



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

March 12, 2018

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

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT – REGULATORY AUDIT
FOR LICENSE AMENDMENT REQUEST TO REVISE EMERGENCY ACTION
LEVEL SCHEMES (EPID L-2018-LLA-0032)

Dear Mr. Hanson:

By application dated January 31, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18037A786), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) for the James A. FitzPatrick Nuclear Power Plant. The amendment would revise the emergency plan by changing the emergency action level schemes for this facility. The proposed changes are based on the Nuclear Energy Institute's (NEI's) guidance in NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," which was endorsed by the U.S. Nuclear Regulatory Commission (NRC) by letter dated March 28, 2013 (ADAMS Accession No. ML12346A463).

The NRC staff will perform a regulatory audit to support its review of the LAR in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information. The audit will be conducted to gain understanding, verify information, and/or identify information that will require docketing to support the basis for the licensing decision regarding the LAR.

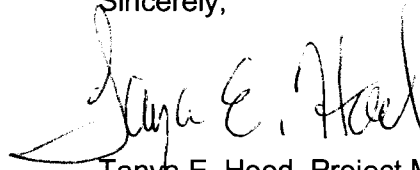
The audit will be performed using an online reference portal that will allow the NRC staff limited read-only access to licensee documents. Use of the online reference portal is acceptable, as long as the following conditions are met:

- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent NRC staff from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that Exelon agrees to the terms and conditions set forth in this letter. Please provide the NRC staff access to the portal and provide the information needed to access the portal, such as username and password, as soon as possible.

The enclosed audit plan identifies the documents which should be uploaded to the portal. The NRC staff will request additional information that is needed to support the staff's regulatory decision using its normal process. If you have any questions, please contact me at (301) 415-1387.

Sincerely,

A handwritten signature in black ink, appearing to read "Tanya E. Hood". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Tanya E. Hood, Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure:
Audit Plan

cc: Listserv

REGULATORY AUDIT PLAN
RELATED TO LICENSE AMENDMENT REQUEST TO
REVISE EMERGENCY ACTION LEVEL SCHEMES
EXELON GENERATION COMPANY, LLC
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

Background

By application dated January 31, 2018 (Agencywide Documents Access and Management System Accession No. ML18037A786), Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) for the James A. FitzPatrick Nuclear Power Plant. The amendment would revise the emergency plan by changing the emergency action level (EAL) schemes for this facility.

Regulatory Basis

The audit will support the U.S. Nuclear Regulatory Commission (NRC) staff's review of the LAR. The purpose of the audit is to verify assumptions and input used to calculate specific monitor thresholds in the proposed EALs.

Audit Scope

The scope of this audit is to review calculations, analysis, and supporting documents related to radiological effluent and containment radiation monitor thresholds in the proposed EALs. The following is the initial list of documents that may be reviewed during the audit:

- Calculations used to establish the thresholds for radiological effluent monitors in EALs RU1, RA1, RS1, and RG1.
- Calculations used to establish the thresholds for containment radiation monitors in EALs FC5, RC5, CS6, and CG6.

Additional documents may be reviewed as part of the audit.

Team

The NRC staff participation is expected to include the following individuals. These assignments may change.

- Tanya Hood, Project Manager
- Raymond Hoffman, Technical Reviewer
- Michael Norris, Technical Team Lead
- James Danna, Branch Chief
- Joseph Anderson, Branch Chief

Logistics

The audit will be conducted primarily using an online electronic information portal. If necessary, the NRC staff will make arrangements to review hard copies at a location to be determined. Meetings and teleconferences will be held as necessary for clarification of information. As necessary, public meetings will be used for technical discussions.

The audit will begin once the initial list of documents is made available to the NRC technical reviewer on the online electronic information portal. The audit will end before the NRC staff makes a final regulatory decision on the LAR.

Special Requests

Exelon should establish an online reference portal that allows the NRC staff to access documents remotely. The following conditions associated with the online reference portal must be maintained throughout the duration of the review process:

- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent NRC staff from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The initial list of documents above should be made available as soon as possible to ensure timely completion of the audit. Username and password information should be provided directly to the NRC staff member. All other communications should be coordinated with the NRC project manager.

Exelon should provide access to the electronic portal to Raymond Hoffman, who may be contacted by e-mail to Raymond.Hoffman@nrc.gov or by phone at 301-287-3764. The NRC project manager will inform Exelon if any additional staff members need access to the electronic portal.

Deliverables

The NRC staff will inform Exelon when the audit has concluded, and will hold an exit meeting as needed. The staff will complete an audit summary to document its observations and conclusions within 30 days of the completion of the audit. The audit summary will be made public once the review of the LAR has been completed. Should the staff identify information during the audit that is needed to support its regulatory decision on the LAR, the staff will issue a request for additional information using its normal process.

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT – REGULATORY AUDIT FOR LICENSE AMENDMENT REQUEST TO REVISE EMERGENCY ACTION LEVEL SCHEMES (EPID L-2018-LLA-0032) DATED MARCH 12, 2018

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ADAMS Accession No. ML18064A177

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM
NAME	THood	LRonewicz (JBurkhardt for)	JDanna	THood
DATE	03/05/2018	03/09/2018	03/12/2018	03/12/2018

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