# THE COLLAR REGULA ON THE COMMINGS NO. STATES

### UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 17, 2010

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

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - REQUEST FOR

ADDITIONAL INFORMATION REGARDING AN AMENDMENT REQUEST TO RELOCATE SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS TO A LICENSEE-CONTROLLED PROGRAM (TAC NOS. ME3376 AND ME3377)

Dear Mr. Pardee:

By letter to the Nuclear Regulatory Commission (NRC) dated February 16, 2010 (Agencywide Documents Access and Management System Accession No. ML100480339), Exelon Generation Company, LLC submitted a request to modify the Dresden Nuclear Power Station, Units 2 and 3, technical specifications by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute 04-10, "Risk-informed Technical Specifications Initiative 5b, Risk-informed Method for Control of Surveillance Frequencies," Revision 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 May 14, 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) 415-1055.

Sincerely,

Christopher Gratton, Senior Project Manager

Plant Licensing Branch III-2

Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

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Docket Nos. 50-237 and 50-249

Enclosure:

Request for Additional Information

cc w/encl: Distribution via Listserv

## REQUEST FOR ADDITIONAL INFORMATION DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

### DOCKET NOS. 50-237 AND 50-249

In reviewing the Exelon Generation Company's submittal dated February 16, 2010 (Agencywide Documents Access and Management System Accession No. ML100480339), which proposes to relocate specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute 04-10, "Risk-informed Technical Specifications Initiative 5b, Risk-informed Method for Control of Surveillance Frequencies," Revision 1, the Nuclear Regulatory Commission staff has determined that the following information is needed in order to complete its review:

1. In Table 2-1 of Attachment 2 of the submittal, Gap #2, that was identified against the supporting requirement DA-C8, states that plant-specific operational records were not used to quantify system or train standby times. The disposition of this item states that the existing model is "...judged to appropriately estimate the time that components were in standby..." There is no basis identified for how the licensee reached this judgment. State how standby times were estimated and why these estimates are judged to be appropriate for the calculation of standby failure rates instead of using plant-specific, operational data.

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

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#### /RA/

Christopher Gratton, Senior Project Manager Plant Licensing Branch III-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

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