

October 31, 2007

Mr. Charles G. Pardee
Chief Nuclear Officer and Sr. Vice President
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: BYRON STATION, UNIT NOS. 1 AND 2; BRAIDWOOD STATION, UNITS 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; AND PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 - ISSUANCE OF AMENDMENTS REGARDING THE INCORPORATION OF TSTF-448, REVISION 2, "CONTROL ROOM HABITABILITY" (TAC NOS. MD5272, MD5273, MD5270, MD5271, MD5274, MD5277, MD5278, MD5279, MD5280, MD5282, AND MD5283)

Dear Mr. Pardee:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No.150 to Facility Operating License No. NPF-37 and Amendment No.150 to Facility Operating License No. NPF-66 for the Byron Station, Unit Nos. 1 and 2, respectively, and Amendment No. 145 to Facility Operating License No. NPF-72 and Amendment No.145 to Facility Operating License No. NPF-77 for the Braidwood Station, Units 1 and 2, respectively, and Amendment No. 178 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1, and Amendment No. 186 to Facility Operating License No. NPF-11 and Amendment No. 173 to Facility Operating License No. NPF-18 for the LaSalle County Station, Units 1 and 2, respectively, and Amendment No. 188 to Facility Operating License No. NPF-39 and Amendment No. 149 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2, respectively, and Amendment No. 264 to Facility Operating License No. DPR-44 and Amendment No. 268 to Facility Operating License No. DPR-56 for the Peach Bottom Atomic Power Station, Units 2 and 3, respectively. The amendments are in response to your application dated April 12, 2007.

The amendments modify technical specification (TS) requirements related to control room envelope habitability in accordance with TS Task Force (TSTF) Traveler TSTF-448, Revision 2, "Control Room Habitability."

Your April 12, 2007, letter also requested that this change be reviewed for Dresden Nuclear Power Station, Units 2 and 3, Oyster Creek Generating Station, Quad Cities Nuclear Power Station, Units 1 and 2, and Three Mile Island Station, Unit 1. This change is still under review for these units. The NRC staff's will issue the results of its evaluation for these units in a separate correspondence.

C. Pardee

- 2 -

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Christopher Gratton, Senior Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,
STN 50-456, STN 50-457, 50-461,
50-373, 50-374, 50-352, 50-353, 50-277,
and 50-278

Enclosures:

1. Amendment No. 150 to NPF-37
2. Amendment No. 150 to NPF-66
3. Amendment No. 145 to NPF-72
4. Amendment No. 145 to NPF-77
5. Amendment No. 178 to NPF-62
6. Amendment No. 186 to NPF-11
7. Amendment No. 173 to NPF-18
8. Amendment No. 188 to NPF-39
9. Amendment No. 149 to NPF-85
10. Amendment No. 264 to DPR-44
11. Amendment No. 268 to DPR-56
12. Safety Evaluation

cc w/encls: See next page

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Christopher Gratton, Senior Project Manager
 Plant Licensing Branch III-2
 Division of Operating Reactor Licensing
 Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,
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1. Amendment No. 150 to NPF-37
2. Amendment No. 150 to NPF-66
3. Amendment No. 145 to NPF-72
4. Amendment No. 145 to NPF-77
5. Amendment No. 178 to NPF-62
6. Amendment No. 186 to NPF-11
7. Amendment No. 173 to NPF-18
8. Amendment No. 188 to NPF-39
9. Amendment No. 149 to NPF-85
10. Amendment No. 264 to DPR-44
11. Amendment No. 268 to DPR-56
12. Safety Evaluation

cc w/encls: See next page

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Package: ML072550382
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Amendment: ML072550393
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DATE	10/23/07	10/23/07	8/22/07	10/16/07	10/29/07

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EXELON GENERATION COMPANY, LLC

DOCKET NO. STN 50-454

BYRON STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.150
License No. NPF-37

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-37 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A as revised through Amendment No. 150 and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-37 will be amended to add the following license conditions to Appendix C, to read as follows:

Upon implementation of Amendment No. 150 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.5.18.c.(i), the assessment of CRE habitability as required by Specification 5.5.18.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.18.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.10.4, in accordance with Specification 5.5.18.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from November 1, 2004, the date of the most recent successful tracer gas test, as stated in the January 31, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.18.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from November 1, 2004, the date of the most recent successful tracer gas test, as stated in the January 31, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.18.d, shall be within

18 months, plus the 138 days allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.

4. This license amendment is effective as of the date of its issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Russell Gibbs, Chief
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications and Facility Operating License

Date of Issuance: October 31, 2007

EXELON GENERATION COMPANY, LLC

DOCKET NO. STN 50-455

BYRON STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 150
License No. NPF-66

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter 1;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-66 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, (NUREG-1113) as revised through Amendment No. 150 and the Environmental Protection Plan contained in Appendix B, both of which were attached to License No. NPF-37, are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-66 will be amended to add the following license conditions to Appendix C, to read as follows:

Upon implementation of Amendment No. 150 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.5.18.c.(i), the assessment of CRE habitability as required by Specification 5.5.18.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.18.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.10.4, in accordance with Specification 5.5.18.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from November 1, 2004, the date of the most recent successful tracer gas test, as stated in the January 31, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.18.c.(ii), shall be within 3 years, plus the 9 month allowance of SR 3.0.2, as measured from November 1, 2004, the date of the most recent successful tracer gas test, as stated in the January 31, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.18A shall be within 18 months, plus the

138 days allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.

4. This license amendment is effective as of the date of its issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Russell Gibbs, Chief
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications and Facility Operating License

Date of Issuance: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NOS. 150 AND 150

FACILITY OPERATING LICENSE NOS. NPF-37 AND NPF-66

DOCKET NOS. STN 50-454 AND STN 50-455

Replace the following pages of the Facility Operating License and Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-37

Page 3

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License NPF-66

Page 3

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TSs

3.7.10-1

3.7.10-2

3.7.10-3

3.7.10-4

5.5-21

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Insert

License NPF-37

Page 3

Page 3 of Appendix C

License NPF-66

Page 3

Page 3 of Appendix C

TSs

3.7.10-1

3.7.10-2

3.7.10-3

3.7.10-4

5.5-21

5.5-22

EXELON GENERATION COMPANY, LLC

DOCKET NO. STN 50-456

BRAIDWOOD STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 145
License No. NPF-72

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-72 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A as revised through Amendment No. 145 and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-72 will be amended to add the following license conditions to Appendix C, to read as follows:

Upon implementation of Amendment No. 145 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.5.18.c.(i), the assessment of CRE habitability as required by Specification 5.5.18.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.18.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.10.4, in accordance with Specification 5.5.18.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from November 7, 2004, the date of the most recent successful tracer gas test, as stated in the February 7, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.18.c.(ii), shall be within 3 years, plus the 9 month allowance of SR 3.0.2, as measured from November 7, 2004, the date of the most recent successful tracer gas test, as stated in the February 7, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.18A shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured

from the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.

4. This license amendment is effective as of the date of its issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Russell Gibbs, Chief
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications and Facility Operating License

Date of Issuance: October 31, 2007

EXELON GENERATION COMPANY, LLC

DOCKET NO. STN 50-457

BRAIDWOOD STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.145
License No. NPF-77

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter 1;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-77 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A as revised through Amendment No. 145 and the Environmental Protection Plan contained in Appendix B, both of which were attached to License No. NPF-72, dated July 2, 1987, are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-77 will be amended to add the following license conditions to Appendix C, to read as follows:

Upon implementation of Amendment No.145 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.5.18.c.(i), the assessment of CRE habitability as required by Specification 5.5.18.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.18.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.10.4, in accordance with Specification 5.5.18.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from November 7, 2004, the date of the most recent successful tracer gas test, as stated in the February 7, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.18.c.(ii), shall be within 3 years, plus the 9 month allowance of SR 3.0.2, as measured from November 7, 2004, the date of the most recent successful tracer gas test, as stated in the February 7, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.18A shall be within 18 months, plus the

138 days allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.

4. This license amendment is effective as of the date of its issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Russell Gibbs, Chief
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications and Facility Operating License

Date of Issuance: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NOS. 145 AND 145

FACILITY OPERATING LICENSE NOS. NPF-72 AND NPF-77

DOCKET NOS. STN 50-456 AND STN 50-457

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-72

Page 3

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License NPF-77

Page 3

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TSs

3.7.10-1

3.7.10-2

3.7.10-3

3.7.10-4

5.5-21

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Insert

License NPF-72

Page 3

Page 3 of Appendix C

License NPF-77

Page 3

Page 3 of Appendix C

TSs

3.7.10-1

3.7.10-2

3.7.10-3

3.7.10-4

5.5-21

5.5-22

AMERGEN ENERGY COMPANY, LLC

DOCKET NO. 50-461

CLINTON POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 178

License No. NPF-62

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by AmerGen Energy Company, LLC (the licensee), dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-62 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A as revised through Amendment No. 178 and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-62 will be amended to add the following license condition 2.C.(23), to read as follows:

- (23) Upon implementation of Amendment No.178 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.5, in accordance with TS 5.5.15.c.(i), the assessment of CRE habitability as required by Specification 5.5.15.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.15.d, shall be considered met. Following implementation:
- (a) The first performance of SR 3.7.3.5, in accordance with Specification 5.5.15 .c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from November 16, 2004, the date of the most recent successful tracer gas test, as stated in the February 8, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
 - (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.15.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from November 16, 2004, the date of the most recent successful tracer gas test, as stated in the February 8, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
 - (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.15.d, shall be within 24 months, plus the 6 months allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 6 months if not performed previously.

4. This license amendment is effective as of its date of issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Russell Gibbs, Chief
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications and Facility Operating License

Date of Issuance: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 178

FACILITY OPERATING LICENSE NO. NPF-62

DOCKET NO. 50-461

Replace the following pages of the Facility Operating License and Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-62

Page 4 (Amd. 177)

Page 7

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TSs

3.7-4

3.7-5

3.7-6

3.7-7

5.0-16b

5.0-16c

Insert

License NPF-62

Page 3

Page 7

Page 7a

TSs

3.7-4

3.7-5

3.7-6

3.7-7

5.0-16b

5.0-16c

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-373

LASALLE COUNTY STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 186
License No. NPF-11

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by the Exelon Generation Company, LLC (the licensee) dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the enclosure to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-11 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 186, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-11 will be amended to add the following license condition 2.C.(45), to read as follows:

(45) Upon implementation of Amendment No. 186 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air leakage as required by SR 3.7.4.5, in accordance with TS 5.5.15.c.(i), the assessment of CRE habitability as required by Specification 5.5.15.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.15.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.4.5, in accordance with Specification 5.5.15.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from 1998, the date of the most recent successful tracer gas test, as stated in the December 9, 2003 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.15.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from 1998, the date of the most recent successful tracer gas test, as stated in the December 9, 2003 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.15.d, shall be within 24 months, plus 6 months allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 6 months if not performed previously.

4. This license amendment is effective as of the date of its issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Russell Gibbs, Chief
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications and Facility Operating License

Date of Issuance: October 31, 2007

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-374

LASALLE COUNTY STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 173
License No. NPF-18

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by the Exelon Generation Company, LLC (the licensee), dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the enclosure to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-18 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 173, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-18 will be amended to add the following license condition 2.C.(29), to read as follows:

- (29) Upon implementation of Amendment No. 173 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.4.5, in accordance with TS 5.5.15.c.(i), the assessment of CRE habitability as required by Specification 5.5.15.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.15.d, shall be considered met. Following implementation:
- (a) The first performance of SR 3.7.4.5, in accordance with Specification 5.5.15.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from 1998, the date of the most recent successful tracer gas test, as stated in the December 9, 2003 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
 - (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.15.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from 1998, the date of the most recent successful tracer gas test, as stated in the December 9, 2003 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
 - (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.15.d, shall be within 24 months, plus the 6 months allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 6 months if not performed previously.

4. This license amendment is effective as of the date of its issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Russell Gibbs, Chief
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications and Facility Operating License

Date of Issuance: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NOS. 186 AND 173

FACILITY OPERATING LICENSE NOS. NPF-11 AND NPF-18

DOCKET NOS. 50-373 AND 50-374

Replace the following pages of the Facility Operating Licenses and Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-11

Page 3

Page 16a2

License NPF-18

Page 3

Page 9d

Page 10

TSs

3.7.4-1

3.7.4-2

3.7.4-3

3.7.4-4

5.5-14

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Insert

License NPF-11

Page 3

Page 16a2

License NPF-18

Page 3

Page 9d

Page 10

TSs

3.7.4-1

3.7.4-2

3.7.4-3

3.7.4-4

5.5-14

5.5-15

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.188
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee), dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 188, are hereby incorporated in the license. Exelon Generation Company, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-39 will be amended to add the following license condition 2.C.(23), to read as follows:

- (23) Upon implementation of Amendment No. 188 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air leakage as required by SR 4.7.2.2.a, in accordance with TS 6.16.c.(i), the assessment of CRE habitability as required by Specification 6.16.c.(ii), and the measurement of CRE pressure as required by Specification 6.16.d, shall be considered met. Following implementation:
 - (a) The first performance of SR 4.7.2.2.a, in accordance with Specification 6.16.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 4.0.2, as measured from September 16, 2004, the date of the most recent successful tracer gas test, as stated in the December 10, 2004 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
 - (b) The first performance of the periodic assessment of CRE habitability, Specification 6.16.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 4.0.2, as measured from September 16, 2004, the date of the most recent successful tracer gas test, as stated in the December 10, 2004 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
 - (c) The first performance of the periodic measurement of CRE pressure, Specification 6.16.d, shall be within 24 months, plus the 180 days allowed by SR 4.0.2, as measured from September 16, 2004, the date of the most recent successful pressure measurement test, or within 180 days if not performed previously.

4. This license amendment is effective as of its date of issuance and shall be implemented within 180 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the License
and Technical Specifications

Date: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 188

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Facility Operating Licenses and Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-39

Page 3

Page 8

Page 9

TSs

xxi

xxviii

3/4 7-6

3/4 7-7

3/4 7-8

6-22

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Insert

License NPF-39

Page 3

Page 8

Page 9

TSs

xxi

xxviii

3/4 7-6

3/4 7-7

3/4 7-8

6-22

6-23

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 149

License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 149, are hereby incorporated into this license. Exelon Generation Company, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Further, Facility Operating License No. NPF-85 will be amended to add the following license condition 2.C.(11), to read as follows:

(23) Upon implementation of Amendment No. 149 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 4.7.2.2.a, in accordance with TS 6.16.c.(i), the assessment of CRE habitability as required by Specification 6.16.c.(ii), and the measurement of CRE pressure as required by Specification 6.16.d, shall be considered met. Following implementation:

- (a) The first performance of SR 4.7.2.2.a, in accordance with Specification 6.16.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 4.0.2, as measured from September 16, 2004, the date of the most recent successful tracer gas test, as stated in the December 10, 2004 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 6.16.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 4.0.2, as measured from September 16, 2004, the date of the most recent successful tracer gas test, as stated in the December 10, 2004 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 6.16.d, shall be within 24 months, plus the 180 days allowed by SR 4.0.2, as measured from September 16, 2004, the date of the most recent successful pressure measurement test, or within 180 days if not performed previously.

4. This license amendment is effective as of its date of issuance and shall be implemented within 180 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the License and
Technical Specifications

Date of Issuance: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 149

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Facility Operating Licenses and Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-85

Page 3

Page 5

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TSs

xxi

xxviii

3/4 7-6

3/4 7-6a

3/4 7-7

3/4 7-8

6-22

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Insert

License NPF-85

Page 3

Page 5

Page 5a

TSs

xxi

xxviii

3/4 7-6

3/4 7-6a

3/4 7-7

3/4 7-8

6-22

6-23

EXELON GENERATION COMPANY, LLC

PSEG NUCLEAR, LLC

DOCKET NO. 50-277

PEACH BOTTOM ATOMIC POWER STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 264

Renewed License No. DPR-44

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (Exelon Generation Company), and PSEG Nuclear, LLC (the licensees), dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Renewed Facility Operating License No. DPR-44 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 264, are hereby incorporated in the license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications.

3. Further, Facility Operating License No. DPR-44 will be amended to add the following license condition 2.C.(13), to read as follows:

(13) Upon implementation of Amendment No. 264 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air leakage as required by SR 3.7.4.4, in accordance with TS 5.5.13.c(i), the assessment of CRE habitability as required by Specification 5.5.13.c(ii), and the measurement of CRE pressure as required by Specification 5.5.13.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.4.4, in accordance with Specification 5.5.13.c(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from October 25, 2004, the date of the most recent successful tracer gas test, as stated in the January 21, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.13.c(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from October 25, 2004, the date of the most recent successful tracer gas test, as stated in the January 21, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.13.d, shall be within 24 months, plus the 180 days allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 180 days if not performed previously.

4. This license amendment is effective as of its date of issuance and shall be implemented within 180 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the License and
Technical Specifications

Date of Issuance: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 264

RENEWED FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace the following pages of the Facility Operating Licenses and Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License DPR-44

Page 3

Page 7

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TSS

3.7-7

3.7-8

3.7-9

5.0-18

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Insert

License DPR-44

Page 3

Page 7

Page 7a

TSS

3.7-7

3.7-8

3.7-9

5.0-18

5.0-18a

EXELON GENERATION COMPANY, LLC

PSEG NUCLEAR, LLC

DOCKET NO. 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNIT 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 268

Renewed License No. DPR-56

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (Exelon Generation Company), and PSEG Nuclear LLC (the licensees), dated April 12, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Renewed Facility Operating License No. DPR-56 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 268, are hereby incorporated in the license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications.

3. Further, Facility Operating License No. DPR-56 will be amended to add the following license condition 2.C.(13), to read as follows:

(13) Upon implementation of Amendment No. 268 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air leakage as required by SR 3.7.4.4, in accordance with TS 5.5.13.c(i), the assessment of CRE habitability as required by Specification 5.5.13.c(ii), and the measurement of CRE pressure as required by Specification 5.5.13.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.4.4, in accordance with Specification 5.5.13.c(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from October 25, 2004, the date of the most recent successful tracer gas test, as stated in the January 21, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.13.c(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from October 25, 2004, the date of the most recent successful tracer gas test, as stated in the January 21, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.13.d, shall be within 24 months, plus the 180 days allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 180 days if not performed previously.

