

**Pre-Submittal Meeting With NRC**

# **Exelon Decommissioning Licensing Action Submittal Plan**

July 12, 2016



# Agenda

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## Summary

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- ❑ Exelon announced closure of Clinton by June 1, 2017 and Quad Cities 1 & 2 by June 1, 2018
- ❑ Exelon needs a small number of licensing actions approved by April 4, 2017 for Clinton in order to implement efficient decommissioning staffing
- ❑ Oyster Creek closure is unchanged (i.e. by December 31, 2019)
- ❑ Exelon is proposing an integrated submittal plan for all 3 sites to support NRC resources planning

## Submittal Background

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- ❑ Clinton - permanently shutdown by June 1, 2017
- ❑ Quad Cities Units 1 & 2 - permanently shutdown by June 1, 2018
- ❑ Overall goal is to provide for a safe and efficient transition from an operating site to a permanently shutdown site
- ❑ Two Key Milestone Dates
  - Permanently Shutdown & Defueled
  - The end of the Zirc-Fire period
- ❑ Need Dates are 60 days in advance of Key Milestone Date:
  - Enable efficient implementation to preserve Trust Funds
  - Provide Change Management and more certainty for employee transitions
  - Provide more certainty for stakeholders (i.e., State & Local Gov.)

## Submittal Background

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- Licensing Action Submittal Schedule
  - Decommissioning Licensing Actions are focused on Key Milestones:
    - Permanently Shutdown & Defueled
    - The end of the Zirc-Fire period
  - Exelon is planning to use a staggered approach to submit the needed Licensing Actions (i.e., every three months)
  - Exelon is requesting the Staff to complete its review by the Need Date in order to implement the licensing action at the site
  - A full list of proposed Decommissioning Licensing Actions is being provided for NRC advanced notice

## Submittal Background

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- Exelon Licensing Submittals are based on:
  - Review of the regulations and guidance documents
  - Review of Industry guidance documents (NEI Guidance)
  - Benchmarking and Lessons Learned from Industry Peers undergoing the decommissioning process including RAI review
  - Licensing submittals will align with licensing actions previously submitted; improved by RAI responses
  - One exception is the first Permanent Shutdown Emergency Plan submittal that will include Decommission EALs. This item was discussed during a Public Meeting on 4/6/16

# Urgent Need Licensing Actions for Clinton

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- Permanent Shutdown Date: June 1, 2017
- Need Date: April 4, 2017

	Clinton
1 LS-3 Certified Fuel Handler Training Program	7/29/2016
2 LS-4 Changes to Administrative Controls TS to reflect Decommissioning Staffing and Training	7/29/2016
3 LS-5 E-Plan Amendment Request for Post-Shutdown ERO Staffing and EAL Changes	8/19/2016
4 LS-6 Request exemption to 10 CFR 73.55(p)(i) and (ii) allow Certified Fuel Handlers to suspend security measures	8/31/2016

# Exelon Licensing Actions to Enable Efficient Decommissioning Staffing

Plant	Clinton	Quad Cities	Oyster Creek
Planned Shutdown Date	6/1/2017	6/1/2018	12/31/2019
Licensing Action Need Date* Defuel	4/4/2017	4/3/2018	9/30/2019
Licensing Need Date** Zirc-Fire Period	6/30/2018	6/30/2019	11/30/2020

