

From: [Ennis, Rick](#)
To: [David Neff](#)
Cc: [David Helker](#); [Danna, James](#)
Subject: Acceptance Review - Peach Bottom Unit 2 - License Amendment Request Regarding Safety Relief Valve and Safety Valve Operability for Cycle 22 (CAC No. MF9705)
Date: Wednesday, June 07, 2017 11:27:37 AM

Dave,

By letter dated May 19, 2017 (ADAMS Accession No. ML17139D357), Exelon Generation Company, LLC (Exelon) submitted a license amendment request for Peach Bottom Atomic Power Station (PBAPS), Unit 2. The amendment would revise the Technical Specifications (TSs) to decrease the number of safety relief valves (SRVs) and safety valves (SVs), required to be operable, when operating at a power level less than or equal to 3358 megawatts thermal (i.e., approximately 85 percent of the current licensed thermal power level). This change would be in effect for the current PBAPS Unit 2 Cycle 22 that is scheduled to end in October 2018.

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.

During the current PBAPS Unit 2 cycle of operation (i.e., Cycle 22), one of the 11 SRVs was declared inoperable. The other 10 SRVs and 3 SVs remain operable. However, if another SRV or a SV became inoperable, the plant would be in a 12-hour shutdown statement in accordance with TS 3.4.3, Required Action A.1. As such, Exelon's letter dated May 19, 2017, requested expedited NRC review of the amendment request. Specifically, Exelon stated that:

Exelon requests approval of the proposed amendment under an expedited

NRC review. While the current plant conditions do not meet the criteria for an emergency situation or an exigent circumstance of 10 CFR 50.91(a)(5) and (a)(6), the inoperability of another SRV or an SV would require commencement of a 12-hour reactor shutdown. Expedited NRC review of this proposed amendment could avoid an unnecessary reactor shutdown and avoid the reactivity control challenges that can occur during startup from a Hot Shutdown condition following a short shutdown. Exelon requests approval of the proposed amendment within 6 months of the date of this letter.

Based on the information provided in your submittal, the NRC staff has estimated that this request will take approximately 270 hours to complete. The NRC staff expects to complete this review by November 17, 2017, (i.e., within 6 months of the application as requested by Exelon's letter dated May 19, 2017). Should another SRV or SV become inoperable during the current operating cycle, the NRC staff would expect Exelon to supplement the amendment request to request a shorter review time and to justify the further expedited review in accordance with 10 CFR 50.91(a)(5) and (a)(6).

If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during our routine interactions.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information and unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1420.

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