

10 CFR 50.90

RS-10-138

August 13, 2010

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

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

Quad Cities Nuclear Power Station, (QCNPS) Units 1 and 2  
Renewed Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

**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

- References:**
1. DNPS 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 (ADAMS Accession No. ML100480330)
  2. QCNPS 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 (ADAMS Accession No. ML100480339)
  3. Letter from C. Gratton (U.S. NRC) to M. J. Pacilio (Exelon Nuclear), "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)," dated July 21, 2010

In References 1 and 2, Exelon Generation Company, LLC (EGC) requested an amendment to Facility Operating License Nos. DPR-19, DPR-25, DPR-29 and DPR-30 for Dresden Nuclear Power Station (DNPS), Units 2 and 3, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, respectively. The proposed change modifies the DNPS and QCNPS Technical Specifications (TS) by relocating specific surveillance frequencies to a licensee-controlled program. The change requested is consistent with NRC-approved Technical Specifications Task Force TSTF-425, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," Revision 3. The NRC requested additional information to support review of the proposed change in Reference 3. In response to this request, EGC is providing the attached information.

EGC has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachments 6 and 1, respectively, of References 1 and 2. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendments do not involve a significant hazards consideration. In addition, the additional information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendments.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Mr. Mitchel A. Mathews at (630) 657-2819.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of August 2010.

Respectfully,



Jeffrey L. Hansen  
Manager - Licensing

Attachment: Response to Request for Additional Information

cc: Illinois Emergency Management Agency – Division of Nuclear Safety

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

**NRC Request**

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 [Surveillance Frequency Control Program] 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 the technical specifications (TSs). 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 Surveillance Frequency Control Program (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 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"*

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

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 DNPS and QCNPS 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 application as described above, or develop an alternate resolution to the issue with Insert #2 described herein, and include appropriate justifications.

**Response**

The proposed changes described in References 1 and 2 requests NRC approval to relocate SFs to the SFCP. Upon implementation of the proposed changes, the existing TS Bases information describing the basis for the SF will be relocated to the licensee-controlled SFCP. This will ensure that the information describing the bases for unchanged SFs is maintained.

As discussed in References 1 and 2, EGC proposed a variation from TSTF-425 that replaced text describing the basis for each SF relocated to the SFCP. This variation was necessary because, independent of whether SFs have been changed under the SFCP, the SFs are not, in all cases, based on operating experience, equipment reliability, and plant risk.

As required by proposed DNPS TS Section 5.5.15 and QCNPS TS Section 5.5.14, "Surveillance Frequency Control Program," subsequent changes to the SFs listed in the SFCP will be made in accordance with the NRC-endorsed methodology described in Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1. NEI 04-10 provides the methodology to identify, assess, implement, and monitor proposed changes to SFs. NEI 04-10 identifies the need to address both quantitative and qualitative considerations when changing SFs. As discussed in Section 4.0, Step 7, qualitative considerations include vendor-specified maintenance frequency, test intervals specified in applicable industry codes and standards, impact on defense-in-depth protection, and the existence of alternate testing of structures, systems, and components (SSCs) affected by the change. These qualitative considerations provide examples of instances where SFs changed under the SFCP may not be based upon operating experience, equipment reliability, or plant risk.

In order to avoid future confusion regarding this issue, EGC will replace the TS Bases text insert proposed in References 1 and 2 (i.e., "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") with a revised insert that reads "The Surveillance Frequency is controlled under the Surveillance Frequency Control Program." This change to the TS Bases text inserts will be made upon implementation of the proposed changes.

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**References**

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