reliability, resource requirements, effects on other severe accident response strategies, and the quality of the water source. Raw water sources should generally be used only as a last resort. If other systems become available, injection lineups should be shifted to higher quality sources to minimize use of raw water. This strategy will ensure cooling for at least 72 hours after commencing injection from the UHS. During this time, Nine Mile Point will develop recovery methods that will utilize a clean source of water. The recovery methods could include transition back to the reactor water grade sources, arranging for clean water sources, or other methods to filter water prior to injecting into the core. The detailed response for this item has been provided on the ePORTAL for NRC staff review.</p>	

**MILESTONE SCHEDULE – ITEMS COMPLETE**

Milestone	Completion Date
Submit 60 Day Status Report	October 26, 2012
Submit Overall Integrated Plan	February 28, 2013
Contract with National SAFER Response Center	March 3, 2015
Six Month Integrated Plan Progress Report	August 27, 2013
Engineering and Design Completion – Equipment Storage Facility	November 2014
Six Month Integrated Plan Progress Report	February 27, 2014
Engineering and Design Completion – Portable Equipment Connections	November 2014
Six Month Integrated Plan Progress Report	August 26, 2014

<b>Milestone</b>	<b>Completion Date</b>
Six Month Integrated Plan Progress Report	February 19, 2015
Six Month Integrated Plan Progress Report	August 28, 2015
Six Month Integrated Plan Progress Report	February 26, 2016
Non-Outage Installation – Portable Equipment Connection	February 2016
Validation Walkdowns Complete	March 2016
Portable Equipment Procedures Changes	March 2016
FLEX Training	March 2016
Outage Installation – Portable Equipment Connections	May 2016
Equipment Storage Facility Installation	May 2015
Unit 2 Implementation Date	May 5, 2016
Final Implementation Notification to USNRC (with this submittal)	July 2016

#### **ORDER EA-12-049 COMPLIANCE ELEMENTS SUMMARY**

The elements identified below for Nine Mile Point Nuclear Station, Unit 2 as well as the site OIP response submittal (References 5 and 6), the 6-Month Status Reports (References 7, 8, 9, 10, 11, and 12), and any additional docketed correspondence, demonstrate compliance with Order EA-12-049.

#### **Strategies - Complete**

Nine Mile Point Nuclear Station, Unit 2 strategies are in compliance with Order EA-12-049. There are no strategy related Open Items, Confirmatory Items, or Audit Questions/Audit Report Open Items. The Nine Mile Point Nuclear Station, Unit 2 Final Integrated Plan for mitigating strategies is provided with this letter as Enclosure 1.

#### **Modifications - Complete**

The modifications required to support the FLEX strategies for Nine Mile Point Nuclear Station, Unit 2 have been fully implemented in accordance with the station design control process.

#### **Equipment – Procured and Maintenance & Testing – Complete**

The equipment required to implement the FLEX strategies for Nine Mile Point Nuclear Station, Unit 2 has been procured in accordance with NEI 12-06, Sections 11.1 and 11.2, received at Nine Mile Point Nuclear Station, Unit 2, initially tested/performance verified as identified in NEI 12-06, Section 11.5, and is available for use.

Maintenance and testing will be conducted through the use of the Nine Mile Point Nuclear Station, Unit 2 Preventative Maintenance program such that equipment reliability is maintained.

### **Protected Storage – Complete**

The storage facilities required to implement the FLEX strategies for Nine Mile Point Nuclear Station, Unit 2 have been completed and provide protection from the applicable site hazards. The equipment required to implement the FLEX strategies for Nine Mile Point Nuclear Station, Unit 2 is stored in its protected configuration.

### **Procedures – Complete**

FLEX Support Guidelines (FSGs) for Nine Mile Point Nuclear Station, Unit 2 have been developed, and integrated with existing procedures. The FSGs and affected existing procedures have been validated and are available for use in accordance with the site procedure control program.

Preventive maintenance actions have been developed for FLEX equipment including procedures for functional and performance testing.

### **Training – Complete**

Training for Nine Mile Point Nuclear Station, Unit 2 has been completed in accordance with an accepted training process as described in NEI 12-06, Section 11.6.

### **Staffing – Complete**

The Phase 2 staffing study for Nine Mile Point Nuclear Station, Unit 2 has been completed in accordance with 10CFR50.54(f), "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," Recommendation 9.3, dated March 12, 2012 (Reference 14), as documented in Reference 15.

### **National SAFER Response Center – Complete**

EGC has established a contract with Pooled Equipment Inventory Company (PEICo) and has joined the Strategic Alliance for FLEX Emergency Response (SAFER) Team Equipment Committee for off-site facility coordination. It has been confirmed that PEICo is ready to support Nine Mile Point Nuclear Station, Unit 2 with Phase 3 equipment stored in the National SAFER Response Centers in accordance with the site specific SAFER Response Plan.

### **Validation – Complete**

EGC has completed performance of validation in accordance with industry developed guidance to assure required tasks, manual actions and decisions for FLEX strategies are feasible and may be executed within the constraints identified in the Overall Integrated Plan (OIP) / Final Integrated Plan (FIP) for Order EA-12-049.

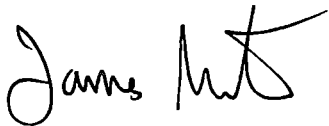
**FLEX Program Document - Established**

The Nine Mile Point Nuclear Station, Unit 2 FLEX Program Document has been developed in accordance with the requirements of NEI 12-06.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David P. Helker at 610-765-5525.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 1<sup>st</sup> day of July 2016.

Respectfully submitted,



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James Barstow  
Director - Licensing & Regulatory Affairs  
Exelon Generation Company, LLC

Enclosure:

Nine Mile Point Nuclear Station, Unit 2 Final Integrated Plan Document – Mitigating Strategies  
NRC Order EA-12-049

cc: Director, Office of Nuclear Reactor Regulation  
NRC Regional Administrator - Region I  
NRC Senior Resident Inspector – Nine Mile Point Nuclear Station  
NRC Project Manager, NRR – Nine Mile Point Nuclear Station  
Mr. Jeremy S. Bowen, NRR/JLD/JOMB, NRC  
Mr. Jason C. Paige, NRR/JLD/JOMB, NRC