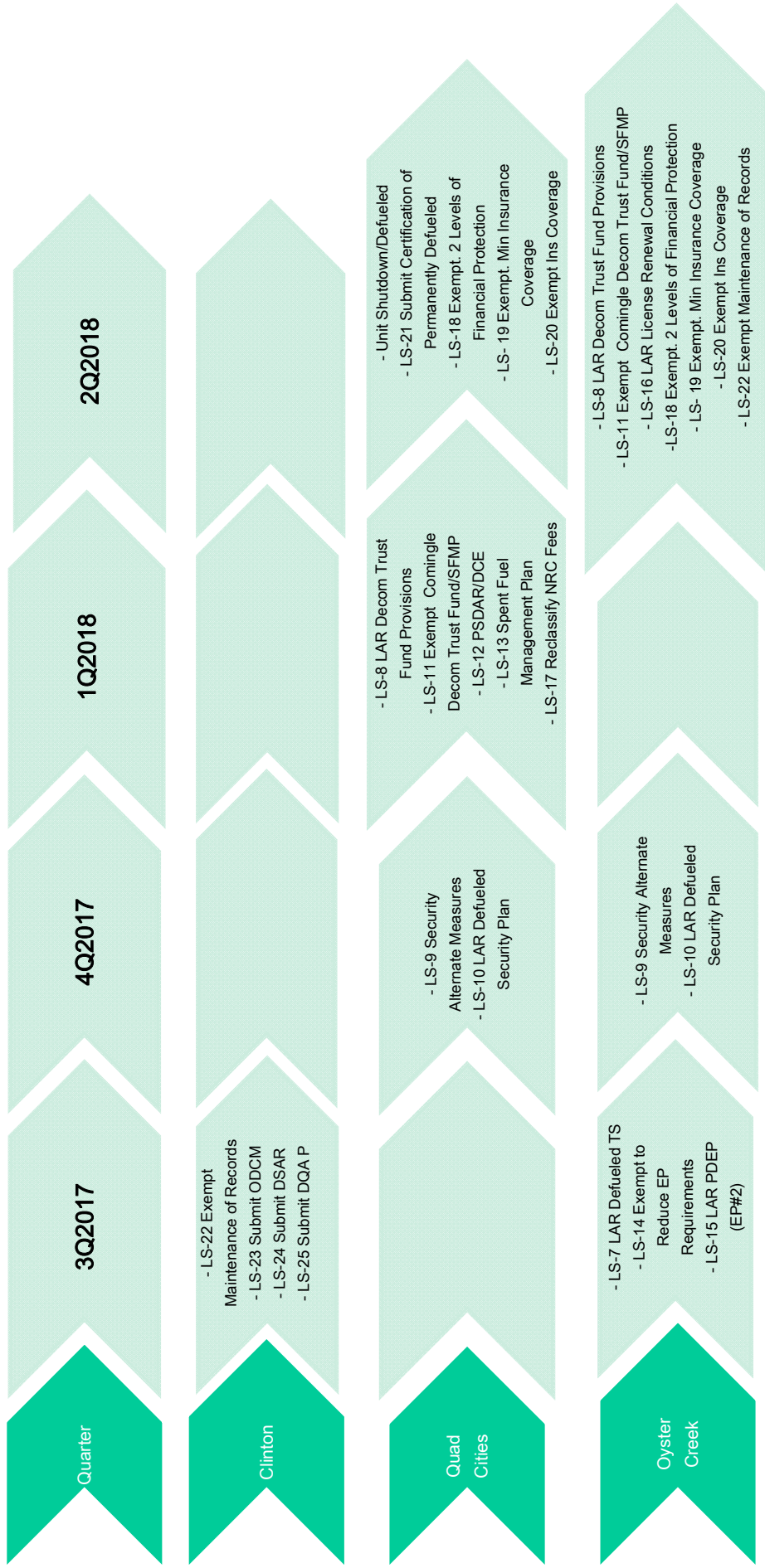
	Clinton	Quad Cities	Oyster Creek
1* LS-3 Certified Fuel Handler Training Program	7/29/2016	7/29/2016	Submitted 1/29/16
2* LS-4 Changes to Administrative Controls TS to reflect Decommissioning Staffing and Training	7/29/2016	10/29/2016	Submitted 5/17/16
3* LS-5 E-Plan Amendment Request for Post-Shutdown ERO Staffing Changes	8/19/2016	11/30/2016	2/28/2017
4* LS-6 Request exemption to 10 CFR 73.55(p)(i) and (ii) allow Certified Fuel Handlers to suspend security measures	8/31/2016	11/30/2016	2/28/2017
5** LS-14 Permanently Defueled E-Plan LAR	2/28/2017	5/31/2017	8/31/2017
6** LS-15 EP Exemption Request	2/28/2017	5/31/2017	8/31/2017



