



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

September 20, 2016

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO)
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: 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; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; 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 — LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION REQUIREMENTS FOR INSERVICE TESTING PROGRAM (CAC NOS. MF8238–MF8256)

Dear Mr. Hanson:

By application dated July 26, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16209A218), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request for 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; Nine Mile Point Nuclear Station, Units 1 and 2; 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. The proposed amendment would revise the technical specification requirements for the inservice testing program for each of these facilities.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

B. Hanson

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The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that Exelon supplement the application to address the information requested in the enclosure by October 7, 2016. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Ms. Laura Lynch and other members of your staff on September 20, 2016.

If you have any questions, please contact me at (301) 415-1380.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Purnell', is written over the typed name.

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,
50-220, 50-410, 50-277, 50-278, 50-254,
50-265, 50-244, and 50-289

Enclosure:
As stated

cc w/encl: Distribution via Listserv

SUPPLEMENTAL INFORMATION NEEDED
LICENSE AMENDMENT REQUEST TO REVISE
TECHNICAL SPECIFICATION REQUIREMENTS FOR INSERVICE TESTING PROGRAM

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;

NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2;

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.

EXELON GENERATION COMPANY, LLC

DOCKET NOS. STN 50-456, STN 50-457, STN 50-454, STN 50-455, 50-317, 50-318, 50-461,

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The Nuclear Regulatory Commission (NRC) staff has determined that the following information is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

Request 1

The application states that the proposed TS changes are consistent with Technical Specification Task Force (TSTF)-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR [Surveillance Requirement] Usage Rule Application to Section 5.5 Testing." Consistent with TSTF-545, the application proposed to define INSERVICE TESTING PROGRAM in TS Section 1 as follows: "The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f)." However, TSTF-545 deletes the IST program from the TSs, whereas the application proposes to retain the IST program in the TSs with the following new wording:

The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f). The provisions of SR 3.0.2 and SR 3.0.3 are only applicable to those SRs that reference usage of the INSERVICE TESTING PROGRAM.

Although the application provides a reason for this deviation from TSTF-545, the application does not provide a justification for the revised TS IST program.

- a. Provide the technical evaluation for the proposed new wording of the TS IST program.
- b. Explain how the proposed TS changes are to be implemented since the INSERVICE TESTING PROGRAM is proposed as a definition in TS Section 1 and retained as a program in TS Section 5, or equivalent.
- c. Justify not including the TS IST program in the definition of the INSERVICE TESTING PROGRAM, since with the proposed change the facilities would be required to comply with the requirements in 10 CFR 50.54(f) and the TS IST program.
- d. Justify the difference in wording between the definition and the TS program.

Request 2

As stated above, the revised TS IST program states:

The provisions of SR 3.0.2 and SR 3.0.3 are only applicable to those SRs that reference usage of the INSERVICE TESTING PROGRAM.

This statement appears to modify SR 3.0.2 and SR 3.0.3 such that they would no longer be applicable to any SRs except those that reference usage of the INSERVICE TESTING PROGRAM. In addition, the proposed changes to the bases provided with the application appear to contradict this statement (see Braidwood Station example in Request 3).

Explain the intent of the statement added to the TS IST program. Revise the proposed TS changes and bases to ensure consistency with the intent of the change. Provide justification for the revised TS and bases.

Request 3

Consistent with TSTF-545, the application includes a proposed bases change for several Exelon facilities that adds an example of when SR 3.0.2 does not apply. For example, the Braidwood Station, Units 1 and 2, revised bases for SR 3.0.2 states: "Examples where SR 3.0.2 does not apply are . . . the inservice testing of pumps and valves in accordance with the applicable American Society for Mechanical Engineers Operation and Maintenance Code as required by 10 CFR 50.55a." However, other Exelon facilities (e.g., LaSalle County Station, Nine Mile Point Nuclear Station, and Quad Cities Nuclear Power Station) included in the application did not include this proposed bases change.

For each facility that did not include this example of when SR 3.0.2 is not applicable, provide the following:

- a. Clarify whether or not SR 3.0.2 applies to the inservice testing of pumps and valves in accordance with the applicable American Society for Mechanical Engineers Operation and Maintenance Code as required by 10 CFR 50.55a.
- b. If SR 3.0.2 applies to these cases, explain how this will be implemented and provide justification.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that Exelon supplement the application to address the information requested in the enclosure by October 7, 2016. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

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Sincerely,

/RA/

Blake Purnell, Project Manager
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Division of Operating Reactor Licensing
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ADAMS Accession No. ML16253A125

***by email**

OFFICE	LPL3-2/PM	LPL3-2/LA	DSS/STSB	LPL3-2/BC(A)	LPL3-2/PM
NAME	BPurnell	SRohrer	AKlein*	GEMiller	BPurnell
DATE	9/20/16	9/13/16	9/13/16	9/20/16	9/20/16

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