



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 14, 2001

LICENSEE: Exelon Generation Company, LLC

FACILITIES: Braidwood Station, Units 1 and 2
Byron Station, Units 1 and 2
Clinton Power Station
Dresden Nuclear Power Station, Units 2 and 3
LaSalle County Station, Units 1 and 2
Limerick Generating Station, Units 1 and 2
Oyster Creek Nuclear Generating Station
Peach Bottom Atomic Power Station, Units 2 and 3
Quad Cities Nuclear Power Station, Units 1 and 2
Three Mile Island, Unit 1

SUBJECT: SUMMARY OF FEBRUARY 8, 2001, MEETING WITH EXELON GENERATION COMPANY, LLC TO DISCUSS LICENSING ISSUES

On February 8, 2001, the U. S. Nuclear Regulatory Commission (NRC) licensing project management staff met with members of the Exelon Generation Company, LLC (Exelon, the licensee) staff to discuss the licensee's organization, licensing focus, and upcoming licensing requests that are expected to be submitted for NRC review. A list of those attending the meeting is provided as Enclosure 1. Enclosure 2 is a copy of the handout used during the meeting.

As a result of the formation of Exelon, which resulted from the merger of several utilities, Exelon is evaluating the conduct of business of each of its components and developing a congruous organization and set of procedures for its licensing organization. The operating company is organized into two groups, a Mid-Atlantic Regional Operating Group (Limerick, Oyster Creek, Peach Bottom, and TMI) and a Mid-West Operating Group (Byron, Braidwood, Clinton, Dresden, LaSalle, and Quad Cities). The Licensing Directors for each Operating Group (J. Hutton and R. Krich) report to the Vice President, Licensing, J. Benjamin.

Exelon discussed their Business Plan for Proposed Licensing Actions for the Year 2001, the basis and development of it, and how it incorporated licensing actions. A list of proposed licensing actions for each plant was discussed with the staff (see Enclosure 2). Exelon noted that they are working toward the standardization of their licensing processes across the company with the goal of establishing consistent, high quality submittals for each plant.

During the discussions, the staff raised several issues that were intended to make the processing of Exelon's licensing requests smoother and more efficient. The issues included a request for continuation of the practice of the licensee sending copies of submittals directly to the project managers at the same time they are sent to the public document desk, providing a requested completion date that is achievable within the normal staff workload scheduling (e.g., eight to nine months), an assignment of priorities if there are several amendment requests sent

Meeting Summary

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in at the same time (particularly, if a particular technical branch is involved in the review of several submittals), and the resulting effect on the plant if the licensee's schedule for a particular licensing action is not met by the staff. The licensee indicated that it will consider the staff's comments in their conduct of business with the NRC.

After closure of the official meeting, it was reopened for questions from the public. The representative from the State of New Jersey raised a question regarding information exchange between the State and the licensee in the area of emergency preparedness. The licensee indicated they were aware of the agreements that were in place between itself and the State of New Jersey regarding the issue.

/RA/

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Project Directorate III
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Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455, STN 50-456,
STN 50-457, 50-461, 50-237, 50-249, 50-373,
50-374, 50-352, 50-353, 50-219, 50-277, 50-278,
50-254, 50-265, and 50-289

Enclosures: 1. Meeting Attendees
2. Handout

cc w/encls: See next page

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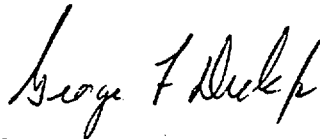
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2. Handout

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EXELON LICENSING MEETING

FEBRUARY 8, 2001

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Nuclear

Business Plan for 2001 Proposed Licensing Actions

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Rod Krich

Jim Hutton

Plan Development



- **Vision:**

- Exelon Nuclear will be the best operator of nuclear plants world-wide
- Setting the industry benchmark for operational excellence and safety
- Providing reliable and high levels of generation
- Beating other power suppliers on cost
- Asserting nuclear industry leadership
- Optimizing the value of its assets

- **Management Model:**

- Method for integration and alignment of the organization and the shared understanding of fundamentals
- Provides a basis for consistent management and operation of a geographically dispersed fleet
 - Governance, Oversight, Support and Performance
- Provides guidance and a template for integration and operation of new plants

