



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

April 22, 2010

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 REGARDING LICENSE AMENDMENT REQUEST TO ADOPT TSTF-425, REVISION 3, "RELOCATE SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL - RITSTF INITIATIVE 5B" (ME3332)

Dear Mr. Pardee:

By letter to the Nuclear Regulatory Commission (NRC) dated February 15, 2010 (Agencywide Documents Access and Management System Accession No. ML100470787), Exelon Generation Company, LLC submitted a request for approval to adopt Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control — [Risk Informed] RITSTF Initiative 5b," for the Clinton Power Station, Unit No. 1.

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 April 19, 2010, it was agreed that you would provide a response within 30 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) 415-1115.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas J. DiFrancesco".

Nicholas J. DiFrancesco, 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

REGARDING ADOPTION OF TSTF-425, REV 3

CLINTON POWER STATION, UNIT NO. 1

DOCKET NO. 50-461

In reviewing the Exelon Generation Company's submittal dated February 15, 2010 (Agencywide Documents Access and Management System Accession No. ML100470787), related to the proposed adoption of Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control—RITSTF Initiative 5b," for the Clinton Power Station (CPS), Unit No. 1, the Nuclear Regulatory Commission staff has determined that the following information is needed in order to complete its review:

Question:

1. On license amendment request 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.

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.

2. In Table A.2-1 of Attachment 2 of the submittal, the peer review element identified as TH-8 states that additional room heatup calculations are needed to support modeling assumptions for room cooling requirements. The impact is identified as "primarily a documentation issue," and further that "the PRA already makes appropriate assumptions regarding the need for room cooling in the appropriate areas." There is insufficient information for the staff to reach a conclusion on the disposition of this peer review item. Specifically, for any areas for which room cooling is assumed to not be required where there is not a documented room heatup analysis to

support the assumption, the licensee should identify room cooling assumptions and their bases. Note that there are similar concerns with Table A.2-2 of Attachment 2, gap #2, which should also be addressed in the response.

3. In Table A.2-2 of Attachment 2 of the submittal, gap #3 regarding the process for developing pre-initiator human error events identifies four specific deficiencies of the analysis. The importance is stated as "primarily a documentation issue." No adequate basis is provided for this statement. In fact, the status of the item implies that the requirements are not actual but only "inferred" and states without a basis that "other BWRs" which attempted to rigorously follow the standard model fewer pre-initiator events. The licensee needs to provide a more rigorous basis for why its method for identification of pre-initiator human error events actually conforms to the requirements of the standard and that the deficiency is only a matter of documentation.

4. In Table A.2-2 of Attachment 2 of the submittal, gap #5 regarding failure data and unavailability data development is "...judged to have a non-significant impact..." "...judged to have a minimal impact..." and that the model is "reasonably consistent with data from the plant MR database, which is adequate for future applications." No basis is provided for how these judgments have been reached given the identified gaps to the probabilistic risk assessment standard requirements. The licensee should more rigorously address the specific impact of the deficiency on the failure data to justify the stated non-significance for this application.

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Sincerely,
/ra/

Nicholas J. DiFrancesco, Project Manager
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