# Integrated Schedule Until Clinton / Quad Cities Shutdown



# Integrated Schedule Until Clinton / Quad Cities Shutdown



# Exelon Integrated Submittal Plan

Item #	Submittal*	Clinton Submittal Date*	Quad Cities Submittal Date	Oyster Creek Submittal Date	Supports DC Milestone
LS-1	Letter Notifying Permanent Cessation of Power Operations	6/20/16	6/20/16	1/7/11	Permanent Unit Shutdown
LS-2	Withdrawal of Licensing Actions	TBD	TBD		
LS-3	Submittal of Certified Fuel Handler Training and Retraining Program	7/29/16	7/29/16	Submitted 1/29/16	Permanent Fuel Removal
LS-4	License Amendment Request Supporting Staffing and Training Requirement Technical Specifications Changes to Section 5 or 6	7/29/16	10/29/16	Submitted 5/17/16	Permanent Fuel Removal
LS-5	License Amendment Request for Emergency Plan and Emergency Action Level (EAL) schemes (ERO on-shift and augmented staff changes, deletion of some EALs)	8/19/16	11/30/16	2/28/17	Permanent Fuel Removal
LS-6	Exemption Request to Permit Suspension of Certain Security Measures During Severe Weather Conditions	8/31/16	11/30/16	2/28/17	Permanent Fuel Removal
LS-7	License Amendment Request for Permanently Defueled Technical Specifications/Bases and Revised License Conditions	9/28/16	4/3/17	9/29/17	Permanent Fuel Removal
LS-8	License Amendment Request Related to Decommissioning Trust Provisions	11/30/16	4/28/17	6/29/18	Permanent Fuel Removal
LS-9	Exemption Request(s)/Alternative Measure(s) from Certain Security Requirements (Part 73)	12/16/16	11/30/17	12/15/17	Permanent Fuel Removal
LS-10	License Amendment Request in Support of Changes to Security Plan for Permanently Defueled Facility	12/16/16	11/30/17	12/15/17	Permanent Fuel Removal
LS-11	Exemption Request for Use of the Decommissioning Trust Fund for Spent Fuel Management Expenses	1/31/17	4/28/18	6/29/18	Permanent Fuel Removal

# Exelon Integrated Submittal Plan

Item #	Submittal*	Clinton Estimated Submittal Date*	Quad Cities Estimated Submittal Date	Oyster Creek Estimated Submittal Date	Supports DC Milestone
LS-12	Submittal of Post-Shutdown Decommissioning Activities Report (PSDAR)/Site Specific Decommissioning Cost Estimate	1/31/17	1/31/18	12/14/18	Permanent Fuel Removal
LS-13	Spent Fuel Management Plan	1/31/17	1/31/18	Submitted 12/30/14	Permanent Fuel Removal
LS-14	Exemption Request(s) to Allow Reduction of Certain 10 CFR 50.47 and 10 CFR 50, Appendix E Emergency Preparedness Requirements	2/28/17	5/31/17	8/28/17	End of Zr Fire Anal Window
LS-15	License Amendment Request for Permanently Defueled Emergency Plan (Plan changes supported by Exemptions including deletion of EOF, TSC, offsite interface, field teams, EPZs, further reduction in augmented staff)	2/28/17	5/31/17	8/28/17	End of Zr Fire Anal Window
LS-16	License Amendment Request Related to Deletion of License Renewal Condition for Permanently Defueled License	NA	3/31/17	6/29/18	Permanent Fuel Removal
LS-17	Request to Reclassify Unit for NRC Fees	3/31/17	1/31/18	8/31/18	Permanent Fuel Removal
LS-18	Exemption Request from Maintaining Two Levels of Financial Protection Against Offsite Liability	5/31/17	6/29/18	6/29/18	End of Zr Fire Analysis Window
LS-19	Exemption Request for Reduction in the Required Minimum Insurance Coverage Limit	5/31/17	6/29/18	6/29/18	End of Zr Fire Anal Window
LS-20	Exemption Request from Obtaining Insurance Coverage from Private Sources	5/31/17	6/29/18	6/29/18	End of Zr Fire Analysis Window
LS-21	Certification of Permanent Fuel Removal	6/30/17	6/29/18	12/22/19	Permanent Fuel Removal

