



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

March 9, 2016

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

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - REQUEST FOR INFORMATION FOR AN NRC PILOT DESIGN BASES INSPECTION ON THE IMPLEMENTATION OF THE ENVIRONMENTAL QUALIFICATION PROGRAM INSPECTION REPORT 05000237/2016009; 05000249/2016009

Dear Mr. Hanson:

On June 27, 2016, the U. S. Nuclear Regulatory Commission (NRC) will begin the pilot program portion of the triennial baseline Design Bases Inspection at Dresden Nuclear Power Station, Units 2 and 3. This inspection will be performed in accordance with NRC Baseline Inspection Procedure 71111.21N.

The inspection will focus on the implementation of the Environmental Qualification (EQ) Program. The EQ components to be reviewed during this baseline inspection will be identified during the in-office preparation week that occurs prior to the onsite inspection week.

The inspection will include a bagman trip to support selection of components and one week of onsite inspection. The inspection team will consist of three NRC inspectors. The current inspection schedule is as follows:

- Bagman trip onsite week: May 17 - 18, 2016
- Inspection onsite week: June 27, 2016, through July 1, 2016

The team will be preparing for the inspection, mainly during the week of June 20-24, 2016, as discussed in the enclosure.

Experience with previous baseline design inspections of similar depth and length has shown that this type of inspection is 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 information needed for 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. Insofar as possible, this information should be provided electronically to the lead inspector. The information request has been divided into four groups:

- The first group lists information necessary for our initial inspection scoping activities. This information should be provided to the lead inspector no later than April 5, 2016. Prior to the bagman trip on April 15, 2016, the lead inspector will communicate the initial selected set of approximately 12 - 15 EQ components.
- The second group of documents requested is those items needed to support the bagman trip. This set of documents should be available to the lead inspector onsite on May 17, 2016.
- The third group of documents requested is those items needed to support our in-office preparation activities for the selected set of 6 - 9 EQ components. This set of documents should be provided to the lead inspector at the Regional Office no later than June 15, 2016. During the in-office preparation activities, the team may identify additional information needed to support the inspection.
- The last group includes the additional information above as well as plant specific reference material. This information should be available to the team onsite on June 27, 2016. It is also requested that corrective action documents and/or questions developed during the inspection be provided to the lead inspector as the documents are generated.

The lead inspector for this inspection is Mr. Andrew Dunlop. We understand that our licensing contact for this inspection is Mr. Dean Walker of your organization. If there are any questions about the inspection or the material requested in the enclosure, please contact the lead inspector at (630) 829-9726 or via e-mail at Andrew.Dunlop@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.

B. Hanson

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In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Andrew Dunlop, Senior Reactor Engineer
Engineering Branch 2
Division of Reactor Safety

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosure:
Information Request for Design Bases Inspection

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REQUEST FOR INFORMATION – DESIGN BASES INSPECTION

Inspection Report: 05000237/2016009; 05000249/2016009

Bagman Dates: May 17 - 18, 2016

Inspection Dates: June 27, 2016, through July 1, 2016

Inspection Procedure: IP 71111.21N, “Design Bases Inspection”

Lead Inspector: Andrew Dunlop, Senior Reactor Engineer, DRS
(630) 829-9726
Andrew.Dunlop@nrc.gov

I. Information Requested Prior to the Onsite Information Gathering/Bagman Week

The following information is requested by April 5, 2016, or sooner, to facilitate inspection preparation. If you have any questions regarding this information, please call the team leader as soon as possible. (Please provide the information electronically in “pdf” files, Excel, or other searchable formats, preferably on some portable electronic media (e.g., CD-ROM, DVD, etc.). The portable electronic media should contain descriptive names, and be indexed and hyperlinked to facilitate ease of use. Information in “lists” should contain enough information to be easily understood by someone who has knowledge of light water reactor technology).