- **Strategic Focus Areas:**

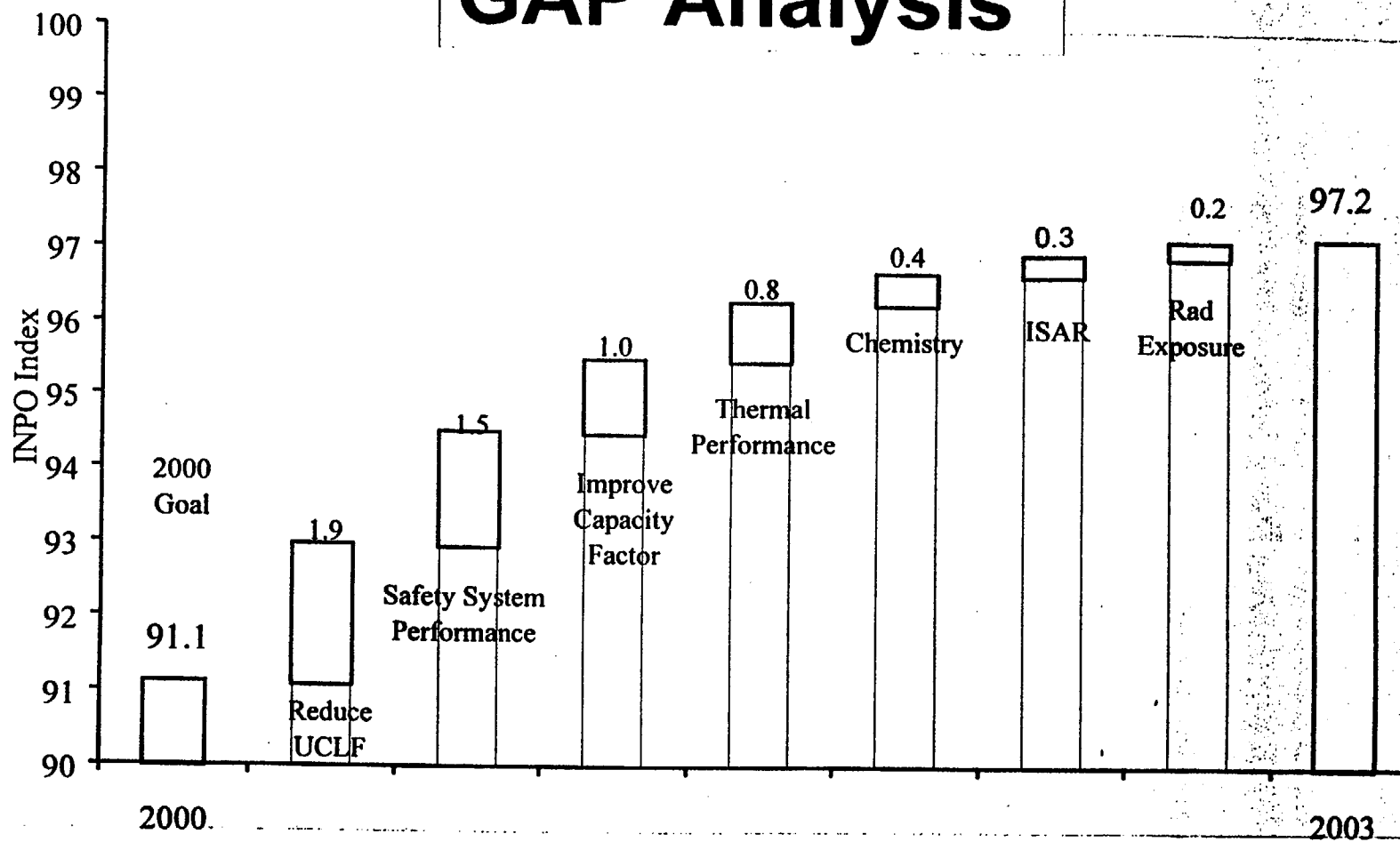
- Operational Execution
- Production
- Cost
- Asset Management

