

## **NRR-PMDAPEm Resource**

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**From:** Rankin, Jennivine  
**Sent:** Tuesday, October 03, 2017 10:32 AM  
**To:** Mathews, Mitchel A:(GenCo-Nuc); Nicely, Ken M.:(GenCo-Nuc)  
**Subject:** Clinton Power Station - Request for Additional Information Regarding License Amendment Request Related to Reactor Pressure Vessel Water Inventory Control (CAC No. MF9666)  
**Attachments:** RAI final.docx

Mr. Mathews and Mr. Nicely,

By application dated May 1, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17121A517), Exelon Generation Company, LLC, requested a change to the technical specifications (TSs) for Clinton Power Station, Unit 1. The proposed change adopts technical specifications task force (TSTF) traveler TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2 (ADAMS Accession No. ML16074A448). Specifically, the proposed changes would replace the existing requirements in the TSs related to operation with a potential for draining the reactor vessels with revised TSs providing an alternative for reactor pressure vessel water inventory control. These alternative requirements would protect Safety Limit 2.1.1.3, which requires reactor pressure vessel water level to be greater than the top of active fuel. TSTF-542, Revision 2, was approved by the U.S. Nuclear Regulatory Commission (NRC) on December 20, 2016 (ADAMS Accession No. ML16343B008).

The NRC staff has reviewed the information provided and determined that additional information is required in order to complete its review. A draft request for additional information (RAI) was transmitted on September 20, 2017, and a clarification call was held on October 2, 2017. As agreed upon, please submit your response to the RAI within 30 days of this email. If you wish to alter the date of your response, please contact me at (301) 415-1530.

Please treat this e-mail as formal transmittal of the RAIs.

Thanks,  
Jennie

Jennie Rankin, Project Manager  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3751

**Mail Envelope Properties** (Jennivine.Rankin@nrc.gov20171003103200)

**Subject:** Clinton Power Station - Request for Additional Information Regarding License Amendment Request Related to Reactor Pressure Vessel Water Inventory Control (CAC No. MF9666)  
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**Received Date:** 10/3/2017 10:32:00 AM  
**From:** Rankin, Jennivine

**Created By:** Jennivine.Rankin@nrc.gov

**Recipients:**

"Mathews, Mitchel A:(GenCo-Nuc)" <Mitchel.Mathews@exeloncorp.com>  
Tracking Status: None  
"Nicely, Ken M.:(GenCo-Nuc)" <ken.nicely@exeloncorp.com>  
Tracking Status: None

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**Return Notification:** No  
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REQUEST FOR ADDITIONAL INFORMATION  
EXELON GENERATION COMPANY, LLC  
CLINTON POWER STATION, UNIT 1  
LICENSE AMENDMENT REQUEST RELATED TO  
REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL  
DOCKET NO. 50-461

By application dated May 1, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17121A517), Exelon Generation Company, LLC (the licensee), requested a change to the technical specifications (TSs) for Clinton Power Station, Unit 1 (CPS). The proposed change adopts technical specifications task force (TSTF) traveler TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2 (ADAMS Accession No. ML16074A448). Specifically, the proposed changes would replace the existing requirements in the TSs related to operation with a potential for draining the reactor vessels (OPDRVs) with revised TSs providing an alternative for reactor pressure vessel water inventory control (RPV WIC). These alternative requirements would protect Safety Limit 2.1.1.3, which requires RPV water level to be greater than the top of active fuel.

TSTF-542, Revision 2, was approved by the U.S. Nuclear Regulatory Commission (NRC) on December 20, 2016 (ADAMS Accession No. ML16343B008).

Based on its review of the amendment request, the NRC staff has determined that additional information is required to complete the review.

RAI 1

The staff has identified an apparent discrepancy in Attachment 2, page 3.5-11 of the license amendment request (LAR). Specifically, the current TSs (i.e., current TS surveillance requirements 3.5.2.5 and 3.5.2.6) contain text not shown in the proposed markup as being deleted.

For clarity, please correct the proposed TS markup, as appropriate.

RAI 2

TSTF-542, Revision 2 changes the title of TS 3.5.2 from "ECCS – Shutdown" to "RPV Water Inventory Control." Current TS 3.8.2, "AC Sources – Shutdown," TS 3.8.5, "DC Sources – Shutdown," and TS 3.8.8, "Inverters – Shutdown," reference TS 3.5.2, "ECCS- Shutdown." There was not any revised TS pages submitted in the LAR to reflect the changes to these sections.

Please provide revised and markup TS pages for these sections, as appropriate.

RAI 3

Attachment 2, pages 3.3-54 through 3.3-59 of the LAR provides a markup of Table 3.3.6.1-1, "Primary Containment and Drywell Isolation Instrumentation." Due to the deletion of Footnote (c), which states, "During operations with a potential for draining the reactor vessel," the following instrumentation were affected.

- Function 2 (primary containment and drywell isolation), Item a, "Reactor Vessel Water Level-Low Low, Level 2"
- Function 2, Item g, "Containment Building Fuel Transfer Pool Ventilation Plenum Radiation-High"
- Function 2, Item h, "Containment Building Exhaust Radiation-High"
- Function 2, Item i, "Containment Building Continuous Containment Purge (CCP) Exhaust Radiation-High"
- Function 2, Item j, "Reactor Vessel Water Level-Low Low Low, Level 1"
- Function 2, Item l, "Manual Initiation"
- Function 4 (reactor water cleanup system isolation), Item f, "Reactor Vessel Level-Low Low, Level 2"
- Function 4, Item h, "Manual Initiation"

Table 3.3.6.1-1, "Primary Containment Isolation Instrumentation" in TSTF-542, Revision 2 modifies Function 2.g, "Containment and Drywell Ventilation Exhaust Radiation-High," in relation to the removal of Footnote (b) which states, "...or operations with a potential for draining the reactor vessel."

Compared to the TSTF-542, Revision 2, CPS proposed to delete additional instrumentation (related to the Applicability during Modes 4 and 5 or OPDRVs) from its TSs. Please provide a technical variation to describe the deviations between the proposed CPS TSs and TSTF-542, Revision 2.