



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

December 9, 2014

Mr. Michael J. Pacilio
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: CLINTON POWER STATION – NOTIFICATION FOR NRC TRIENNIAL
PERMANENT PLANT MODIFICATIONS AND 50.59 INSPECTION – REQUEST
FOR INFORMATION**

Dear Mr. Pacilio:

On March 2, 2015, the U.S. Nuclear Regulatory Commission (NRC) will begin a MOD/50.59 Baseline Inspection at the Clinton Power Station. This inspection will be performed in accordance with the NRC Baseline Inspection Procedure (IP) 71111.17T. The onsite portion of the inspection will take place on March 2 – 6, 2015, and March 16 – 20, 2015.

Experience has shown that these baseline inspections are extremely resource intensive, both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both parties, we have enclosed a request for documents needed for the inspection. These documents have been divided into three groups.

The first group of information is necessary to ensure that the inspection team is adequately prepared for the inspection. This information should be made available via compact disc and delivered to the regional office no later than January 7, 2015. The inspection team will review this information and, by January 26, 2015, will request specific items that should be provided for review in the regional office by February 16, 2015.

The second group of requested documents contains additional items that the team will review, or need access to, during the inspection. Certain documents contained within this group (i.e., Item (1)), will be requested for review in the regional office prior to the inspection by February 16, 2015, as identified above. The remaining documents should be available by the first day of the onsite inspection, March 2, 2015.

The third group lists information necessary to aid the inspection team in tracking issues identified as a result of the inspection. The remaining documents in group three should be available by the first day of the onsite inspection, March 2, 2015. It is requested that this information be provided to the lead inspector as the information is generated during the inspection. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

M. Pacilio

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The lead inspector for this inspection is Mr. George M. Hausman. We understand that our regulatory contact for this inspection is Mr. Duane R. Avery of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at (630) 829-9743 or via e-mail at George.Hausman@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

In accordance with Title 10, *Code of Federal Regulations* (CFR), Part 2 Section 390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No. 50-461
License No. NPF-62

Enclosure:
Modification and 50.59 Inspection Document Request

cc w/encl: Distribution via LISTSERV®

MODIFICATION AND 50.59 INSPECTION DOCUMENT REQUEST

Inspection Report: 05000461/2015008

Inspection Dates: March 2 – 6, 2015, and March 16 – 20, 2015

Inspection Procedure: Inspection Procedure 71111.17T, "Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications"

Inspectors: Mr. George M. Hausman (Lead)
(630) 829-9743
George.Hausman@nrc.gov

Mr. James E. Neurauter
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James.Neurauter@nrc.gov

Mr. Lionel Rodriguez
(630) 829-9609
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I. Information Requested for In-Office Preparation Week

The following information is requested by January 7, 2015, or sooner, to facilitate the selection of specific items that will be reviewed during the onsite inspection weeks. The inspection team will select specific items from the information requested below and submit a list to your staff by January 26, 2015. We will request that certain items be made available to the regional office prior to the inspection by February 16, 2015. We request that the remaining items selected from the lists be available and ready for review on the first day of the inspection (i.e., March 2, 2015). All requested information should identify the associated system and cover the time frame from the receipt of information for the last MOD/50.59 Inspection to the present.

The required information identified below should be provided on compact disc (CD). Please provide three copies of each CD submitted (i.e., one for each inspector). The preferred file format is a searchable "pdf" file. The CDs should be indexed and hyper-linked to facilitate ease of use, if possible. If you have any questions regarding this information, please call the inspection team leader as soon as possible.

- (1) List of "permanent plant modifications" to systems, structures, or components that are field work complete. (For the purpose of this inspection, permanent plant modifications include permanent: plant changes, design changes, set point changes, equivalency evaluations, suitability analyses, and commercial grade dedications.)

The list should contain the number of each document, the title, the revision (or date), the affected system and safety classification. In addition to the list, please provide a description of each modification and a list of associated calculations and affected procedures.