Operational Execution

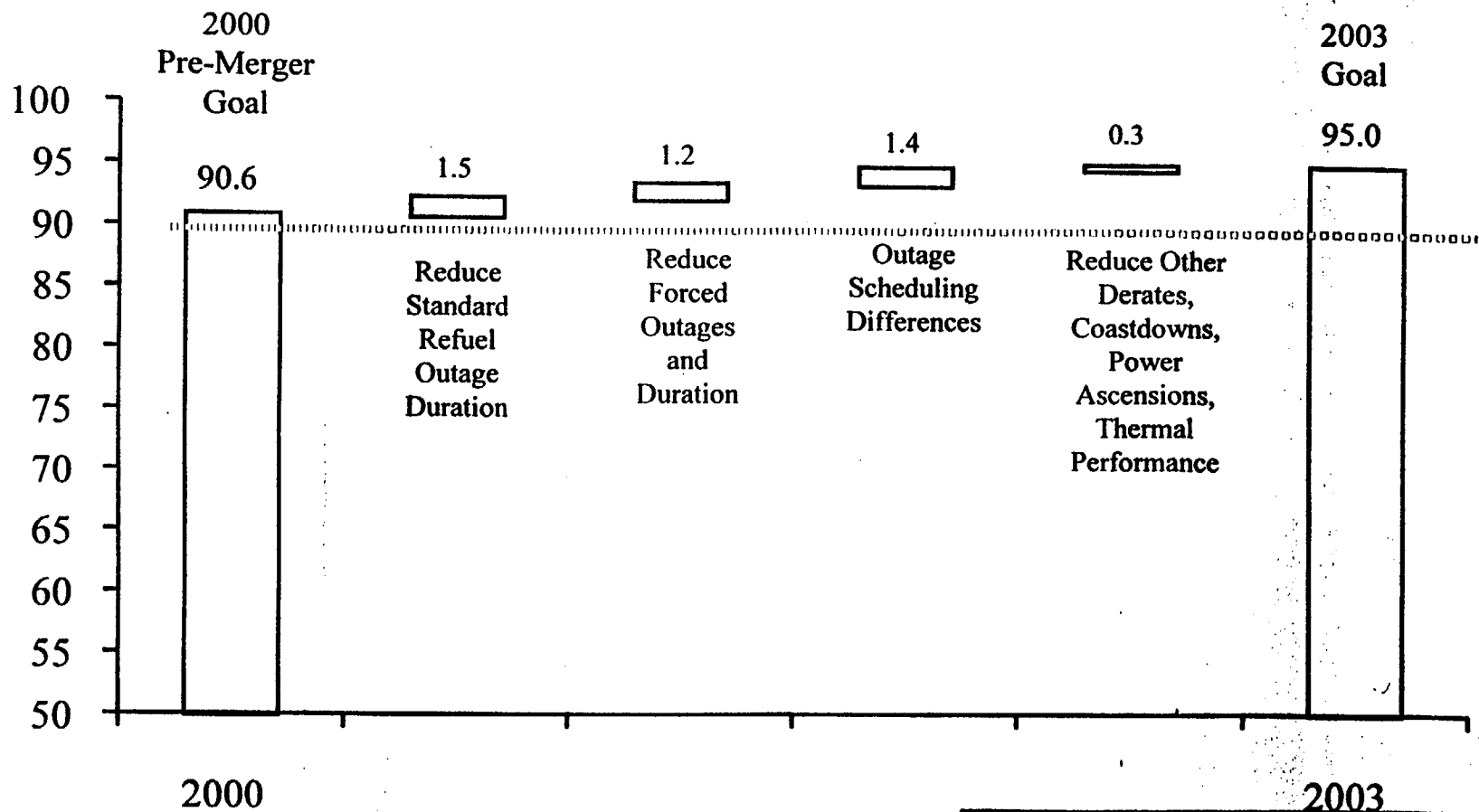
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Nuclear

GAP Analysis



GAP Analysis



⚡ RO, EFO, BIC, 2 cents

- Improve productivity
- Reduce reliance on contractors
- Reduce costs through cost effective use of information technology
- Improve staffing management
- Keep the plants running at peak efficiency
- Plan projects well to take advantage of potential savings
- Be aggressive in project management

Sound investment in plant and equipment to maximize value and return; effective planning and assessment to develop operating and maintenance strategies which sustain and enhance asset value

- Materiel condition improvement program
- Industry-leading assessment and improvement program
- An aggressive license renewal program

Bases for Proposed Licensing Actions **Exelon**SM

Nuclear

For Licensing and Regulatory Affairs, the vision, strategic focus areas, beliefs and behaviors are accomplished through:

- Supporting plant operation by effectively implementing the Revised Reactor Oversight Process; pursuing timely high quality licensing actions; reducing unnecessary regulatory burden; and supporting effective implementation of the corrective action and self-assessment programs
- Providing industry regulatory leadership through excellence in performance and interactions with industry groups and external agencies
- Providing governance, oversight, and support to ensure regulatory credibility, sustained industry top quartile performance, and effective and efficient implementation of regulatory programs/processes
- Establishing and maintaining open and effective relationships with regulatory authorities.