4. This license amendment is effective as of its date of issuance and shall be implemented within 180 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the License and
Technical Specifications

Date of Issuance: October 31, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 268

RENEWED FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace the following pages of the Facility Operating Licenses and Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License DPR-56

Page 3

Page 7

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TSS

3.7-7

3.7-8

3.7-9

5.0-18

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Insert

License DPR-56

Page 3

Page 7

Page 7a

TSS

3.7-7

3.7-8

3.7-9

5.0-18

5.0-18a

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 150 TO FACILITY OPERATING LICENSE NO. NPF-37,
AMENDMENT NO. 150 TO FACILITY OPERATING LICENSE NO. NPF-66,
AMENDMENT NO. 145 TO FACILITY OPERATING LICENSE NO. NPF-72,
AMENDMENT NO. 145 TO FACILITY OPERATING LICENSE NO. NPF-77,
AMENDMENT NO. 178 TO FACILITY OPERATING LICENSE NO. NPF-62,
AMENDMENT NO. 186 TO FACILITY OPERATING LICENSE NO. NPF-11,
AMENDMENT NO. 173 TO FACILITY OPERATING LICENSE NO. NPF-18,
AMENDMENT NO. 188 TO FACILITY OPERATING LICENSE NO. NPF-39,
AMENDMENT NO. 149 TO FACILITY OPERATING LICENSE NO. NPF-85,
AMENDMENT NO. 264 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-44,
AMENDMENT NO. 268 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-56,

EXELON GENERATION COMPANY, LLC,

AMERGEN ENERGY COMPANY, LLC, AND PSEG NUCLEAR, LLC

BYRON STATION, UNIT NOS. 1 AND 2

BRAIDWOOD STATION, UNITS 1 AND 2

CLINTON POWER STATION, UNIT NO. 1

LASALLE COUNTY STATION, UNITS 1 AND 2

LIMERICK GENERATING STATION, UNITS 1 AND 2

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

DOCKET NOS. STN 50-454, STN 50-455, STN 50-456, STN 50-457,

50-461, 50-373, 50-374, 50-352, 50-353, 50-277 AND 50-278

The following safety evaluations are contained within the appendices of this enclosure:

Appendix A: BYRON STATION, UNIT NOS. 1 AND 2

Appendix B: BRAIDWOOD STATION, UNITS 1 AND 2

Appendix C: CLINTON POWER STATION, UNIT NO. 1

Appendix D: LASALLE COUNTY STATION, UNITS 1 AND 2

Appendix E: LIMERICK GENERATING STATION, UNITS 1 AND 2

Appendix F: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

APPENDIX A

BYRON STATION, UNITS 1 AND 2

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated April 12, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML071090282), as supported by letter dated December 9, 2003 (Reference 7), Exelon Generation Company, LLC (the licensee), requested changes to the technical specifications (TS) for the Byron Station, Units 1 and 2 (Byron). Reference 7 provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 5, 2007 (72 FR 31100).

On August 8, 2006 (ADAMS Accession No. ML062210095), the commercial nuclear electrical power generation industry owners group TSs Task Force (TSTF) submitted a proposed change traveler, TSTF-448, Revision 3, "Control Room Habitability," to the improved standard technical specifications (STS) (NUREGs 1430-1434) on behalf of the industry (TSTF-448, Revisions 0, 1, and 2 were prior draft iterations). TSTF-448, Revision 3, is a proposal to establish more effective and appropriate action, surveillance, and administrative STS requirements related to ensuring the habitability of the control room envelope (CRE).

In NRC Generic Letter 2003-01 (Reference 1), licensees were alerted to findings at facilities that existing TS surveillance requirements (SRs) for the Control Room Envelope Emergency Ventilation System (CREEVS) may not be adequate. Specifically, the results of American Society for Testing and Materials E741-00 (ASTM E741) (Reference 2) tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. Licensees were requested to address existing TS as follows:

Provide confirmation that your technical specifications verify the integrity [i.e., operability] of the CRE [boundary], and the assumed [unfiltered] inleakage rates of potentially contaminated air. If you currently have a differential pressure surveillance requirement to demonstrate CRE [boundary] integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your differential pressure surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE [boundary] so that compliance with your new surveillance requirement can be demonstrated.

If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

To promote standardization and to minimize the resources that would be needed to create and process plant-specific amendment applications in response to the concerns described in the generic letter, the industry and the NRC proposed revisions to CRE habitability system requirements contained in the STS, using the STS change traveler process. This effort culminated in Revision 3 to TSTF-448, which the NRC staff approved on January 17, 2007.

Consistent with the traveler as incorporated into NUREG-1431, the licensee proposed revising action and SRs in Specification 3.7.10, "Control Room Ventilation (VC) Filtration System," and adding a new administrative controls program, Specification 5.5.18, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that CRE boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

Some editorial and plant specific changes were incorporated into this safety evaluation (SE) resulting in minor deviations from model SE text in TSTF-448, Revision 3.

2.0 REGULATORY EVALUATION

2.1 Control Room and Control Room Envelope

NRC Regulatory Guide (RG) 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, May 2003 (Reference 4) uses the term "control room envelope" in addition to the term "control room" and defines each term as follows:

Control Room: The plant area, defined in the facility licensing basis, in which actions can be taken to operate the plant safely under normal conditions and to maintain the reactor in a safe condition during accident situations. It encompasses the instrumentation and controls necessary for a safe shutdown of the plant and typically includes the critical document reference file, computer room (if used as an integral part of the emergency response plan), shift supervisor's office, operator wash room and kitchen, and other critical areas to which frequent personnel access or continuous occupancy may be necessary in the event of an accident.

Control Room Envelope: The plant area, defined in the facility licensing basis, that in the event of an emergency, can be isolated from the plant areas and the environment external to the CRE. This area is served by an emergency ventilation system, with the intent of maintaining the habitability of the control room. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident.

NRC RG 1.197, "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Revision 0, May 2003 (Reference 5), also contains these definitions, but uses the term CRE to mean both. This is because the protected environment provided for operators varies with the nuclear power facility. At some facilities this environment is limited to the control room; at others, it is the CRE. In this SE, consistent with the proposed changes to the STS, the CRE will be used to designate both. For consistency, facilities should use the term CRE with an appropriate facility-specific definition derived from the above CRE definition.

2.2 VC Filtration System

The VC Filtration System (the term used at Byron for CREEVS) provides a protected environment from which operators can control the unit, during airborne challenges from radioactivity, hazardous chemicals, and fire byproducts, such as fire suppression agents and smoke, during both normal and accident conditions.

The VC Filtration System is designed to maintain a habitable environment in the control room envelope for 30 days of continuous occupancy after a design-basis accident (DBA) without exceeding a 5 roentgen equivalent man (rem) total effective dose equivalent (TEDE).

The VC Filtration System consists of two redundant trains, each capable of maintaining the habitability of the CRE. The VC Filtration System is considered operable when the individual components necessary to limit operator exposure are operable in both trains. A VC Filtration System train is considered operable when the associated:

- Fans are operable;
- High efficiency particulate air (HEPA) filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- Heater, ductwork, valves, and dampers are operable, and air circulation can be maintained; and
- CRE boundary is operable (the single boundary supports both trains).

The CRE boundary is considered operable when the measured unfiltered air inleakage is less than or equal to the inleakage value assumed by the licensing basis analyses of design-basis accident consequences to CRE occupants.

2.3 Regulations Applicable to Control Room Habitability

In Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, "Domestic Licensing of Production and Utilization Facilities," General Design Criteria (GDC) 1, 2, 3, 4, 5, and 19 apply to CRE habitability. A summary of these GDCs follows.

GDC 1, "Quality Standards and Records," requires that structures, systems, and components (SSCs) important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions performed.

GDC 2, "Design Basis for Protection Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of earthquakes and other natural hazards.

GDC 3, "Fire Protection," requires SSCs important to safety be designed and located to minimize the effects of fires and explosions.

GDC 4, "Environmental and Dynamic Effects Design Bases," requires SSCs important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents (LOCAs).

GDC 5, "Sharing of Structures, Systems, and Components," requires that SSCs important to safety not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, the orderly shutdown and cooldown of the remaining units.

GDC 19, "Control Room," requires that a control room be provided from which actions can be taken to operate the nuclear reactor safely under normal conditions and to maintain the reactor in a safe condition under accident conditions, including a LOCA. Adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of specified values.

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing CRE boundary operability resided only in the following CRE ventilation system specifications:

- NUREG-1430, TS 3.7.10, "Control Room Emergency Ventilation System (CREVS);"
- NUREG-1431, TS 3.7.10, "Control Room Emergency Filtration System (CREFS);"
- NUREG-1432, TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS);"
- NUREG-1433, TS 3.7.4, "[Main Control Room Environmental Control (MCREC)] System;" and
- NUREG-1434, TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."

In these specifications, the SR associated with demonstrating the operability of the CRE boundary requires verifying that one control room ventilation subsystem can maintain a positive pressure relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate. Facilities that pressurize the CRE during the emergency mode of operation of the control room ventilation system have similar SRs. Other facilities that do not pressurize the CRE have only a system flow rate criterion for the emergency mode of operation. Regardless, the results of ASTM E741 tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance (or the alternative surveillance at non-pressurization facilities) is not a reliable method for demonstrating CRE boundary operability. That is, licensees were able to obtain differential pressure and flow measurements satisfying the SR limits even though unfiltered inleakage was determined to exceed the value assumed in the safety analyses.

In addition to an inadequate SR, the action requirements of these specifications were ambiguous regarding CRE boundary operability in the event CRE unfiltered inleakage is found

to exceed the analysis assumption. The ambiguity stemmed from the view that the CRE boundary may be considered operable but degraded in this condition, and that it would be deemed inoperable only if calculated radiological exposure limits for CRE occupants exceeded a licensing basis limit; e.g., as stated in GDC-19, even while crediting compensatory measures.

NRC Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," (AL 98-10) states that "the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition," which is defined in NRC Inspection Manual Chapter 9900; see latest guidance in Regulatory Issue Summary (RIS) 2005-20 (Reference 3). "Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The NRC staff expects that, following the imposition of administrative controls, an amendment to the inadequate TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Licenseses that have found unfiltered inleakage in excess of the limit assumed in the safety analyses and have yet to either reduce the inleakage below the limit or establish a higher bounding limit through re-analysis, have implemented compensatory actions to ensure the safety of CRE occupants, pending final resolution of the condition, consistent with RIS 2005-20. However, based on GL 2003-01 and AL 98-10, the NRC staff expects each licensee to propose TS changes that include a surveillance to periodically measure CRE unfiltered inleakage in order to satisfy 10 CFR 50.36(d)(3), which requires a facility's TS to include SRs, which it defines as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and *that limiting conditions for operation will be met.*" (Emphasis added.)

The NRC staff also expects facilities to propose unambiguous remedial actions, consistent with 10 CFR 50.36(d)(2), for the condition of not meeting the limiting condition for operation (LCO) due to an inoperable CRE boundary. The action requirements should specify a reasonable completion time to restore conformance to the LCO before requiring a facility to be shut down. This completion time should be based on the benefits of implementing mitigating actions to ensure CRE occupant safety and sufficient time to resolve most problems anticipated with the CRE boundary, while minimizing the chance that operators in the CRE will need to use mitigating actions during accident conditions.

2.4 Adoption of TSTF-448, Revision 3, by Byron

Adoption of TSTF-448, Revision 3, will assure that the facility's TS LCO for the VC Filtration System is met by demonstrating unfiltered leakage into the CRE is within limits; i.e., the operability of the CRE boundary. In support of this surveillance, which specifies the test interval (frequency) described in RG 1.197, TSTF-448 also adds TS administrative controls to assure the habitability of the CRE between performances of the CRE unfiltered inleakage test. In addition, adoption of TSTF-448 will establish clearly stated and reasonable required actions in the event CRE unfiltered inleakage is found to exceed the analysis assumption.

The changes made by TSTF-448 to the STS requirements for the VC Filtration System and the CRE boundary conform to 10 CFR 50.36(d)(2) and 10 CFR 50.36(d)(3). Their adoption will better assure that the Byron CRE will remain habitable during normal operation and design DBA. These changes are, therefore, acceptable from a regulatory standpoint.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the VC Filtration System at Byron pressurizes the CRE to minimize unfiltered air inleakage. The proposed changes are consistent with this design.

3.1 Proposed Changes

The proposed amendment would strengthen CRE habitability TS requirements by changing TS 3.7.10, "Control Room Ventilation (VC) Filtration System," and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform with the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant specific differences, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the STS markups and evaluations in TSTF-448. The NRC staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases and the plant-specific design and licensing bases, although approval of the Bases is not a condition for accepting the proposed amendment. However, TS 5.5.14, "TS Bases Control Program," provides assurance that the licensee has established and will maintain the adequacy of the Bases. The proposed Bases for TS 3.7.10 refer to specific guidance in NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001 (Reference 6), which the NRC staff has formally endorsed, with exceptions, through RG 1.196.

3.2 Editorial Changes

The licensee proposed editorial changes to TS 3.7.10, "Control Room Ventilation (VC) Filtration System," to establish standard terminology, such as "control room envelope" in place of "control room," except for the plant-specific name for the CREEVS (i.e., VC Filtration System). The licensee also proposed "radiological event, hazardous chemical release or smoke challenges," in place of various phrases to describe the hazards that CRE occupants are protected from by the VC Filtration System in TS 5.5.18. These changes improve the usability and quality of the presentation of the TS, have no impact on safety, and therefore, are acceptable.

3.3 TS 3.7.10, "Control Room Ventilation (VC) Filtration System"

Evaluation 1 - for facilities that have adopted the CREEVS TS LCO Note and Action B of TSTF-287, Rev. 5 - Not Applicable

Evaluation 2 - for facilities that have not yet adopted the VC Filtration System TS LCO Note and Action B of TSTF-287, Rev. 5

The licensee proposed to establish new action requirements in TS 3.7.10, "Control Room Ventilation (VC) Filtration System," for an inoperable CRE boundary. Currently, if one VC Filtration System train is determined to be inoperable due to an inoperable CRE boundary, existing Action A would apply and require restoring the train and the CRE boundary to operable status in 7 days. If two trains are determined to be inoperable due to an inoperable CRE boundary, existing Action E specifies no time to restore the trains and the CRE boundary to operable status, but requires immediate entry into the shutdown actions of LCO 3.0.3. These existing Actions are more restrictive than would be appropriate in situations for which CRE occupant implementation of compensatory measures or mitigating actions would temporarily afford adequate CRE occupant protection from postulated airborne hazards. To account for such situations, the licensee proposed to revise the action requirements to add a new Condition B, "One or more VC Filtration System trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4." New Action B.3 would allow 90 days to restore the CRE boundary (and consequently, the affected VC Filtration System trains) to operable status, provided that mitigating actions are immediately implemented and within 24 hours are verified to ensure, that in the event of a DBA, CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke.

The 24-hour Completion Time of new Required Action B.2 is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90-day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. The 90-day Completion Time of new Required Action B.3 is a reasonable time to diagnose, plan and possibly repair, and test most anticipated problems with the CRE boundary. Therefore, proposed Actions B.1, B.2, and B.3 are acceptable.

To distinguish new Condition B from the existing condition for one VC Filtration System train inoperable, Condition A is revised to state, "One VC Filtration System train inoperable for reasons other than Condition B." To distinguish new Condition B from the existing condition for two VC Filtration System trains inoperable, Condition E (renumbered as Condition F) is revised to state, "Two VC Filtration System trains inoperable during MODE 1, 2, 3, or 4 for reasons other than Condition B." The changes to existing Conditions A and E are less restrictive because these Conditions will no longer apply in the event one or two VC Filtration System trains are inoperable due to an inoperable CRE boundary during unit operation in Mode 1, 2, 3, or 4. This is acceptable because the new Action B establishes adequate remedial measures in this condition. With the addition of a new Condition B, existing Conditions B, C, D, and E are re-designated C, D, E, and F, respectively.

The licensee also proposed to modify the VC Filtration System LCO by adding a note allowing the CRE boundary to be opened intermittently under administrative controls. As stated in the LCO Bases, this note "only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the

person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE integrity is required.” The allowance of this note is acceptable because the administrative controls will ensure that the opening will be quickly sealed to maintain the validity of the licensing basis analyses of DBA consequences.

Evaluation 3 - for B&W CREVS TS - Not Applicable

Evaluation 4 - for B&W, CE, and W VC Filtration System TS

The licensee proposed to add a new condition to Action E of TS 3.7.10 that states, “One or more VC Filtration System trains inoperable due to an inoperable CRE boundary in Mode 5 or 6, or during movement of irradiated fuel assemblies.” The specified Required Action proposed for this condition is the same as for the existing condition of Action E (revised as discussed previously), which states “Two VC Filtration System trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.” Accordingly, the new Condition is stated with the other Condition E using the logical connector “OR.” The practical result of this presentation in format is the same as specifying two separately numbered Actions, one for each condition. Its advantage is to make the TS Actions table easier to use by avoiding having an additional numbered row in the Actions table. The new condition in Action E is needed because proposed Action B will only apply in Modes 1, 2, 3, and 4. As such, this change will ensure that the Actions table continues to specify a condition for an inoperable CRE boundary during Modes 5 and 6 and during refueling. Therefore, this change is administrative and acceptable.

Evaluation 5 - for BWR4 and BWR6 CREEVS TS - Not Applicable

Evaluation 6 - for facilities that have a CRE pressurization surveillance requirement

In the emergency mode of operation, the VC Filtration System isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that one VC Filtration System train, operating in the emergency mode, can maintain a pressure of 0.125 inches water gauge, relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate of 5400 cubic feet per minute. The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In Reference 7, the licensee reported that it had determined that the Byron CRE pressurization surveillance, SR 3.7.10.4, may not be adequate to demonstrate the operability of the CRE boundary, and proposed to replace it with an leakage measurement SR and a CRE Habitability Program in TS Section 5.5, in accordance with the approved version of TSTF-448. Based on the adoption of TSTF-448, Revision 3, the licensee's proposal to modify SR 3.7.10.4 is acceptable.

The proposed CRE leakage measurement SR states, "Perform required CRE unfiltered air leakage testing in accordance with the Control Room Envelope Habitability Program." The CRE Habitability Program TS, proposed TS 5.5.18, requires that the program include requirements for determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the frequencies specified in Sections C.1 and C.2 of RG 1.197. This guidance references ASTM E741 as an acceptable method for ascertaining the unfiltered leakage into the CRE. The licensee has proposed to follow this method. Therefore, the proposed CRE leakage measurement SR is acceptable.

