

10 CFR 50.90

RS-10-107  
June 22, 2010

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Dresden Nuclear Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

Subject: Additional Information Supporting Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program

- Reference:
1. Letter from J. L. Hansen (Exelon Generation Company, LLC) to U. S. NRC, "Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (Adoption of TSTF-425, Revision 3)" dated February 16, 2010
  2. Letter from C. Gratton (U. S. NRC) to C. G. Pardee (Exelon Generation Company, LLC), "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 thru ME3377)," dated May 17, 2010.
  3. May 20, 2010 Teleconference between U. S. NRC (C. Gratton) and Exelon Generation Company, LLC (J. Schrage, et al)

In Reference 1, Exelon Generation Company, LLC (EGC) submitted a request to amend Appendix A, "Technical Specifications," (TS) of Renewed Facility Operating License Nos. DPR-19, and DPR-25 Dresden Nuclear Power Station (DNPS), Units 2 and 3, respectively. The proposed amendment revises the DNPS TS by relocating specific surveillance frequencies to a licensee-controlled program.

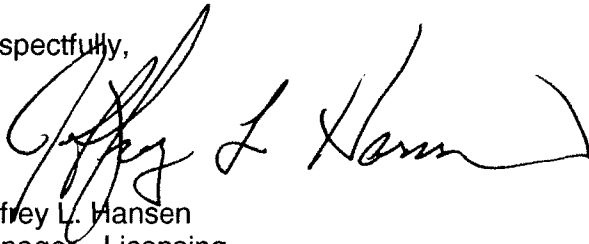
In Reference 2, the NRC forwarded a request for additional information concerning the Reference 1 license amendment request. In the Reference 3 teleconference, representatives from the NRC and EGC clarified the information that was requested by the NRC. The attachment to this letter provides the additional information requested by the NRC.

There are no regulatory commitments in this letter or the attachment.

Should you have any questions or require additional information, please contact Mr. John L. Schrage at (630) 657-2821.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 22<sup>nd</sup> day of June 2010.

Respectfully,

A handwritten signature in black ink, appearing to read "Jeffrey L. Hansen", with a large, sweeping flourish at the end.

Jeffrey L. Hansen  
Manager - Licensing

Attachment: Response to NRC Request for Additional Information, License Amendment Request to Relocate Specific Surveillance Frequency Requirements to a Licensee-Controlled Program

**ATTACHMENT**  
**Response to NRC Request for Additional Information**

**License Amendment Request to Relocate Specific Surveillance Frequency Requirements  
to a Licensee-Controlled Program**

By letter dated February 16, 2010, Exelon Generation Company, LLC (EGC) submitted a request to amend Appendix A, "Technical Specifications," (TS) of Renewed Facility Operating License Nos. DPR-19, and DPR-25 Dresden Nuclear Power Station (DNPS), Units 2 and 3, respectively. The proposed amendment revises the DNPS TS by relocating specific surveillance frequencies to a licensee-controlled program.

The NRC forwarded a request for additional information concerning the proposed license amendment request by letter dated May 17, 2010. On May 20, 2010, representatives from the NRC and EGC clarified the information that was requested by the NRC. The EGC response to the NRC request is provided below.

**NRC Request for Additional Information**

"In Table 2-1 of Attachment 2 of the submittal, Gap #2 identified against 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."

**EGC Response**

For standby systems, nearly all of the demands are surveillance tests. As such, the system or train standby time estimates are based on the surveillance test interval for the system or train. Basing the standby time on the interval between successive surveillance tests, using the established frequencies, is therefore consistent with actual demand experience.

However, this demand estimate does not account for operational demands or unplanned surveillances. The exclusion of these additional demands in the estimation of standby times is conservative in that the estimated standby time would be greater than or equal to actual. This difference does not significantly impact the risk profile.

Additionally, NEI 04-10, Step 8, requires that an appropriate time-related failure contribution be utilized in the surveillance frequency change assessment, and Step 14, "Perform Sensitivity Studies," requires the performance of sensitivity studies regarding the choice of that value.