



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

February 11, 2016

LICENSEE: EXELON GENERATION COMPANY, LLC

FACILITIES: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; OYSTER CREEK NUCLEAR GENERATING STATION; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; R. E. GINNA NUCLEAR POWER PLANT; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1

SUBJECT: SUMMARY OF JANUARY 21, 2016, MEETING WITH EXELON GENERATION COMPANY, LLC LICENSING MANAGERS

On January 21, 2016, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company, LLC (Exelon, the licensee). The purpose of the meeting was for Exelon licensing managers to meet with licensing project managers and supervisors in the NRC Office of Nuclear Reactor Regulation (NRR), Division of Operating Reactor Licensing (DORL), to discuss planned fleet license amendment requests (LARs) and NRR licensing processes and expectations. Exelon said it would like to have this meeting annually. The meeting notice and agenda, dated December 16, 2015, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML15351A042. A copy of Exelon's slides which were used at the meeting is available under ADAMS Accession No. ML16022A092. A list of attendees is enclosed.

After introductions, Exelon personnel discussed the structure of their licensing organization (slide 2). The Regional and General Counsel position at the head of the organization is new and was created to help with consistency. The Licensing Programs Manager position is responsible updated final safety analysis reports, budget, and business plans. Exelon does provide operations support for Fort Calhoun Station, but does not submit licensing actions on their behalf. The Constellation nuclear plants have been completely integrated into the Exelon organization.

Exelon indicated that it has created a guidance document for its licensing staff entitled "Understanding the Role of the NRR Project Manager [PM]." This document is based on publicly available NRR Office Instructions and an old NRC PM handbook. The NRC staff noted that this old handbook is no longer in use but is similar to the current handbook.

Exelon and NRR staff discussed the use of email versus letters for correspondence, particularly requests for additional information. NRC staff said it is considering using more email correspondence. Exelon personnel noted that letters get greater attention, but emails are acceptable if they go through the same NRC review process and are clear about expectations (e.g., response dates, draft versus final version). The NRC staff acknowledge that it needs to ensure branch chief review of emails. The NRC staff noted that one concern is that, while publicly available in ADAMS, emails are not distributed via listserv could reduce public awareness.

NRC Regulatory Issue Summary (RIS) 2015-16, "Planned Licensing Action Submittals" (ADAMS Accession No. ML16013A156), was also discussed. The NRC staff stated that information provided would be used to populate an internal database. In the future, the database would likely be updated by PMs with information provided by the licensee during biweekly status calls. Exelon noted that NRC staff also interact with industry working groups (e.g., Technical Specifications Task Force (TSTF)) where the larger industry has identified its plans to submitting licensing actions once NRC endorsement is received. The staff took an action to ensure that DORL contact other NRR divisions regarding planned industry actions.

Exelon stated that it is planning on submitting LARs for its entire fleet, except Oyster Creek Nuclear Generation Station (Oyster Creek), to implement TSTF-505, Revision 1, "Provide Risk Informed Completion Times—RITSTF [Risk Informed TSTF] Initiative 4b" (ADAMS Accession No. ML111650552). Exelon stated that it plans to submit the LAR for Calvert Cliffs Nuclear Power Plant in February 2016, which will serve as the pilot plant for its fleet. The LARs would be sequenced with the LAR for Peach Bottom Atomic Power Station likely to be submitted in June 2016, followed later this year by either Limerick Generating Station or Braidwood Station. Exelon plans to continue to submit three to four LARs per year for TSTF-505. The NRC staff noted that the quality of the probabilistic risk assessments (PRAs) may not be the same for each plant. Exelon personnel acknowledged that it needs to upgrade the PRAs to support the LARs. The NRC staff also noted that it has implemented a dedicated team approach to the initial TSTF-505 submittals. The staff also stated that these LARs would be considered complex and Exelon should prepare to have a pre-application meeting for each plant.

Exelon personnel also discussed other planned fleet actions (slide 4). Exelon personnel briefly mentioned the Oyster Creek decommissioning efforts and that Exelon plans to lay out an overall schedule of licensing actions.

NRC and Exelon discussed the Task Interface Agreement (TIA) process. Exelon noted that in the past it was not very well informed of the status of TIAs. Exelon has seen an improvement with the revised process. The NRC staff noted that licensees should contact the resident inspectors regarding the status of TIAs. Although the TIA process remains an internal process, the staff now has an entrance call with the licensee when a TIA is initiated and the licensee can provide additional information to the NRC when the TIA is under review. Before a TIA is finalized, the licensee will be provided with some opportunity to fact check the results. The staff also emphasized that the licensee should be prepared in advance to address issues in case the outcome of the TIA is unfavorable to them.

