



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

September 3, 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 NO. 1 – INTERIM STAFF RESPONSE TO
REEVALUATED FLOOD HAZARDS SUBMITTED IN RESPONSE TO
10 CFR 50.54(f) INFORMATION REQUEST – FLOOD-CAUSING MECHANISM
REEVALUATION (TAC NO. MF3654)

Dear Mr. Hanson:

The purpose of this letter is to provide a summary of the U.S. Nuclear Regulatory Commission (NRC) staff's assessment of the re-evaluated flood-causing mechanisms described in the March 12, 2014 (Agencywide Document Access and Management System (ADAMS) Accession No. ML14079A415), flood hazard reevaluation report (FHRR) submitted by Exelon Generation Company, LLC (Exelon, the licensee) for Clinton Power Station, Unit No. 1 (Clinton), as well as supplemental information resulting from requests for additional information and audits.

By letter dated March 12, 2012, the NRC issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter referred to as the 50.54(f) letter) (ADAMS Accession No. ML12053A340). The request was issued as part of implementing lessons-learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested licensees to re-evaluate flood-causing mechanisms using present-day methodologies and guidance. Concurrently, with the reevaluation of flooding hazards, licensees were required to develop and implement mitigating strategies in accordance with NRC Order EA-12-049, "Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A735). On March 30, 2015, the Commission provided Staff Requirements Memoranda (SRM) (ADAMS Accession No. ML15089A236) to COMSECY-14-0037, "Integration of Mitigating Strategies for Beyond-Design-Basis External Events and the Reevaluation of Flooding Hazards," dated November 21, 2014 (ADAMS Accession No. ML14309A256), affirming that licensees need to address the reevaluated flooding hazards within their mitigating strategies for beyond-design-basis external events.

The NRC staff has reviewed the flood hazard information submitted by the licensee and has summarized the results of the review in the table provided as an Enclosure to this letter.

Table 1 provides the current design-basis flood hazard mechanisms. All the reevaluated flood hazard mechanisms at Clinton are bounded by the current design-basis.

The NRC staff has concluded that the licensee's reevaluated flood hazards information, as summarized in the Enclosure, is suitable for the assessment of mitigating strategies developed in response to Order EA-12-049 (i.e., defines the mitigating strategies flood hazard information described in guidance documents currently being finalized by the industry and NRC staff) for Clinton. Further, the NRC staff has concluded that the licensee's reevaluated flood hazard information is a suitable input for other assessments associated with Near-Term Task Force Recommendation 2.1 "Flooding". The NRC staff plans to issue a staff assessment documenting the basis for these conclusions at a later time.

In addition, NEI 12-06 "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" is currently being revised. This revision will include a methodology to perform a Mitigating Strategies Assessment (MSA) with respect to the reevaluated flood hazards. Once this methodology is endorsed by the NRC, flood event duration parameters and applicable flood associated effects should be considered as part of the Clinton MSA. The NRC staff will evaluate the flood event duration parameters (including warning time and period of inundation) and flood-related associated effects developed by the licensee during the NRC staff's review of the MSA.

Because the reevaluated flood hazard mechanisms at Clinton are bounded by the current design-basis, it is unnecessary for the licensee to perform an integrated assessment or focused evaluation, as described in NRC letter, "Coordination of Request for Information Regarding Flooding Hazard Reevaluation and Mitigating Strategies for Beyond Design Bases External Events" (ADAMS Accession No. ML15174A257). This letter describes the changes in the NRC's approach to the flood hazard reevaluations that were approved by the Commission in its SRM to COMSECY-15-0019, "Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants" (ADAMS Accession No. ML15209A682). Therefore, the NRC staff confirms that the licensee responded appropriately to Enclosure 2 of the 50.54(f) letter.

B. Hanson

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If you have any questions, please contact me at (301) 415-6197 or e-mail at Tekia.Govan@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tekia Govan". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Tekia Govan, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure:
Summary of Results of Flooding
Hazard Re-Evaluation Report

cc w/encl: Distribution via Listserv

ENCLOSURE:
SUMMARY TABLE OF
REEVALUATED FLOOD HAZARD LEVELS

Table 1. Current Design Basis Flood Hazards for Use in the MSA

Mechanism	Stillwater Elevation	Waves/ Runup	Design Basis Hazard Elevation	Reference
Local Intense Precipitation Local Intense Precipitation and Associated Drainage	736.8 ft MSL	Not applicable	736.8 ft MSL	FHRR Section 2.2.1 and Table 4.0.2
Streams and Rivers	No impact on the site identified	No impact on the site identified	No impact on the site identified	FHRR Section 2.2.2
Failure of Dams and Onsite Water Control/Storage Structures	No impact on the site identified	No impact on the site identified	No impact on the site identified	FHRR Section 2.2.3
Storm Surge Probable maximum flooding on cooling pond	No impact on the site identified	No impact on the site identified	No impact on the site identified	FHRR Section 2.2.5
Seiche	No impact on the site identified	No impact on the site identified	No impact on the site identified	FHRR Section 2.2.5
Tsunami	No impact on the site identified	No impact on the site identified	No impact on the site identified	FHRR Section 2.2.6
Ice-Induced Flooding	No impact on the site identified	No impact on the site identified	No impact on the site identified	FHRR Section 2.2.7
Channel Migrations/Diversions	No impact on the site identified	No impact on the site identified	No impact on the site identified	FHRR Section 2.2.8

Note: Reported values are rounded to the nearest one-tenth of a foot.

B. Hanson

- 3 -

If you have any questions, please contact me at (301) 415-6197 or e-mail at Tekia.Govan@nrc.gov.

Sincerely,

/RA/

Tekia Govan, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure:
Summary of Results of Flooding
Hazard Re-Evaluation Report

cc w/encl: Distribution via Listserv

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ADAMS Accession No.PKG ML15230A012; LTR: ML15212A010; ENCL: ML15219A645 *via email

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