



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

December 1, 2015

LICENSEE: Exelon Generation Company, LLC

FACILITY: Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2

SUBJECT: SUMMARY OF NOVEMBER 5, 2015, PRE-SUBMITTAL MEETING WITH EXELON GENERATION COMPANY, LLC, ON CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2, REGARDING THE LICENSE AMENDMENT REQUEST TO ADOPT TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER-505 (CAC NOS. MF6978 AND MF6979)

On November 5, 2015, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Exelon Generation Company, LLC (the licensee), at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss the planned submittal of a license amendment request (LAR) to adopt Technical Specification Task Force Traveler-505 (TSTF-505) "Provide Risk-Informed Extended Completion Times [RICTs] – RITSTF [Risk-Informed Technical Specification Task Force] Initiative 4B," for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (Calvert Cliffs). The meeting notice and agenda, dated October 26, 2015, is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML15308A194. A list of attendees is provided in the Enclosure.

The licensee presented information regarding the content of the proposed LAR, the licensee's probabilistic risk assessment (PRA) model and configuration risk management program (CRMP), the plan to implement TSTF-505 and train operators on the use of RICTs, and the proposed schedule and next steps for submitting the LAR. The licensee's presentation slides can be viewed at ADAMS Accession No. ML15308A107.

The licensee presented information that outlined the content of the proposed LAR. The proposed LAR will modify approximately 27 limiting conditions of operation (LCOs) for Modes 1 and 2 only. A Technical Specification (TS) will be added to the Administrative Controls section of the TSs for the RICT program. In addition, the licensee plans to propose approximately three variations from TSTF-505 along with minor differences in wording of the TS due to plant-specific TSs. The licensee detailed parts of their PRA and CRMP models to explain how the internal events PRA, fire PRA, seismic risk, and wind risk will be accounted for within the Calvert Cliffs RICT program. The licensee also discussed how plant modifications from the NFPA-805 LAR would impact the RICT program and the timeframe for implementing the modifications. The licensee has updated the CRMP tool and PRA models to support the RICT and will implement procedure changes, training, and qualifications on the RICT program. The licensee has targeted December 2015 to submit the LAR, with implementation planned in 2017.

During the meeting the NRC staff queried the licensee on several aspects of the proposed LAR. Some of these queries resulted in follow-up items for the licensee to investigate. The NRC staff asked why there is a restoration action in the Calvert Cliffs site-specific TSs for the main feedwater isolation valves. The licensee will look into this question further. The licensee will

also determine if changes in their PRA model due to the NFPA-805 LAR should be classified as "upgrades" to the PRA. The licensee and the NRC will discuss whether there is a need to include a proposed license condition to state that the RICT program will not be implemented until completion of certain modifications that have been proposed as part of the NFPA-805 LAR. Approval of the NFPA-805 LAR does not appear to be necessary for the licensee to submit the TSTF-505 LAR. The NRC staff questioned the licensee on how the licensee plans to define PRA Functionality for TSs when there is a loss of specified TS safety function operability. As a result of this discussion the licensee will investigate how safety margins and the defense-in-depth philosophy will be maintained in the "as-built" plant as well as the program to maintain the safety margins and defense-in-depth when using PRA functional instead of operability. In addition, the staff encouraged the licensee to provide a detailed comparison of the "design basis function" and the "PRA function" for certain SSCs and to explain any differences. The licensee will also follow-up on the scope of the systems, structures, and components that were included in the high wind PRA walkdown. As part of its review of key assumptions and uncertainties, the licensee may also need to consider PRA modeling assumptions which may result in a conservative baseline risk estimate, and non-conservative RICT calculation.

Members of the public were in attendance but did not have any comments. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-2549 or Alexander.Chereskin@nrc.gov.



Alexander N. Chereskin, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

NOVEMBER 5, 2015, MEETING WITH EXELON GENERATION COMPANY, LLC, TO

DISCUSS CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

SUBMITTAL OF THE TSTF-505 LICENSE AMENDMENT REQUEST

U.S. Nuclear Regulatory Commission and Contractors

A. Chereskin
T. Hilsmeier
S. Dinsmore
N. Carte
S. Rosenberg
S. Arndt
D. Gennardo
M. Reisifard
T. Tate
E. Miller
G. Curran
M. Chernoff

Exelon Generation Company, LLC

G. Stewart
H. Harrison III
B. Sloane
G. Kelly
J. Mitchell*

Members of the Public

A. Cullku
V. Anderson*

*via teleconference

Enclosure

also determine if changes in their PRA model due to the NFPA-805 LAR should be classified as “upgrades” to the PRA. The licensee and the NRC will discuss whether there is a need to include a proposed license condition to state that the RICT program will not be implemented until completion of certain modifications that have been proposed as part of the NFPA-805 LAR. Approval of the NFPA-805 LAR does not appear to be necessary for the licensee to submit the TSTF-505 LAR. The NRC staff questioned the licensee on how the licensee plans to define PRA Functionality for TSs when there is a loss of specified TS safety function operability. As a result of this discussion the licensee will investigate how safety margins and the defense-in-depth philosophy will be maintained in the “as-built” plant as well as the program to maintain the safety margins and defense-in-depth when using PRA functional instead of operability. In addition, the staff encouraged the licensee to provide a detailed comparison of the “design basis function” and the “PRA function” for certain SSCs and to explain any differences. The licensee will also follow-up on the scope of the systems, structures, and components that were included in the high wind PRA walkdown. As part of its review of key assumptions and uncertainties, the licensee may also need to consider PRA modeling assumptions which may result in a conservative baseline risk estimate, and non-conservative RICT calculation.

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/RA/

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ADAMS Accession Nos.:

Meeting Notice: ML15308A194 Meeting Summary: ML15314A122 Handouts: ML15308A107

OFFICE	NRR/DORL/LPLI-1/PM	NRR/DORL/LPLI-1/LA	NRR/DRA/APLA/BC
NAME	AChereskin	KGGoldstein	SRosenberg
DATE	11/13/2015	11/10/2015	11/19/2015
OFFICE	NRR/DSS/STSB/BC	NRR/DORL/LPLI-1/BC	NRR/DORL/LPLI-1/PM
NAME	RElliot	TTate	AChereskin
DATE	11/19/2015	11/23/2015	12/01/2015