3.4 TS 5.5.18, "Control Room Envelope Habitability Program"

The proposed administrative controls program TS is consistent with the model program TS in TSTF-448, Revision 3. In combination with SR 3.7.10.4, this program is intended to ensure the operability of the CRE boundary, which as part of an operable VC Filtration System will ensure that CRE habitability is maintained such that CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under DBA conditions without personnel receiving radiation exposures in excess of 5 rem TEDE for the duration of the accident.

A CRE Habitability Program TS acceptable to the NRC staff requires the program to contain the following elements:

Definitions of CRE and CRE boundary - This element is intended to ensure that these definitions accurately describe the plant areas that are within the CRE, and also the interfaces that form the CRE boundary, and are consistent with the general definitions discussed in Section 2.1 of this SE. Establishing what is meant by the CRE and the CRE boundary will preclude ambiguity in the implementation of the program.

Configuration control and preventive maintenance of the CRE boundary - This element is intended to ensure the CRE boundary is maintained in its design condition. Guidance for implementing this element is contained in RG 1.196, which endorsed, with exceptions, NEI 99-03. Maintaining the CRE boundary in its design condition provides assurance that its leak-tightness will not significantly degrade between CRE leakage determinations.

Assessment of CRE habitability at the frequencies stated in Sections C.1 and C.2 of RG 1.197, and measurement of unfiltered air leakage into the CRE in accordance with the testing methods and at the frequencies stated in Sections C.1 and C.2 of RG 1.197 - Assessing CRE habitability at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not go undetected between CRE leakage determinations. Determination of CRE leakage using test methods acceptable to the NRC staff assures that test results are reliable for ascertaining CRE boundary operability. Determination of CRE leakage at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not occur between CRE leakage determinations.

Measurement of CRE pressure with respect to all areas adjacent to the CRE boundary at designated locations for use in assessing the CRE boundary at a frequency of 18 months on a staggered test basis (with respect to the VC Filtration System trains) - This element is intended

to ensure that CRE differential pressure is regularly measured to identify changes in pressure warranting evaluation of the condition of the CRE boundary. Obtaining and trending pressure data provides additional assurance that significant degradation of the CRE boundary will not go undetected between CRE leakage determinations.

Quantitative limits on unfiltered leakage - This element is intended to establish the CRE leakage limit as the CRE unfiltered infiltration rate assumed in the CRE occupant radiological consequence analyses of design-basis accidents. Having an unambiguous criterion for the CRE boundary to be considered operable in order to meet LCO 3.7.10, will ensure that associated action requirements will be consistently applied in the event of CRE degradation resulting in leakage exceeding the limit.

Consistent with TSTF-448, Revision 3, the program states that the provisions of SR 3.0.2 are applicable to the program frequencies for performing the activities required by program paragraph number c, parts (i) and (ii) (assessment of CRE habitability and measurement of CRE leakage), and paragraph number d (measurement of CRE differential pressure) - This statement is needed to avoid confusion. SR 3.0.2 is applicable to the surveillance that references the testing in the CRE Habitability Program. However, SR 3.0.2 is not applicable to Administrative Controls unless specifically invoked. Providing this statement in the program eliminates any confusion regarding whether SR 3.0.2 is applicable, and is acceptable.

Consistent with TSTF-448, Revision 3, proposed TS 5.5.18 states that (1) a CRE Habitability Program shall be established and implemented, (2) the program shall include all of the NRC-staff required elements, as described above, and (3) the provisions of SR 3.0.2 shall apply to program frequencies. Therefore, TS 5.5.18, which is consistent with the model program TS approved by the NRC staff in TSTF-448, Revision 3, is acceptable.

3.5 Implementation of New Surveillance and Assessment Requirements by the Licensee

The licensee has proposed license conditions regarding the initial performance of the new surveillance and assessment requirements. The new license conditions adopted the conditions in Section 2.3 of the model application published in the Federal Register on January 17, 2007 (72 FR 2022). Plant specific changes were made to the proposed license conditions. The proposed plant specific license conditions are consistent with the model application, and are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the appropriate State and Local officials were notified of the proposed issuance of the amendment. The State and Local officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation

exposure. The Commission has previously issued a proposed finding that the amendments involve no-significant-hazards considerations, and there has been no public comment on the finding (72 FR 2022). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. NRC Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003, (GL 2003-01). (ADAMS Accession No. ML031620248)
2. ASTM E741 - 00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," 2000, (ASTM E741).
3. NRC Regulatory Issue Summary 2005-20: Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," dated September 26, 2005 (RIS 2005-20). (ADAMS Accession No. ML052020424)
4. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, dated May 2003. (ADAMS Accession No. ML031490611)
5. Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003. (ADAMS Accession No. ML031490664)
6. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001. (ADAMS Accession No. ML020600236)
7. Exelon/AmerGen 180-day Response to NRC Generic Letter 2003-1, "Control Room Habitability," dated December 9, 2003. (ADAMS Accession No. ML033560302)

Principal Contributor: W. Cartwright, NRR

Date: October 31, 2007

APPENDIX B

BRAIDWOOD STATION UNITS 1 AND 2

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated April 12, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML071090282), as supported by letter dated December 9, 2003 (Reference 7), Exelon Generation Company, LLC (the licensee), requested changes to the technical specifications (TS) for the Braidwood Station, Units 1 and 2 (Braidwood). Reference 7 provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 5, 2007 (72 FR 31100).

On August 8, 2006 (ADAMS Accession No. ML062210095), the commercial nuclear electrical power generation industry owners group TSs Task Force (TSTF) submitted a proposed change traveler, TSTF-448, Revision 3, "Control Room Habitability," to the improved standard technical specifications (STS) (NUREGs 1430-1434) on behalf of the industry (TSTF-448, Revisions 0, 1, and 2 were prior draft iterations). TSTF-448, Revision 3, is a proposal to establish more effective and appropriate action, surveillance, and administrative STS requirements related to ensuring the habitability of the control room envelope (CRE).

In NRC Generic Letter 2003-01 (Reference 1), licensees were alerted to findings at facilities that existing TS surveillance requirements (SRs) for the Control Room Envelope Emergency Ventilation System (CREEVS) may not be adequate. Specifically, the results of American Society for Testing and Materials E741-00 (ASTM E741) (Reference 2) tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. Licensees were requested to address existing TS as follows:

Provide confirmation that your technical specifications verify the integrity [i.e., operability] of the CRE [boundary], and the assumed [unfiltered] inleakage rates of potentially contaminated air. If you currently have a differential pressure surveillance requirement to demonstrate CRE [boundary] integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your differential pressure surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE [boundary] so that compliance with your new surveillance requirement can be demonstrated.

If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

To promote standardization and to minimize the resources that would be needed to create and process plant-specific amendment applications in response to the concerns described in the generic letter, the industry and the NRC proposed revisions to CRE habitability system requirements contained in the STS, using the STS change traveler process. This effort culminated in Revision 3 to TSTF-448, which the NRC staff approved on January 17, 2007.

Consistent with the traveler as incorporated into NUREG-1431, the licensee proposed revising action and SRs in Specification 3.7.10, "Control Room Ventilation (VC) Filtration System," and adding a new administrative controls program, Specification 5.5.18, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that CRE boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

Some editorial and plant specific changes were incorporated into this SE resulting in minor deviations from model SE text in TSTF-448, Revision 3.

2.0 REGULATORY EVALUATION

2.1 Control Room and Control Room Envelope

NRC Regulatory Guide (RG) 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, May 2003, (Reference 4) uses the term "control room envelope" in addition to the term "control room" and defines each term as follows:

Control Room: The plant area, defined in the facility licensing basis, in which actions can be taken to operate the plant safely under normal conditions and to maintain the reactor in a safe condition during accident situations. It encompasses the instrumentation and controls necessary for a safe shutdown of the plant and typically includes the critical document reference file, computer room (if used as an integral part of the emergency response plan), shift supervisor's office, operator wash room and kitchen, and other critical areas to which frequent personnel access or continuous occupancy may be necessary in the event of an accident.

Control Room Envelope: The plant area, defined in the facility licensing basis, that in the event of an emergency, can be isolated from the plant areas and the environment external to the CRE. This area is served by an emergency ventilation system, with the intent of maintaining the habitability of the control room. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident.

NRC RG 1.197, "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Revision 0, May 2003 (Reference 5), also contains these definitions, but uses the term CRE to mean both. This is because the protected environment provided for operators varies with the nuclear power facility. At some facilities this environment is limited to the control room; at others, it is the CRE. In this SE, consistent with the proposed changes to the STS, the CRE will be used to designate both. For consistency, facilities should use the term CRE with an appropriate facility-specific definition derived from the above CRE definition.

2.2 VC Filtration System

The VC Filtration System (the term used at Braidwood for CREEVS) provides a protected environment from which operators can control the unit, during airborne challenges from radioactivity, hazardous chemicals, and fire byproducts, such as fire suppression agents and smoke, during both normal and accident conditions.

The VC Filtration System is designed to maintain a habitable environment in the control room envelope for 30 days of continuous occupancy after a design-basis accident (DBA) without exceeding a 5 roentgen equivalent man (rem) total effective dose equivalent (TEDE).

The VC Filtration System consists of two redundant trains, each capable of maintaining the habitability of the CRE. The VC Filtration System is considered operable when the individual components necessary to limit operator exposure are operable in both trains. A VC Filtration System train is considered operable when the associated:

- Fans are operable;
- High efficiency particulate air (HEPA) filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- Heater, ductwork, valves, and dampers are operable, and air circulation can be maintained; and
- CRE boundary is operable (the single boundary supports both trains).

The CRE boundary is considered operable when the measured unfiltered air inleakage is less than or equal to the inleakage value assumed by the licensing basis analyses of design-basis accident consequences to CRE occupants.

2.3 Regulations Applicable to Control Room Habitability

In Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, "Domestic Licensing of Production and Utilization Facilities," General Design Criteria (GDC) 1, 2, 3, 4, 5, and 19 apply to CRE habitability. A summary of these GDCs follows.

GDC 1, "Quality Standards and Records," requires that structures, systems, and components (SSCs) important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions performed.

GDC 2, "Design Basis for Protection Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of earthquakes and other natural hazards.

GDC 3, "Fire Protection," requires SSCs important to safety be designed and located to minimize the effects of fires and explosions.

GDC 4, "Environmental and Dynamic Effects Design Bases," requires SSCs important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents (LOCAs).

GDC 5, "Sharing of Structures, Systems, and Components," requires that SSCs important to safety not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, the orderly shutdown and cooldown of the remaining units.

GDC 19, "Control Room," requires that a control room be provided from which actions can be taken to operate the nuclear reactor safely under normal conditions and to maintain the reactor in a safe condition under accident conditions, including a LOCA. Adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of specified values.

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing CRE boundary operability resided only in the following CRE ventilation system specifications:

- NUREG-1430, TS 3.7.10, "Control Room Emergency Ventilation System (CREVS);"
- NUREG-1431, TS 3.7.10, "Control Room Emergency Filtration System (CREFS);"
- NUREG-1432, TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS);"
- NUREG-1433, TS 3.7.4, "[Main Control Room Environmental Control (MCREC)] System;" and
- NUREG-1434, TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."

In these specifications, the SR associated with demonstrating the operability of the CRE boundary requires verifying that one control room ventilation subsystem can maintain a positive pressure relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate. Facilities that pressurize the CRE during the emergency mode of operation of the control room ventilation system have similar SRs. Other facilities that do not pressurize the CRE have only a system flow rate criterion for the emergency mode of operation. Regardless, the results of ASTM E741 tracer gas tests to measure CRE unfiltered leakage at facilities indicated that the differential pressure surveillance (or the alternative surveillance at non-pressurization facilities) is not a reliable method for demonstrating CRE boundary operability. That is, licensees were able to obtain differential pressure and flow measurements satisfying the SR limits even though unfiltered leakage was determined to exceed the value assumed in the safety analyses.

In addition to an inadequate SR, the action requirements of these specifications were ambiguous regarding CRE boundary operability in the event CRE unfiltered leakage is found to exceed the analysis assumption. The ambiguity stemmed from the view that the CRE

boundary may be considered operable but degraded in this condition, and that it would be deemed inoperable only if calculated radiological exposure limits for CRE occupants exceeded a licensing basis limit; e.g., as stated in GDC-19, even while crediting compensatory measures.

NRC Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," (AL 98-10) states that "the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition," which is defined in NRC Inspection Manual Chapter 9900; see latest guidance in Regulatory Issue Summary (RIS) 2005-20 (Reference 3). "Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The NRC staff expects that, following the imposition of administrative controls, an amendment to the inadequate TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Licensees that have found unfiltered inleakage in excess of the limit assumed in the safety analyses and have yet to either reduce the inleakage below the limit or establish a higher bounding limit through re-analysis, have implemented compensatory actions to ensure the safety of CRE occupants, pending final resolution of the condition, consistent with RIS 2005-20. However, based on GL 2003-01 and AL 98-10, the NRC staff expects each licensee to propose TS changes that include a surveillance to periodically measure CRE unfiltered inleakage in order to satisfy 10 CFR 50.36(d)(3), which requires a facility's TS to include SRs, which it defines as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and *that limiting conditions for operation will be met.*" (Emphasis added.)

The NRC staff also expects facilities to propose unambiguous remedial actions, consistent with 10 CFR 50.36(d)(2), for the condition of not meeting the limiting condition for operation (LCO) due to an inoperable CRE boundary. The action requirements should specify a reasonable completion time to restore conformance to the LCO before requiring a facility to be shut down. This completion time should be based on the benefits of implementing mitigating actions to ensure CRE occupant safety and sufficient time to resolve most problems anticipated with the CRE boundary, while minimizing the chance that operators in the CRE will need to use mitigating actions during accident conditions.

2.4 Adoption of TSTF-448, Revision 3, by Braidwood

Adoption of TSTF-448, Revision 3, will assure that the facility's TS LCO for the VC Filtration System is met by demonstrating unfiltered leakage into the CRE is within limits; i.e., the operability of the CRE boundary. In support of this surveillance, which specifies the test interval (frequency) described in RG 1.197, TSTF-448 also adds TS administrative controls to assure the habitability of the CRE between performances of the CRE unfiltered inleakage test. In addition, adoption of TSTF-448 will establish clearly stated and reasonable required actions in the event CRE unfiltered inleakage is found to exceed the analysis assumption.

The changes made by TSTF-448 to the STS requirements for the VC Filtration System and the CRE boundary conform to 10 CFR 50.36(d)(2) and 10 CFR 50.36(d)(3). Their adoption will better assure that the Braidwood CRE will remain habitable during normal operation and design DBAs. These changes are, therefore, acceptable from a regulatory standpoint.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the VC Filtration System at Braidwood pressurizes the CRE to minimize unfiltered air leakage. The proposed changes are consistent with this design.

3.1 Proposed Changes

The proposed amendment would strengthen CRE habitability TS requirements by changing TS 3.7.10, "Control Room Ventilation (VC) Filtration System," and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform with the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant specific differences, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the STS markups and evaluations in TSTF-448. The NRC staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases and the plant-specific design and licensing bases, although approval of the Bases is not a condition for accepting the proposed amendment. However, TS 5.5.14, "TS Bases Control Program," provides assurance that the licensee has established and will maintain the adequacy of the Bases. The proposed Bases for TS 3.7.10 refer to specific guidance in NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001 (Reference 6), which the NRC staff has formally endorsed, with exceptions, through RG 1.196.

3.2 Editorial Changes

The licensee proposed editorial changes to TS 3.7.10, "Control Room Ventilation (VC) Filtration System," to establish standard terminology, such as "control room envelope" in place of "control room," except for the plant-specific name for the VC Filtration System. The licensee also proposed "radiological event, hazardous chemical release or a smoke challenge," in place of various phrases to describe the hazards that CRE occupants are protected from by the VC Filtration System in TS 5.5.18. These changes improve the usability and quality of the presentation of the TS, have no impact on safety, and therefore, are acceptable.

3.3 TS 3.7.10, "Control Room Ventilation (VC) Filtration System"

Evaluation 1 - for facilities that have adopted the VC Filtration System TS LCO Note and Action B of TSTF-287, Rev. 5 - Not Applicable

Evaluation 2 - for facilities that have not yet adopted the VC Filtration System TS LCO Note and Action B of TSTF-287, Rev. 5

The licensee proposed to establish new action requirements in TS 3.7.10, "Control Room Ventilation (VC) Filtration System," for an inoperable CRE boundary. Currently, if one VC Filtration System train is determined to be inoperable due to an inoperable CRE boundary, existing Action A would apply and require restoring the train and the CRE boundary to operable status in 7 days. If two trains are determined to be inoperable due to an inoperable CRE boundary, existing Action E specifies no time to restore the trains and the CRE boundary to operable status, but requires immediate entry into the shutdown actions of LCO 3.0.3. These existing Actions are more restrictive than would be appropriate in situations for which CRE occupant implementation of compensatory measures or mitigating actions would temporarily afford adequate CRE occupant protection from postulated airborne hazards. To account for such situations, the licensee proposed to revise the action requirements to add a new Condition B, "One or more VC Filtration System trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4." New Required Action B.3 would allow 90 days to restore the CRE boundary (and consequently, the affected VC Filtration System trains) to operable status, provided that mitigating actions are immediately implemented and within 24 hours are verified to ensure, that in the event of a DBA, CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke.

The 24-hour Completion Time of new Required Action B.2 is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90-day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. The 90-day Completion Time of new Required Action B.3 is a reasonable time to diagnose, plan and possibly repair, and test most anticipated problems with the CRE boundary. Therefore, the proposed Actions B.1, B.2 and B.3 are acceptable.

To distinguish new Condition B from the existing condition for one VC Filtration System train inoperable, Condition A is revised to state, "One VC Filtration System train inoperable for reasons other than Condition B." To distinguish new Condition B from the existing condition for two VC Filtration System trains inoperable, Condition E (renumbered as Condition F) is revised to state, "Two VC Filtration System trains inoperable during MODE 1, 2, 3, or 4 for reasons other than Condition B." The changes to existing Conditions A and E are less restrictive because these Conditions will no longer apply in the event one or two VC Filtration System trains are inoperable due to an inoperable CRE boundary during unit operation in Mode 1, 2, 3, or 4. This is acceptable because the new Action B establishes adequate remedial measures in this condition. With the addition of a new Condition B, existing Conditions B, C, D, and E are re-designated C, D, E, and F, respectively.

