



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

September 22, 2104

Mr. Michael J. Pacilio  
Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Office (CNO)  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, Illinois 60555

SUBJECT: CLINTON POWER STATION, UNIT 1, REVISION 16 OF THE UPDATED FINAL  
SAFETY ANALYSIS REPORT (TAC NO. MF4277)

Dear Mr. Pacilio:

By letter dated January 9, 2014, Exelon Generation Company, LLC (the licensee), submitted Revision 16 of the updated final safety analysis report (UFSAR) for Clinton Power Station (CPS), Unit 1 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14015A117). Licensees are required to periodically submit UFSAR revisions in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.71, "Maintenance of records, making of reports," Paragraph (e).

Guidance for compliance with 10 CFR 50.71(e) is provided in U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide 1.181 (RG 1.181), "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)," September 1999, which endorses Nuclear Energy Institute (NEI) 98-03, "Guidelines for Updating Final Safety Analysis Reports," Revision 1, June 1999 (ADAMS Accession Nos. ML003740112 and ML003779028, respectively). Section 1.1.9.7 of the CPS UFSAR states that CPS will use the guidance in RG 1.181 and NEI 98-03 to maintain its UFSAR.

The NRC staff has reviewed the CPS UFSAR, Revision 16, using this guidance. The staff identified one change to the UFSAR that deviated from the guidance in NEI 98-03. In Revision 16 to the UFSAR, the licensee removed all the information from Section 13.4, "Review and Audit," and replaced it with: "The program for conducting reviews and audits for Clinton Power Station is conducted in accordance with Quality Assurance Topical Report [QATR] NO-AA-10." The guidance in Section A4.3, "Referencing Other Documents in Updated FSARs," of NEI 98-03 states that if a licensee removes information from the UFSAR that is part of a separate licensee-controlled document, the UFSAR should clearly state that "the document or portion thereof is 'incorporated by reference' in the UFSAR." The NRC staff determined that UFSAR Section 13.4 does not clearly state that the QATR is incorporated by reference in the UFSAR.

This issue was discussed with licensee personnel on June 23, 2014. In that discussion, the licensee stated that the UFSAR does not specifically state that the QATR is incorporated by reference. The licensee further stated that changes to the QATR are controlled by

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10 CFR 50.54(a)(3) and the licensee's procedure LS-AA-107, "UFSAR Update Procedure," identifies the QATR as a document typically considered to be incorporated by reference in the UFSAR. Based on the above, the NRC staff determined that the licensee deviated from the guidance in NEI 98-03. However, this issue does not have a significant regulatory impact since changes to the QATR are controlled by 10 CFR 50.54(a)(3). By email dated September 4, 2014, the licensee confirmed that this issue has been entered into its corrective action program.

If you have any questions regarding this issue, please contact Blake Purnell at 301-415-1380 or by email to [blake.purnell@nrc.gov](mailto:blake.purnell@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Purnell', is written over a horizontal line.

Blake Purnell, Project Manager  
Plant Licensing Branch III-2 and  
Planning and Analysis Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-461

cc: Listserv

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10 CFR 50.54(a)(3) and the licensee's procedure LS-AA-107, "UFSAR Update Procedure," identifies the QATR as a document typically considered to be incorporated by reference in the UFSAR. Based on the above, the NRC staff determined that the licensee deviated from the guidance in NEI 98-03. However, this issue does not have a significant regulatory impact since changes to the QATR are controlled by 10 CFR 50.54(a)(3). By email dated September 4, 2014, the licensee confirmed that this issue has been entered into its corrective action program.

If you have any questions regarding this issue, please contact Blake Purnell at 301-415-1380 or by email to [blake.purnell@nrc.gov](mailto:blake.purnell@nrc.gov).

Sincerely,

/RA/

Blake Purnell, Project Manager  
Plant Licensing Branch III-2 and  
Planning and Analysis Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-461

cc: Listserv

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