October 30, 2001

Mr. Michael P. Gallagher
Director-Licensing
Exelon Corporation
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

Dear Mr. Gallagher:

By letter dated July 2, 2001, Exelon Generation Company, LLC (Exelon), submitted for Nuclear Regulatory Commission (NRC) review an application, pursuant to 10 CFR Part 54, to renew the operating licenses for the Peach Bottom Atomic Power Station, Units 2 and 3. Subsequent to receiving the application, the NRC staff identified areas where additional information is needed to complete its review.

In a meeting with Exelon on October 22, 2001, the NRC staff shared its concerns regarding Exelon's methodology for scoping and screening of systems, structures and components that are within the scope of license renewal (10 CFR 54.4). The NRC staff was also concerned about how the methodology was used to determine the results of the scoping/screening process.

The NRC staff advised Exelon of its intent to issue a request for additional information (RAI). Our requests for RAIs are enclosed. We request that you provide your responses to the RAIs by November 16, 2001.

If you have any questions, please feel free to contact me at 301-415-1146.

Sincerely,

/***RA***/

Raj K. Anand, Project Manager
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosure: As stated

cc w/encl: See next page

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NAME	RKAnand	EGHylton	RPettis	BThomas	CIGrimes
DATE	10/26/01	10/26/01	10/30/01	10/29/01	10/30/01

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N. Dudley
RLSB Staff

B. Thomas
G. Hatchett
R. Pettis
R. McIntyre
J. Boska
L. Wheeler
N. St. Amour
D. McCain

Peach Bottom Atomic Power Station, Units 2 and 3
cc:

Mr. Edward Cullen
Vice President & General Counsel
Exelon Generation Company, LLC
300 Exelon Way
Kennett Square, PA 19348

Mr. J. Doering
Site Vice President
Peach Bottom Atomic Power Station
1848 Lay Road
Delta, PA 17314

Mr. G. Johnston
Plant Manager
Peach Bottom Atomic Power Station
1848 Lay Road
Delta, PA 17314

Mr. A. Winter
Regulatory Assurance Manager
Peach Bottom Atomic Power Station
1848 Lay Road
Delta, PA 17314

Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station
P.O. Box 399
Delta, PA 17314

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Roland Fletcher
Department of Environment
Radiological Health Program
2400 Broening Highway
Baltimore, MD 21224

Correspondence Control Desk
Exelon Generation Company, LLC
200 Exelon Way, KSA 1-N-1
Kennett Square, PA 19348

A. F. Kirby, III
External Operations - Nuclear
Delmarva Power & Light Company
P.O. Box 231
Wilmington, DE 19899

Chief-Division of Nuclear Safety
PA Dept. of Environmental Protection
P.O. Box 8469
Harrisburg, PA 17105-8469

Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, PA 17314

Public Service Commission of Maryland
Engineering Division
6 St. Paul Center
Baltimore, MD 21202-6806

Mr. Richard McLean
Power Plant and Environmental Review Division
Department of Natural Resources
B-3, Tawes State Office Building
Annapolis, MD 21401

Dr. Judith Johnsrud
National Energy Committee, Sierra Club
433 Orlando Avenue
State College, PA 16803

Manager-Financial Control & Co-Owner Affairs
Public Service Electric and Gas Company
P.O. Box 236
Hancocks Bridge, NJ 08038-0236

Mr. Frederick W. Polaski
Manager License Renewal
Exelon Corporation
200 Exelon Way
Kennett Square, PA 19348

Mr. Jeffrey A. Benjamin
Vice President-Licensing
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

Mr. Joseph Hagan
Senior Vice President
Mid-Atlantic Regional Operating Group
Exelon Generation Company, LLC
200 Exelon Way, KSA 3-N
Kennett Square, PA 19348

Mr. John Skolds
Chief Operating Officer
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

Mr. William Bohlke
Senior Vice President, Nuclear Services
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

Mr. John Cotton
Senior Vice President, Operations Support
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

Mr. Alan Nelson
Nuclear Energy Institute
1776 I Street, Suite 400
Washington, DC 20006

REQUEST FOR ADDITIONAL INFORMATION

2.1 SCOPING AND SCREENING METHODOLOGY

RAI 2.1-1
Describe the scoping and screening process as shown in Figure 2.1-1 of the Peach Bottom License Renewal Application (LRA), and explain in detail how Exelon ensured that this process meets the requirements of 10 CFR 54.4(a)(1), 54.4(a)(2), 54.4(a)(3), and 54.4 (b) with respect to the intended functions of the systems, structures, and components, with respect to the requirements of § 54.21.