The licensee also proposed to modify the VC Filtration System LCO by adding a note allowing the CRE boundary to be opened intermittently under administrative controls. As stated in the LCO Bases, this note "only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the

person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE integrity is indicated.” The allowance of this note is acceptable because the administrative controls will ensure that the opening will be quickly sealed to maintain the validity of the licensing basis analyses of DBA consequences.

Evaluation 3 - for B&W CREVS TS - Not Applicable

Evaluation 4 - for B&W, CE, and W VC Filtration System TS

The licensee proposed to add a new condition to Action E of TS 3.7.10 that states, “One or more VC Filtration System trains inoperable due to an inoperable CRE boundary in Mode 5 or 6, or during movement of irradiated fuel assemblies.” The specified Required Action proposed for this condition is the same as for the existing condition of Action E (revised as discussed previously), which states “Two VC Filtration System trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.” Accordingly, the new Condition is stated with the other Condition E using the logical connector “OR.” The practical result of this presentation in format is the same as specifying two separately numbered Actions, one for each condition. Its advantage is to make the TS Actions table easier to use by avoiding having an additional numbered row in the Actions table. The new condition in Action E is needed because proposed Action B will only apply in Modes 1, 2, 3, and 4. As such, this change will ensure that the Actions table continues to specify a condition for an inoperable CRE boundary during Modes 5 and 6 and during refueling. Therefore, this change is administrative and acceptable.

Evaluation 5 - for BWR4 and BWR6 CREEVS TS - Not Applicable

Evaluation 6 - for facilities that have a CRE pressurization surveillance requirement

In the emergency mode of operation, the VC Filtration System isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that one VC Filtration System train, operating in the emergency mode, can maintain a pressure of 0.125 inches water gauge, relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate of 5400 cubic feet per minute. The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In Reference 7, the licensee reported that it had determined that the Braidwood Unit 1 and 2 CRE pressurization surveillance, SR 3.7.10.4, may not be adequate to demonstrate the operability of the CRE boundary, and proposed to replace it with an inleakage measurement SR and a CRE Habitability Program in TS Section 5.5, in accordance with the approved version of TSTF-448. Based on the adoption of TSTF-448, Revision 3, the licensee's proposal to modify SR 3.7.10.4 is acceptable.

The proposed CRE leakage measurement SR states, "Perform required CRE unfiltered air leakage testing in accordance with the Control Room Envelope Habitability Program." The CRE Habitability Program TS, proposed TS 5.5.18, requires that the program include requirements for determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the frequencies specified in Sections C.1 and C.2 of RG 1.197. This guidance references ASTM E741 as an acceptable method for ascertaining the unfiltered leakage into the CRE. Therefore, the proposed CRE leakage measurement SR is acceptable.

3.4 TS 5.5.18, "Control Room Envelope Habitability Program"

The proposed administrative controls program TS is consistent with the model program TS in TSTF-448, Revision 3. In combination with SR 3.7.10.4, this program is intended to ensure the operability of the CRE boundary, which as part of an operable VC Filtration System will ensure that CRE habitability is maintained such that CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under DBA conditions without personnel receiving radiation exposures in excess of 5 rem TEDE for the duration of the accident. A CRE Habitability Program TS acceptable to the NRC staff requires the program to contain the following elements:

Definitions of CRE and CRE boundary - This element is intended to ensure that these definitions accurately describe the plant areas that are within the CRE, and also the interfaces that form the CRE boundary, and are consistent with the general definitions discussed in Section 2.1 of this safety evaluation. Establishing what is meant by the CRE and the CRE boundary will preclude ambiguity in the implementation of the program.

Configuration control and preventive maintenance of the CRE boundary - This element is intended to ensure the CRE boundary is maintained in its design condition. Guidance for implementing this element is contained in Regulatory Guide 1.196, which endorsed, with exceptions, NEI 99-03. Maintaining the CRE boundary in its design condition provides assurance that its leak-tightness will not significantly degrade between CRE leakage determinations.

Assessment of CRE habitability at the frequencies stated in Sections C.1 and C.2 of RG 1.197, and measurement of unfiltered air leakage into the CRE in accordance with the testing methods and at the frequencies stated in Sections C.1 and C.2 of RG 1.197 - Assessing CRE habitability at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not go undetected between CRE leakage determinations. Determination of CRE leakage using test methods acceptable to the NRC staff assures that test results are reliable for ascertaining CRE boundary operability. Determination of CRE leakage at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not occur between CRE leakage determinations.

Measurement of CRE pressure with respect to all areas adjacent to the CRE boundary at designated locations for use in assessing the CRE boundary at a frequency of 18 months on a staggered test basis (with respect to the VC Filtration System trains) - This element is intended to ensure that CRE differential pressure is regularly measured to identify changes in pressure

warranting evaluation of the condition of the CRE boundary. Obtaining and trending pressure data provides additional assurance that significant degradation of the CRE boundary will not go undetected between CRE leakage determinations.

Quantitative limits on unfiltered leakage - This element is intended to establish the CRE leakage limit as the CRE unfiltered infiltration rate assumed in the CRE occupant radiological consequence analyses of design-basis accidents. Having an unambiguous criterion for the CRE boundary to be considered operable in order to meet LCO 3.7.10, will ensure that associated action requirements will be consistently applied in the event of CRE degradation resulting in leakage exceeding the limit.

Consistent with TSTF-448, Revision 3, the program states that the provisions of SR 3.0.2 are applicable to the program frequencies for performing the activities required by program paragraph number c, parts (i) and (ii) (assessment of CRE habitability and measurement of CRE leakage), and paragraph number d (measurement of CRE differential pressure). This statement is needed to avoid confusion. SR 3.0.2 is applicable to the surveillance that references the testing in the CRE Habitability Program. However, SR 3.0.2 is not applicable to Administrative Controls unless specifically invoked. Providing this statement in the program eliminates any confusion regarding whether SR 3.0.2 is applicable, and is acceptable.

Consistent with TSTF-448, Revision 3, proposed TS 5.5.18 states that (1) a CRE Habitability Program shall be established and implemented, (2) the program shall include all of the NRC-staff required elements, as described above, and (3) the provisions of SR 3.0.2 shall apply to program frequencies. Therefore, TS 5.5.18, which is consistent with the model program TS approved by the NRC staff in TSTF-448, Revision 3, is acceptable.

3.5 Implementation of New Surveillance and Assessment Requirements by the Licensee

The licensee has proposed license conditions regarding the initial performance of the new surveillance and assessment requirements. The new license conditions adopted the conditions in Section 2.3 of the model application published in the Federal Register on January 17, 2007 (72 FR 2022). Plant specific changes were made to the proposed license conditions. The proposed plant specific license conditions are consistent with the model application, and are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the appropriate State and Local officials were notified of the proposed issuance of the amendment. The State and Local officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments

involve no-significant-hazards considerations, and there has been no public comment on the finding (72 FR 2022). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. NRC Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003, (GL 2003-01). (ADAMS Accession No. ML031620248)
2. ASTM E741 - 00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," 2000, (ASTM E741).
3. NRC Regulatory Issue Summary 2005-20: Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," dated September 26, 2005 (RIS 2005-20). (ADAMS Accession No. ML052020424)
4. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, dated May 2003. (ADAMS Accession No. ML031490611)
5. Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003. (ADAMS Accession No. ML031490664)
6. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001. (ADAMS Accession No. ML020600236)
7. Exelon/AmerGen 180-day Response to NRC Generic Letter 2003-1, "Control Room Habitability," dated December 9, 2003. (ADAMS Accession No. ML033560302)

Principal Contributor: W. Cartwright, NRR

Date: October 31, 2007

APPENDIX C

CLINTON POWER STATION, UNIT 1

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated April 12, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML071090282), as supported by letter dated December 9, 2003 (Reference 7), Exelon Generation Company, LLC and AmerGen Energy Company, LLC (the licensee) requested changes to the technical specifications (TS) for the Clinton Power Station, Unit 1 (CPS). Reference 7 provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 5, 2007 (72 FR 31100).

On August 8, 2006 (ADAMS Accession No. ML062210095), the commercial nuclear electrical power generation industry owners group TSs Task Force (TSTF) submitted a proposed change traveler, TSTF-448, Revision 3, "Control Room Habitability," to the improved standard technical specifications (STS) (NUREGs 1430-1434) on behalf of the industry (TSTF-448, Revisions 0, 1, and 2 were prior draft iterations). TSTF-448, Revision 3, is a proposal to establish more effective and appropriate action, surveillance, and administrative STS requirements related to ensuring the habitability of the control room envelope (CRE).

In NRC Generic Letter 2003-01 (Reference 1), licensees were alerted to findings at facilities that existing TS surveillance requirements (SRs) for the Control Room Envelope Emergency Ventilation System (CREEVS) may not be adequate. Specifically, the results of American Society for Testing and Materials E741-00 (ASTM E741) (Reference 2) tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. Licensees were requested to address existing TS as follows:

Provide confirmation that your technical specifications verify the integrity [i.e., operability] of the CRE [boundary], and the assumed [unfiltered] inleakage rates of potentially contaminated air. If you currently have a differential pressure surveillance requirement to demonstrate CRE [boundary] integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your differential pressure surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE [boundary] so that compliance with your new surveillance requirement can be demonstrated.

If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

To promote standardization and to minimize the resources that would be needed to create and process plant-specific amendment applications in response to the concerns described in the generic letter, the industry and the NRC proposed revisions to CRE habitability system requirements contained in the STS, using the STS change traveler process. This effort culminated in Revision 3 to TSTF-448, which the NRC staff approved on January 17, 2007.

Consistent with the traveler as incorporated into NUREG-1434, the licensee proposed revising action and SRs in Specification 3.7.3, "Control Room Ventilation System," and adding a new administrative controls program, Specification 5.5.15, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that CRE boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

Some editorial and plant specific changes were incorporated into this safety evaluation (SE) resulting in minor deviations from model SE text in TSTF-448, Revision 3.

2.0 REGULATORY EVALUATION

2.1 Control Room and Control Room Envelope

NRC Regulatory Guide (RG) 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, May 2003, (Reference 4) uses the term "control room envelope" in addition to the term "control room" and defines each term as follows:

Control Room: The plant area, defined in the facility licensing basis, in which actions can be taken to operate the plant safely under normal conditions and to maintain the reactor in a safe condition during accident situations. It encompasses the instrumentation and controls necessary for a safe shutdown of the plant and typically includes the critical document reference file, computer room (if used as an integral part of the emergency response plan), shift supervisor's office, operator wash room and kitchen, and other critical areas to which frequent personnel access or continuous occupancy may be necessary in the event of an accident.

Control Room Envelope: The plant area, defined in the facility licensing basis, that in the event of an emergency, can be isolated from the plant areas and the environment external to the CRE. This area is served by an emergency ventilation system, with the intent of maintaining the habitability of the control room. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident.

NRC RG 1.197, "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Revision 0, May 2003 (Reference 5), also contains these definitions, but uses the term CRE to mean both. This is because the protected environment provided for operators varies with the nuclear power facility. At some facilities this environment is limited to the control room; at others, it is the CRE. In this SE, consistent with the proposed changes to the STS, the CRE will be used to designate both. For consistency, facilities should use the term CRE with an appropriate facility-specific definition derived from the above CRE definition.

2.2 Control Room Ventilation System (CRVS)

The CRVS (the term used at the CPS for CREEVS) provides a protected environment from which operators can control the unit, during airborne challenges from radioactivity, hazardous chemicals, and fire byproducts, such as fire suppression agents and smoke, during both normal and accident conditions.

The CRVS is designed to maintain a habitable environment in the control room envelope for 30 days of continuous occupancy after a design-basis accident (DBA) without exceeding a 5 roentgen equivalent man (rem) total effective dose equivalent (TEDE).

The CRVS consists of two redundant subsystems, each capable of maintaining the habitability of the CRE. The CRVS is considered operable when the individual components necessary to limit operator exposure are operable in both subsystems. A CRVS subsystem is considered operable when the associated:

- Fan is operable;
- High efficiency particulate air (HEPA) filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- Heater, demister, ductwork, valves, and dampers are operable, and air circulation can be maintained; and
- CRE boundary is operable (the single boundary supports both subsystems).

The CRE boundary is considered operable when the measured unfiltered air inleakage is less than or equal to the inleakage value assumed by the licensing basis analyses of design-basis accident consequences to CRE occupants.

2.3 Regulations Applicable to Control Room Habitability

In Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, "Domestic Licensing of Production and Utilization Facilities," General Design Criteria (GDC) 1, 2, 3, 4, 5, and 19 apply to CRE habitability. A summary of these GDCs follows.

GDC 1, "Quality Standards and Records," requires that structures, systems, and components (SSCs) important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions performed.

GDC 2, "Design Basis for Protection Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of earthquakes and other natural hazards.

GDC 3, "Fire Protection," requires SSCs important to safety be designed and located to minimize the effects of fires and explosions.

GDC 4, "Environmental and Dynamic Effects Design Bases," requires SSCs important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents (LOCAs).

GDC 5, "Sharing of Structures, Systems, and Components," requires that SSCs important to safety not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, the orderly shutdown and cooldown of the remaining units.

GDC 19, "Control Room," requires that a control room be provided from which actions can be taken to operate the nuclear reactor safely under normal conditions and to maintain the reactor in a safe condition under accident conditions, including a LOCA. Adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of specified values.

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing CRE boundary operability resided only in the following CRE ventilation system specifications:

- NUREG-1430, TS 3.7.10, "Control Room Emergency Ventilation System (CREVS);"
- NUREG-1431, TS 3.7.10, "Control Room Emergency Filtration System (CREFS);"
- NUREG-1432, TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS);"
- NUREG-1433, TS 3.7.4, "[Main Control Room Environmental Control (MCREC)] System;" and
- NUREG-1434, TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."

In these specifications, the SR associated with demonstrating the operability of the CRE boundary requires verifying that one control room ventilation subsystem can maintain a positive pressure relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate. Facilities that pressurize the CRE during the emergency mode of operation of the CRVS have similar SRs. Other facilities that do not pressurize the CRE have only a system flow rate criterion for the emergency mode of operation. Regardless, the results of ASTM E741 tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance (or the alternative surveillance at non-pressurization facilities) is not a reliable method for demonstrating CRE boundary operability. That is, licensees were able to obtain differential pressure and flow measurements satisfying the SR limits even though unfiltered inleakage was determined to exceed the value assumed in the safety analyses.

In addition to an inadequate SR, the action requirements of these specifications were ambiguous regarding CRE boundary operability in the event CRE unfiltered inleakage is found to exceed the analysis assumption. The ambiguity stemmed from the view that the CRE

boundary may be considered operable but degraded in this condition, and that it would be deemed inoperable only if calculated radiological exposure limits for CRE occupants exceeded a licensing basis limit; e.g., as stated in GDC-19, even while crediting compensatory measures.

NRC Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," (AL 98-10) states that "the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition," which is defined in NRC Inspection Manual Chapter 9900; see latest guidance in Regulatory Issue Summary (RIS) 2005-20 (Reference 3). "Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The NRC staff expects that, following the imposition of administrative controls, an amendment to the inadequate TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Licenseses that have found unfiltered inleakage in excess of the limit assumed in the safety analyses and have yet to either reduce the inleakage below the limit or establish a higher bounding limit through re-analysis, have implemented compensatory actions to ensure the safety of CRE occupants, pending final resolution of the condition, consistent with RIS 2005-20. However, based on GL 2003-01 and AL 98-10, the NRC staff expects each licensee to propose TS changes that include a surveillance to periodically measure CRE unfiltered inleakage in order to satisfy 10 CFR 50.36(d)(3), which requires a facility's TS to include SRs, which it defines as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and *that limiting conditions for operation will be met.*" (Emphasis added.)

The NRC staff also expects facilities to propose unambiguous remedial actions, consistent with 10 CFR 50.36(d)(2), for the condition of not meeting the limiting condition for operation (LCO) due to an inoperable CRE boundary. The action requirements should specify a reasonable completion time to restore conformance to the LCO before requiring a facility to be shut down. This completion time should be based on the benefits of implementing mitigating actions to ensure CRE occupant safety and sufficient time to resolve most problems anticipated with the CRE boundary, while minimizing the chance that operators in the CRE will need to use mitigating actions during accident conditions.

2.4 Adoption of TSTF-448, Revision 3, by CPS

Adoption of TSTF-448, Revision 3, will assure that the facility's TS LCO for the CRVS is met by demonstrating unfiltered leakage into the CRE is within limits; i.e., the operability of the CRE boundary. In support of this surveillance, which specifies the test interval (frequency) described in RG 1.197, TSTF-448 also adds TS administrative controls to assure the habitability of the CRE between performances of the CRE unfiltered inleakage test. In addition, adoption of TSTF-448 will establish clearly stated and reasonable required actions in the event CRE unfiltered inleakage is found to exceed the analysis assumption.

The changes made by TSTF-448 to the STS requirements for the CRVS and the CRE boundary conform to 10 CFR 50.36(d)(2) and 10 CFR 50.36(d)(3). Their adoption will better assure that the CPS CRE will remain habitable during normal operation and DBA conditions. These changes are, therefore, acceptable from a regulatory standpoint.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the CRVS at the Clinton pressurizes the CRE to minimize unfiltered air leakage. The proposed changes are consistent with this design.

3.1 Proposed Changes

The proposed amendment would strengthen CRE habitability TS requirements by changing TS 3.7.3, "Control Room Ventilation System," and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform with the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant specific differences, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the STS markups and evaluations in TSTF-448. The NRC staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases and the plant-specific design and licensing bases, although approval of the Bases is not a condition for accepting the proposed amendment. However, TS 5.5.11, "TS Bases Control Program," provides assurance that the licensee has established and will maintain the adequacy of the Bases. The proposed Bases for TS 3.7.3 refer to specific guidance in NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001 (Reference 6), which the NRC staff has formally endorsed, with exceptions, through RG 1.196.

