

NRR-DMPSPeM Resource

From: Haskell, Russell
Sent: Friday, March 23, 2018 1:58 PM
To: christian.williams@exeloncorp.com
Subject: Draft Request for Information (RAI) for JAFNPP Re: Traveler TSTF-542, RPV Water Inventory Control (EPID L-2017-LLA-0311)
Attachments: DRAFT to EGC Re Fitz TSTF542 RAI.pdf

Dear Mr. Williams:

By letter dated October 2, 2017 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML17275A520), Exelon Generation Company (EGC), LLC (the licensee), submitted a license amendment request (LAR) for James A. FitzPatrick Nuclear Power Plant, Unit 1 (JAFNPP), to propose changes to the Technical Specification (TS) to replace existing requirements for “operations with a potential to drain the reactor vessel” (OPDRVs) with new requirements on Reactor Pressure Vessel Water Inventory Control (RPV WIC) to protect Safety Limit 2.1.1.3. Safety Limit 2.1.1.3 requires the reactor vessel water level to be greater than the top of active irradiated fuel.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has identified an area where additional information is needed to complete its review. Attached, please find a DRAFT request for additional information (RAI) being sent to ensure the request is understandable and the regulatory basis is clear. This email and the attachment do not convey or represent an NRC staff position regarding the EGC request.

Should EGC require additional clarification to the attached request, please contact me to coordinate a teleconference between the NRC & EGC staff. If you determine EGC requires no clarification, the NRC will formalize the attached request through separate correspondence which will include an expected response date to the NRC.

Thank you for your attention.

/for Tanya Hood

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

✉ Russell.Haskell@NRC.Gov; ☎ (301) 415-1129; Office: O-8C01; Mail-Stop O-8B1A

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Water Inventory Control (EPID L-2017-LLA-0311)
Sent Date: 3/23/2018 1:57:47 PM
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From: Haskell, Russell

Created By: Russell.Haskell@nrc.gov

Recipients:
"christian.williams@exeloncorp.com" <christian.williams@exeloncorp.com>
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Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
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REQUEST FOR ADDITIONAL INFORMATION

RE: APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT

TECHNICAL SPECIFICATION TASK FORCE TRAVELER 542, REVISION 2,

“REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL”

FOR EXELON GENERATION COMPANY, LLC,

JAMES A. FITZPATRICK NUCLEAR POWER PLANT, UNIT 1

(EPID L-2017-LLA-0311)

By letter dated October 2, 2017 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML17275A520), Exelon Generation Company, LLC (the licensee), submitted a license amendment request (LAR) for James A. FitzPatrick Nuclear Power Plant, Unit 1 (JAFNPP), to propose changes to the Technical Specification (TS) to replace existing requirements for “operations with a potential to drain the reactor vessel” (OPDRVs) with new requirements on Reactor Pressure Vessel Water Inventory Control (RPV WIC) to protect Safety Limit 2.1.1.3. Safety Limit 2.1.1.3 requires the reactor vessel water level to be greater than the top of active irradiated fuel.

The NRC’s regulatory requirements related to the content of the TS are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) at 10 CFR 50.36(c)(2)(ii). Applicable regulatory guidance for JAFNPP is contained in Standard Technical Specifications for General Electric, BWR-4 Plants, NUREG-1433, Revision 4 (STS, ADAMS Accession Number ML12104A192) and the NRC approved Technical Specification Task Force Traveler (TSTF) 542, Revision 2 (ADAMS Accession No. ML16074A448).

JAFNPP-RAI-01

In Attachment 1 (of the LAR), for Variation 2.2.6, the licensee states that Surveillance Requirement (SR) SR 3.3.5.2.3, “Perform LOGIC SYSTEM FUNCTIONAL TEST,” is not applicable because the “manual initiation” logic does not exist in the JAFNPP design. However, in Attachment 2 (of the LAR), on proposed TS markup page 3.3.5.2-2, SR 3.3.5.2.3 was included. Furthermore, proposed TS Table 3.3.5.2-1, “Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation,” has no reference to SR 3.3.5.2.3.

Request

Since this appears to indicate the proposed markups for the SRs (page 3.3.5.2-2) and TS Table 3.3.5.2-1 (page 3.3.5.2-3) do not align, either provide clarification or correct the proposed TS markup page(s) as appropriate.