



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

November 4, 2009

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

SUBJECT: CLINTON POWER STATION, UNIT NO. 1 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO GENERIC LETTER 2008-01, "MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS" (TAC NO. MD7811)

Dear Mr. Pardee:

By letter to the Nuclear Regulatory Commission (NRC) dated October 14, 2008 (Agencywide Documents Access and Management System Accession No. ML082880706), Exelon Generation Company, LLC submitted its 9-month response to Generic Letter 2008-01, for the Clinton Power Station.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on October 29, 2009, it was agreed that you would provide a response within 45 days from the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-3719.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Goodwin".

Cameron S. Goodwin, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

## REQUEST FOR ADDITIONAL INFORMATION

### CLINTON POWER STATION, UNIT NO. 1

#### DOCKET NO. 50-461

Guidance on Nuclear Regulatory Commission (NRC) staff expectations is provided by Reference 1 which is generally consistent with Nuclear Energy Institute (NEI) guidance provided to industry in Reference 2 as clarified in later NEI communications. The NRC staff recommends that the licensee consult Reference 1 when responding to the following requests for additional information:

1. In Reference 4, the licensee states that “the impact of the voids on system operability is evaluated on a case-by-case basis, with acceptable void volumes being determined as part of the evaluation.” Please provide a description of your void volume determination methods and how said voids will be quantified and recorded. Compare your method against the criteria stated in Reference 5.
2. The licensee states in Reference 4 that “the evaluation process includes consideration of the impact that the void could have on pump operation, water hammer pressure transients, etc.” Please further describe the monitoring of pump operation in all modes and specialized monitoring of appropriate plant parameters during shutdown operation.
3. In Reference 4, the licensee states that a review of system design and operating practices by AmerGen, previous licensee for Clinton Power Station, concluded that the systems are adequately monitored and tested for potential gas intrusion mechanism. Discuss in greater detail measures to guard against gas intrusion because of inadvertent draining, system realignments, incorrect maintenance procedures, or other evolutions.
4. Provide a brief description of actions that will be taken if surveillance criteria are not met. Summarize any post-surveillance activities, such as gas volume trending and procedural checks, used in response to the failure to meet void acceptance criteria.
5. Discuss the control and revision of work packages due to changes in maintenance work scope, including review and reauthorization of the package and any new temporary procedures.
6. Summarize the corrective action program with respect to your response to issues identified in Generic Letter (GL) 2008-01 (Reference 3).
7. Training was not identified in the GL (Reference 3), but is considered to be a necessary part of applying procedures and other activities when addressing the issues identified in the GL. Provide a brief description of training.

#### REFERENCES:

1. Ruland, William H., “Preliminary Assessment of Responses to Generic Letter 2008-01, ‘Managing Gas Accumulation in emergency Core Cooling, Decay Heat Removal, and

ENCLOSURE

Containment Spray Systems,' and Future NRC Staff Review Plans," NRC letter to James H. Riley, Nuclear Energy Institute, ML091390637, May 28, 2009.

2. Riley, James H., "Generic Letter (GL) 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Contain Spray Systems' Evaluation and 3 Month Response Template," Letter to Administrative Points of Contact from Director, Engineering, Nuclear Generation Division, Nuclear Energy Institute, Enclosure 2, "Generic Letter 2008-01 Response Guidance," March 20, 2008.

3. Case, Michael J., "NRC Generic Letter 2008-01: Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," Letter from Director, Division of Policy and Rulemaking, Office of Nuclear Regulation, NRC, ML072910759, January 11, 2008.

4. Jury, Keith R., "Nine-Month Response to NRC Generic Letter 2008-01," Letter to Document Control Desk, NRC, from Vice President- Licensing and Regulatory Affairs, Exelon Generation Company, LLC, AmerGen Energy Company, LLC, ML082880706, October 14, 2008.

5. "Revision 2 to NRC Staff Criteria for Gas Movement in Suction Lines and Pump Response to Gas," ML090900136, March 26, 2009.

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*/RA/*

Cameron S. Goodwin, Project Manager  
Plant Licensing Branch III-2  
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