

**From:** <eddie.grant@exeloncorp.com>  
**To:** <nvg@nrc.gov>  
**Date:** 10/12/04 12:34PM  
**Subject:** Response to RAI Letter No. 9

Nannette Gilles

Attached is your copy of the response to RAI letter No. 9 that was signed out yesterday.

Thanks,

Exelon  
Early Site Permit Project  
Eddie R. Grant  
610.765.5001 voice  
610.765.5755 fax  
850.598.9801 cell

\*\*\*\*\*  
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None

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52.17

October 11, 2004

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

Subject: Response to Request for Additional Information (RAI) Letter No. 9 –  
Exelon Early Site Permit (ESP) Application for the Clinton ESP Site  
(TAC No. MC1122)

Re: Letter, U.S. Nuclear Regulatory Commission (N. V. Gilles) to Exelon  
Generation Company, LLC, (M. Kray), dated July 26, 2004, Request for  
Additional Information (RAI) Letter No. 9 – Exelon Early Site Permit  
(ESP) Application for the Clinton ESP Site (TAC No. MC1122)

Enclosed, as requested in the referenced letter, are responses to the RAIs associated with  
the topic of quality assurance as related to the Exelon Generation Company, LLC (EGC)  
ESP.

Please contact Eddie Grant of my staff at 610-765-5001 if you have any questions  
regarding this submittal.

Sincerely yours,



Marilyn C. Kray  
Vice President, Project Development

TPM/erg

cc: U.S. NRC Regional Office (w/ enclosures)  
Ms. Nanette V. Gilles (w/ enclosures)

U.S. Nuclear Regulatory Commission  
October 11, 2004  
Page 2 of 3

Enclosure: Response to RAIs 17.1.1-2 through 17.1.1-5

**AFFIDAVIT OF MARILYN C. KRAY**

State of Pennsylvania

County of Chester

The foregoing document was acknowledged before me, in and for the County and State aforesaid, by Marilyn C. Kray, who is Vice President, Project Development, of Exelon Generation Company, LLC. She has affirmed before me that she is duly authorized to execute and file the foregoing document on behalf of Exelon Generation Company, LLC, and that the statements in the document are true to the best of her knowledge and belief.

Acknowledged and affirmed before me this 11<sup>th</sup> day of October, 2004.

My commission expires 10-6-07.



Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Vivia V. Gallimore, Notary Public  
Kennett Square Boro, Chester County  
My Commission Expires Oct. 6, 2007

Member, Pennsylvania Association Of Notaries

**NRC Letter Dated: 07/27/2004**

**NRC RAI No. 17.1.1-2**

Please describe the quality assurance (QA) measures used to authenticate and verify data retrieved from internet websites that supports information in the SSAR that would affect the design, construction, or operation of structures, systems, and components important to safety.

**EGC RAI ID: R6-1**

**EGC RESPONSE:**

A description of the quality assurance measures used to authenticate and verify data retrieved from internet websites was provided by separate correspondence submitted on October 8, 2004, in response to NRC Inspection Report 0520007/2004001 dated February 20, 2004. However, these QA measures are not discussed in the EGC SSAR, and are not considered as part of the application.

