



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

August 20, 2009

**LICENSEE:** Exelon Generation Company

**SUBJECT:** SUMMARY OF JUNE 25, 2009, LICENSING COUNTERPARTS MEETING  
WITH EXELON GENERATION COMPANY, TO DISCUSS LICENSING  
PRACTICES AND PROCESSES

On June 25, 2009, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company (the licensee) at the NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss licensing practices and processes. A list of attendees is provided as Enclosure 1.

The licensee presented information on licensing issues (See Enclosure 2). This presentation involved the Exelon Nuclear licensing organizational structure and licensing issues. The NRC staff and the licensee discussed planned multi-plant submittals which included Technical Specification Task Force-425, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force Initiative 5b," cyber security plan and license conditions, and Nuclear Energy Institute-99-01, Revision 5, emergency action level upgrade. The licensee plans to submit these license amendment requests later this year.

The NRC staff and the licensee also discussed licensing practices and processes such as reviewer challenges, deviating from regulatory guidance, lack of rigor/accuracy, effectiveness of pre-submittal interactions, and the process for requests for additional information (RAIs). A proposal to initiate electronic RAIs was discussed at the meeting. The NRC staff indicated that this would be evaluated further.

The NRC staff and the licensee discussed the license amendment request (LAR) pre-submittal meetings, and the licensee conveyed that they did not find the meetings meaningful. The NRC staff and licensee discussed different ways the meetings could be more meaningful however, no change to the meeting structure was agreed upon. It was agreed that it would be of benefit to further investigate this topic. The NRC staff and licensee agreed going forward that the licensee will have pre-submittal meetings mainly for first-of-a-kind LARs.

The NRC staff conveyed that, in some cases, licensing and/or technical evaluations and analyses have not been rigorous enough to identify deficiencies prior to submittal. This has resulted in submittals that asserted conformance with precedents that were not applicable to a specific site's design and licensing basis. Additionally, the NRC cited examples of submittals that contained technically contradictory information or errors. These types of problems are difficult to identify during an acceptance review, and when eventually identified later in the review process, can result in significant disruptions to review schedules. The licensee stated that these types of issues were being captured in their corrective action program.

- 2 -

Members of the public were not in attendance. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-3154, or SPS1@nrc.gov.

A handwritten signature in black ink, appearing to read "Sands" followed by "FOR" in a larger, more stylized font.

Stephen Sands, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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

Enclosures:

1. List of Attendees
2. Licensee Handout

cc w/encl: Distribution via ListServ

LIST OF ATTENDEES

June 25, 2009, MEETING WITH EXELON TO DISCUSS LICENSING PRACTICES AND  
PROCESSES

<b>Name</b>	<b>Affiliation</b>	<b>Phone</b>
J. Giitter	NRC/NRR/DORL	301-415-1453
R. Nelson	NRC/NRR/DORL	301-415-1453
S. Campbell	NRC/NRR/DORL	301-415-3353
H. Chernoff	NRC/NRR/DORL	301-415-1430
S. Sands	NRC/NRR/DORL	301-415-3154
M. Mahoney	NRC/NRR/DORL	301-415-3867
P. Bamford	NRC/NRR/DORL	301-415-2833
E. Miller	NRC/NRR/DORL	301-415-2481
J. Hughey	NRC/NRR/DORL	301-415-3204
M. David	NRC/NRR/DORL	301-415-1547
D. Benyak	Exelon	630-657-2811
P. Cowan	Exelon	610-765-5664
P. Simpson	Exelon	630-657-2823
D. Helker	Exelon	610-765-5525
J. Vera	NRC/NRR/DORL	301-415-2706
C. Goodwin	NRC/NRR/DORL	301-415-3719

