



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

June 17, 2014

Mr. Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE BYRON STATION, UNITS 1 AND 2, AND BRAIDWOOD STATION, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION, SET 35 (TAC NOS. MF1879, MF1880, MF1881, AND MF1882)

Dear Mr. Gallagher:

By letter dated May 29, 2013, Exelon Generation Company, LLC, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses NPF-37, NPF-66, NPF-72, and NPF-77 for Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2, respectively, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with John Hufnagel, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-4115 or by e-mail at Lindsay.Robinson@nrc.gov.

Sincerely,

/RA/

Lindsay R. Robinson, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-454, 50-455, 50-456, and 50-457

Enclosure:
Request for Additional Information

cc w/encl: Listserv

June 17, 2014

Mr. Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

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Letter to M.P. Gallagher from Lindsay R. Robinson dated June 17, 2014

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BYRON STATION, UNITS 1 AND 2, AND BRAIDWOOD STATION, UNITS 1
AND 2, LICENSE RENEWAL APPLICATION, SET 35 (TAC NOS. MF1879,
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BYRON STATION, UNITS 1 AND 2,
AND BRAIDWOOD STATION, UNITS 1 AND 2,
LICENSE RENEWAL APPLICATION
REQUEST FOR ADDITIONAL INFORMATION, SET 35
(TAC NOS. MF1879, MF1880, MF1881, MF1882)

RAI A.1-1, License Renewal Commitments and the Updated Final Safety Analysis Report

Applicability:

Byron Station (Byron) and Braidwood Station (Braidwood), Units 1 and 2

Background:

By letter dated May 29, 2013, Exelon Generation Company, LLC, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Part 54, to renew the operating licenses NPF-37, NPF-66, NPF-72, and NPF-77 for Byron, Units 1 and 2, and Braidwood, Units 1 and 2, respectively, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff of NRC is reviewing this application in accordance with the guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants." During the review of the Byron and Braidwood license renewal application (LRA) by the NRC staff, the applicant made commitments related to aging management programs (AMPs), aging management reviews (AMRs), and time-limited aging analyses, as applicable, related to managing the aging effects of structures and components prior to the period of extended operation (PEO). The list of these commitments, as well as the implementation schedules and the sources for each commitment, will be included as a Table in Appendix A to the LRA and the safety evaluation report (SER) with Open Items.

In Section 1.7, "Summary of Proposed License Conditions," of the SER with Open Items, the staff stated that following its review of the LRA, including subsequent information and clarifications provided by the applicant, it identified proposed license conditions. The first license condition requires the information in the updated final safety analysis report (UFSAR) supplement, submitted pursuant to 10 CFR 54.21(d), as revised during the LRA review process, be made a part of the UFSAR. The second license condition in part states that the new programs and enhancements to existing programs listed in Appendix A of the SER and the applicant's USAR supplement be implemented no later than 6 months prior to the PEO. This license condition also states, in part, that activities in certain other commitments shall be completed by 6 months prior to the PEO or the end of the last refueling outage prior to the PEO, whichever occurs later.

The NRC plans to revise Appendix A of the SER to align with this guidance and to reformat the license condition to be as follows:

The UFSAR supplement submitted pursuant to 10 CFR 54.21(d), as revised during the license renewal application review process, and as supplemented by Appendix A of NUREG [XXXX], "Safety Evaluation Report Related to the License Renewal of Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2" dated [Month Year], describes certain programs to be implemented and activities to be completed prior to the PEO.

ENCLOSURE

- a) The licensee shall implement those new programs and enhancements to existing programs no later than 6 months prior to PEO.
- b) The licensee shall complete those inspection and testing activities, as noted in Commitment Nos. x through xx of Appendix A of NUREG XXXX, by the 6 month date prior to PEO or the end of the last refueling outage prior to the PEO, whichever occurs later.

The licensee shall notify the NRC in writing within 30 days after having accomplished item (a) above and include the status of those activities that have been or remain to be completed in item (b) above.

The staff also notes that in the course of its evaluating multiple commitments to be implemented in the future in order to arrive at a conclusion of reasonable assurance that requirements of 10 CFR 54.29(a) have been met, these license renewal commitments must be incorporated either into a license condition or into a mandated licensing basis document, such as the UFSAR. Those commitments that are incorporated into the UFSAR are typically done so by incorporating each one verbatim (or by a summary and a commitment reference number) into the respective UFSAR summaries in the applicant's LRA Appendix A.

Issue:

As proposed by the applicant and as reflected in the SER Appendix A, the implementation schedule for some commitments may conflict with the implementation schedule intended by the generic license condition. In addition, these licensing commitments need to be incorporated either into a license condition or into the applicant's UFSAR summary in such a manner as discussed above.

Request:

1. Identify those commitments to implement new programs and enhancements to existing programs. Indicate the expected date for completing the implementation of each of these programs and enhancements.
2. Identify those commitments to complete inspection or testing activities prior to the PEO. Indicate the expected dates for the completion of each of these inspection and testing activities.
3. For each commitment provided by the applicant in the SER Appendix A, identify where and how Exelon Generation Company, LLC, proposes that it be incorporated: into either a license condition or into the Byron and Braidwood UFSAR.