




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

July 27, 2016

MEMORANDUM TO: Douglas A. Broaddus, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager 
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3,
DRAFT REQUEST FOR ADDITIONAL INFORMATION
(CAC NOS. MF7143 AND MF7144)

The attached draft request for additional information (RAI) was transmitted on June 30, 2016, to Ms. Stephanie Hanson of Exelon Generation Company, LLC (Exelon, the licensee). This information was transmitted to facilitate a conference call in order to clarify the licensee's amendment request for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, dated December 3, 2015, as supplemented by letter dated June 9, 2016. The proposed amendment would revise the technical specification (TS) surveillance requirements (SRs) associated with the emergency diesel generator (EDG) fuel oil transfer system. Specifically, the amendment would allow for the crediting of manual actions, in lieu of automatic actions, without having to declare the EDGs inoperable.

The draft RAI was sent to Exelon to ensure that the questions are understandable, the regulatory basis for the questions is clear, and to determine if the information was previously docketed. During a telephone call to discuss the draft RAI on July 25, 2016, the licensee agreed to provide a response to the questions by August 5, 2016.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-277 and 50-278

Attachment: Draft RAI

DRAFT REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT
EMERGENCY DIESEL GENERATOR
FUEL OIL TRANSFER SURVEILLANCE REQUIREMENTS
EXELON GENERATION COMPANY, LLC
PEACH BOTTOM ATOMIC POWER STATION - UNITS 2 AND 3
DOCKET NOS. 50-277 AND 50-278

By letter dated December 3, 2015, as supplemented by letter dated June 9, 2016 (ADAMS Accession Nos. ML15337A413 and ML16162A101, respectively), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The proposed amendment would revise the technical specification (TS) surveillance requirements (SRs) associated with the emergency diesel generator (EDG) fuel oil transfer system. Specifically, the amendment would allow for the crediting of manual actions, in lieu of automatic actions, without having to declare the EDGs inoperable.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed amendment and would like to discuss the following issues to clarify the submittal.

Human Factors Branch (APHB)

Reviewer: Brian Green

APHB-RAI-8

In APHB-RAI-7 (ADAMS Accession No. ML16134A474), the NRC staff requested the licensee to address the following:

Describe the process used to monitor manual actions to ensure that they remain feasible and reliable over the long term, and are not degraded because of design changes, inadequate training, or other mechanisms.

In the June 9, 2016, response to this request for additional information (RAI), the licensee indicated that there is no specific training required to support this LAR. The licensee also referenced procedure CC-AA-102, Revision 29, "Design Input and Configuration Change Impact Screening," and stated that, in accordance with the procedure, impacts on operator manual actions need to be assessed as part of the design change process. The licensee's response does not fully address the staff's concern as discussed below.

Section 3.11, "Human Performance Monitoring Strategy" of NUREG-1764 (ADAMS Accession No. ML07260413), contains review criteria intended to ensure that operators remain capable of

performing manual actions throughout the lifetime of the plant. Subsequent changes to plant systems or procedures, operators becoming unfamiliar with rarely used procedures, or other factors may influence operators in a way that impedes future task performance. Licensees typically track and trend credited operator manual actions to ensure that these actions remain feasible.

The procedure referenced in the RAI response dated June 9, 2016 (i.e., CC-AA-102) was not docketed so it's not clear to the NRC staff if it provides for tracking and trending of operator manual actions. Additional information is necessary to clarify how the review criteria in Section 3.11 of NUREG-1764 are met. One potential method for submitting this material is to provide a brief summary of the tracking/trending program that will track this action accompanied by indication that the credited manual actions described in this LAR will be included in this program. Alternatively, you may choose to provide the procedure, or portion of the procedure that indicates how this particular manual action is tracked and maintained over time.

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ADAMS Accession No.: ML16209A204

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