**Exelon<sup>®</sup>**

Nuclear

# **NRC/Exelon Licensing Counterparts Meeting**

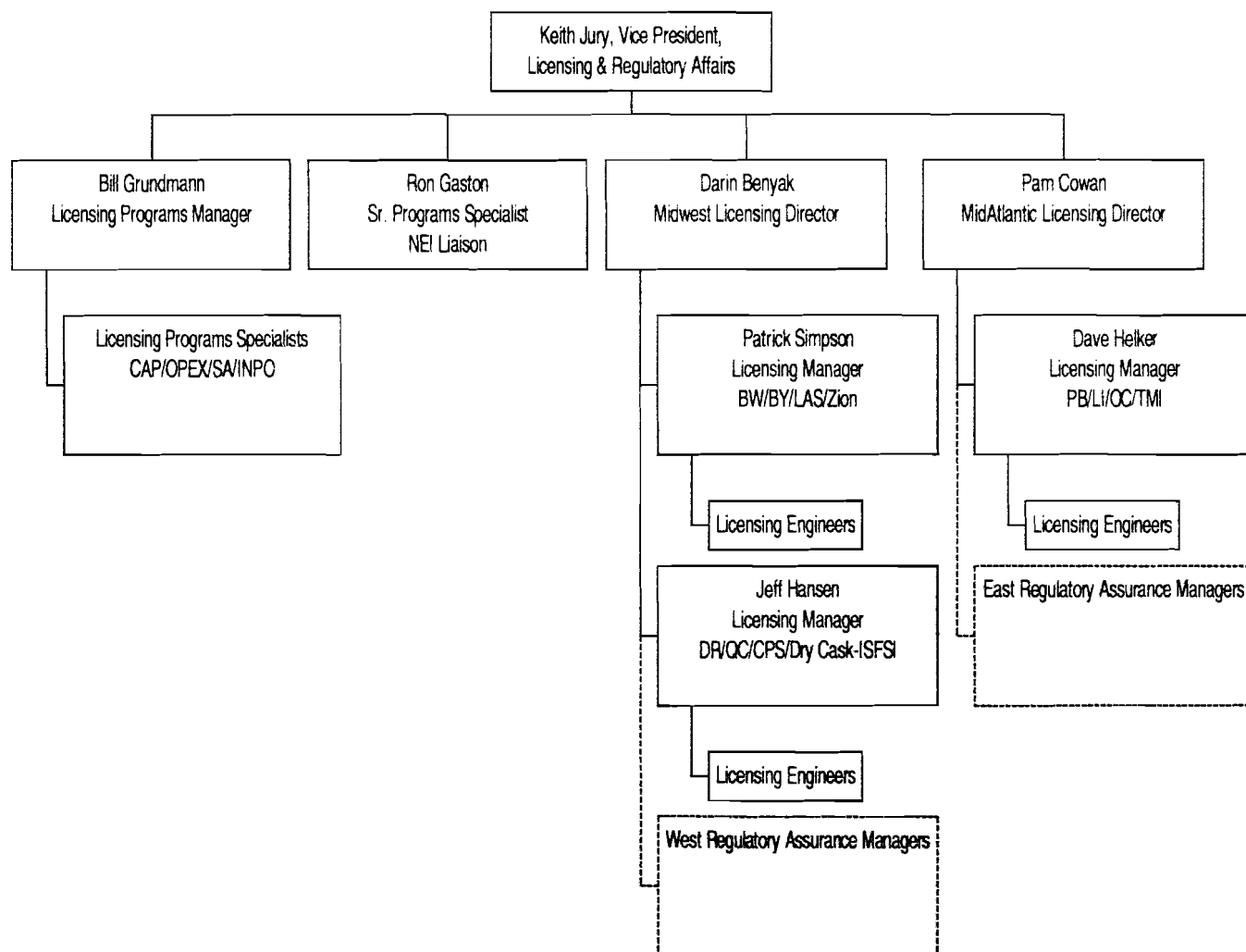
**June 25, 2009**

ENCLOSURE 2

# Agenda

- ✓ Introductions
  - Exelon Nuclear Licensing Organizational Structure
- ✓ Licensing Issues Overview
  - Planned Multi-Plant Submittals
  - Other Licensing Actions/Issues
- ✓ NRC Feedback for Exelon
- ✓ Questions

# Exelon Nuclear Licensing Organizational Structure



# Licensing Issues Overview

- ✓ Planned Multi-Plant Submittals
  - Initiative 5b/TSTF-425
  - Cyber Security Plan and License Condition
  - NEI 99-01, Revision 5, Emergency Action Level Upgrade

## **Licensing Issues Overview (cont.)**

### ✓ Other Licensing Actions

- Steam Generator Replacement
- Fire Protection Exemptions
- TMI and Oyster Creek Tech Spec Reviews
- Generic Safety Issue 191 Status

### ✓ Other Issues

- Reviewer Challenges
- Effectiveness of Pre-submittal Interactions
- Process for Requests for Additional Information (RAIs)



## **NRC Feedback**

✓ NRC items for Exelon

# Questions

Members of the public were not in attendance. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-3154, or SPS1@nrc.gov.

**/RA by C. Goodwin for/**

Stephen Sands, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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

**Enclosures:**

1. List of Attendees
2. Licensee Handout

cc w/encl: Distribution via ListServ

**DISTRIBUTION:**

**PUBLIC**

LPL3-2 r/f

RidsAcrsAcnw\_MailCTR Resource

RidsNrrAdro Resource

RidsNrrDorl Resource

RidsNrrDorlLpl3-2Resource

RidsNrrPMDresden Resource

RidsNrrLATHarris Resource

RidsOgcMailCenter Resource

RidsOpaMail Resource

RidsRgn3MailCenter Resource

C. Tucci, NRR

U. Shoop, EDO Region 3

D. Screnci, OPA Region 1

P. Chandrathil, OPA Region 3

RidsNrrDorlLpl1-2 Resource

RidsRgn1MailCenter Resource

J. Glitter, NRR

R. Nelson, NRR

S. Campbell, NRR

H. Chernoff, NRR

RidsNrrPMQuadCities Resource

RidsNrrPMPBamford Resource

RidsNrrPMJHughey Resource

RidsNrrPMEMiller Resource

RidsNrrPMBraidwood Resource

RidsNrrPMByron Resource

RidsNrrPMClinton Resource

RidsNrrPMLaSalle Resource

**ADAMS Accession No. ML091980363**

**NRC-001**

OFFICE	DORL/LPL3-2/PM	DORL/LPL3-2/LA	DORL//LPL3-1/BC w/comments	DORL/LPL3-2/BC
NAME	SSands	THarris TLH	EMiller for HChernoff	SCampbell
DATE	08/12/09	08/ 06 /09	08/18/09	08/20/09

**OFFICIAL RECORD COPY**