

November 15, 2006

Mr. Patrick R. Simpson
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SUBJECT: APPROVAL OF EXELON GENERATION COMPANY, LLC, AND AMERGEN ENERGY COMPANY, LLC, QUALITY ASSURANCE PROGRAM CHANGES REGARDING THE REASSIGNMENT OF INDEPENDENT REVIEW (TAC NOS. MD1270, MD1271, MD1272, MD1273, MD1274, MD1275, MD1276, MD1277, MD1278, MD1279, MD1280, MD1281, MD1282, MD1283, MD1284, MD1285, AND MD1286)

Dear Mr. Simpson:

By letter to the Nuclear Regulatory Commission (NRC) dated April 24, 2006, as supplemented by letter dated June 29, 2006, Exelon Generation Company, LLC and AmerGen Energy Company, LLC (the licensees), submitted a proposed change to Quality Assurance Topical Report (QATR), NO-AA-10, Revision 77, for NRC review and approval, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(a)(4). The topical report describes the Appendix B quality assurance (QA) program applicable to the nuclear fleet of 21 nuclear reactors owned by the licensees.

The proposed change would reassign the Nuclear Safety Review Board (NSRB) independent review responsibilities for technical specification changes, license amendments, and emergency plan changes to the Plant Operations Review Committee (PORC). The licensees cite as precedent a similar change approved by the NRC for Nuclear Management Company, LLC, on January 13, 2005, which reassigns NSRB reviews to other site organizations. Pursuant to 10 CFR 50.54(a)(3)(ii), licensees may adopt previously approved alternatives, provided that the bases of the NRC approval are applicable to the licensee's facility.

Based on our review of the changes to the QA program that are described in the licensees' submittals, the NRC staff concludes that the proposed alternative, to reassign to the PORC the NSRB independent review responsibilities for the review of TS changes, license amendments, and changes to the emergency plan, is acceptable. The enclosed safety evaluation documents the basis for our conclusion that the proposed changes to the QA program are acceptable.

P. Simpson

-2-

If you have any questions, please contact me at (301) 415-1055.

Sincerely,

/RA/

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Office of Nuclear Reactor Regulation

Docket Nos. 50-456, 50-457, 50-454, 50-455,
50-461, 50-010, 50-237, 50-249, 72-37, 50-373,
50-374, 50-352, 50-353, 50-219, 72-15, 50-171,
50-277, 50-278, 72-29, 50-254, 50-265, 72-53,
50-289, 50-295, and 50-304

Enclosure:
Safety Evaluation

cc w/encl: See next page

P. Simpson

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If you have any questions, please contact me at (301) 415-1055.

Sincerely,

/RA/

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Enclosure:
Safety Evaluation

cc w/encl: See next page

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ADAMS Accession No.: **ML063210338**

*SE Input dated

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Date	11/15/06	11/15/06	10/05/2006	11/15/06

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED CHANGE TO THE QUALITY ASSURANCE PROGRAM

QUALITY ASSURANCE PROGRAM CONSOLIDATION

EXELON GENERATION COMPANY, LLC, AND

AMERGEN ENERGY COMPANY, LLC

BYRON STATION, UNIT NOS. 1 AND 2

BRAIDWOOD STATION, UNIT NOS. 1 AND 2

CLINTON POWER STATION, UNIT 1

DRESDEN NUCLEAR POWER STATION, UNITS 1, 2, AND 3

LASALLE COUNTY STATION, UNITS 1 AND 2

LIMERICK GENERATING STATION, UNITS 1 AND 2

OYSTER CREEK GENERATING STATION

PEACH BOTTOM ATOMIC POWER STATION, UNITS 1, 2, AND 3

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

THREE MILE ISLAND, UNIT 1

ZION NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. STN 50-456 AND STN 50-457; STN 50-454 AND STN 50-455;

50-461; 50-10, 50-237 AND 50-249; 50-373 AND 50-374; 50-352 AND 50-353; 50-219, 50-171,

50-277 AND 50-278; 50-254 AND 50-265; 50-289; AND 50-295 AND 50-304

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC) dated April 24, 2006 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML061140437), as supplemented by letter dated June 29, 2006 (ADAMS Accession No. ML061290590), Exelon Generation Company, LLC, and AmerGen Energy Company, LLC (the licensees), submitted a

ENCLOSURE

proposed change to Quality Assurance Topical Report (QATR), NO-AA-10, Revision 77, for NRC review and approval in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(a)(4). The topical report describes the Appendix B quality assurance (QA) program, applicable to the nuclear fleet of 21 nuclear reactors owned by the licensees.