3.2 Editorial Changes

The licensee proposed editorial changes to TS 3.7.3, "Control Room Ventilation System," to establish standard terminology, such as "control room envelope" in place of "control room," except for the plant-specific name for the CREEVS (i.e., CRVS). The licensee also proposed "radiological event, hazardous chemical release or smoke challenges" in place of various phrases to describe the hazards that CRE occupants are protected from by the CRVS in TS 5.5.15. These changes improve the usability and quality of the presentation of the TS, have no impact on safety, and therefore, are acceptable.

3.3 TS 3.7.3, "Control Room Ventilation System"

Evaluation 1 - for facilities that have adopted the CRVS TS LCO Note and Action B of TSTF-287, Rev. 5 - Not Applicable

Evaluation 2 - for facilities that have not yet adopted the CRVS TS LCO Note and Action B of TSTF-287, Rev. 5

The licensee proposed to establish new action requirements in TS 3.7.3, "Control Room Ventilation System," for an inoperable CRE boundary. Currently, if one CRVS subsystem is determined to be inoperable due to an inoperable CRE boundary, existing Action A would apply and require restoring the subsystem and the CRE boundary to operable status in 7 days. If two subsystems are determined to be inoperable due to an inoperable CRE boundary, existing Action D specifies no time to restore the subsystems and the CRE boundary to operable status, but requires immediate entry into the shutdown actions of LCO 3.0.3. These existing Actions are more restrictive than would be appropriate in situations for which CRE occupant implementation of compensatory measures or mitigating actions would temporarily afford adequate CRE occupant protection from postulated airborne hazards. To account for such situations, the licensee proposed to revise the action requirements to add a new Condition B, "One or more Control Room Ventilation subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3." New Action B.3 would allow 90 days to restore the CRE boundary (and consequently, the affected CRVS subsystems) to operable status, provided that mitigating actions are immediately implemented and within 24 hours are verified to ensure, that in the event of a DBA, CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke.

The 24-hour Completion Time of new Required Action B.2 is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90-day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. The 90-day Completion Time of new Required Action B.3 is a reasonable time to diagnose, plan and possibly repair, and test most anticipated problems with the CRE boundary. Therefore, proposed Actions B.1, B.2, and B.3 are acceptable.

To distinguish new Condition B from the existing condition for one CRVS subsystem inoperable, Condition A is revised to state, "One Control Room Ventilation subsystem inoperable for reasons other than Condition B." To distinguish new Condition B from the existing condition for two CRVS subsystems inoperable, Condition D is revised to state, "Two Control Room Ventilation subsystems inoperable during MODE 1, 2, or 3 for reasons other than Condition B." The changes to existing Conditions A and D are less restrictive because these Conditions will no longer apply in the event one or two CRVS subsystems are inoperable due to an inoperable CRE boundary during unit operation in Mode 1, 2, or 3. This is acceptable because the new Action B establishes adequate remedial measures in this condition. With the addition of a new Condition B, existing Conditions B, C, D, and E are re-designated C, D, E, and F, respectively.

The licensee also proposed to modify the CRVS LCO by adding a note allowing the CRE boundary to be opened intermittently under administrative controls. As stated in the LCO Bases, this note "only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and

consist of stationing a dedicated individual at the opening who is in continuous communication with operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE isolation is indicated.” The allowance of this note is acceptable because the administrative controls will ensure that the opening will be quickly sealed to maintain the validity of the licensing basis analyses of DBA consequences.

Evaluation 3 - for B&W CREVS TS - Not Applicable

Evaluation 4 - for B&W, CE, and W CREEVS - Not Applicable

Evaluation 5 - for BWR4 and BWR6 CRVS TS

The licensee proposed to add a new condition to Action F of TS 3.7.3 that states, “One or more Control Room Ventilation subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the primary or secondary containment or during operations with a potential for draining the reactor vessel (OPDRVs).” The specified Required Actions proposed for this condition are the same as for the other existing condition for Action E, which states, “Two Control Room Ventilation subsystems inoperable during movement of irradiated fuel assemblies in the primary or secondary containment, during CORE ALTERATIONS, or during OPDRVs.” Accordingly, the new condition is stated with the other condition in Action E using the logical connector “OR.” The practical result of this presentation in format is the same as specifying two separately numbered Actions, one for each condition. Its advantage is to make the TS Actions table easier to use by avoiding having an additional numbered row in the Actions table. This new condition in Action E is needed because proposed Action B will only apply in Modes 1, 2, and 3. As such, this change will ensure that the Actions table continues to specify a condition for an inoperable CRE boundary during refueling and OPDRVs. Therefore, this change is administrative and acceptable.

Evaluation 6 - for facilities that have a CRE pressurization surveillance requirement

In the emergency mode of operation, the CRVS isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that one CRVS subsystem, operating in the emergency mode, can maintain a pressure of 0.125 inches water gauge, relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate of 3000 cubic feet per minute. The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In Reference 7, the licensee reported that it had determined that the CPS CRE leakage surveillance SR 3.7.3.5 and pressurization surveillance, SR 3.7.3.6, may not be adequate to demonstrate the operability of the CRE boundary, and proposed to replace it with an leakage measurement SR and a CRE Habitability Program in TS Section 5.5, in accordance with the approved version of TSTF-448. Based on the adoption of TSTF-448, Revision 3, the licensee's proposal to delete existing SR 3.7.3.5 and modify SR 3.7.3.6 are acceptable.

The proposed CRE leakage measurement SR states, "Perform required CRE unfiltered air leakage testing in accordance with the Control Room Envelope Habitability Program." The CRE Habitability Program TS, proposed TS 5.5.15, requires that the program include requirements for determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the frequencies specified in Sections C.1 and C.2 of RG 1.197. This guidance references ASTM E741 as an acceptable method for ascertaining the unfiltered leakage into the CRE. The licensee has proposed to follow this method. Therefore, the proposed CRE leakage measurement SR is acceptable.

3.4 TS 5.5.15, "Control Room Envelope Habitability Program"

The proposed administrative controls program TS is consistent with the model program TS in TSTF-448, Revision 3. In combination with SR 3.7.3.5, this program is intended to ensure the operability of the CRE boundary, which as part of an operable CRVS will ensure that CRE habitability is maintained such that CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under DBA conditions without personnel receiving radiation exposures in excess of 5 rem TEDE for the duration of the accident.

A CRE Habitability Program TS acceptable to the NRC staff requires the program to contain the following elements:

Definitions of CRE and CRE boundary - This element is intended to ensure that these definitions accurately describe the plant areas that are within the CRE, and also the interfaces that form the CRE boundary, and are consistent with the general definitions discussed in Section 2.1 of this SE. Establishing what is meant by the CRE and the CRE boundary will preclude ambiguity in the implementation of the program.

Configuration control and preventive maintenance of the CRE boundary - This element is intended to ensure the CRE boundary is maintained in its design condition. Guidance for implementing this element is contained in RG 1.196, which endorsed, with exceptions, NEI 99-03. Maintaining the CRE boundary in its design condition provides assurance that its leak-tightness will not significantly degrade between CRE leakage determinations.

Assessment of CRE habitability at the frequencies stated in Sections C.1 and C.2 of RG 1.197, and measurement of unfiltered air leakage into the CRE in accordance with the testing methods and at the frequencies stated in Sections C.1 and C.2 of RG 1.197 - Assessing CRE habitability at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not go undetected between CRE leakage determinations. Determination of CRE leakage using test methods acceptable to the NRC staff assures that test results are reliable for ascertaining CRE boundary operability. Determination of CRE leakage at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not occur between CRE leakage determinations.

Measurement of CRE pressure with respect to all areas adjacent to the CRE boundary at designated locations for use in assessing the CRE boundary at a frequency of 24 months on a staggered test basis (with respect to the CRVS subsystems) - This element is intended to ensure that CRE differential pressure is regularly measured to identify changes in pressure

warranting evaluation of the condition of the CRE boundary. Obtaining and trending pressure data provides additional assurance that significant degradation of the CRE boundary will not go undetected between CRE leakage determinations.

Quantitative limits on unfiltered leakage - This element is intended to establish the CRE leakage limit as the CRE unfiltered infiltration rate assumed in the CRE occupant radiological consequence analyses of design-basis accidents. Having an unambiguous criterion for the CRE boundary to be considered operable in order to meet LCO 3.7.3, will ensure that associated action requirements will be consistently applied in the event of CRE degradation resulting in leakage exceeding the limit.

Consistent with TSTF-448, Revision 3, the program states that the provisions of SR 3.0.2 are applicable to the program frequencies for performing the activities required by program paragraph number c, parts (i) and (ii) (assessment of CRE habitability and measurement of CRE leakage), and paragraph number d (measurement of CRE differential pressure) - This statement is needed to avoid confusion. SR 3.0.2 is applicable to the surveillance that references the testing in the CRE Habitability Program. However, SR 3.0.2 is not applicable to Administrative Controls unless specifically invoked. Providing this statement in the program eliminates any confusion regarding whether SR 3.0.2 is applicable, and is acceptable.

Consistent with TSTF-448, Revision 3, proposed TS 5.5.15 states that (1) a CRE Habitability Program shall be established and implemented, (2) the program shall include all of the NRC-staff required elements, as described above, and (3) the provisions of SR 3.0.2 shall apply to program frequencies. Therefore, TS 5.5.15, which is consistent with the model program TS approved by the NRC staff in TSTF-448, Revision 3, is acceptable.

3.5 Implementation of New Surveillance and Assessment Requirements by the Licensee

The licensee has proposed license conditions regarding the initial performance of the new surveillance and assessment requirements. The new license conditions adopted the conditions in Section 2.3 of the model application published in the Federal Register on January 17, 2007 (72 FR 2022). Plant specific changes were made to the proposed license conditions. The proposed plant specific license conditions are consistent with the model application, and are acceptable.

3.6 Correction of Typographical Error

The NRC staff identified a typographical error that was introduced on page 3 of the CPS operating license as part of Amendment 177. The July 5, 2007 (ADAMS Accession No. ML070650616), amendment inadvertently changed the operating license page number "3" to "4." The NRC staff corrected the typographical error in this amendment.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the appropriate State and Local officials were notified of the proposed issuance of the amendment. The State and Local officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no-significant-hazards considerations, and there has been no public comment on the finding (72 FR 2022). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. NRC Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003, (GL 2003-01). (ADAMS Accession No. ML031620248)
2. ASTM E741 - 00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," 2000, (ASTM E741).
3. NRC Regulatory Issue Summary 2005-20: Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," dated September 26, 2005 (RIS 2005-20). (ADAMS Accession No. ML052020424)
4. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, dated May 2003. (ADAMS Accession No. ML031490611)
5. Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003. (ADAMS Accession No. ML031490664)
6. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001. (ADAMS Accession No. ML020600236)
7. Exelon/AmerGen 180-day Response to NRC Generic Letter 2003-1, "Control Room Habitability," dated December 9, 2003. (ADAMS Accession No. ML033560302)

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Date: October 31, 2007

APPENDIX D

LASALLE COUNTY STATION, UNITS 1 AND 2

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated April 12, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML071090282), as supported by letter dated December 9, 2003 (Reference 7), Exelon Generation Company, LLC (the licensee), requested changes to the technical specifications (TS) for the LaSalle County Station, Units 1 and 2 (LSCS). Reference 7 provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 5, 2007 (72 FR 31100).

On August 8, 2006 (ADAMS Accession No. ML062210095), the commercial nuclear electrical power generation industry owners group TSs Task Force (TSTF) submitted a proposed change traveler, TSTF-448, Revision 3, "Control Room Habitability," to the improved standard technical specifications (STS) (NUREGs 1430-1434) on behalf of the industry (TSTF-448, Revisions 0, 1, and 2 were prior draft iterations). TSTF-448, Revision 3, is a proposal to establish more effective and appropriate action, surveillance, and administrative STS requirements related to ensuring the habitability of the control room envelope (CRE).

In NRC Generic Letter 2003-01 (Reference 1), licensees were alerted to findings at facilities that existing TS surveillance requirements (SRs) for the Control Room Envelope Emergency Ventilation System (CREEVS) may not be adequate. Specifically, the results of American Society for Testing and Materials E741-00 (ASTM E741) (Reference 2) tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. Licensees were requested to address existing TS as follows:

Provide confirmation that your technical specifications verify the integrity [i.e., operability] of the CRE [boundary], and the assumed [unfiltered] inleakage rates of potentially contaminated air. If you currently have a differential pressure surveillance requirement to demonstrate CRE [boundary] integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your differential pressure surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE [boundary] so that compliance with your new surveillance requirement can be demonstrated.

If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

To promote standardization and to minimize the resources that would be needed to create and process plant-specific amendment applications in response to the concerns described in the generic letter, the industry and the NRC proposed revisions to CRE habitability system requirements contained in the STS, using the STS change traveler process. This effort culminated in Revision 3 to TSTF-448, which the NRC staff approved on January 17, 2007.

Consistent with the traveler as incorporated into NUREG-1433, the licensee proposed revising action and SRs in Specification 3.7.4, "Control Room Area Filtration (CRAF) System," and adding a new administrative controls program, Specification 5.5.15, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that CRE boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

Some editorial and plant specific changes were incorporated into this safety evaluation (SE) resulting in minor deviations from model SE text in TSTF-448, Revision 3.

2.0 REGULATORY EVALUATION

2.1 Control Room and Control Room Envelope

NRC Regulatory Guide (RG) 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, May 2003, (Reference 4) uses the term "control room envelope" in addition to the term "control room" and defines each term as follows:

Control Room: The plant area, defined in the facility licensing basis, in which actions can be taken to operate the plant safely under normal conditions and to maintain the reactor in a safe condition during accident situations. It encompasses the instrumentation and controls necessary for a safe shutdown of the plant and typically includes the critical document reference file, computer room (if used as an integral part of the emergency response plan), shift supervisor's office, operator wash room and kitchen, and other critical areas to which frequent personnel access or continuous occupancy may be necessary in the event of an accident.

Control Room Envelope: The plant area, defined in the facility licensing basis, that in the event of an emergency, can be isolated from the plant areas and the environment external to the CRE. This area is served by an emergency ventilation system, with the intent of maintaining the habitability of the control room. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident.

NRC RG 1.197, "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Revision 0, May 2003 (Reference 5), also contains these definitions, but uses the term CRE to mean both. This is because the protected environment provided for operators varies with the nuclear power facility. At some facilities this environment is limited to the control room; at others, it is the CRE. In this SE, consistent with the proposed changes to the STS, the CRE will be used to designate both. For consistency, facilities should use the term CRE with an appropriate facility-specific definition derived from the above CRE definition.

2.2 CRAF System

The CRAF system (the term used at LSCS for CREEVS) provides a protected environment from which operators can control the unit, during airborne challenges from radioactivity, hazardous chemicals, and fire byproducts, such as fire suppression agents and smoke, during both normal and accident conditions.

The CRAF system is designed to maintain a habitable environment in the control room envelope for 30 days of continuous occupancy after a design-basis accident (DBA) without personnel exceeding radiation exposures of 5 roentgen equivalent man (rem) whole body or its equivalent to any part of the body.

The CRAF system consists of two redundant subsystems, each capable of maintaining the habitability of the CRE. The CRAF system is considered operable when the individual components necessary to limit operator exposure are operable in both subsystems. A CRAF subsystem is considered operable when the associated:

- Fan is operable;
- High efficiency particulate air (HEPA) filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- Heater, demister, ductwork, valves, and dampers are operable, and air circulation can be maintained; and
- CRE boundary is operable (the single boundary supports both subsystems).

The CRE boundary is considered operable when the measured unfiltered air inleakage is less than or equal to the inleakage value assumed by the licensing basis analyses of design-basis accident consequences to CRE occupants.

2.3 Regulations Applicable to Control Room Habitability

In Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, "Domestic Licensing of Production and Utilization Facilities," General Design Criteria (GDC) 1, 2, 3, 4, 5, and 19 apply to CRE habitability. A summary of these GDCs follows.

GDC 1, "Quality Standards and Records," requires that structures, systems, and components (SSCs) important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions performed.

GDC 2, "Design Basis for Protection Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of earthquakes and other natural hazards.

GDC 3, "Fire Protection," requires SSCs important to safety be designed and located to minimize the effects of fires and explosions.

GDC 4, "Environmental and Dynamic Effects Design Bases," requires SSCs important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents (LOCAs).

GDC 5, "Sharing of Structures, Systems, and Components," requires that SSCs important to safety not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, the orderly shutdown and cooldown of the remaining units.

GDC 19, "Control Room," requires that a control room be provided from which actions can be taken to operate the nuclear reactor safely under normal conditions and to maintain the reactor in a safe condition under accident conditions, including a LOCA. Adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of specified values.

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing CRE boundary operability resided only in the following CRE ventilation system specifications:

- NUREG-1430, TS 3.7.10, "Control Room Emergency Ventilation System (CREVS);"
- NUREG-1431, TS 3.7.10, "Control Room Emergency Filtration System (CREFS);"
- NUREG-1432, TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS);"
- NUREG-1433, TS 3.7.4, "[Main Control Room Environmental Control (MCREC)] System;" and
- NUREG-1434, TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."

In these specifications, the SR associated with demonstrating the operability of the CRE boundary requires verifying that one control room ventilation subsystem can maintain a positive pressure relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate. Facilities that pressurize the CRE during the emergency mode of operation of the control room ventilation system have similar SRs. Other facilities that do not pressurize the CRE have only a system flow rate criterion for the emergency mode of operation. Regardless, the results of ASTM E741 tracer gas tests to measure CRE unfiltered leakage at facilities indicated that the differential pressure surveillance (or the alternative surveillance at non-pressurization facilities) is not a reliable method for demonstrating CRE boundary operability. That is, licensees were able to obtain differential pressure and flow measurements satisfying the SR limits even though unfiltered leakage was determined to exceed the value assumed in the safety analyses.

In addition to an inadequate SR, the action requirements of these specifications were ambiguous regarding CRE boundary operability in the event CRE unfiltered leakage is found to exceed the analysis assumption. The ambiguity stemmed from the view that the CRE

boundary may be considered operable but degraded in this condition, and that it would be deemed inoperable only if calculated radiological exposure limits for CRE occupants exceeded a licensing basis limit; e.g., as stated in GDC-19, even while crediting compensatory measures.

