



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

May 29, 2018

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

SUBJECT: CLINTON POWER STATION, UNIT NO. 1; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; AND NINE MILE POINT NUCLEAR STATION, UNIT 2 - ISSUANCE OF AMENDMENTS TO REVISE TECHNICAL SPECIFICATION REQUIREMENTS FOR SECONDARY CONTAINMENT (EPID L-2017-LLA-0378)

Dear Mr. Hanson:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the following enclosed amendments in response to the Exelon Generation Company, LLC (Exelon) application dated November 8, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17312A364):

1. Amendment No. 218 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1;
2. Amendment No. 228 to Renewed Facility Operating License No. NPF-11 and Amendment No. 214 to Renewed Facility Operating License No. NPF-18 for the LaSalle County Station, Units 1 and 2, respectively;
3. Amendment No. 229 to Renewed Facility Operating License No. NPF-39 and Amendment No. 192 to Renewed Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2, respectively; and
4. Amendment No. 169 to Renewed Facility Operating License No. NPF-69 for the Nine Mile Point Nuclear Station, Unit 2.

The amendments revise the technical specification requirements for secondary containment for each of these facilities based on Technical Specifications Task Force (TSTF) Traveler TSTF-551, "Revise Secondary Containment Surveillance Requirements," Revision 3 (ADAMS Accession No. ML16277A226).

The application also included similar license amendment requests for Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2. However, Exelon withdrew the requests for these two facilities by letter dated January 24, 2018 (ADAMS Accession No. ML18024B022). The NRC staff acknowledged the withdrawal of these requests by letter dated January 26, 2018 (ADAMS Accession No. ML18025B443).

B. Hanson

- 2 -

A copy of the NRC staff's Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read 'Blake Purnell', written in a cursive style.

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-461, 50-373, 50-374, 50-352,
50-353, and 50-410

Enclosures:

1. Amendment No. 218 to NPF-62
2. Amendment No. 228 to NPF-11
3. Amendment No. 214 to NPF-18
4. Amendment No. 229 to NPF-39
5. Amendment No. 192 to NPF-85
6. Amendment No. 169 to NPF-69
7. Safety Evaluation

cc w/enclosures: Listserv



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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-461

CLINTON POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 218
License No. NPF-62


1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 8, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-62 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 218, are hereby incorporated into this license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "David J. Wrona", with a long horizontal flourish extending to the right.

David J. Wrona, Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications
and Facility Operating License

Date of Issuance: May 29, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 218

FACILITY OPERATING LICENSE NO. NPF-62

CLINTON POWER STATION, UNIT NO. 1

DOCKET NO. 50-461

Replace the following pages of the Facility Operating License and Appendix A, Technical Specifications (TSs), with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

Insert

License NPF-62

License NPF-62

Page 3

Page 3

TSs

TSs

3.6-44

3.6-44

3.6-45

3.6-45

- (4) Exelon Generation Company, pursuant to the Act and to 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) Exelon Generation Company, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components;
- (6) Exelon Generation Company, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility. Mechanical disassembly of the GE14i isotope test assemblies containing Cobalt-60 is not considered separation; and
- (7) Exelon Generation Company, pursuant to the Act and 10 CFR Parts 30, to intentionally produce, possess, receive, transfer, and use Cobalt-60.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Exelon Generation Company is authorized to operate the facility at reactor core power levels not in excess of 3473 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 218, are hereby incorporated into this license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the primary or secondary containment.	C.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of recently irradiated fuel assemblies in the primary and secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.1.1 -----NOTE----- Not required to be met for 4 hours if analysis demonstrates one standby gas treatment (SGT) subsystem is capable of establishing the required secondary containment vacuum. ----- Verify secondary containment vacuum is \geq 0.25 inch of vacuum water gauge.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.2 Verify all secondary containment equipment hatches are closed and sealed.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	Verify one door in each access to secondary containment is closed, except during normal entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	Verify the secondary containment can be drawn down to ≥ 0.25 inch of vacuum water gauge within the time required using one SGT subsystem.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.5	Verify the secondary containment can be maintained ≥ 0.25 inch of vacuum water gauge for 1 hour using one SGT subsystem at a flow rate ≤ 4400 cfm.	In accordance with the Surveillance Frequency Control Program



UNITED STATES
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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-373

LASALLE COUNTY STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 228
Renewed License No. NPF-11

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 8, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-11 is hereby amended to read as follows:
 - (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 228, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall

operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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David J. Wrona, Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications
and Renewed Facility Operating License

Date of Issuance: May 29, 2018



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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-374

LASALLE COUNTY STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 214
Renewed License No. NPF-18

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 8, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-18 is hereby amended to read as follows:
 - (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 214, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall

operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "David J. Wrona", followed by a horizontal line.

David J. Wrona, Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications
and Renewed Facility Operating License

Date of Issuance: May 29, 2018

ATTACHMENT TO LICENSE AMENDMENT NOS. 228 AND 214
RENEWED FACILITY OPERATING LICENSE NOS. NPF-11 AND NPF-18
LASALLE COUNTY STATION, UNITS 1 AND 2
DOCKET NOS. 50-373 AND 50-374

Replace the following pages of the Renewed Facility Operating Licenses and Appendix A, Technical Specifications (TSs), with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-11
Page 3

License NPF-18
Page 3

TSs
3.6.4.1-3

Insert

License NPF-11
Page 3

License NPF-18
Page 3

TSs
3.6.4.1-3

(3) Exelon Generation Company, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

Am. 146
01/12/01

(4) Exelon Generation Company, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

Am. 202
07/21/11

(5) Exelon Generation Company, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of LaSalle County Station, Units 1 and 2, and such Class B and Class C low-level radioactive waste as may be produced by the operation of Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, and Clinton Power Station, Unit 1.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

Am. 198
09/16/10

(1) Maximum Power Level

The licensee is authorized to operate the facility at reactor core power levels not in excess of full power (3546 megawatts thermal).

Am. 228
05/29/18

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 228, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

Am. 194
08/28/09

(3) DELETED

Am. 194
08/28/09

(4) DELETED

Am. 194
08/28/09

(5) DELETED

- (2) Pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (3) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Exelon Generation Company, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of LaSalle County Station, Units 1 and 2, and such Class B and Class C low-level radioactive waste as may be produced by the operation of Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, and Clinton Power Station, Unit 1.

Am. 189
07/21/11

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

Am. 185
09/16/10

- (1) Maximum Power Level
The licensee is authorized to operate the facility at reactor core power levels not in excess of full power (3546 megawatts thermal). Items in Attachment 1 shall be completed as specified. Attachment 1 is hereby incorporated into this license.

Am. 214
05/29/18

- (2) Technical Specifications and Environmental Protection Plan
The Technical Specifications contained in Appendix A, as revised through Amendment No. 214, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.1.1 -----NOTE----- Not required to be met for 4 hours if analysis demonstrates one standby gas treatment (SGT) subsystem is capable of establishing the required secondary containment vacuum. ----- Verify secondary containment vacuum is ≥ 0.25 inch of vacuum water gauge.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.1.2 Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.1.3 Verify the secondary containment can be drawn down to ≥ 0.25 inch of vacuum water gauge in ≤ 900 seconds using one SGT subsystem.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.1.4 Verify the secondary containment can be maintained ≥ 0.25 inch of vacuum water gauge for 1 hour using one SGT subsystem at a flow rate ≤ 4400 cfm.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.1.5 Verify all secondary containment equipment hatches are closed and sealed.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>



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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 229
Renewed License No. NPF-39

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 8, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-39 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 229, are hereby incorporated into this renewed license. Exelon Generation

Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "D. J. Wrona", followed by a horizontal line.

David J. Wrona, Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications
and Renewed Facility Operating License

Date of Issuance: May 29, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 229
RENEWED FACILITY OPERATING LICENSE NO. NPF-39
LIMERICK GENERATING STATION, UNIT 1
DOCKET NO. 50-352

Replace the following pages of the Renewed Facility Operating License and Appendix A, Technical Specifications (TSs), with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-39
Page 3

TSs

1-6
1-7
3/4 6-46
3/4 6-47

Insert

License NPF-39
Page 3

TSs

1-6
1-7
3/4 6-46
3/4 6-47

- (2) Pursuant to the Act and 10 CFR Part 70, to receive, possess and to use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) Pursuant to the Act and 10 CFR Parts 30, 40, 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility, and to receive and possess, but not separate, such source, byproduct, and special nuclear materials as contained in the fuel assemblies and fuel channels from the Shoreham Nuclear Power Station.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D. below) and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Exelon Generation Company is authorized to operate the facility at reactor core power levels not in excess of 3515 megawatts thermal (100% rated power) in accordance with the conditions specified herein and in Attachment 1 to this license. The items identified in Attachment 1 to this renewed license shall be completed as specified. Attachment 1 is hereby incorporated into this renewed license.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 229, are hereby incorporated into this renewed license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

DEFINITIONS

PURGE - PURGING

1.31 PURGE or PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

1.32 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3515 MWt.

REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY

1.33 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall exist when:

- a. All reactor enclosure secondary containment penetrations required to be closed during accident conditions are either:
 1. Capable of being closed by an OPERABLE secondary containment automatic isolation system, or
 2. Closed by at least one manual valve, blind flange, slide gate damper, or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.1.
- b. All reactor enclosure secondary containment hatches and blowout panels are closed and sealed.
- c. The standby gas treatment system is in compliance with the requirements of Specification 3.6.5.3.
- d. The reactor enclosure recirculation system is in compliance with the requirements of Specification 3.6.5.4.
- e. At least one door in each access to the reactor enclosure secondary containment is closed, except when the access opening is being used for entry and exit.
- f. The sealing mechanism associated with each reactor enclosure secondary containment penetration, e.g., welds, bellows, or O-rings, is OPERABLE.
- g. The pressure within the reactor enclosure secondary containment is less than or equal to the value required by Specification 4.6.5.1.1a, except as indicated by the footnote for Specification 4.6.5.1.1a.

REACTOR PROTECTION SYSTEM RESPONSE TIME

1.34 REACTOR PROTECTION SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

RECENTLY IRRADIATED FUEL

1.35 RECENTLY IRRADIATED FUEL is fuel that has occupied part of a critical reactor core within the previous 24 hours.

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY

1.36 REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY shall exist when:

- a. All refueling floor secondary containment penetrations required to be closed during accident conditions are either:

DEFINITIONS

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY (Continued)

1. Capable of being closed by an OPERABLE secondary containment automatic isolation system, or
 2. Closed by at least one manual valve, blind flange, slide gate damper, or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.2.
- b. All refueling floor secondary containment hatches and blowout panels are closed and sealed.
 - c. The standby gas treatment system is in compliance with the requirements of specification 3.6.5.3.
 - d. At least one door in each access to the refueling floor secondary containment is closed, except when the access opening is being used for entry and exit.
 - e. The sealing mechanism associated with each refueling floor secondary containment penetration, e.g., welds, bellows, or O-rings, is OPERABLE.
 - f. The pressure within the refueling floor secondary containment is less than or equal to the value required by Specification 4.6.5.1.2a, except as indicated by the footnote for Specification 4.6.5.1.2a.

REPORTABLE EVENT

- 1.37 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

RESTRICTED AREA

- 1.37a RESTRICTED AREA means an area, access to which is limited by the licensee for the purpose of protecting individuals against undue risks from exposure to radiation and radioactive materials. RESTRICTED AREA does not include areas used as residential quarters, but separate rooms in a residential building may be set apart as a RESTRICTED AREA.

- 1.38 (Deleted)

SHUTDOWN MARGIN (SDM)

- 1.39 SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical throughout the operating cycle assuming that:
- a. The reactor is xenon free;
 - b. The moderator temperature is $\geq 68^{\circ}\text{F}$, corresponding to the most reactive state; and
 - c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM.

SITE BOUNDARY

- 1.40 The SITE BOUNDARY shall be that line as defined in Figure 5.1.3-1a.

SOURCE CHECK

- 1.41 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

CONTAINMENT SYSTEMS

3/4.6.5 SECONDARY CONTAINMENT

REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

Without REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY, restore REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall be demonstrated by:

- a. Verifying in accordance with the Surveillance Frequency Control Program that the pressure within the reactor enclosure secondary containment is greater than or equal to 0.25 inch of vacuum water gauge.*
- b. Verifying in accordance with the Surveillance Frequency Control Program that:
 1. All reactor enclosure secondary containment equipment hatches and blowout panels are closed and sealed.
 2. At least one door in each access to the reactor enclosure secondary containment is closed, except when the access opening is being used for entry and exit.
 3. All reactor enclosure secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers/valves and required to be closed during accident conditions are closed by valves, blind flanges, slide gate dampers or deactivated automatic dampers/valves secured in position.
- c. In accordance with the Surveillance Frequency Control Program:
 1. Verifying that one standby gas treatment subsystem will draw down the reactor enclosure secondary containment to greater than or equal to 0.25 inch of vacuum water gauge in less than or equal to 916 seconds with the reactor enclosure recirc system in operation and
 2. Operating one standby gas treatment subsystem for one hour and maintaining greater than or equal to 0.25 inch of vacuum water gauge in the reactor enclosure secondary containment at a flow rate not exceeding 2500 cfm with wind speeds of ≤ 7.0 mph as measured on the wind instrument on Tower 1, elevation 30' or, if that instrument is unavailable, Tower 2, elevation 159'.

*Not required to be met for 4 hours if analysis demonstrates one standby gas treatment subsystem is capable of establishing the required secondary containment vacuum.

CONTAINMENT SYSTEMS

3/4.6.5 SECONDARY CONTAINMENT

REFUELING AREA SECONDARY CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.5.1.2 REFUELING AREA SECONDARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: When RECENTLY IRRADIATED FUEL is being handled in the secondary containment.

ACTION:

Without REFUELING AREA SECONDARY CONTAINMENT INTEGRITY, suspend handling of RECENTLY IRRADIATED FUEL in the secondary containment. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.5.1.2 REFUELING AREA SECONDARY CONTAINMENT INTEGRITY shall be demonstrated by:

- a. Verifying in accordance with the Surveillance Frequency Control Program that the pressure within the refueling area secondary containment is greater than or equal to 0.25 inch of vacuum water gauge.*
- b. Verifying in accordance with the Surveillance Frequency Control Program that:
 1. All refueling area secondary containment equipment hatches and blowout panels are closed and sealed.
 2. At least one door in each access to the refueling area secondary containment is closed, except when the access opening is being used for entry and exit.
 3. All refueling area secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers/valves and required to be closed during accident conditions are closed by valves, blind flanges, slide gate dampers or deactivated automatic dampers/valves secured in position.
- c. In accordance with the Surveillance Frequency Control Program:

Operating one standby gas treatment subsystem for one hour and maintaining greater than or equal to 0.25 inch of vacuum water gauge in the refueling area secondary containment at a flow rate not exceeding 764 cfm.

*Not required to be met for 4 hours if analysis demonstrates one standby gas treatment subsystem is capable of establishing the required secondary containment vacuum.



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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 192
Renewed License No. NPF-85

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 8, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-85 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 192, are hereby incorporated into this renewed license. Exelon Generation

Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "D. J. Wrona", with a long horizontal flourish extending to the right.

David J. Wrona, Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications
and Renewed Facility Operating License

Date of Issuance: May 29, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 192

RENEWED FACILITY OPERATING LICENSE NO. NPF-85

LIMERICK GENERATING STATION, UNIT 2

DOCKET NO. 50-353

Replace the following pages of the Renewed Facility Operating License and Appendix A, Technical Specifications (TSs), with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

Insert

License NPF-85

License NPF-85

Page 3

Page 3

TSs

TSs

1-6

1-6

1-7

1-7

3/4 6-46

3/4 6-46

3/4 6-47

3/4 6-47

- (2) Pursuant to the Act and 10 CFR Part 70, to receive, possess and to use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) Pursuant to the Act and 10 CFR Parts 30, 40, 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility, and to receive and possess, but not separate, such source, byproduct, and special nuclear materials as contained in the fuel assemblies and fuel channels from the Shoreham Nuclear Power Station.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D. below) and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Exelon Generation Company is authorized to operate the facility at reactor core power levels of 3515 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 192, are hereby incorporated into this renewed license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

DEFINITIONS

PURGE - PURGING

1.31 PURGE or PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

1.32 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3515 MWt.

REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY

1.33 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall exist when:

- a. All reactor enclosure secondary containment penetrations required to be closed during accident conditions are either:
 1. Capable of being closed by an OPERABLE secondary containment automatic isolation system, or
 2. Closed by at least one manual valve, blind flange, slide gate damper or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.1.
- b. All reactor enclosure secondary containment hatches and blowout panels are closed and sealed.
- c. The standby gas treatment system is in compliance with the requirements of Specification 3.6.5.3.
- d. The reactor enclosure recirculation system is in compliance with the requirements of Specification 3.6.5.4.
- e. At least one door in each access to the reactor enclosure secondary containment is closed, except when the access opening is being used for entry and exit.
- f. The sealing mechanism associated with each reactor enclosure secondary containment penetration, e.g., welds, bellows, or O-rings, is OPERABLE.
- g. The pressure within the reactor enclosure secondary containment is less than or equal to the value required by Specification 4.6.5.1.1a, except as indicated by the footnote for Specification 4.6.5.1.1a.

REACTOR PROTECTION SYSTEM RESPONSE TIME

1.34 REACTOR PROTECTION SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

RECENTLY IRRADIATED FUEL

1.35 RECENTLY IRRADIATED FUEL is fuel that has occupied part of a critical reactor core within the previous 24 hours.

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY

1.36 REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY shall exist when:

- a. All refueling floor secondary containment penetrations required to be closed during accident conditions are either:

DEFINITIONS

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY (Continued)

1. Capable of being closed by an OPERABLE secondary containment automatic isolation system, or
 2. Closed by at least one manual valve, blind flange, slide gate damper or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.2.
- b. All refueling floor secondary containment hatches and blowout panels are closed and sealed.
 - c. The standby gas treatment system is in compliance with the requirements of Specification 3.6.5.3.
 - d. At least one door in each access to the refueling floor secondary containment is closed, except when the access opening is being used for entry and exit.
 - e. The sealing mechanism associated with each refueling floor secondary containment penetration, e.g., welds, bellows, or O-rings, is OPERABLE.
 - f. The pressure within the refueling floor secondary containment is less than or equal to the value required by Specification 4.6.5.1.2a, except as indicated by the footnote for Specification 4.6.5.1.2a.

REPORTABLE EVENT

- 1.37 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

RESTRICTED AREA

- 1.37a RESTRICTED AREA means an area, access to which is limited by the licensee for the purpose of protecting individuals against undue risks from exposure to radiation and radioactive materials. RESTRICTED AREA does not include areas used as residential quarters, but separate rooms in a residential building may be set apart as a RESTRICTED AREA.

- 1.38 (Deleted)

SHUTDOWN MARGIN (SDM)

- 1.39 SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical throughout the operating cycle assuming that:
- a. The reactor is xenon free;
 - b. The moderator temperature is $\geq 68^{\circ}\text{F}$, corresponding to the most reactive state; and
 - c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM.

SITE BOUNDARY

- 1.40 The SITE BOUNDARY shall be that line as defined in Figure 5.1.3-1a.

SOURCE CHECK

- 1.41 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

CONTAINMENT SYSTEMS

3/4.6.5 SECONDARY CONTAINMENT

REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

Without REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY, restore REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall be demonstrated by:

- a. Verifying in accordance with the Surveillance Frequency Control Program that the pressure within the reactor enclosure secondary containment is greater than or equal to 0.25 inch of vacuum water gauge.*
- b. Verifying in accordance with the Surveillance Frequency Control Program that:
 1. All reactor enclosure secondary containment equipment hatches and blowout panels are closed and sealed.
 2. At least one door in each access to the reactor enclosure secondary containment is closed, except when the access opening is being used for entry and exit.
 3. All reactor enclosure secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers/valves and required to be closed during accident conditions are closed by valves, blind flanges, slide gate dampers or deactivated automatic dampers/valves secured in position.
- c. In accordance with the Surveillance Frequency Control Program:
 1. Verifying that one standby gas treatment subsystem will draw down the reactor enclosure secondary containment to greater than or equal to 0.25 inch of vacuum water gauge in less than or equal to 916 seconds with the reactor enclosure recirc system in operation, and
 2. Operating one standby gas treatment subsystem for one hour and maintaining greater than or equal to 0.25 inch of vacuum water gauge in the reactor enclosure secondary containment at a flow rate not exceeding 2500 cfm with wind speeds of ≤ 7.0 mph as measured on the wind instrument on Tower 1, elevation 30' or, if that instrument is unavailable, Tower 2, elevation 159'.