RAI 2.1-2
Describe the "system realignment" process and the rational for its use. During the meeting on October 22, 2001, the staff understood that the "system realignment" process is simply a recategorization of existing systems and components for licensing renewal. Explain how the systems, structures, and components reflected in the Peach Bottom current licensing basis [as defined by §54.3(a)] are captured in a consistent and auditable manner in the scoping process.

RAI 2.1-3
Explain the differences between the Component Record List (CRL), and the updated final safety analysis report (UFSAR) and how they are treated by the scoping process and reflected in the LRA.

RAI 2.1-4
Explain, using specific examples, how the scoping and screening process was performed to ensure that structures and components (SCs) that need to be in the scope of license renewal are captured in a consistent manner, in accordance with Part 54. For examples, discuss the omission of the following components:

(a) Battery and Emergency Switchgear Ventilation System (Section 2.3.3.9)

In Table 2.2-1 of the LRA in the comment column for Instrument Air System (page 2-21), the following comment is provided, "...Piping and components associated with nitrogen backup to the battery and emergency switchgear ventilation system are included with the battery and emergency switchgear ventilation system." In the section discussing the battery and emergency switchgear ventilation system, no mention is made of the "realigned" system or portion thereof. It is noted that on drawing LR-M-399, sheets 1 and 4, the realigned nitrogen backup, safety grade, pneumatic supply is shown. However, Table 2.3.3-9 on page 2-73 does not list the piping and valves associated with nitrogen backup pneumatic supply as requiring an aging management review (AMR). Explain the omission of these components.

(b) Reactor Building Structure (Section 2.4.2)

UFSAR Section 12.2.1(e) states that the “watertight reactor building doors above Elevation 135.0 ft (C.D.) are weatherstripped for leak tightness at secondary containment.” However, Tables 2.3.2.8-1 and 2.4.2 do not list watertight doors or weatherstripping. The NRC staff believes that the watertight doors and weatherstripping are long-lived, passive components that are within the scope of licensing renewal, and require an AMR. Provide the basis for the omission of these components.

UFSAR Section 12.2.1(e) also states that “Small amounts of water which might leak through the doors' weatherstripping would be handled by the building drainage system and pumped out. All the concrete construction below Elevation 135 ft 0 in (C.D.) is waterproofed to Elevation 128 ft 0 in (C.D.), and a fibrated bitumastic paint applied up to grade...” However, Tables 2.3.2.8-1 and 2.4.2 do not list the components of the building drainage system, waterproofing sealants or the fibrated bitumastic paint. The NRC staff believes that these are long-lived and passive components that are within the scope of licensing renewal and require an AMR. Please provide the basis for the omission of these components.

RAI 2.1-5

Explain, using specific examples, how the scoping and screening process was performed to ensure that intended functions for systems, structures and components (SSCs) that need to be in the scope of license renewal are captured in a consistent manner, in accordance with Part 54. For examples, discuss the omission of the following intended functions:

(a) Residual Heat Removal System (RHRS - Section 2.3.2.5)

The applicant is required by 10 CFR Part 54.21 to identify those structures and components subject to an aging management review. The containment spray mode of the RHRS containment cooling subsystem has spray header components which have a spray function. These components have not been identified in Table 2.3.2-5 as one of the component groups in that table has having that function. Please correct the LRA to identify this component and its intended function.

(b) Fuel Handling System (FHS - Section 2.3.3.1)

Power Generation Design Criteria 9 of UFSAR Section 1.5.1.2 states that “fuel handling and storage facilities shall be designed to maintain adequate shielding and cooling for spent fuel.” Failure of the fuel handling system could violate these criteria. The LRA description for this system lists “Maintain Structural Integrity” as the only function for this system. Provide the basis for omitting these functions for the fuel handling system.