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- (2) List of all 10 CFR 50.59 completed evaluations involving (a) calculations, (b) procedure revisions, (c) changes to the facility (modifications), (d) non-routine operating configurations, or (e) departures in methods of analyses. This list should include MOD/50.59 evaluations for the following:
 - a. Changes that have been made under the provisions of 10 CFR 50.59 that have been updated in accordance with 10 CFR 50.71(e)(4) since the last inspection;
 - b. Modifications that are field work complete; and
 - c. Changes to calculations (or initiation of new calculations) that have been issued. The list should contain the number and title of each document, a brief description of the change, and the corresponding number and type of the affected document (i.e., the modification or procedure to which the evaluation applies). The list should NOT include any evaluations in which prior NRC approval was sought and obtained.
- (3) A list of all 10 CFR 50.59 changes that have been screened out as not requiring a full evaluation involving: (a) calculations; (b) procedure revisions; (c) changes to the facility (modifications); (d) non-routine operating configurations; or (e) departures in methods of analyses.

The list should contain the number and title of each document, a brief description of the change, and the corresponding number and type of the affected document (i.e., the modification or procedure to which the evaluation applies).
- (4) A list of any modifications, procedure revisions, or Updated Final Safety Analysis Report (UFSAR) changes where it was determined that 10 CFR 50.59 did not apply.
- (5) A list of calculation changes that have been issued for use.
- (6) A list of corrective action documents (open and closed) that address permanent plant modifications or 10 CFR 50.59 issues, concerns, or processes. These documents should also include the corrective action documents associated with the modification and the MOD/50.59 change implementation.

The list should contain the number, title and revision (or date) of each document, the affected system and corresponding documentation (if applicable), and should be sorted in order of significance.
- (7) Copies of procedures addressing the following: modifications, design changes, set point changes, equivalency evaluations or suitability analyses, commercial grade dedications, post-modification testing, 10 CFR 50.59 evaluations and screenings, and UFSAR updates.
- (8) The UFSAR updates submitted in accordance with 10 CFR 50.71(e)(4). Provide copies of the complete submittal.
- (9) Copy of the UFSAR change log or a synopsis of the changes. This should include all of the changes made to the UFSAR that were incorporated in the last 10 CFR 50.71(e)(4) submittal.

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- (10) Electronic copy of the UFSAR and Technical Specifications, if available.
- (11) Name(s) and phone numbers for the regulatory and technical contacts.
- (12) Current management and engineering organizational chart.

II. Information Requested to be Available Prior to and at the Start of the Inspection.

Requests will be made for specific Item (1) documents by January 26, 2015. Provide requested Item (1) documents to the Regional Office by February 16, 2015. Documents Identified in Items (2), (3), and (4) are requested to be available on the first day of the inspection (March 2, 2015).

- (1) Copies of all selected items from Group *I*. This includes copies of associated documents such as calculations, post-modification test packages, 10 CFR 50.59 evaluations or screenings, and any corrective action documents.
- (2) Copies of these documents do not need to be solely available to the inspection team as long as the inspectors have easy and unrestrained access to them.
 - a. Updated Final Safety Analysis Report, if not previously provided;
 - b. Original Final Safety Analysis Report (FSAR) Volumes;
 - c. Original Safety Evaluation Report (SER) and Supplements;
 - d. FSAR Question and Answers;
 - e. Quality Assurance Plan;
 - f. Technical Specifications, if not previously provided;
 - g. Latest IPE/PRA Report;
 - h. Vendor Manuals; and
 - i. The latest 10 CFR 50.59 UFSAR Update Submittal.
- (3) Please ensure that other supporting documents for the selected items have been located and are readily retrievable as the inspection team will likely be requesting these documents during the inspection. Examples of supporting documents are:
 - a. Drawings supporting the modifications;
 - b. Procedures affected by the modifications; and
 - c. UFSAR change papers generated due to a 10 CFR 50.59 evaluation.
- (4) Assessment and Corrective Actions:
 - a. The most recent MOD/50.59 Quality Assurance (QA) audit and/or self-assessment; and

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- b. Corrective action documents (e.g., condition reports, including status of corrective actions) generated as a result of the most recent MOD/50.59 Quality Assurance (QA) audit and/or self-assessment.

III. Information Requested to be Provided Throughout the Inspection

- (1) Copies of any corrective action documents generated as a result of the inspection team's questions or queries during this inspection.
- (2) Copies of the list of questions submitted by the inspection team members and the status/resolution of the information requested (provide daily during the inspection to each inspection team member).

If you have any questions regarding the information requested, please contact the inspection team leader.

M. Pacilio

-2-

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Sincerely,

Robert C. Daley, Chief
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Letter to Mr. Michael J. Pacilio from Mr. Robert C. Daley dated December 9, 2014.

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PERMANENT PLANT MODIFICATIONS AND 50.59 INSPECTION – REQUEST
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