The NRC staff noted that it had seen a number of issues with Exelon submittals that included requests for withholding information from the public per 10 CFR 2.390. These issues included (1) claims that publicly available information is proprietary and (2) information which is not

consistently marked as proprietary throughout submittals. The staff stated that Exelon should review its vendors' proprietary claims before submitting them to the NRC. The staff noted that reasonable proprietary claims can be reviewed quickly, but when there are problems it takes a significant amount of time and effort to resolve the issue. Exelon personnel acknowledged that it could improve in this area.

The NRC staff also noted that some recent submittals had the entire document marked as containing security-related information. For amendments, the no significant hazards consideration must be published for public review and should not contain security-related information. The staff also mentioned that it will be reviewing emergency plan documents, updated final safety analysis reports, and fire plan documents for sensitive, unclassified, non-safeguards information (SUNSI) and make them public to the extent possible. In the past, the staff only performed a SUNSI review of these documents when requested. The staff noted that Exelon's emergency plan documents are also marked as containing proprietary information. The staff indicated that this is unusual and may be challenged during the SUNSI review effort.

Exelon personnel asked about the NRC's current effort to update NRR Office Instructions LIC-101, "License Amendment Review Procedures" (ADAMS Accession No. ML113200053), and LIC-109, "Acceptance Review Procedures" (ADAMS Accession No. ML091810088). The NRC staff stated that some of the changes are to incorporate practices that have already been implemented. The changes are intended to improve communication, hold licensees more accountable for meeting dates, ensure complex submittals are identified, and improve RAIs. For routine submittals (e.g., TSTFs), Exelon asked why it sometimes has to provide information that was not required for previous LARs. The staff noted that some of the model safety evaluations may no longer be considered legally sufficient.

Exelon asked about the NRR risk-informing initiatives. The NRC staff noted that this effort is about dedication of resources. The staff wants to ensure that the amount of resources spent on an effort are commensurate to the risk.

Please direct any inquiries to me at 301-415-1380, or Blake.Purnell@nrc.gov.



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

Docket Nos. STN 50-456, STN 50-457,
STN 50-454, STN 50-455, 50-317, 50-318,
50-461, 50-237, 50-249,
50-373, 50-374, 50-352, 50-353,
50-220, 50-410, 50-219,
50-277, 50-278, 50-254, 50-265, 72-53, 50-244,
and 50-289

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES
JANUARY 21, 2016, MEETING WITH
EXELON GENERATION COMPANY, LLC

NRC	Exelon
B. Purnell	G. Kaegi
J. Lamb	P. Simpson
A. Chereskin	J. Barstow
D. Render	D. Gudger
J. Hauser	D. Gullott
R. Ennis	D. Helker
R. Haskell	
J. Poole	
A. Boland	
G. Wilson	
P. Krohn	
B. Mozafari	
D. Broaddus	
T. Tate	
R. Gladney	
H. Cruz	
L. Wilkins	
E. Brown	
B. Vaidya	

Please direct any inquiries to me at 301-415-1380, or Blake.Purnell@nrc.gov.

Blake Purnell, Project Manager */RA/*
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Office of Nuclear Reactor Regulation

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50-277, 50-278, 50-254, 50-265, 72-53, 50-244,
and 50-289

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DISTRIBUTION:

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LPL1-1 R/F
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RidsNrrPMBraidwood Resource
RidsNrrLaSalle Resource
RidsNrrPMQuadCities Resource
RidsAcrs_MailCTR Resource
RidsNrrLASrohrer Resource
RidsNrrPMPeachBottom Resource
RidsNrrPMNineMilePoint Resource
TWertz, NRR
HCruz, NRR

LPL3-2 R/F
RidsNrrDorlLp1-1 Resource
RidsNrrDorlLp3-2 Resource
RidsNrrPMBYron Resource
RidsNrrPMDresden Resource
RidsNrrPMOysterCreek Resource
RidsNRidsNrrDorlDpr Resource
RidsNrrDorlLp1-2 Resource
RidsNrrPMCalvertCliffs Resource
RidsNrrPMREGinna Resource
CSantos, EDO
LWilkins, NRR

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RidsNrrPMClinton Resource
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RidsNrrPMThreeMileIsland Resource
RidsNrrPMExelon Resource
RidsNrrDprPipb Resource
RidsNrrDorl Resource

ADAMS Accession Nos.:

Meeting Notice: ML15351A042

Meeting Summary: ML16040A218

OFFICE	NRR/DORL/LPL3-2/PM	NRR/DORL/LPL3-2/LA	NRR/DORL/LPL3-2/BC(A)	NRR/DORL/LPL3-2/PM
NAME	BPurnell	SRohrer	JPoole	BPurnell
DATE	02/10/16	02/09/16	02/11/16	02/11/16

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