Operational Execution



Nuclear

Initiative	Action
Reduce Collective Radiation Exposure	Obtain and implement Steam Generator Inspection Program changes (Braidwood/Byron/Three Mile Island)
Improve Safety System Performance (SSPI)	Obtain approval of Three Mile Island Technical Specification change to revise EDG inspection frequency to 24 months
	Develop and submit Licensing Actions to the NRC that support shorter refueling outages
	Elimination of Missile Shield – Three Mile Island
Eliminate Human Performance Events	Provide support for ITS implementation at Midwest ROG BWR sites (Dresden/LaSalle/Quad Cities)
	Support implementation of 24 month Technical Specification for Midwest ROG BWRs (Quad Cities/Dresden/LaSalle)
	Identify and pursue additional improvement to MWROG Stations ITS resulting from industry efforts (TSTF Process)

Initiative	Action
Eliminate Forced Outages and Duration	Submit licensing actions that take advantage of alternative Source Term Reduction
	Pursue risk-informed Technical Specification changes and Licensing Actions
	Pursue approval of risk-informed Quality Assurance Program
	Support risk-informed IST/ISI Initiatives
	Pursue approval of risk-informed MOV Programs

Cost



Nuclear

Initiative	Action
Reduce O&M Baseline Costs	Obtain and implement Steam Generator Inspection Program changes (Braidwood/Byron/Three Mile Island)
	Pursue risk-informed Technical Specification changes and Licensing Actions
	Identify and pursue additional improvement to MWROG Stations ITS resulting from industry efforts (TSTF Process)
	Obtain approval of Three Mile Island Technical Specification change to revise EDG inspection frequency to 24 months
	Develop and submit Licensing Actions to the NRC that support shorter refueling outages
	Elimination of Missile Shield – Three Mile Island

Asset Management

ExelonSM

Nuclear

Initiative	Action
Long-term Materiel Condition Improvements	Support interim spent fuel storage licensing activities (Dresden/Oyster Creek)
	Support decommissioning activities
Increase Capacity Output	Support Power Uprate initiatives (Braidwood/Byron/Dresden/Quad Cities/Clinton/Peach Bottom/Limerick/Three Mile Island/Oyster Creek)
License Renewal Activities	Support license renewal initiatives (Dresden/Quad Cities/Peach Bottom/Three Mile Island)

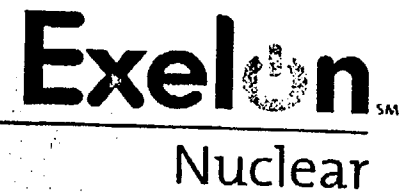
Byron/Braidwood Licensing Actions **Exelon** SM

Nuclear

Description	Submittal Date	Proposed Approval
BEACON	2/15/00	2/01
Boron Dilution Protection System Elimination	6/19/00	3/01/01
Power Upate	7/05/00	5/07/01
Best Estimate LOCA	10/24/00	5/07/01
NEI Steam Generator Program Changes	TBD	TBD
Slave Relay Testing (Extend Surv Frequency to 18 months)	11/07/00	5/01/01
Negative Flux Rate Trip	11/13/00	4/30/01
Risk Informed ISI Relief Request	Bwd:10/16/00	3/31/01
	By:11/17/00	4/01/01
Post-Accident Sample System (PASS) Elimination	TBD	TBD
Diesel Fuel Oil	11/30/00	5/30/01
Alternate Requirements for VT-2 Examination Personnel Relief Request – (Braidwood Only)	10/16/00	6/30/01
Steam Generator Tube Inspection Frequency (One-time Relaxation) – (Braidwood Only)	2/15/01	6/30/01
Security Plan Change (Replaces previously submitted exemptions)	2/28/01	TBD

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Byron/Braidwood Licensing Actions (Continued)



Description	Submittal Date	Proposed Approval
Instrument Bus Inverter AOT Extension	R-9	Refueling Outage
Essential Service Water Train AOT Extension	R-9	Refueling Outage
Containment Airlock AOT Extension	R-9	Refueling Outage
Containment Isolation Valve AOT Extension	R-9	Refueling Outage
Battery Charger AOT Extension	R-9	Refueling Outage
Reactor Trip System/Engineered Safety Features Actuation System AOT Extension	R-9	Refueling Outage
Main Steam Isolation Valve AOT Extension	R-9	Refueling Outage
Reactor Coolant Pump Motor Flywheel Inspection Frequency Extension	R-9	Refueling Outage