NRC Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," (AL 98-10) states that "the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition," which is defined in NRC Inspection Manual Chapter 9900; see latest guidance in Regulatory Issue Summary (RIS) 2005-20 (Reference 3). "Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The NRC staff expects that, following the imposition of administrative controls, an amendment to the inadequate TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Licensees that have found unfiltered inleakage in excess of the limit assumed in the safety analyses and have yet to either reduce the inleakage below the limit or establish a higher bounding limit through re-analysis, have implemented compensatory actions to ensure the safety of CRE occupants, pending final resolution of the condition, consistent with RIS 2005-20. However, based on GL 2003-01 and AL 98-10, the NRC staff expects each licensee to propose TS changes that include a surveillance to periodically measure CRE unfiltered inleakage in order to satisfy 10 CFR 50.36(d)(3), which requires a facility's TS to include SRs, which it defines as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and *that limiting conditions for operation will be met.*" (Emphasis added.)

The NRC staff also expects facilities to propose unambiguous remedial actions, consistent with 10 CFR 50.36(d)(2), for the condition of not meeting the limiting condition for operation (LCO) due to an inoperable CRE boundary. The action requirements should specify a reasonable completion time to restore conformance to the LCO before requiring a facility to be shut down. This completion time should be based on the benefits of implementing mitigating actions to ensure CRE occupant safety and sufficient time to resolve most problems anticipated with the CRE boundary, while minimizing the chance that operators in the CRE will need to use mitigating actions during accident conditions.

2.4 Adoption of TSTF-448, Revision 3, by LSCS

Adoption of TSTF-448, Revision 3, will assure that the facility's TS LCO for the CRAF system is met by demonstrating unfiltered leakage into the CRE is within limits; i.e., the operability of the CRE boundary. In support of this surveillance, which specifies the test interval (frequency) described in RG 1.197, TSTF-448 also adds TS administrative controls to assure the habitability of the CRE between performances of the CRE unfiltered inleakage test. In addition, adoption of TSTF-448 will establish clearly stated and reasonable required actions in the event CRE unfiltered inleakage is found to exceed the analysis assumption.

The changes made by TSTF-448 to the STS requirements for the CRAF system and the CRE boundary conform to 10 CFR 50.36(d)(2) and 10 CFR 50.36(d)(3). Their adoption will better assure that LSCS CRE will remain habitable during normal operation and DBA conditions. These changes are, therefore, acceptable from a regulatory standpoint.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the CRAF System at LSCS pressurizes the CRE to minimize unfiltered air inleakage. The proposed changes are consistent with this design.

3.1 Proposed Changes

The proposed amendment would strengthen CRE habitability TS requirements by changing TS 3.7.4, "Control Room Area Filtration (CRAF) System," and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform with the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant specific differences, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the STS markups and evaluations in TSTF-448. The NRC staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases and the plant-specific design and licensing bases, although approval of the Bases is not a condition for accepting the proposed amendment. However, TS 5.5.11, "TS Bases Control Program," provides assurance that the licensee has established and will maintain the adequacy of the Bases. The proposed Bases for TS 3.7.4 refer to specific guidance in NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001 (Reference 6), which the NRC staff has formally endorsed, with exceptions, through RG 1.196.

3.2 Editorial Changes

The licensee proposed editorial changes to TS 3.7.4, "Control Room Area Filtration," to establish standard terminology, such as "control room envelope" in place of "control room," except for the plant-specific name for the CREEVS (i.e., CRAF system). The licensee also proposed "radiological event, hazardous chemical release or smoke challenges" in place of various phrases to describe the hazards that CRE occupants are protected from by the CRAF system in TS 5.5.15. These changes improve the usability and quality of the presentation of the TS, have no impact on safety, and therefore, are acceptable.

3.3 TS 3.7.4, "Control Room Area Filtration (CRAF) System"

Evaluation 1 - for facilities that have adopted the CRAF System TS LCO Note and Action B of TSTF-287, Rev. 5 - Not Applicable

Evaluation 2 - for facilities that have not yet adopted the CRAF System TS LCO Note and Action B of TSTF-287, Rev. 5

The licensee proposed to establish new action requirements in TS 3.7.4, "Control Room Area Filtration (CRAF) System," for an inoperable CRE boundary. Currently, if one CRAF system subsystem is determined to be inoperable due to an inoperable CRE boundary, existing Action A would apply and require restoring the subsystem and the CRE boundary to operable status in 7 days. If two subsystems are determined to be inoperable due to an inoperable CRE boundary, existing Action E specifies no time to restore the subsystems and the CRE boundary to operable status, but requires immediate entry into the shutdown actions of LCO 3.0.3. These existing Actions are more restrictive than would be appropriate in situations for which CRE occupant implementation of compensatory measures or mitigating actions would temporarily afford adequate CRE occupant protection from postulated airborne hazards. To account for such situations, the licensee proposed to revise the action requirements to add a new Condition B, "One or more CRAF subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3." New Action B.3 would allow 90 days to restore the CRE boundary (and consequently, the affected Control Room Ventilation System subsystems) to operable status, provided that mitigating actions are immediately implemented and within 24 hours are verified to ensure, that in the event of a DBA, CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke.

The 24-hour Completion Time of new Required Action B.2 is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90-day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. The 90-day Completion Time of new Required Action B.3 is a reasonable time to diagnose, plan and possibly repair, and test most anticipated problems with the CRE boundary. Therefore, proposed Actions B.1, B.2, and B.3 are acceptable.

To distinguish new Condition B from the existing condition for one CRAF System subsystem inoperable, Condition A is revised to state, "One CRAF subsystem inoperable for reasons other than Condition B." To distinguish new Condition B from the existing condition for two CRAF Systems subsystems inoperable, Condition E is revised to state, "Two CRAF subsystems inoperable during MODE 1, 2, or 3 for reasons other than Condition B." The changes to existing Conditions A and E are less restrictive because these Conditions will no longer apply in the event one or two CRAF System subsystems are inoperable due to an inoperable CRE boundary during unit operation in Mode 1, 2, or 3. This is acceptable because the new Action B establishes adequate remedial measures in this condition. With the addition of a new Condition B, existing Conditions B, C, D, and E are re-designated C, D, E, and F, respectively.

The licensee also proposed to modify the CRAF System LCO by adding a note allowing the CRE boundary to be opened intermittently under administrative controls. As stated in the LCO Bases, this note "only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for

the CRAF system to be in the pressurization mode of operation is indicated.” The allowance of this note is acceptable because the administrative controls will ensure that the opening will be quickly sealed to maintain the validity of the licensing basis analyses of DBA consequences.

Evaluation 3 - for B&W CREVS TS - Not Applicable

Evaluation 4 - for B&W, CE, and W CREEVS - Not Applicable

Evaluation 5 - for BWR4 and BWR6 CRAF System TS

The licensee proposed to add a new condition to Action F of TS 3.7.4 that states, “One or more CRAF subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs [operations with a potential for draining the reactor vessel].” The specified Required Actions proposed for this condition are the same as for the other existing condition for Action F, which states, “Two CRAF subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.” Accordingly, the new condition is stated with the other condition in Action F using the logical connector “OR.” The practical result of this presentation in format is the same as specifying two separately numbered Actions, one for each condition. Its advantage is to make the TS Actions table easier to use by avoiding having an additional numbered row in the Actions table. This new condition in Action F is needed because proposed Action B will only apply in Modes 1, 2, and 3. As such, this change will ensure that the Actions table continues to specify a condition for an inoperable CRE boundary during refueling and OPDRVs. Therefore, this change is administrative and acceptable.

Evaluation 6 - for facilities that have a CRE pressurization surveillance requirement

In the emergency mode of operation, the CRAF System isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that one CRAF subsystem, operating in the emergency mode, can maintain a pressure of 0.125 inches water gauge, relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate of 4000 cubic feet per minute. The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In Reference 7, the licensee reported that it had determined that LSCS CRE pressurization surveillance, SR 3.7.4.5, may not be adequate to demonstrate the operability of the CRE boundary, and proposed to replace it with an leakage measurement SR and a CRE Habitability Program in TS Section 5.5.15, in accordance with the approved version of TSTF-448. Based on the adoption of TSTF-448, Revision 3, the licensee's proposal to modify SR 3.7.4.5 is acceptable.

The proposed CRE leakage measurement SR states, “Perform required CRE unfiltered air leakage testing in accordance with the Control Room Envelope Habitability Program.” The CRE Habitability Program TS, proposed TS 5.5.15, requires that the program include requirements for determining the unfiltered air leakage past the CRE boundary into the CRE

in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of RG 1.197. This guidance references ASTM E741 as an acceptable method for ascertaining the unfiltered leakage into the CRE. The licensee has proposed to follow this method. Therefore, the proposed CRE inleakage measurement SR is acceptable.

3.4 TS 5.5.15, "Control Room Envelope Habitability Program"

The proposed administrative controls program TS is consistent with the model program TS in TSTF-448, Revision 3. In combination with SR 3.7.4.5, this program is intended to ensure the operability of the CRE boundary, which as part of an operable CRAF System will ensure that CRE habitability is maintained such that CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under DBA conditions without personnel receiving radiation exposures in excess of 5 rem whole body dose or its equivalent for the duration of the accident.

A CRE Habitability Program TS acceptable to the NRC staff requires the program to contain the following elements:

Definitions of CRE and CRE boundary - This element is intended to ensure that these definitions accurately describe the plant areas that are within the CRE, and also the interfaces that form the CRE boundary, and are consistent with the general definitions discussed in Section 2.1 of this SE. Establishing what is meant by the CRE and the CRE boundary will preclude ambiguity in the implementation of the program.

Configuration control and preventive maintenance of the CRE boundary - This element is intended to ensure the CRE boundary is maintained in its design condition. Guidance for implementing this element is contained in RG 1.196, which endorsed, with exceptions, NEI 99-03. Maintaining the CRE boundary in its design condition provides assurance that its leak-tightness will not significantly degrade between CRE inleakage determinations.

Assessment of CRE habitability at the frequencies stated in Sections C.1 and C.2 of RG 1.197, and measurement of unfiltered air leakage into the CRE in accordance with the testing methods and at the frequencies stated in Sections C.1 and C.2 of RG 1.197 - Assessing CRE habitability at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not go undetected between CRE inleakage determinations. Determination of CRE inleakage using test methods acceptable to the NRC staff assures that test results are reliable for ascertaining CRE boundary operability. Determination of CRE inleakage at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not occur between CRE inleakage determinations.

Measurement of CRE pressure with respect to all areas adjacent to the CRE boundary at designated locations for use in assessing the CRE boundary at a frequency of 24 months on a staggered test basis (with respect to the CRAF subsystems) - This element is intended to ensure that CRE differential pressure is regularly measured to identify changes in pressure warranting evaluation of the condition of the CRE boundary. Obtaining and trending pressure data provides additional assurance that significant degradation of the CRE boundary will not go undetected between CRE inleakage determinations.

Quantitative limits on unfiltered inleakage - This element is intended to establish the CRE inleakage limit as the CRE unfiltered infiltration rate assumed in the CRE occupant radiological consequence analyses of design-basis accidents. Having an unambiguous criterion for the CRE boundary to be considered operable in order to meet LCO 3.7.4, will ensure that associated action requirements will be consistently applied in the event of CRE degradation resulting in inleakage exceeding the limit.

Consistent with TSTF-448, Revision 3, the program states that the provisions of SR 3.0.2 are applicable to the program frequencies for performing the activities required by program paragraph number c, parts (i) and (ii) (assessment of CRE habitability and measurement of CRE inleakage), and paragraph number d (measurement of CRE differential pressure) - This statement is needed to avoid confusion. SR 3.0.2 is applicable to the surveillance that references the testing in the CRE Habitability Program. However, SR 3.0.2 is not applicable to Administrative Controls unless specifically invoked. Providing this statement in the program eliminates any confusion regarding whether SR 3.0.2 is applicable, and is acceptable.

Consistent with TSTF-448, Revision 3, proposed TS 5.5.15 states that (1) a CRE Habitability Program shall be established and implemented, (2) the program shall include all of the NRC-staff required elements, as described above, and (3) the provisions of SR 3.0.2 shall apply to program frequencies. Therefore, TS 5.5.15, which is consistent with the model program TS approved by the NRC staff in TSTF-448, Revision 3, is acceptable.

3.5 Implementation of New Surveillance and Assessment Requirements by the Licensee

The licensee has proposed license conditions regarding the initial performance of the new surveillance and assessment requirements. The new license conditions adopted the conditions in Section 2.3 of the model application published in the Federal Register on January 17, 2007 (72 FR 2022). Plant specific changes were made to the proposed license conditions. The proposed plant specific license conditions are consistent with the model application, and are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the appropriate State and Local officials were notified of the proposed issuance of the amendment. The State and Local officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no-significant-hazards considerations, and there has been no public comment on the finding (72 FR 2022). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental

impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. NRC Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003, (GL 2003-01). (ADAMS Accession No. ML031620248)
2. ASTM E741 - 00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," 2000, (ASTM E741).
3. NRC Regulatory Issue Summary 2005-20: Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," dated September 26, 2005 (RIS 2005-20). (ADAMS Accession No. ML052020424)
4. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, dated May 2003. (ADAMS Accession No. ML031490611)
5. Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003. (ADAMS Accession No. ML031490664)
6. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001. (ADAMS Accession No. ML020600236)
7. Exelon/AmerGen 180-day Response to NRC Generic Letter 2003-1, "Control Room Habitability," dated December 9, 2003. (ADAMS Accession No. ML033560302)

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Date: October 31, 2007

APPENDIX E

LIMERICK GENERATING STATION, UNITS 1 AND 2

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated April 12, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML071090282), as supported by letter dated December 9, 2003 (Reference 7), Exelon Generation Company, LLC (the licensee), requested changes to the technical specifications (TS) for the Limerick Generating Station, Units 1 and 2 (Limerick). Reference 7 provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 5, 2007 (72 FR 31100).

On August 8, 2006 (ADAMS Accession No. ML062210095), the commercial nuclear electrical power generation industry owners group TSs Task Force (TSTF) submitted a proposed change traveler, TSTF-448, Revision 3, "Control Room Habitability," to the improved standard technical specifications (STS) (NUREGs 1430-1434) on behalf of the industry (TSTF-448, Revisions 0, 1, and 2 were prior draft iterations). TSTF-448, Revision 3, is a proposal to establish more effective and appropriate action, surveillance, and administrative STS requirements related to ensuring the habitability of the control room envelope (CRE).

In NRC Generic Letter 2003-01 (Reference 1), licensees were alerted to findings at facilities that existing TS surveillance requirements (SRs) for the Control Room Envelope Emergency Ventilation System (CREEVS) may not be adequate. Specifically, the results of American Society for Testing and Materials E741-00 (ASTM E741) (Reference 2) tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. Licensees were requested to address existing TS as follows:

Provide confirmation that your technical specifications verify the integrity [i.e., operability] of the CRE [boundary], and the assumed [unfiltered] inleakage rates of potentially contaminated air. If you currently have a differential pressure surveillance requirement to demonstrate CRE [boundary] integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your differential pressure surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE [boundary] so that compliance with your new surveillance requirement can be demonstrated.

If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

To promote standardization and to minimize the resources that would be needed to create and process plant-specific amendment applications in response to the concerns described in the generic letter, the industry and the NRC proposed revisions to CRE habitability system requirements contained in the STS, using the STS change traveler process. This effort culminated in Revision 3 to TSTF-448, which the NRC staff approved on January 17, 2007.

Consistent with the traveler as incorporated into NUREG-1434, the licensee proposed revising action and SRs in Specification 3/4.7.2, "Control Room Emergency Fresh Air Supply System," and adding a new administrative controls program, Specification 6.16, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that CRE boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

Some editorial and plant specific changes were incorporated into this safety evaluation (SE) resulting in minor deviations from model SE text in TSTF-448, Revision 3.

2.0 REGULATORY EVALUATION

2.1 Control Room and Control Room Envelope

NRC Regulatory Guide (RG) 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, May 2003 (Reference 4) uses the term "control room envelope" in addition to the term "control room," and defines each term as follows:

Control Room: The plant area, defined in the facility licensing basis, in which actions can be taken to operate the plant safely under normal conditions and to maintain the reactor in a safe condition during accident situations. It encompasses the instrumentation and controls necessary for a safe shutdown of the plant and typically includes the critical document reference file, computer room (if used as an integral part of the emergency response plan), shift supervisor's office, operator wash room and kitchen, and other critical areas to which frequent personnel access or continuous occupancy may be necessary in the event of an accident.

Control Room Envelope: The plant area, defined in the facility licensing basis, that in the event of an emergency, can be isolated from the plant areas and the environment external to the CRE. This area is served by an emergency ventilation system, with the intent of maintaining the habitability of the control room. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident.

NRC RG 1.197, "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Revision 0, May 2003 (Reference 5), also contains these definitions, but uses the term CRE to mean both. This is because the protected environment provided for operators varies with the nuclear power facility. At some facilities this environment is limited to the control room; at others, it is the CRE. In this SE, consistent with the proposed changes to the STS, the CRE will be used to designate both. For consistency, facilities should use the term CRE with an appropriate facility-specific definition derived from the above CRE definition.

2.2 Control Room Emergency Fresh Air Supply System

The Control Room Emergency Fresh Air Supply (CREFAS) system (the term used at Limerick for the CREEVS) provides a protected environment from which operators can control the unit, during airborne challenges from radioactivity, hazardous chemicals, and fire byproducts, such as fire suppression agents and smoke, during both normal and accident conditions.

The CREFAS system is designed to maintain a habitable environment in the control room envelope for 30 days of continuous occupancy after a design-basis accident (DBA) without exceeding a 5 roentgen equivalent man (rem) total effective dose equivalent (TEDE).

The CREFAS system consists of two redundant subsystems, each capable of maintaining the habitability of the CRE. The CREFAS system is considered operable when the individual components necessary to limit operator exposure are operable in both subsystems. A CREFAS subsystem is considered operable when the associated:

- Fan is operable;
- High efficiency particulate air (HEPA) filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- Heater, demister, ductwork, valves, and dampers are operable, and air circulation can be maintained; and
- CRE boundary is operable (the single boundary supports both subsystems).

The CRE boundary is considered operable when the measured unfiltered air leakage is less than or equal to the leakage value assumed by the licensing basis analyses of design-basis accident consequences to CRE occupants.

2.3 Regulations Applicable to Control Room Habitability

In Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, "Domestic Licensing of Production and Utilization Facilities," General Design Criteria (GDC) 1, 2, 3, 4, 5, and 19 apply to CRE habitability. A summary of these GDCs follows.

