

September 22, 2009

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

SUBJECT: THREE MILE ISLAND NUCLEAR STATION UNIT 1 - NRC LICENSE RENEWAL
INSPECTION REPORT NO. 05000289/2009008

Dear Mr. Pardee:

On August 19, 2009, the NRC issued Inspection Report 05000289/2009008 documenting the results of our follow up of your augmentation of the operational experience review portion of your application for a renewed license. An error occurred when recording the dates of your augmented review.

The report states, in part, on page 2, in the middle of the third paragraph that "... Exelon revised their position and implemented a full review of the site specific operational records as stated in B.1.4 of their application for the period of January 2005 to November 2006, ...". The report should be corrected to state "... Exelon revised their position and implemented a full review of the site specific operational records as stated in B.1.4 of their application for the period of November 2001 to January 2005, ...". A revised page is enclosed.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Richard J. Conte, Chief
Engineering Branch 1
Division of Reactor Safety

Docket No. 50-289
License No. DPR-16

Enclosure: Page 2 of Inspection Report No. 05000289/2009008

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SUNSI Review Complete: RJC (Reviewer's Initials)

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DATE	09/04/09	09/22/09	09/22/09				

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* See Previous Concurrence Page

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After having reviewed the relevant Exelon Generation Group, LLC procedures, the EPRI handbook, and independently searching the corrective actions system for a year when Exelon gave the handbook credit for the specific plant review of operational experience, the inspectors concluded the approach taken by Exelon Generation Group, LLC, although not a direct "...plant specific operating experience review..." as described in NEI 95-10 was indirectly a comprehensive review of the aging effects that might be applicable and took into account more than just the local experience recorded in the Three Mile Island corrective actions program history.

The inspectors concluded, in Inspection Report 05000289/2008010, there was reasonable assurance that the operational experience review was adequate.

Subsequently the Advisory Committee on Reactor Safeguards, subcommittee for license renewal, reviewed the Exelon application and NRC Inspection Report 5000289/2008010. During the meeting, a member of the ACRS questioned the NRC staff and Exelon about this approach to operational review. As a consequence of the exchange with the Advisory Committee on Reactor Safeguards, Exelon revised their position and implemented a full review of the site specific operational records as stated in B.1.4 of their application for the period of November 2001 to January 2005, the period previously covered by the handbook. The revised approach brought the review into direct alignment with the language used in the original application for a renewed license:

"Each AMP summary in this appendix contains a discussion of operating experience relevant to the program. This information was obtained through the review of in-house operating experience captured by the Corrective Action Program, Program Self-Assessments, and Program Health Reports, and through the review of primarily post-2005 industry operating experience (industry operating experience prior to 2005 having been addressed by Revision 1 to NUREG-1801). Additionally, operating experience was obtained through interviews with system and program engineers. The operating experience in each AMP summary identifies past corrective actions that have resulted in program enhancements and provides objective evidence that the effects of aging have been, and will continue to be, adequately managed."

The inspector randomly selected three mechanical systems, susceptible to age related degradation, and reviewed the results of Exelon's operating experience for the period noted above:

Auxiliary Steam System – the inspector reviewed reference A2031848 and A2098380 to determine if the operational experience reflected in these to corrective action reports was appropriately disposed of by the Exelon reviewer.

Circulating Water System – For OE Reference A2129388 the Exelon reviewer appropriately flagged the report as reflecting relevant age related information because it reported that CW-P-1A had pressure ports clogged with corrosion product. The following references were appropriately flagged as not relevant: