

## **NRR-DMPSPeM Resource**

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**From:** Haskell, Russell  
**Sent:** Monday, March 26, 2018 10:58 AM  
**To:** Williams, Christian D:(GenCo-Nuc)  
**Subject:** James A. FitzPatrick Nuclear Power Plant, Unit 1 - Request for Information To Adopt Traveler TSTF-542, "RPV Water Inventory Control" (EPID: L-2017-LLA-0311)  
**Attachments:** FINAL RAI for Fitz TSTF\_542.pdf

Dear Mr. Williams,

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.

On March 23, 2018, following a teleconference between NRC and EGC staff, the NRC sent an email to EGC re: "DRAFT" request for information (RAI) for the above RPV WIC request. Shortly following a review of the RAI, you informed the NRC that EGC required no additional clarifications associated with the RAI. Therefore, the NRC is requesting EGC to submit their response to the RAI (as attached) no later than **April 23, 2018**.

The NRC considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1129 or by email at [Russell.Haskell@nrc.gov](mailto: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

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

**Hearing Identifier:** NRR\_DMPS  
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**Subject:** James A. FitzPatrick Nuclear Power Plant, Unit 1 - Request for Information To Adopt Traveler TSTF-542, "RPV Water Inventory Control" (EPID: L-2017-LLA-0311)  
**Sent Date:** 3/26/2018 10:58:06 AM  
**Received Date:** 3/26/2018 10:58:09 AM  
**From:** Haskell, Russell

**Created By:** Russell.Haskell@nrc.gov

**Recipients:**  
"Williams, Christian D:(GenCo-Nuc)" <Christian.Williams@exeloncorp.com>  
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MESSAGE	1797	3/26/2018 10:58:09 AM
FINAL RAI for Fitz TSTF_542.pdf		100706

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**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
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**Recipients Received:**

**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 SR (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.