# Exelon Integrated Submittal Plan

Item #	Submittal*	Clinton Estimated Submittal Date*	Quad Cities Estimated Submittal Date	Oyster Creek Estimated Submittal Date	Supports DC Milestone
LS-22	Exemption Request Regarding Maintenance of Records	7/28/17	3/30/18	6/29/18	Permanent Fuel Removal
LS-23	Submit Changes to Offsite Dose Calculation Manual (ODCM)	8/31/17	5/31/18	12/14/18	Permanent Fuel Removal
LS-24	Develop & submit Decommissioning Safety Analysis Report (DSAR)	8/31/17	5/31/18	12/14/18	Permanent Fuel Removal
LS-25	Submittal of Decommissioned QA Program (DQA)	8/31/17	5/31/18	12/14/18	Permanent Fuel Removal
LS-26	License Amendment Request in Support of Additional Changes to Security Plan (supports ISFSI)	11/29/19	12/15/20	6/30/22	End of Zr Fire Anal Window - ISFSI Only
LS-27	License Amendment Request for Permanently Defueled Emergency Plan and EALs (ISFSI-only)	11/29/19	12/15/20	6/30/22	End of Zr Fire Anal Window - ISFSI Only
LS-28	License Amendment Request for Operating License/Technical Specifications "Clean-up" Once All Fuel is Transferred to ISFSI	11/29/19	12/15/20	6/30/22	End of Zr Fire Anal Window - ISFSI Only

## In-Progress Licensing Actions

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- Impact to in-progress licensing actions
  - Exelon is continuing to evaluate all proposed and submitted licensing actions for Clinton and Quad Cities
  - Clinton and Quad Cities will remain in compliance with all outstanding orders.
  - Exelon is planning to submit a request for schedule relief for Quad Cities Unit 1 compliance with Hardened Containment Venting System (HCVS) order
  - Quad Cities Unit 2 compliance dates associated with HCVS and FLEX are not impacted
  - Exelon will also request relief from the requirement for 6 month updates

## **In-Progress Licensing Actions**

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- Impact to in-progress licensing reviews for Clinton
  - The following licensing actions currently on the docket for Clinton will not be withdrawn and should continue to be processed according to the current schedule
    - Extension of ILRT frequency requested approval by 1/29/2017
    - Secondary Containment drawdown time requested approval by 8/1/2016
    - Implementation of TSTF-484 (Use of TS 3.10.1 for Scram Time Testing Activities) requested approval by 4/4/2017
    - Utilization of Code Case N-513-4 requested approval by 1/28/2017 (Fleet)

## **In-Progress Licensing Actions**

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- Impact to in-progress licensing reviews for Quad Cities
  - The following licensing actions currently on the docket for Quad Cities will not be withdrawn and should continue to be processed according to the current schedule
  - Update COLR methodologies for transition to AREVA fuel requested approval by 9/30/2016
  - Spent fuel pool channel bow/bulge methodology requested approval by 12/14/2016
  - Revise TS 3.6.4.1 to address secondary containment access openings requested approval by 2/3/2017
  - Utilization of Code Case N-513-4 requested approval by 1/28/2017 (Fleet)



## Onsite Activities

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- Impact to planned inspections at each station
- The inspection schedule at Quad Cities is in place with no changes planned.
- The inspection schedule at Clinton is in place.
  - One exception is the Component Design Basis Inspection (CDBI) was rescheduled.

## Other Updates

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- Update on Decommissioning funding for each station
- Schedule for submitting the PSDAR and DCE is as shown on the integrated submittal plan.
- Exemptions for financing Spent Fuel Management and ISFSI

## Summary

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- ❑ Exelon announced closure of Clinton by June 1, 2017 and Quad Cities 1 & 2 by June 1, 2018
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- ❑ Oyster Creek closure is unchanged i.e. by December 31, 2019
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# Questions ?