**ASSOCIATED EGC ESP APPLICATION REVISIONS:**

None

**ATTACHMENTS:**

None

**NRC Letter Dated: 07/27/2004**

**NRC RAI No. 17.1.1-3**

- a) Section 8 of Exelon Generation Company's (EGC's) document AP-AA-1000, "Early Site Permit Project Quality Assurance Instructions," Revision 0, and Section 2.8 of CH2M HILL's "Project Quality Plan for Exelon Early Site Permit," Revision 4, state that the safety-related scope of the development of the ESP application would not involve the use of QA measures for identification and control of materials, parts, or components. Please describe why these QA measures were not applicable to the development of the ESP application. Alternatively, if these QA measures were applicable to the ESP application, please describe the QA measures used by EGC and the primary contractor (CH2M HILL) for these activities.
- b) Section 9 of EGC's document AP-AA-1000, "Early Site Permit Project Quality Assurance Instructions," Revision 0, and Section 2.9 of CH2M HILL's "Project Quality Plan for Exelon Early Site Permit," Revision 4, state that the safety-related scope of the development of the ESP application would not involve the use of QA measures for control of special processes. Please describe why these QA measures were not applicable to the development of the ESP application. Alternatively, if these QA measures were applicable to the ESP application, please describe the QA measures used by EGC and the primary contractor (CH2M HILL) for these activities.
- c) Section 10 of EGC's document AP-AA-1000, "Early Site Permit Project Quality Assurance Instructions," Revision 0, and Section 2.10 of CH2M HILL's "Project Quality Plan for Exelon Early Site Permit," Revision 4, state that the safety-related scope of the development of the ESP application would not involve the use of QA measures for inspection. Please describe why these QA measures were not applicable to the development of the ESP application. Alternatively, if these QA measures were applicable to the ESP application, please describe the QA measures used by EGC and the primary contractor (CH2M HILL) for these activities.
- d) Section 14 of EGC's document AP-AA-1000, "Early Site Permit Project Quality Assurance Instructions," Revision 0, and Section 2.14 of CH2M HILL's "Project Quality Plan for Exelon Early Site Permit," Revision 4, state that the safety-related scope of the development of the ESP application would not involve the use of QA measures for inspection, test, and operating status. Please describe why these QA measures were not applicable to the development of the ESP application. Alternatively, if these QA measures were applicable to the ESP application, please describe the QA measures used by EGC and the primary contractor (CH2M HILL) for these activities.
- e) Section 15 of EGC's document AP-AA-1000, "Early Site Permit Project Quality Assurance Instructions," Revision 0, and Section 2.15 of CH2M HILL's "Project Quality Plan for Exelon Early Site Permit," Revision 4, state that the safety-related scope of the development of the ESP application would not involve the use of QA measures for nonconforming materials parts, or components. Please describe why these QA measures were not applicable to the development of the ESP application. Alternatively, if these QA measures were applicable to the ESP application, please describe the QA measures used by EGC and the primary contractor (CH2M HILL) for these activities.

**EGC RAI ID: R6-2**

**EGC RESPONSE:**

A description of why the various identified quality assurance measures were not applicable to the development of the ESP application was provided by separate correspondence submitted on October 8, 2004, in response to NRC Inspection Report 0520007/2004001 dated February 20, 2004. However, these QA measures are not discussed in the EGC SSAR, and are not considered as part of the application.

**ASSOCIATED EGC ESP APPLICATION REVISIONS:**

None

**ATTACHMENTS:**

None



**NRC Letter Dated: 07/27/2004**

**NRC RAI No. 17.1.1-4**

Please provide copies of the following documents that were reviewed during the NRC's special team inspection that was conducted from January 12-16, 2004, to review aspects of applicant and contractor quality control activities involved with the preparation of the application for the Clinton ESP:

- a.) AP-AA-1000, "Early Site Permit Project Quality Assurance Instructions," Revision 0
- b.) DEL-012-4, "Project Quality Plan for Exelon Early Site Permit," Revision 4, dated December 10, 2002

**EGC RAI ID: R6-3**

**EGC RESPONSE:**

The requested PROPRIETARY project internal documents were voluntarily provided during the above noted inspection, and for your convenience, an additional copy was submitted by separate correspondence dated September 7, 2004. However, these process documents are not discussed nor referenced in the EGC SSAR, and are not considered as part of the application.

**ASSOCIATED EGC ESP APPLICATION REVISIONS:**

None

**ATTACHMENTS:**

None

**NRC Letter Dated: 07/27/2004**

**NRC RAI No. 17.1.1-5**

A special team inspection was conducted from January 12-16, 2004, to review aspects of applicant and contractor quality control activities involved with the preparation of the application for the Exelon ESP. The team identified an open item regarding an issue which was not addressed during the inspection. The open item involves the applicability of 10 CFR Part 21, "Report of Defects and Noncompliance," to the Exelon ESP project. Please describe the actions taken to ensure the Exelon ESP project complies with Part 21. Refer to the NRC letter sent to Nuclear Energy Institute (NEI) and to all of the other ESP applicants dated June 22, 2004 (Accession No. ML040430041), on the subject "Applicability of 10 CFR Part 21" for further information.

**EGC RAI ID: R6-4**

**EGC RESPONSE:**

The applicability of 10 CFR Part 21 was addressed by separate correspondence submitted on October 8, 2004, in response to NRC Inspection Report 0520007/2004001 dated February 20, 2004. However, the applicability of, and compliance with, Part 21 is not discussed in the EGC SSAR, and is not considered as part of the application.

**ASSOCIATED EGC ESP APPLICATION REVISIONS:**

None

**ATTACHMENTS:**

None