

NRR-PMDAPEm Resource

From: Haskell, Russell
Sent: Thursday, March 16, 2017 11:24 AM
To: 'Mitchel.Mathews@exeloncorp.com'
Cc: Oesterle, Eric; Klein, Alex; Waters, Michael; Green, Kimberly
Subject: Acceptance Review - Dresden, Units 2 & 3 - License Amendment Request to Adopt TSTF-542 - OPDRVs (CAC Nos. MF9295/MF9296)

Dear Mr. Mathews,

By letter dated February 10, 2017, Exelon Generation Company, LLC (EGC, or Exelon) submitted a license amendment request for Dresden Nuclear Power Station (DNPS), Units 2 and 3. The amendment would replace existing Technical Specification (TS) requirements related to "operations with a potential for draining the reactor vessels" (OPDRVs) with new requirements on reactor pressure vessel (RPV) water inventory control to protect Safety Limit 2.1.1.3. Safety Limit 2.1.1.3 requires RPV water level to be greater than the top of active irradiated fuel. The proposed changes are based on the final safety evaluation associated with Technical Specification Task Force (TSTF) Traveler TSTF-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control," dated December 20, 2016.

The purpose of this e-mail is to provide the results of the 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 TSs) 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.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the staff to proceed with its detailed technical review and 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. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff is conservatively estimating this licensing request to take approximately 540 hours to complete. This estimate is based on the NRC staff's initial review of the application and subject to change due to several factors including requests for additional information and unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. EGC's application dated February 10, 2017, requested that the NRC staff complete its review by August 1, 2017 (i.e., approximately a 6 month review schedule). It is unlikely we will meet the requested issuance date since the NRC staff expects to complete this review in December 2017. Should there be emergent complexities or challenges identified during the staffs detailed review resulting in changes to the projected level of effort or forecasted completion date, these will be communicated during routine staff interactions between the NRC and EGC.

If you have any questions, please contact me at (301) 415-1129 or Russell.Haskell@nrc.gov.

Sincerely,

Russell S. Haskell II

United States Nuclear Regulatory Commission (NRC)
Licensing Project Manager - NRR/DORL/LPL 3

Dresden Nuclear Power Station, Units 2 and 3

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