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Clinton Licensing Actions



Nuclear

Description	Submittal Date	Proposed Approval
Revise periodic testing requirements for Hydrogen Mixing System	10/06/00	4/06/01
Revise reference to TS Figure 3.6.4.1-1 for secondary cont. drawdown acceptance criteria	10/06/00	7/31/01
Revise ATWS-RPT Actions	12/28/00	8/31/01
Diesel Generator Allowed Outage Time	12/29/00	5/31/01
Allow removal of IFTS blind flange in Modes 1, 2, & 3	3/30/01	C1R08
Revise Secondary Contain. Requirements during shutdown conditions	6/15/01	C1R08
Incorporate OPRM in TS	3/30/01	C1R08
Revise testing requirements for excess flow check valves in instrument lines	3/30/01	C1R08
Power Uprate	6/15/01	C1R08
Refueling bridge interlock requirements	3/30/01	C1R08

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Dresden Licensing Actions

ExelonSM

Nuclear

Description	Submittal Date	Proposed Approval
ITS / 24 Month Cycle	3/03/00	3/09/01
Unit 2 Target Rock Safety Function	2/29/00	3/09/01
MELLLA	12/27/00	10/20/01
DG Operating Voltage	8/31/00	3/09/01
GE 14 Transition [D2R17]	9/29/00	10/20/01
Extended Power Uprate	12/27/00	10/20/01
Mechanical Vacuum Pump Trip Instrumentation	8/31/00	3/09/01
Increased MSIV Leakage (Alternate Source Term)	4/16/01	TBD
Containment Inspections Scheduler Exemption Req.	12/08/00	9/09/01
Risk Informed ISI Relief Request	10/18/00	7/01/01
Reactor Pressure Instrumentation LAR	2/28/01	8/03/01
OPRM	8/31/01	6/01/02
EDG AOT Extention	TBD	TBD
Security Plan Change (Replaces previously submitted exemptions)	2/28/01	TBD

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

LaSalle Licensing Actions



Nuclear

Description	Submittal Date	Proposed Approval
OPRM (*Part 21 Issue May Impact Submittal)	11/10/00	6/01/01
ITS / 24 Month Cycle	3/03/00	3/02/01
Removal of AEER from CR Boundary	4/26/00	4/15/01
Diesel Generator Allowed Outage Time	2/16/01	10/01/01
Risk Informed ISI Relief Request	3/30/01	TBD
Security Plan Change (Replaces previously submitted exemptions)	2/28/01	TBD

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Limerick Licensing Actions



Nuclear

Description	Submittal Date	Proposed Approval
Revised Excess Flow Check Valve Testing	9/05/00	U2 Refueling Outage (4/01)
Cycle-specific MCPR	2/02/01	U2 Refueling Outage (4/01)
Revised P/T Curves (U/2)	11/20/00	U2 Refueling Outage (4/01)
Clarification of Shorting Links Removal	1/18/01	U2 Refueling Outage (4/01)
Clarification regarding Mode Switch to Refuel/ Control Rod movement	1/18/01	U2 Refueling Outage (4/01)
Core Shroud Re-inspection deferral	10/27/00	U2 Refueling Outage (4/01)
ISI Relief Requests related to PDI	12/21/00	U2 Refueling Outage (4/01)
Exemption Request to use Code Case N-640 (linked with P/T Curves submittal)	11/20/00	U2 Refueling Outage (4/01)
Revised P/T Curves (U/1)	9/01	3/02
Clarification Regarding Operability of Offsite Feeder Breakers	2/01	TBD
Revise Requirements Involving Open SRV/Mode Switch to Shutdown in Two Minutes	5/01	TBD

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Oyster Creek Licensing Actions



Nuclear

Description	Submittal Date	Proposed Approval
Eliminate MSIV Full Close quarterly surveillance	3/1/01	9/1/01
Single failure proof crane: eliminate load handling restrictions over fuel pool	4/1/01	9/1/01
Organization and STA Changes	8/29/00	3/1/01
Allow DG battery surveillances to be conducted online rather than during shutdown.	4/30/01	9/1/01
Revise specifications to reflect the results of off site power distribution study.	12/29/00	TBD
Approval of criticality analysis for spent fuel pool Boraflex racks. (USQ)	2/28/01	TBD
Reduce Drywell to Torus Vacuum breakers to < 14 required valves	4/30/01	TBD
CRD Issues: Allow maintenance without considering rod inoperable. Change CRD weekly surveillance to monthly and CRD operability requirements	12/31/01	TBD
90% MAPHLGR relief when a core spray system is OOS.	TBD	TBD

