

May 3, 2012

LICENSEE: Exelon Generation Company, LLC

FACILITY: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; OYSTER CREEK NUCLEAR GENERATING STATION; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1

SUBJECT: SUMMARY OF APRIL 10, 2012, PUBLIC MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING ITS FUTURE SUBMITTAL OF TECHNICAL SPECIFICATION CHANGES OF LICENSED OPERATOR ELIGIBILITY REQUIREMENTS (TAC NOS. ME8163, ME8164, ME8165, ME8166, ME8167, ME8168, ME8169, ME8170, ME8171, ME8172, ME8173, ME8174, ME8175, ME8176, ME8177, ME8178, ME8179).

On April 10, 2012, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Exelon Generation Company, LLC (Exelon) at the NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss Exelon's plan to submit an application for amendment to technical specifications (TSs) regarding licensed operator eligibility requirements for units in its reactor fleet. A list of attendees is provided as Enclosure 1.

Exelon presented information at the meeting (see Agencywide Documents Access and Management System (ADAMS) Accession No. ML120870140). Exelon proposes to implement National Academy for Nuclear Training Academy Document, ACAD 10-001, Revision 0, "Guidelines for Initial Training and Qualification of Licensed Operators." To do so, it is necessary to submit a TS amendment to change the current requirement which is ACAD 00-003, Revision 1, "Guidelines for Initial Training and Qualification of Licensed Operators." However, Exelon wants to be able to implement future changes to these guidelines without making TS changes. To do so, Exelon proposes to remove the current TS exception clauses for licensed operators, which will effectively require meeting the current TS American National Standards Institute (ANSI) guidance. Exelon's comparison of the ANSI guidance with the ACAD 10-001 requirements revealed a potential issue with licensed operator training/experience equivalency for academic training. Exelon proposed an interpretation of the ANSI guidance to resolve the issue (see slide 8 of the Exelon presentation). While no decision was made, the NRC staff in attendance did not see a clear path to acceptance of the proposed interpretation.

As a result of the discussion, the attendees reached a consensus that for licensed operators the ANSI guidance does not reflect current Title 10 of the *Code of Federal Regulations* (10 CFR) Part 55, statements regarding a systems approach to training. Therefore, making changes to TSs which requires meeting the ANSI guidance may not be the best approach. Industry standards, such as ANSI, which are endorsed by the NRC are one means of meeting

regulatory requirements. In the case of licensed operator staff qualifications, the regulations are sufficiently detailed that using an industry standard to implement the regulation may not be necessary.

No decisions were made regarding the acceptability of Exelon's proposed submittal, but the NRC staff agreed to consider changes to the TSs that are similar to the current Limerick TS 6.3.1, which refers to 10 CFR Part 55, for licensed operator staff qualifications.

Members of the public were in attendance. Public Meeting Feedback forms were available, but not received.

Please direct any inquiries to me at 301-415-6606, or [Joel.Wiebe@nrc.gov](mailto:Joel.Wiebe@nrc.gov).

Joel S. Wiebe, Senior Project Manager

**/RA/**

Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Dockets Nos.: 50-456, 50-457, 50-454, 50-455, 50-461,  
50-237, 50-249, 50-373, 50-374, 50-352, 50-353,  
50-219, 50-277, 50-278, 50-254, 50-265, and 50-289

Enclosure:  
List of Attendees

cc w/encls: Distribution via ListServ

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Joel S. Wiebe, Senior Project Manager

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**NRC-001**

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NAME	JWiebe	KGoldstein/SRohrer	JMcHale	JZimmerman	JWiebe
DATE	05/01/12	04/23/12 05/01/12	04/23/12	05/03/12	05/01/12

OFFICIAL RECORD COPY

**LIST OF ATTENDEES**

**PUBLIC MEETING WITH EXELON GENERATION COMPANY, LLC**  
**REGARDING FUTURE SUBMITTAL TO REVISE**  
**LICENSED OPERATOR ELIGIBILITY REQUIREMENTS**  
**APRIL 10, 2012**

<b>Name</b>	<b>Affiliation</b>
Jack McHale	NRC
John Munro	NRC
Shaun Anderson	NRC
Joel Wiebe	NRC
David Helker	Exelon
Gregg Ludlam	Exelon
Frank Mascitelli	Exelon
Putri Kusumawatimurry*	Exelon
Ron Zak* (Partial, dropped off because of phone noise)	Department of Environmental Protection Bureau of Nuclear Radiation State of New Jersey

\*Via Teleconference

Enclosure