



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

July 21, 2010

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3, AND QUAD CITIES
NUCLEAR POWER STATION, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO THE RISK-INFORMED RELOCATION OF
SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS
(TAC NOS. ME3374 THROUGH ME3377)

Dear Mr. Pacilio:

By letters to the Nuclear Regulatory Commission (NRC) dated February 16, 2010 (Agencywide Documents Access and Management System Accession Nos. ML100480330 and ML100480339), Exelon Generation Company, LLC, submitted a request to relocate specific surveillance frequency requirements for the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2.

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 telecon with the licensee on July 19, 2010, it was agreed that a conference call for the purpose of clarifying the information request was not necessary. The response is requested 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,

A handwritten signature in black ink, appearing to read "Chris Gratton", with a long horizontal flourish extending to the right.

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

Docket Nos. 50-237, 50-249, 50-254, and 50-265

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

AND

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. 50-237, 50-249, 50-254, AND 50-265

In reviewing the Exelon Generation Company's (EGC's) applications dated February 16, 2010 (Agencywide Document Access and Management System (ADAMS) Accession Nos. ML100480330 and ML100480339), related to the risk-informed relocation of specific surveillance frequency (SF) requirements for the Dresden Nuclear Power Station, Units 1 and 2 (Dresden), and Quad Cities Nuclear Power Station, Units 1 and 2, (Quad Cities), the Nuclear Regulatory Commission (NRC) staff has determined that the following information is needed in order to complete its review:

In each application, the licensee included an evaluation of proposed changes in Attachment 1. Attachment 1, Item 2 in each application stated the following:

The insert provided in TSTF-425 to replace text in the [Technical Specification] TS Bases describing the basis for each frequency relocated to the SFCP 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 [DNPS/QCNPS] basis for frequencies which do not, in all cases, base frequency on operating experience, equipment reliability and plant risk.

TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," (ADAMS Accession Nos. ML090850627, ML090850630, ML090850638, and ML090850640) was approved by Notice of Availability published in the *Federal Register* on July 6, 2009. TSTF-425, Rev. 3 involves the relocation of most time-based surveillance frequencies to a licensee controlled program, called the Surveillance Frequency Control Program (SFCP), and adds the SFCP to the administrative controls section of TS. The SFCP does not include surveillance frequencies that are event driven, controlled by an existing program, or are condition-based.

Part of the TSTF-425 change to NUREG 1430 – 1434 (Standard Technical Specifications) provides an optional insert (INSERT #2) to the existing TS Bases to facilitate adoption of the TSTF while retaining the existing NUREG TS Surveillance Frequency TS Bases for licensees not choosing to adopt TSTF-425. The TSTF-425 TS Bases INSERT #2 states:

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

Several licensees requesting license amendments to adopt TSTF-425 have identified a need to deviate from this statement because it only applies to frequencies that have been changed in accordance with the SFCP and does not apply to frequencies that are relocated but not changed.

The NRC staff agrees that the TSTF-425 TS Bases insert applies only to relocated SFs that are subsequently evaluated and changed in accordance with the SFCP, and that the current insert does not apply to SFs relocated to the SFCP but remain unchanged. For SFs relocated to the SFCP but not subsequently changed in accordance with the program, the existing TS Bases description remains a valid Bases for these SFs.

One option to address this concern for those instances where the licensee used TSTF-425 Insert 2, is to modify the wording used in the application as follows:

“The Surveillance Frequency is controlled under the Surveillance Frequency Control Program”

In addition, the following statement should be included regarding SF Bases relocated to the SFCP:

“The existing Bases information describing the basis for the Surveillance Frequency will be relocated to the licensee-controlled Surveillance Frequency Control Program.”

It should be noted that only the Bases for the SF can be relocated to the SFCP. The Bases for the TS Surveillance will remain in the TS Bases and should not be relocated to the SFCP.

EGC's applications for Dresden and Quad Cities dated February 16, 2010, included the aforementioned deviations from the proposed language in TSTF-425, Revision 3. The NRC staff has reviewed the proposed deviation from TSTF-425 and requests that the licensee modify the applications as described above, or develop an alternate resolution to the issue with Insert #2 described herein, and include appropriate justifications.

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Sincerely,

/RA/

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

Docket Nos. 50-237, 50-249, 50-254, and 50-265

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ADAMS Accession No. ML101940422

OFFICE	LPL3-2/PM	LPL3-2/LA	LPL3-2/BC	LPL3-2/PM
NAME	CGratton	BClayton for THarris	RCarlson	CGratton
DATE	7/20/10	7/20/10	7/20/10	7/21/10

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