GDC 1, "Quality Standards and Records," requires that structures, systems, and components (SSCs) important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions performed.

GDC 2, "Design Basis for Protection Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of earthquakes and other natural hazards.

GDC 3, "Fire Protection," requires SSCs important to safety be designed and located to minimize the effects of fires and explosions.

GDC 4, "Environmental and Dynamic Effects Design Bases," requires SSCs important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents (LOCAs).

GDC 5, "Sharing of Structures, Systems, and Components," requires that SSCs important to safety not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, the orderly shutdown and cooldown of the remaining units.

GDC 19, "Control Room," requires that a control room be provided from which actions can be taken to operate the nuclear reactor safely under normal conditions and to maintain the reactor in a safe condition under accident conditions, including a LOCA. Adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of specified values.

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing CRE boundary operability resided only in the following CRE ventilation system specifications:

- NUREG-1430, TS 3.7.10, "Control Room Emergency Ventilation System (CREVS);"
- NUREG-1431, TS 3.7.10, "Control Room Emergency Filtration System (CREFS);"
- NUREG-1432, TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS);"
- NUREG-1433, TS 3.7.4, "[Main Control Room Environmental Control (MCREC)] System;" and
- NUREG-1434, TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."

In these specifications, the SR associated with demonstrating the operability of the CRE boundary requires verifying that one control room ventilation subsystem can maintain a positive pressure relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate. Facilities that pressurize the CRE during the emergency mode of operation of the control room ventilation system have similar SRs. Other facilities that do not pressurize the CRE have only a system flow rate criterion for the emergency mode of operation. Regardless, the results of ASTM E741 tracer gas tests to measure CRE unfiltered leakage at facilities indicated that the differential pressure surveillance (or the alternative surveillance at non-pressurization facilities) is not a reliable method for demonstrating CRE boundary operability. That is, licensees were able to obtain differential pressure and flow measurements satisfying the SR limits even though unfiltered leakage was determined to exceed the value assumed in the safety analyses.

In addition to an inadequate SR, the action requirements of these specifications were ambiguous regarding CRE boundary operability in the event CRE unfiltered leakage is found to exceed the analysis assumption. The ambiguity stemmed from the view that the CRE

boundary may be considered operable but degraded in this condition, and that it would be deemed inoperable only if calculated radiological exposure limits for CRE occupants exceeded a licensing basis limit; e.g., as stated in GDC-19, even while crediting compensatory measures.

NRC Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," (AL 98-10) states that "the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition," which is defined in NRC Inspection Manual Chapter 9900; see latest guidance in Regulatory Issue Summary (RIS) 2005-20 (Reference 3). "Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The NRC staff expects that, following the imposition of administrative controls, an amendment to the inadequate TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Licensees that have found unfiltered inleakage in excess of the limit assumed in the safety analyses and have yet to either reduce the inleakage below the limit or establish a higher bounding limit through re-analysis, have implemented compensatory actions to ensure the safety of CRE occupants, pending final resolution of the condition, consistent with RIS 2005-20. However, based on GL 2003-01 and AL 98-10, the NRC staff expects each licensee to propose TS changes that include a surveillance to periodically measure CRE unfiltered inleakage in order to satisfy 10 CFR 50.36(d)(3), which requires a facility's TS to include SRs, which it defines as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and *that limiting conditions for operation will be met.*" (Emphasis added.)

The NRC staff also expects facilities to propose unambiguous remedial actions, consistent with 10 CFR 50.36(d)(2), for the condition of not meeting the limiting condition for operation (LCO) due to an inoperable CRE boundary. The action requirements should specify a reasonable completion time to restore conformance to the LCO before requiring a facility to be shut down. This completion time should be based on the benefits of implementing mitigating actions to ensure CRE occupant safety and sufficient time to resolve most problems anticipated with the CRE boundary, while minimizing the chance that operators in the CRE will need to use mitigating actions during accident conditions.

2.4 Adoption of TSTF-448, Revision 3, by Limerick

Adoption of TSTF-448, Revision 3, will assure that the facility's TS LCO for the CREFAS system is met by demonstrating unfiltered leakage into the CRE is within limits; i.e., the operability of the CRE boundary. In support of this surveillance, which specifies the test interval (frequency) described in RG 1.197, TSTF-448 also adds TS administrative controls to assure the habitability of the CRE between performances of the CRE unfiltered inleakage test. In addition, adoption of TSTF-448 will establish clearly stated and reasonable required actions in the event CRE unfiltered inleakage is found to exceed the analysis assumption.

The changes made by TSTF-448 to the STS requirements for the CREFAS system and the CRE boundary conform to 10 CFR 50.36(d)(2) and 10 CFR 50.36(d)(3). Their adoption will better assure that the Limerick CRE will remain habitable during normal operation and DBA conditions. These changes are, therefore, acceptable from a regulatory standpoint.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the CREFAS system at Limerick pressurizes the CRE to minimize unfiltered air inleakage. The proposed changes are consistent with this design.

3.1 Proposed Changes

The proposed amendment would strengthen CRE habitability TS requirements by changing TS 3/4.7.2, CREFAS system and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform with the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant specific differences, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the TS markups and evaluations in TSTF-448. The NRC staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases and the plant-specific design and licensing bases, although approval of the Bases is not a condition for accepting the proposed amendment. However, TS 6.8.4.g., "TS Bases Control Program," provides assurance that the licensee has established and will maintain the adequacy of the Bases. The proposed Bases for TS 3.7.2 refer to specific guidance in NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001 (Reference 6), which the NRC staff has formally endorsed, with exceptions, through Regulatory Guide 1.196.

3.2 Editorial Changes

The licensee proposed editorial changes to TS 3.7.2, "Control Room Emergency Fresh Air Supply System," to establish standard terminology, such as "control room envelope (CRE)" in place of "control room," except for the plant-specific name for the CREEVS (i.e., CREFAS system). The licensee also proposed "radiological event, hazardous chemical release or smoke challenges" in place of various phrases to describe the hazards that CRE occupants are protected from by the CREFAS system in TS 6.16. These changes improve the usability and quality of the presentation of the TS, have no impact on safety, and therefore, are acceptable.

3.3 TS 3.7.2, "Control Room Emergency Fresh Air Supply System"

Evaluation 1 - for facilities that have adopted the CREEVS TS LCO Note and Action B of TSTF-287, Rev. 5 - Not Applicable

Evaluation 2 - for facilities that have not yet adopted the CREFAS system TS LCO Note and Action B of TSTF-287, Rev. 5

The licensee proposed to establish new action requirements in TS 3.7.2, "Control Room Emergency Fresh Air Supply System," for an inoperable CRE boundary. Currently, if one CREFAS subsystem is determined to be inoperable due to an inoperable CRE boundary, existing Action a. would apply and require restoring the subsystem and the CRE boundary to operable status in 7 days. Two subsystems determined to be inoperable due to an inoperable CRE boundary would require immediate entry into the shutdown actions of LCO 3.0.3. These existing Actions are more restrictive than would be appropriate in situations for which CRE occupant implementation of compensatory measures or mitigating actions would temporarily afford adequate CRE occupant protection from postulated airborne hazards. To account for such situations, the licensee proposed to revise the action requirements to add a new Condition a.2, "With one or more control room emergency fresh air supply subsystems inoperable due to an inoperable CRE boundary" (applicable in OPERATIONAL CONDITIONS 1, 2, or 3). New Action a.2.c would allow 90 days to restore the CRE boundary (and consequently, the affected CREFAS subsystems) to operable status, provided that mitigating actions are immediately implemented and within 24 hours are verified to ensure, that in the event of a DBA, CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke.

The 24-hour Completion Time of new Action a.2.b is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90-day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. The 90-day Completion Time of new Action a.2.c is a reasonable time to diagnose, plan and possibly repair, and test most anticipated problems with the CRE boundary. Therefore, the proposed Actions a.2.a, a.2.b, and a.2.c are acceptable.

To distinguish new Action a.2 from the existing condition for one CREFAS subsystem inoperable, Action a.1 is revised to state, "With one control room emergency fresh air supply subsystem inoperable for reasons other than Condition a.2." The changes to Action a.2 are less restrictive because this condition will no longer apply in the event one or two CREFAS subsystems are inoperable due to an inoperable CRE boundary during unit operation in OPERATIONAL CONDITIONS 1, 2, or 3. This is acceptable because the new Action a.2 establishes adequate remedial measures in this condition.

The licensee also proposed to modify the CREFAS system LCO by adding a note allowing the CRE boundary to be opened intermittently under administrative controls. As stated in the LCO Bases, this note "only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for

CRE isolation is indicated.” The allowance of this note is acceptable because the administrative controls will ensure that the opening will be quickly sealed to maintain the validity of the licensing basis analyses of DBA consequences.

Evaluation 3 - for B&W CREVS TS - Not Applicable

Evaluation 4 - for B&W, CE, and W CREEVS - Not Applicable

Evaluation 5 - for BWR4 and BWR6 CREFAS TS

The licensee proposed to add a new condition to Action b.3 of TS 3.7.2 that states, “With one or more control room emergency fresh air supply subsystems inoperable due to an inoperable CRE boundary, immediately suspend handling of RECENTLY IRRADIATED FUEL in the secondary containment and operations with a potential for draining the reactor vessel.” The specified actions proposed for this condition are the same as for the other existing condition for Action b.2, which states, “With both control room emergency fresh air supply subsystems inoperable for reasons other than Condition b.3, immediately suspend handling of RECENTLY IRRADIATED FUEL in the secondary containment and operations with a potential for draining the reactor vessel.” This new condition in Action b.3 is needed because proposed Action a.2 will only apply in OPERATIONAL CONDITIONS 1, 2, and 3. As such, this change will ensure that the Actions table continues to specify a condition for an inoperable CRE boundary during refueling and operations with a potential for draining the reactor vessel. Therefore, this change is administrative and acceptable.

Evaluation 6 - for facilities that have a CRE pressurization surveillance requirement

In the emergency mode of operation, the CREFAS system isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that one CREFAS subsystem, operating in the emergency mode, can maintain a pressure of 0.125 inches water gauge, relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate of 525 cubic feet per minute. The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In Reference 7, the licensee reported that it had determined that the Limerick CRE pressurization surveillance, SR 4.7.2.e.3, may not be adequate to demonstrate the operability of the CRE boundary, and proposed to replace it with an inleakage measurement SR and a CRE Habitability Program in TS Section 6.16, in accordance with the approved version of TSTF-448. Based on the adoption of TSTF-448, Revision 3, the licensee's proposal to modify SR 4.7.2.e.3 is acceptable.

The proposed CRE inleakage measurement SR states, “The control room envelope boundary shall be demonstrated OPERABLE: At a frequency in accordance with the Control Room Envelope Habitability Program by performance of control room envelope unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.” The CRE Habitability Program TS, proposed TS 6.16, requires that the program include requirements for determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance

with the testing methods and at the frequencies specified in Sections C.1 and C.2 of RG 1.197. This guidance references ASTM E741 as an acceptable method for ascertaining the unfiltered leakage into the CRE. The licensee has proposed to follow this method. Therefore, the proposed CRE inleakage measurement SR is acceptable.

3.4 TS 6.16, Control Room Envelope Habitability Program

The proposed administrative controls program TS is consistent with the model program TS in TSTF-448, Revision 3. In combination with SR 4.7.2.2, this program is intended to ensure the operability of the CRE boundary, which as part of an operable CREFAS system will ensure that CRE habitability is maintained such that CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under DBA conditions without personnel receiving radiation exposures in excess of 5 rem TEDE for the duration of the accident.

A CRE Habitability Program TS acceptable to the NRC staff requires the program to contain the following elements:

Definitions of CRE and CRE boundary - This element is intended to ensure that these definitions accurately describe the plant areas that are within the CRE, and also the interfaces that form the CRE boundary, and are consistent with the general definitions discussed in Section 2.1 of this SE. Establishing what is meant by the CRE and the CRE boundary will preclude ambiguity in the implementation of the program.

Configuration control and preventive maintenance of the CRE boundary - This element is intended to ensure the CRE boundary is maintained in its design condition. Guidance for implementing this element is contained in RG 1.196, which endorsed, with exceptions, NEI 99-03. Maintaining the CRE boundary in its design condition provides assurance that its leak-tightness will not significantly degrade between CRE inleakage determinations.

Assessment of CRE habitability at the frequencies stated in Sections C.1 and C.2 of RG 1.197, and measurement of unfiltered air leakage into the CRE in accordance with the testing methods and at the frequencies stated in Sections C.1 and C.2 of RG 1.197 - Assessing CRE habitability at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not go undetected between CRE inleakage determinations. Determination of CRE inleakage using test methods acceptable to the NRC staff assures that test results are reliable for ascertaining CRE boundary operability. Determination of CRE inleakage at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not occur between CRE inleakage determinations.

Measurement of CRE pressure with respect to all areas adjacent to the CRE boundary at designated locations for use in assessing the CRE boundary at a frequency of 24 months on a staggered test basis (with respect to the CREFAS subsystems) - This element is intended to ensure that CRE differential pressure is regularly measured to identify changes in pressure warranting evaluation of the condition of the CRE boundary. Obtaining and trending pressure data provides additional assurance that significant degradation of the CRE boundary will not go undetected between CRE inleakage determinations.

Quantitative limits on unfiltered inleakage - This element is intended to establish the CRE inleakage limit as the CRE unfiltered infiltration rate assumed in the CRE occupant radiological consequence analyses of design-basis accidents. Having an unambiguous criterion for the CRE boundary to be considered operable in order to meet LCO 3.7.2, will ensure that associated action requirements will be consistently applied in the event of CRE degradation resulting in inleakage exceeding the limit.

Consistent with TSTF-448, Revision 3, the program states that the provisions of SR 4.0.2 are applicable to the program frequencies for performing the activities required by program paragraph number c, parts (i) and (ii) (assessment of CRE habitability and measurement of CRE inleakage), and paragraph number d (measurement of CRE differential pressure) - This statement is needed to avoid confusion. SR 4.0.2 is applicable to the surveillance that references the testing in the CRE Habitability Program. However, SR 4.0.2 is not applicable to Administrative Controls unless specifically invoked. Providing this statement in the program eliminates any confusion regarding whether SR 4.0.2 is applicable, and is acceptable.

Consistent with TSTF-448, Revision 3, proposed TS 6.16 states that (1) a CRE Habitability Program shall be established and implemented, (2) the program shall include all of the NRC-staff required elements, as described above, and (3) the provisions of SR 4.0.2 shall apply to program frequencies. Therefore, TS 6.16, which is consistent with the model program TS approved by the NRC staff in TSTF-448, Revision 3, is acceptable.

3.5 Implementation of New Surveillance and Assessment Requirements by the Licensee

The licensee has proposed license conditions regarding the initial performance of the new surveillance and assessment requirements. The new license conditions adopted the conditions in Section 2.3 of the model application published in the Federal Register on January 17, 2007 (72 FR 2022). Plant specific changes were made to the proposed license conditions. The proposed plant specific license conditions are consistent with the model application, and are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the appropriate State and Local officials were notified of the proposed issuance of the amendment. The State and Local officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no-significant-hazards considerations, and there has been no public comment on the finding (72 FR 2022). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental

impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. NRC Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003, (GL 2003-01). (ADAMS Accession No. ML031620248)
2. ASTM E741 - 00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," 2000, (ASTM E741).
3. NRC Regulatory Issue Summary 2005-20: Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," dated September 26, 2005 (RIS 2005-20). (ADAMS Accession No. ML052020424)
4. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, dated May 2003. (ADAMS Accession No. ML031490611)
5. Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003. (ADAMS Accession No. ML031490664)
6. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001. (ADAMS Accession No. ML020600236)
7. Exelon/AmerGen 180-day Response to NRC Generic Letter 2003-1, "Control Room Habitability," dated December 9, 2003. (ADAMS Accession No. ML033560302)

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Date: October 31, 2007

APPENDIX F

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated April 12, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML071090282), as supported by letter dated December 9, 2003 (Reference 7), Exelon Generation Company, LLC, and PSEG Nuclear, LLC (the licensee), requested changes to the technical specifications (TS) for the Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom). Reference 7 provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 5, 2007 (72 FR 31100).

On August 8, 2006 (ADAMS Accession No. ML062210095), the commercial nuclear electrical power generation industry owners group TSs Task Force (TSTF) submitted a proposed change, TSTF-448, Revision 3, "Control Room Habitability," to the improved standard technical specifications (STS) (NUREGs 1430-1434) on behalf of the industry (TSTF-448, Revisions 0, 1, and 2 were prior draft iterations). TSTF-448, Revision 3, is a proposal to establish more effective and appropriate action, surveillance, and administrative STS requirements related to ensuring the habitability of the control room envelope (CRE).

In NRC Generic Letter 2003-01 (Reference 1), licensees were alerted to findings at facilities that existing TS surveillance requirements (SRs) for the Control Room Envelope Emergency Ventilation System (CREEVS) may not be adequate. Specifically, the results of American Society for Testing and Materials E741-00 (ASTM E741) (Reference 2), "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. Licensees were requested to address existing TS as follows:

Provide confirmation that your technical specifications verify the integrity [i.e., operability] of the CRE [boundary], and the assumed [unfiltered] inleakage rates of potentially contaminated air. If you currently have a differential pressure surveillance requirement to demonstrate CRE [boundary] integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your differential pressure surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE [boundary] so that compliance with your new surveillance requirement can be demonstrated.

If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

To promote standardization and to minimize the resources that would be needed to create and process plant-specific amendment applications in response to the concerns described in the generic letter, the industry and the NRC proposed revisions to CRE habitability system requirements contained in the STS, using the STS change traveler process. This effort culminated in Revision 3 to TSTF-448, which the NRC staff approved on January 17, 2007.

Consistent with the traveler as incorporated into NUREG-1433, the licensee proposed revising action and SRs in Specification 3.7.4, "Main Control Room Emergency Ventilation (MCREV) System" and adding a new administrative controls program, Specification 5.5.13, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that CRE boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

Some editorial and plant specific changes were incorporated into this safety evaluation (SE) resulting in minor deviations from model SE text in TSTF-448, Revision 3.