The proposed change would reassign Nuclear Safety Review Board (NSRB) independent review responsibilities for technical specification (TS) changes, license amendments, and emergency plan changes to the Plant Operations Review Committee (PORC). The licensees cite as precedent a similar change approved by the NRC on January 13, 2005 (ADAMS Accession No. ML050210276), which reassigns NSRB reviews to other site organizations. Pursuant to 10 CFR 50.54(a)(3)(ii), licensees may adopt previously approved alternatives, provided that the bases of the NRC approval are applicable to the licensee's facility.

2.0 REGULATORY EVALUATION

The NSRB, as described in Chapter 1, Section 2.2.3.5 of the QATR, reports to and advises the president and chief nuclear officer of the results of its independent oversight of plant operations related to safe operation of the station and the company's nuclear program relative to nuclear safety. The PORC, as described in Chapter 1, Section 2.3.5 of the QATR, is an on-site, multi-disciplined committee, responsible for review of activities that affect nuclear safety, reports to, and advises the management position responsible for plant operation on matters relative to nuclear safety.

Guidance for NRC staff reviews of licensee assessments of operating phase activities important to safety is provided in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Section 13.4, "Operational Review." The NSRB and PORC review functions originated as TS administrative controls, as defined by the regulation in 10 CFR 50.36(c)(5). These review functions were relocated to licensee QA program descriptions in accordance with NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." Operational reviews are addressed by American National Standards Institute (ANSI) N18.7 (American Nuclear Society (ANS) 3.2), Sections 4.4 and 4.7, as endorsed by Regulatory Guide 1.33, "Quality Assurance Program Requirements." Site-specific commitments with respect to operational reviews are described in the QATR, Appendix C, Section 1.1, "Codes and Standards."

3.0 TECHNICAL EVALUATION

The QATR contains a commitment for each of the licensees' 21 plants to follow the guidance of ANSI N18.7 (ANS 3.2), with respect to operational reviews. Therefore, through reference, the QATR requires the NSRB for each site to review TS changes, license amendments, and changes to the emergency plan prior to submittal to the NRC. Current plant implementing procedures require reviews of these changes by both PORC and NSRB.

A primary objective for performing independent reviews is that the body performing the independent review has organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations. In its April 24, 2006, proposed change, the licensees state that the QATR has been revised to require that, should a voting PORC member have a potential conflict of interest in a change under review, another PORC member will satisfy committee quorum requirements when voting on approval of the pending change.

The revised QATR also requires PORC reviews of these changes to maintain safety considerations paramount, as opposed to cost or schedule considerations.

The QATR commits the NSRB to perform an oversight function of the activities performed by PORC. In its oversight role, the NSRB is responsible for assessing the effectiveness of PORC reviews with regard to nuclear safety. In response to the NRC staff's request for additional information, the licensees' letter dated June 29, 2006, provides information on how the NSRB assesses the effectiveness of PORC reviews. The NSRB reviews PORC meeting minutes and nuclear oversight reports related to its assessment of PORC effectiveness. PORC meeting minutes are required by procedures to be sufficiently detailed for NSRB to assess the effectiveness of PORC reviews. Meeting minutes include a detailed description of items reviewed, key discussion points with questions/responses, and the recommendation, including the basis for the determination made.

The NRC staff finds that, while this change removes the NSRB direct review of TS changes, license amendments, and changes to the emergency plan, PORC minutes and nuclear oversight assessment reports provide sufficient detail for NSRB to evaluate the safety issues considered and the conclusions reached by the PORC.

The NRC staff finds that, given the constraint that PORC members having a potential conflict of interest refrain from voting on documents under review, and NSRB oversight of PORC activities, PORC reviews provide sufficient organizational freedom to function as an independent review body. The NRC staff also finds the proposed reassignment of NSRB review responsibilities for TS changes, license amendments, and changes to the emergency plan, given the conditions of the QATR revisions, to be acceptable. The NRC staff further finds that there is reasonable assurance that PORC reviews will be sufficiently independent of cost and schedule pressures to serve as an independent review body for performing the review of TS changes, license amendments, and emergency plan changes requiring NRC approval. As previously described, the NSRB retains its current function of evaluating the effectiveness of PORC reviews with regard to plant safety.

4.0 CONCLUSION

Based on review of the changes to the QA programs, as described in the licensees' submittal, the NRC staff concludes that the proposed alternative, to reassign to PORC the NSRB independent review responsibilities for review of TS changes, license amendments, and changes to the emergency plan, is acceptable.

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