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Oyster Creek Licensing Actions

(Continued)



Nuclear

Description	Submittal Date	Proposed Approval
Change the requirement of 35' of water in the Condensate Storage Tank (CST) to 360,000 gallons between the CST and the Torus and other clarifications. (19R)	10/31/01	10/1/02
Revise Section 6 to reflect new reload analysis methodology (19R)	10/31/01	TBD
Revise SRM quadrant requirements (19R)	10/31/01	TBD
Revise specification for transition to shutdown cooling. (19R)	10/31/01	TBD
Control habitability: new X/Q for control room air intake. (USQ: TS bases change)	12/19/00	11/30/01
Remove cycle-specific SLMCPR approval. (19R)	10/31/01	9/1/02
Changes to verify vs. demonstrate operability of core spray components. (19R)	10/31/01	10/1/01
Add criteria for start up of an isolated recirculation loop.	TBD	TBD
10 CFR 20.2002 Application	12/31/01	TBD
Control Room Habitability Alternate Source Term Update	1/12/01	N/A

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Peach Bottom Licensing Actions



Nuclear

Description	Submittal Date	Proposed Approval
Oscillation Power Range Monitor	2/01	U3 Refueling Outage (9/01)
Cycle-specific MCPR	7/01	U3 Refueling Outage (9/01)
Clarification of Rad Barrier requirements	3/01	U3 Refueling Outage (9/01)
Pending Re-submittal of two Fire Protection Exemption Requests	3/01	TBD
Submit License Renewal Application	7/01	TBD

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Quad Cities Licensing Actions

ExelonSM

Nuclear

Description	Submittal Date	Proposed Approval
AOT / STI	12/27/99	2/28/01
ITS / 24 Month Cycle	3/03/00	3/09/01
DG Operating Voltage	8/31/00	3/09/01
MELLLA	12/27/00	1/11/02
Extended Power Uprate	12/27/00	1/11/02
DG Cooling Water Pump AOT	8/31/00	3/09/01
GE 14 Transition [Q2R16]	9/29/00	1/11/02
Yarway Replacement	6/30/01	2/02/02
Excess Flow Check Valves	TBD	TBD
Increased MSIV Leakage (Alternate Source Term)	4/16/01	TBD
Risk Informed ISI Relief Request	11/16/00	2/02/02
OPRM	8/31/01	8/02/02
EDG AOT Extension	TBD	TBD
SDV Instrumentation	6/30/01	2/02/02
Low Level SCRAM Setpoint Change	2/16/01	6/01/01
Security Plan Change (Replaces previously submitted exemptions)	2/28/01	TBD

NOTE: Dates are for scheduling purposes only and do not constitute regulatory commitments

Three Mile Island Licensing Actions



Nuclear

Description	Submittal Date	Proposed Approval
Containment Requirements During Refueling	1/23/01	8/1/01
Diesel Generator 24 Mo. Inspection Frequency	10/20/00	3/31/00
Emergency Feedwater	12/6/00	8/15/00
ESF system leakage and Control Room Habitability (AST)	1/29/01	8/1/01
OTSG Tube Inspection Permanent Criteria	12/6/00	6/1/01
NEI Steam Generator Program Changes	TBD	TBD
Tube Rupture Reanalysis (USQ)	8/09/00	7/31/01
Deletion of Hydrogen Control T/S (incl. Exemption request)	9/20/00	5/1/01
ISORG/QA Functions	8/9/00	5/1/01
M5 cladding	12/20/00	4/1/01
U235 Loading Criteria	1/15/01	4/1/01
RCS Pressure and Temperature Protective Limits	1/15/01	4/1/01
Lead Test Assembly to exceed 62 GWD/MTU	1/18/01	4/30/01
Heat / Cooldown Limits beyond 17.7 EFPY	3/29/01	9/1/01
Specify AOT for T/S 3.7 Loss of an ES Bus	3/31/01	TBD
MSIV Clarification of TS LCO and AOT	5/15/01	TBD

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