2.0 REGULATORY EVALUATION

2.1 Control Room and Control Room Envelope

NRC Regulatory Guide (RG) 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, May 2003, (Reference 4) uses the term "control room envelope" in addition to the term "control room" and defines each term as follows:

Control Room: The plant area, defined in the facility licensing basis, in which actions can be taken to operate the plant safely under normal conditions and to maintain the reactor in a safe condition during accident situations. It encompasses the instrumentation and controls necessary for a safe shutdown of the plant and typically includes the critical document reference file, computer room (if used as an integral part of the emergency response plan), shift supervisor's office, operator wash room and kitchen, and other critical areas to which frequent personnel access or continuous occupancy may be necessary in the event of an accident.

Control Room Envelope: The plant area, defined in the facility licensing basis, that in the event of an emergency, can be isolated from the plant areas and the environment external to the CRE. This area is served by an emergency ventilation system, with the intent of maintaining the habitability of the control room. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident.

NRC RG 1.197, "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Revision 0, May 2003 (Reference 5), also contains these definitions, but uses the term CRE to mean both. This is because the protected environment provided for operators varies with the nuclear power facility. At some facilities this environment is limited to the control room; at others, it is the CRE. In this SE, consistent with the proposed changes to the STS, the CRE will

be used to designate both. For consistency, facilities should use the term CRE with an appropriate facility-specific definition derived from the above CRE definition.

2.2 Main Control Room Emergency Ventilation System (MCREVS)

The MCREVS (the term used at Peach Bottom for CREEVS) provides a protected environment from which operators can control the unit, during airborne challenges from radioactivity, hazardous chemicals, and fire byproducts, such as fire suppression agents and smoke, during both normal and accident conditions.

The MCREVS is designed to maintain a habitable environment in the control room envelope for 30 days of continuous occupancy after a design-basis accident (DBA) without personnel receiving radiation exposures in excess of 5 roentgen equivalent man (rem) whole body dose or its equivalent to any part of the body.

The MCREVS consists of two redundant subsystems, each capable of maintaining the habitability of the CRE. The MCREVS is considered operable when the individual components necessary to limit operator exposure are operable in both subsystems. A MCREV subsystem is considered operable when the associated:

- Fan is operable;
- High efficiency particulate air (HEPA) filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- Ductwork, valves, and dampers are operable, and air flow can be maintained; and
- CRE boundary is operable (the single boundary supports both subsystems).

The CRE boundary is considered operable when the measured unfiltered air inleakage is less than or equal to the inleakage value assumed by the licensing basis analyses of design-basis accident consequences to CRE occupants.

2.3 Regulations Applicable to Control Room Habitability

In Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, "Domestic Licensing of Production and Utilization Facilities," General Design Criteria (GDC) 1, 2, 3, 4, 5, and 19 apply to CRE habitability. A summary of these GDCs follows.

GDC 1, "Quality Standards and Records," requires that structures, systems, and components (SSCs) important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions performed.

GDC 2, "Design Basis for Protection Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of earthquakes and other natural hazards.

GDC 3, "Fire Protection," requires SSCs important to safety be designed and located to minimize the effects of fires and explosions.

GDC 4, "Environmental and Dynamic Effects Design Bases," requires SSCs important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents (LOCAs).

GDC 5, "Sharing of Structures, Systems, and Components," requires that SSCs important to safety not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, the orderly shutdown and cooldown of the remaining units.

GDC 19, "Control Room," requires that a control room be provided from which actions can be taken to operate the nuclear reactor safely under normal conditions and to maintain the reactor in a safe condition under accident conditions, including a LOCA. Adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of specified values.

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing CRE boundary operability resided only in the following CRE ventilation system specifications:

- NUREG-1430, TS 3.7.10, "Control Room Emergency Ventilation System (CREVS);"
- NUREG-1431, TS 3.7.10, "Control Room Emergency Filtration System (CREFS);"
- NUREG-1432, TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS);"
- NUREG-1433, TS 3.7.4, "[Main Control Room Environmental Control (MCREC)] System;" and
- NUREG-1434, TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."

In these specifications, the SR associated with demonstrating the operability of the CRE boundary requires verifying that one control room ventilation subsystem can maintain a positive pressure relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate. Facilities that pressurize the CRE during the emergency mode of operation of the control room ventilation system have similar SRs. Other facilities that do not pressurize the CRE have only a system flow rate criterion for the emergency mode of operation. Regardless, the results of ASTM E741 tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance (or the alternative surveillance at non-pressurization facilities) is not a reliable method for demonstrating CRE boundary operability. That is, licensees were able to obtain differential pressure and flow measurements satisfying the SR limits even though unfiltered inleakage was determined to exceed the value assumed in the safety analyses.

In addition to an inadequate SR, the action requirements of these specifications were ambiguous regarding CRE boundary operability in the event CRE unfiltered inleakage is found to exceed the analysis assumption. The ambiguity stemmed from the view that the CRE boundary may be considered operable but degraded in this condition, and that it would be deemed inoperable only if calculated radiological exposure limits for CRE occupants exceeded a licensing basis limit; e.g., as stated in GDC-19, even while crediting compensatory measures.

NRC Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," (AL 98-10) states that "the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition," which is defined in NRC Inspection Manual Chapter 9900; see latest guidance in Regulatory Issue Summary (RIS) 2005-20 (Reference 3). "Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The NRC staff expects that, following the imposition of administrative controls, an amendment to the inadequate TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Licenses that have found unfiltered inleakage in excess of the limit assumed in the safety analyses and have yet to either reduce the inleakage below the limit or establish a higher bounding limit through re-analysis, have implemented compensatory actions to ensure the safety of CRE occupants, pending final resolution of the condition, consistent with RIS 2005-20. However, based on GL 2003-01 and AL 98-10, the NRC staff expects each licensee to propose TS changes that include a surveillance to periodically measure CRE unfiltered inleakage in order to satisfy 10 CFR 50.36(d)(3), which requires a facility's TS to include SR, which it defines as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and *that limiting conditions for operation will be met.*" (Emphasis added.)

The NRC staff also expects facilities to propose unambiguous remedial actions, consistent with 10 CFR 50.36(d)(2), for the condition of not meeting the limiting condition for operation (LCO) due to an inoperable CRE boundary. The action requirements should specify a reasonable completion time to restore conformance to the LCO before requiring a facility to be shut down. This completion time should be based on the benefits of implementing mitigating actions to ensure CRE occupant safety and sufficient time to resolve most problems anticipated with the CRE boundary, while minimizing the chance that operators in the CRE will need to use mitigating actions during accident conditions.

2.4 Adoption of TSTF-448, Revision 3, by Peach Bottom

Adoption of TSTF-448, Revision 3, will assure that the facility's TS LCO for the MCREVS is met by demonstrating unfiltered leakage into the CRE is within limits; i.e., the operability of the CRE boundary. In support of this surveillance, which specifies the test interval (frequency) described in RG 1.197, TSTF-448 also adds TS administrative controls to assure the habitability of the CRE between performances of the CRE unfiltered inleakage test. In addition, adoption of TSTF-448 will establish clearly stated and reasonable required actions in the event CRE unfiltered inleakage is found to exceed the analysis assumption.

The changes made by TSTF-448 to the STS requirements for the MCREVS and the CRE boundary conform to 10 CFR 50.36(d)(2) and 10 CFR 50.36(d)(3). Their adoption will better

assure that the Peach Bottom CRE will remain habitable during normal operation and design-basis accident conditions. These changes are, therefore, acceptable from a regulatory standpoint.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the MCREVS at Peach Bottom pressurizes the CRE to minimize unfiltered air leakage. The proposed changes are consistent with this design.

3.1 Proposed Changes

The proposed amendment would strengthen CRE habitability TS requirements by changing TS 3.7.4, "Main Control Room Emergency Ventilation (MCREV) System," and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform with the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant specific differences, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the STS markups and evaluations in TSTF-448. The NRC staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases and the plant-specific design and licensing bases, although approval of the Bases is not a condition for accepting the proposed amendment. However, TS 5.5.10, "TS Bases Control Program," provides assurance that the licensee has established and will maintain the adequacy of the Bases. The proposed Bases for TS 3.7.4 refer to specific guidance in NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001 (Reference 6), which the NRC staff has formally endorsed, with exceptions, through RG 1.196.

3.2 Editorial Changes

The licensee proposed editorial changes to TS 3.7.4, "Main Control Room Emergency Ventilation (MCREV) System," to establish standard terminology, such as "control room envelope" in place of "control room," except for the plant-specific name for the MCREVS (i.e., MCREV system). The licensee also proposed "radiological event, hazardous chemical release or smoke challenges" in place of various phrases to describe the hazards that CRE occupants are protected from by the MCREV system in TS 5.5.13. These changes improve the usability and quality of the presentation of the TS, have no impact on safety, and therefore, are acceptable.

3.3 TS 3.7.4, "Main Control Room Emergency Ventilation (MCREV) System"

Evaluation 1 - for facilities that have adopted the CREEVS TS LCO Note and Action B of TSTF-287, Rev. 5 - Not Applicable

Evaluation 2 - for facilities that have not yet adopted the Main Control Room Emergency Ventilation System TS LCO Note and Action B of TSTF-287, Rev. 5

The licensee proposed to establish new action requirements in TS 3.7.4, "Main Control Room Emergency Ventilation (MCREV) System," for an inoperable CRE boundary. Currently, if one MCREV subsystem is determined to be inoperable due to an inoperable CRE boundary, existing Action A would apply and require restoring the subsystem and the CRE boundary to operable status in 7 days. If two MCREV subsystems are determined to be inoperable due to an inoperable CRE boundary, existing Action D specifies no time to restore the subsystems and the CRE boundary to operable status, but requires immediate entry into the shutdown actions of LCO 3.0.3. These existing Actions are more restrictive than would be appropriate in situations for which CRE occupant implementation of compensatory measures or mitigating actions would temporarily afford adequate CRE occupant protection from postulated airborne hazards. To account for such situations, the licensee proposed to revise the action requirements to add a new Condition B, "One or more MCREV subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3." New Required Action B.3 would allow 90 days to restore the CRE boundary (and consequently, the affected MCREV subsystems) to operable status, provided that mitigating actions are immediately implemented and within 24 hours are verified to ensure, that in the event of a DBA, CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke.

The 24-hour Completion Time of new Required Action B.2 is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90-day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. The 90-day Completion Time of new Required Action B.3 is a reasonable time to diagnose, plan and possibly repair, and test most anticipated problems with the CRE boundary. Therefore, proposed Actions B.1, B.2 and B.3 are acceptable.

To distinguish new Condition B from the existing condition for one MCREV subsystem inoperable, Condition A is revised to state, "One MCREV subsystem inoperable for reasons other than Condition B." To distinguish new Condition B from the existing condition for two MCREV subsystems inoperable, existing Condition D is revised to state, "Two MCREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B." The changes to existing Conditions A and D are less restrictive because these Conditions will no longer apply in the event one or two MCREV subsystems are inoperable due to an inoperable CRE boundary during unit operation in Mode 1, 2, or 3. This is acceptable because the new Action B establishes adequate remedial measures in this condition. With the addition of a new Condition B, existing Conditions B, C, D, and E are re-designated C, D, E, and F, respectively.

The licensee also proposed to modify the MCREV LCO by adding a note allowing the CRE boundary to be opened intermittently under administrative controls. As stated in the LCO Bases, this note “only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE isolation is indicated.” The allowance of this note is acceptable because the administrative controls will ensure that the opening will be quickly sealed to maintain the validity of the licensing basis analyses of DBA consequences.

Evaluation 3 - for B&W CREVS TS - Not Applicable

Evaluation 4 - for B&W, CE, and W CREEVS - Not Applicable

Evaluation 5 - for BWR4 and BWR6 MCREVS TS

The licensee proposed to add a new condition to Action F of TS 3.7.4 that states, “One or more MCREV subsystems inoperable due to an inoperable CRE Boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS or OPDRVs [operations with a potential for draining the reactor vessel].” The specified Required Actions proposed for this condition are the same as for the other existing condition for Action F, which states, “Two MCREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.” Accordingly, the new condition is stated with the other condition in Action F using the logical connector “OR.” The practical result of this presentation in format is the same as specifying two separately numbered Actions, one for each condition. Its advantage is to make the TS Actions table easier to use by avoiding having an additional numbered row in the Actions table. This new condition in Action F is needed because proposed Action B will only apply in Modes 1, 2, and 3. As such, this change will ensure that the Actions table continues to specify a condition for an inoperable CRE boundary during refueling and OPDRVs. Therefore, this change is administrative and acceptable.

Evaluation 6 - for facilities that have a CRE pressurization surveillance requirement

In the emergency mode of operation, the MCREV system isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air inleakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that one MCREV subsystem, operating in the emergency mode, can maintain a pressure of 0.1 inches water gauge, relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate of 2700 cubic feet per minute. The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In Reference 7, the licensee reported that it had determined that the Peach Bottom CRE pressurization

surveillance, SR 3.7.4.4, may not be adequate to demonstrate the operability of the CRE boundary, and proposed to replace it with an inleakage measurement SR and a CRE Habitability Program in TS Section 5.5.13, in accordance with the approved version of TSTF-448. Based on the adoption of TSTF-448, Revision 3, the licensee's proposal to modify SR 3.7.4.4 is acceptable.

The proposed CRE inleakage measurement SR states, "Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program." The CRE Habitability Program TS, proposed TS 5.5.13, requires that the program include requirements for determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the frequencies specified in Sections C.1 and C.2 of RG 1.197. This guidance references ASTM E741 as an acceptable method for ascertaining the unfiltered leakage into the CRE. The licensee has proposed to follow this method. Therefore, the proposed CRE inleakage measurement SR is acceptable.

3.4 TS 5.5.13, "Control Room Envelope Habitability Program"

The proposed administrative controls program TS is consistent with the model program TS in TSTF-448, Revision 3. In combination with SR 3.7.4.4, this program is intended to ensure the operability of the CRE boundary, which as part of an operable MCREV system will ensure that CRE habitability is maintained such that CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under DBA conditions without personnel receiving radiation exposures in excess of 5 rem whole body dose or its equivalent for the duration of the accident.

A CRE Habitability Program TS acceptable to the NRC staff requires the program to contain the following elements:

Definitions of CRE and CRE boundary - This element is intended to ensure that these definitions accurately describe the plant areas that are within the CRE, and also the interfaces that form the CRE boundary, and are consistent with the general definitions discussed in Section 2.1 of this safety evaluation. Establishing what is meant by the CRE and the CRE boundary will preclude ambiguity in the implementation of the program.

Configuration control and preventive maintenance of the CRE boundary - This element is intended to ensure the CRE boundary is maintained in its design condition. Guidance for implementing this element is contained in RG 1.196, which endorsed, with exceptions, NEI 99-03. Maintaining the CRE boundary in its design condition provides assurance that its leak-tightness will not significantly degrade between CRE inleakage determinations.

Assessment of CRE habitability at the frequencies stated in Sections C.1 and C.2 of RG 1.197, and measurement of unfiltered air leakage into the CRE in accordance with the testing methods and at the frequencies stated in Sections C.1 and C.2 of RG 1.197 - Assessing CRE habitability at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not go undetected between CRE inleakage determinations. Determination of CRE inleakage using test methods acceptable to the NRC staff assures that test results are reliable for ascertaining CRE boundary operability. Determination of CRE inleakage at the NRC

accepted frequencies provides assurance that significant degradation of the CRE boundary will not occur between CRE leakage determinations.

Measurement of CRE pressure with respect to all areas adjacent to the CRE boundary at designated locations for use in assessing the CRE boundary at a frequency of 24 months on a staggered test basis (with respect to the MCREV subsystems) - This element is intended to ensure that CRE differential pressure is regularly measured to identify changes in pressure warranting evaluation of the condition of the CRE boundary. Obtaining and trending pressure data provides additional assurance that significant degradation of the CRE boundary will not go undetected between CRE leakage determinations.

Quantitative limits on unfiltered leakage - This element is intended to establish the CRE leakage limit as the CRE unfiltered infiltration rate assumed in the CRE occupant radiological consequence analyses of design basis accidents. Having an unambiguous criterion for the CRE boundary to be considered operable in order to meet LCO 3.7.4, will ensure that associated action requirements will be consistently applied in the event of CRE degradation resulting in leakage exceeding the limit.

Consistent with TSTF-448, Revision 3, the program states that the provisions of SR 3.0.2 are applicable to the program frequencies for performing the activities required by program paragraph number c, parts (i) and (ii) (assessment of CRE habitability and measurement of CRE leakage), and paragraph number d (measurement of CRE differential pressure). This statement is needed to avoid confusion. SR 3.0.2 is applicable to the surveillance that references the testing in the CRE Habitability Program. However, SR 3.0.2 is not applicable to Administrative Controls unless specifically invoked. Providing this statement in the program eliminates any confusion regarding whether SR 3.0.2 is applicable, and is acceptable.

Consistent with TSTF-448, Revision 3, proposed TS 5.5.13 states that (1) a CRE Habitability Program shall be established and implemented, (2) the program shall include all of the NRC-staff required elements, as described above, and (3) the provisions of SR 3.0.2 shall apply to program frequencies. Therefore, TS 5.5.13, which is consistent with the model program TS approved by the NRC staff in TSTF-448, Revision 3, is acceptable.

3.5 Implementation of New Surveillance and Assessment Requirements by the Licensee

The licensee has proposed license conditions regarding the initial performance of the new surveillance and assessment requirements. The new license conditions adopted the conditions in Section 2.3 of the model application published in the Federal Register on January 17, 2007 (72 FR 2022). Plant specific changes were made to the proposed license conditions. The proposed plant specific license conditions are consistent with the model application, and are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the appropriate State and Local officials were notified of the proposed issuance of the amendment. The State and Local officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no-significant-hazards considerations, and there has been no public comment on the finding (72 FR 2022). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. NRC Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003, (GL 2003-01). (ADAMS Accession No. ML031620248)
2. ASTM E741 - 00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," 2000, (ASTM E741).
3. NRC Regulatory Issue Summary 2005-20: Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," dated September 26, 2005 (RIS 2005-20). (ADAMS Accession No. ML052020424)
4. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, dated May 2003. (ADAMS Accession No. ML031490611)
5. Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003. (ADAMS Accession No. ML031490664)
6. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001. (ADAMS Accession No. ML020600236)
7. Exelon/AmerGen 180-day Response to NRC Generic Letter 2003-1, "Control Room Habitability," dated December 9, 2003. (ADAMS Accession No. ML033560302)

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