



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

March 24, 2015

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: CLINTON POWER STATION, UNIT 1 – REQUEST FOR ADDITIONAL
INFORMATION REGARDING LICENSE AMENDMENT REQUEST TO REVISE
TECHNICAL SPECIFICATION 5.5.2, "PRIMARY COOLANT SOURCES
OUTSIDE CONTAINMENT (TAC NO. MF5291)**

Dear Mr. Hanson:

By application dated November 17, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14321A882), Exelon Generation Company, LLC (the licensee) submitted a request to revise Technical Specification (TS) 5.5.2, "Primary Coolant Sources Outside Containment," for Clinton Power Station (CPS), Unit 1. Currently, TS 5.5.2 requires that an integrated leak test be performed on each system subject to TS 5.5.2 at refueling cycle intervals or less. The proposed change would require this test to be performed at least once per 24 months and adds a provision to apply surveillance requirement 3.0.2 to TS 5.5.2 requirements. The reason for the request is to support the CPS transition from 2-year to 1-year refueling cycles. The U.S. Nuclear Regulatory Commission staff is reviewing the submittals and has determined that additional information is needed to complete its review.

A response to the enclosed request should be provided within 30 days from the date of this letter. This request was discussed with Mr. Tim Byam of your staff on March 23, 2015.

B. Hanson

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Should you have any questions, please contact me at 301-415-1380 or by email at blake.purnell@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Blake Purnell', written in a cursive style.

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

Docket No. 50-461

Enclosure:
Request for Additional Information

cc w/encl: Listserv

REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION 5.5.2,

"PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT"

CLINTON POWER STATION, UNIT 1

DOCKET NO. 50-461

By application dated November 17, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14321A882), Exelon Generation Company, LLC (the licensee) submitted a request to revise technical specification (TS) 5.5.2, "Primary Coolant Sources Outside Containment," for Clinton Power Station (CPS), Unit 1. The reason for the request is to support the CPS transition from 2-year to 1-year refueling cycles. Currently, TS 5.5.2 requires that an integrated leak test be performed on each system subject to TS 5.5.2 at refueling cycle intervals or less. The proposed change would require this test to be performed at least once per 24 months and adds a provision to apply surveillance requirement (SR) 3.0.2 to TS 5.5.2 requirements. The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has determined that additional information below is needed to complete its review.

RAI-1

Background

The CPS SR 3.0.2 is consistent with the improved standard technical specifications (STS) (see NUREG-1434, Revision 4, "Standard Technical Specifications — General Electric Plants (BWR/6)," Revision 4, April 2012). SR 3.0.2 states, in part:

The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

On August 23, 2012, the NRC issued Regulatory Issue Summary (RIS) 2012-10, "NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests," which states:

[An NRC] review determined that restructuring TS chapters during the development of improved [STS] resulted in unintended consequences when Section 3.0, "Surveillance Requirement Applicability," provisions were made applicable to Section 5.0 TS. Specifically, applying STS rules of usage would prohibit licensees from using the SR 3.0.2 and SR 3.0.3 allowances in Section 5.0 TS, unless the Section 5.0 TS tests are associated with a TS SR.

Enclosure

The RIS further states:

SR 3.0.2 and SR 3.0.3 cannot be applied to TS 5.5 for tests that are not associated with a TS SR. Therefore, programmatic test frequencies cannot be extended in accordance with SR 3.0.2, and programmatic test frequencies cannot be delayed in accordance with SR 3.0.3, when there is no associated requirement from SR 3.0.1 for program tests to be both performed and met. Using SR 3.0.2 to extend a program test or using SR 3.0.3 to delay declaring a missed program test "not met" without having a TS SR related to the program test would result in noncompliance with TS or nonconformance with other regulatory requirements because these SR allowances cannot be applied to non-SR tests.

Issue

The licensee's application requests that SR 3.0.2 be made applicable to TS 5.5.2 requirements. The applications states:

Additionally, to be consistent with normal surveillance requirements that allow for a 25% extension of the frequency in accordance with SR 3.0.2, the SR 3.0.2 allowance is also being proposed to be applied to TS 5.5.2. This is acceptable since TS 5.5.2 testing is considered a surveillance requirement. As stated in TSTF [Technical Specification Task Force]-299-A, since SR 3.0.2 only applies to TS [limiting condition for operation] Sections 3.0 through 3.9, it is appropriate to add the explicit SR 3.0.2 statement to TS 5.5.2. The application of the SR 3.0.2 allowance to CPS TS 5.5.2 ensures CPS consistency with the [improved STS] 5.5.2 provided in [NUREG-1434, Revision 4].

The purpose of TSTF-299 is to allow a 25 percent extension of a TS administrative control program frequency, similar to the way SR 3.0.2 is applied to SRs. The concern is that SR 3.0.2 is not applicable to programs which do not have an associated SR. The NRC staff is working on correcting the STS in this regard.

Request

Revise the wording of the proposed change to address the concern described above.

B. Hanson

- 2 -

Should you have any questions, please contact me at 301-415-1380 or by email at blake.purnell@nrc.gov.

Sincerely,

/RA/

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

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Request for Additional Information

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