1. Risk-ranking of top 250 components required to meet Environmental Qualifications (EQs) from your site specific probabilistic safety analysis sorted by Fussell Vesely Importance.
2. Probabilistic Safety Analysis listing of top ten risk significant systems.
3. NRC Safety Evaluation Report(s) associated with EQ.
4. Electronic copies of Updated Final Safety Analysis Report, Technical Specifications, and Technical Specifications Bases. Specifically identify which Updated Final Safety Analysis Report sections address EQ (including seismic).
5. Identify the various EQ standards (including year, edition, or revision) that the station is committed to.
6. Copy of EQ Design Basis Document, if applicable.
7. Copy of any open licensing commitments related to EQ, if applicable.
8. Equipment Qualification Master List. Specific issues to be identified include: safety classification (safety-related or nonsafety-related), Regulatory Guide 1.97 instrumentation, EQ (e.g., DOR, NUREG 588, 50.49), original or replaced after implementation of 50.49, and plant location.

Enclosure

REQUEST FOR INFORMATION – DESIGN BASES INSPECTION

9. List of any installed equipment removed from the Equipment Qualification Master List and basis for removal.
10. If EQ files were reviewed for Aging Management effects of license renewal, identify which EQ files were modified/changed to incorporate appropriate actions for the period of extended operation. Copies of any EQ Aging Management Programs.
11. List or drawings of plant areas that are subjected to EQ, identifying design (limiting) temperature, both normal and accident, high energy line break, radiation levels, etc. that the associated equipment will have to be qualified to meet EQ. If unit has obtained a power uprate (greater than 5 percent) provide same information pre-uprate (earliest available if multiple uprates).
12. Site (and corporate if applicable) procedures associated with the Title 10, Code of Federal Regulations, Part 50.49 EQ Program for electrical components. Include procedures for procurement of qualified equipment, maintenance of qualified equipment, modification to qualified equipment (including Equivalency or Commercial Grade Dedication (CGD) Programs), and material storage and shelf life controls.
13. List of CGD evaluations performed, for which the dedicated parts have been issued for installation (parts issued for the last 10 years) on EQ applications in the plant. Include CGD evaluation number, name of part, component ID or description of the component the part was issued to repair, work order, and date issued or installed.
14. List of Corrective Action Documents related to the EQ Program or EQ of specific components for the last 5 years.
15. Current management and engineering organizational chart.

II. Information Requested (for the approximate 12 - 15 selected components) to be Available by the Bagman Trip on May 17, 2016.

1. EQ Summary Report for each component/subcomponent.
2. Qualification Maintenance Requirement Sheet or equivalent.
3. List of corrective action documents associated with each of the selected components for the last 5 years.
4. Photos of any component in containment or high-radiation areas, if available.

III. Information Requested (for the approximate 6 - 9 selected components) to be Available by June 15, 2016, (will be reviewed by the team in the Regional office during the week of June 20, 2016).

This information should be separated for each selected component, especially if provided electronically (e.g., folder with component name that includes EQ files, Qualification Test Reports, calculations, corrective action documents, maintenance history, etc.).

1. EQ file, including associated Qualification Test Reports.
2. Vendor manual (electronic copy or availability of hard copy during inspection).

REQUEST FOR INFORMATION – DESIGN BASES INSPECTION

3. Preventive maintenance template.
4. Last performed work order (WO) for each associated EQ preventive maintenance.
5. List of corrective maintenance WOs for the last 10 years. Include WO number, date performed, and brief one line description.
6. If repair work (e.g., a motor rewind) was performed under a purchase order, provide copy of the purchase order.
7. Thermal life calculation.
8. Any self-assessments of the EQ Program in the last 3 years.

IV. Additional Information to be Provided on June 27, 2016, Onsite

1. During the in-office preparation activities, the team may identify additional information needed to support the inspection. The lead inspector will provide a list of the additional information needed during the week of June 20 - 24, 2016.

V. Information Requested to be Provided Throughout the Inspection

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

If you have questions regarding the information requested, please contact the lead inspector.

B. Hanson

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Sincerely,

/RA/

Andrew Dunlop, Senior Reactor Engineer
Engineering Branch 2
Division of Reactor Safety

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosure:
Information Request for Design Bases Inspection

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