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**Subject:** Draft NRC RAI Re: Clinton Power Station License Amendment Request to Adopt TSTF-425, REVISION 3, "RELOCATE SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL - RITSTF INITIATIVE 5B" (TAC ME3332)  
**Date:** Monday, April 12, 2010 12:49:00 PM

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Mr. Mathews,

By letter dated February 15, 2010 (Agencywide Documents and Management System (ADAMS) Accession No. ML100470787), Exelon Generation Company, LLC (EGC), the licensee for the Clinton Power Station (CPS), Unit No. 1, submitted a license amendment request (LAR) to amend Technical Specifications (TS) by proposing a new TS Section 5.5.16 Program and relocating specific TS Surveillance Frequencies to a licensee-controlled program consistent with approved Technical Specification Task Force (TSTF)-425, Revision 3.

The Technical Specification Branch (ITSB) has reviewed the information provided and determined that in order to complete its evaluation, additional information may be required. The draft RAI related to the staff review is provided below.

After reviewing the draft RAI, please contact me at 301-415-1115 to discuss the need for a teleconference concerning the RAIs and to discuss a due date for the response.

Respectfully,

Nick DiFrancesco

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**-DRAFT-**

**REQUEST FOR ADDITIONAL INFORMATION**

**LICENSE AMENDMENT REQUEST**

**CLINTON POWER STATION (CPS)**

**EXELON GENERATION COMPANY, LLC**

**DOCKET NO.: 50-461**

On LAR Attachment 1, page 3 of 5, 2.2 "Optional Changes and Variations," item number 3, CPS provided the following information regarding a variation from TSTF-425:

“The insert provided in TSTF-425 to replace text describing the basis for each Frequency relocated to the Surveillance Frequency Control Program has been revised from, ‘The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program,’ to read ‘The Frequency may be based on factors such as operating experience, equipment reliability, or plant risk, and is controlled under the Surveillance Frequency Control Program.’ This deviation is necessary to reflect the CPS basis for frequencies which do not, in all cases, base Frequency on operating experience, equipment reliability, and plant risk.”

Question:

While the above TSTF-425 deviation from the TSTF-425 Technical Specification Bases statement addresses Surveillance Frequencies relocated to, but not changed under, the Surveillance Frequency Control Program (SFCP), it does not specifically exclude Surveillance Frequencies changes made in accordance with the SFCP and is, therefore, not consistent with SFCP requirements. Please provide additional clarification explaining how CPS intends to ensure that all Surveillance Frequencies relocated to the SFCP, with or without subsequent Frequency change, will maintain: 1) Bases for unchanged Surveillance Frequencies and, 2) compliance with proposed CPS TS 5.5.16, “Surveillance Frequency Control Program” requirements.

**-DRAFT-**