*Not required to be met for 4 hours if analysis demonstrates one standby gas treatment subsystem is capable of establishing the required secondary containment vacuum.

CONTAINMENT SYSTEMS

3/4.6.5 SECONDARY CONTAINMENT

REFUELING AREA SECONDARY CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.5.1.2 REFUELING AREA SECONDARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: When RECENTLY IRRADIATED FUEL is being handled in the secondary containment.

ACTION:

Without REFUELING AREA SECONDARY CONTAINMENT INTEGRITY, suspend handling of RECENTLY IRRADIATED FUEL in the secondary containment. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.5.1.2 REFUELING AREA SECONDARY CONTAINMENT INTEGRITY shall be demonstrated by:

- a. Verifying in accordance with the Surveillance Frequency Control Program that the pressure within the refueling area secondary containment is greater than or equal to 0.25 inch of vacuum water gauge.*
- b. Verifying in accordance with the Surveillance Frequency Control Program that:
 1. All refueling area secondary containment equipment hatches and blowout panels are closed and sealed.
 2. At least one door in each access to the refueling area secondary containment is closed, except when the access opening is being used for entry and exit.
 3. All refueling area secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers/valves and required to be closed during accident conditions are closed by valves, blind flanges, slide gate dampers or deactivated automatic dampers/valves secured in position.
- c. In accordance with the Surveillance Frequency Control Program:

Operating one standby gas treatment subsystem for one hour and maintaining greater than or equal to 0.25 inch of vacuum water gauge in the refueling area secondary containment at a flow rate not exceeding 764 cfm.

*Not required to be met for 4 hours if analysis demonstrates one standby gas treatment subsystem is capable of establishing the required secondary containment vacuum.



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

NINE MILE POINT NUCLEAR STATION, LLC

LONG ISLAND LIGHTING COMPANY

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-410

NINE MILE POINT NUCLEAR STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 169
Renewed License No. NPF-69

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 8, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-69 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, as revised through Amendment No. 169, are hereby incorporated into this license. Exelon Generation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



David J. Wrona, Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications
and Renewed Facility Operating License

Date of Issuance: May 29, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 169
RENEWED FACILITY OPERATING LICENSE NO. NPF-69
NINE MILE POINT NUCLEAR STATION, UNIT 2
DOCKET NO. 50-410

Replace the following pages of the Renewed Facility Operating License and Appendix A, Technical Specifications (TSs), with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

License NPF-69
Page 4

TSs
3.6.4.1-2
3.6.4.1-3

Insert

License NPF-69
Page 4

TSs
3.6.4.1-2
3.6.4.1-3

(1) Maximum Power Level

Exelon Generation is authorized to operate the facility at reactor core power levels not in excess of 3988 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, as revised through Amendment No. 169, are hereby incorporated into this license. Exelon Generation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Fuel Storage and Handling (Section 9.1, SSER 4)*

- a. Fuel assemblies, when stored in their shipping containers, shall be stacked no more than three containers high.
- b. When not in the reactor vessel, no more than three fuel assemblies shall be allowed outside of their shipping containers or storage racks in the New Fuel Vault or Spent Fuel Storage Facility.
- c. The above three fuel assemblies shall maintain a minimum edge-to-edge spacing of twelve (12) inches from the shipping container array and approved storage rack locations.
- d. The New Fuel Storage Vault shall have no more than ten fresh fuel assemblies uncovered at any one time.

(4) Turbine System Maintenance Program (Section 3.5.1.3.10, SER)

The operating licensee shall submit for NRC approval by October 31, 1989, a turbine system maintenance program based on the manufacturer's calculations of missile generation probabilities. (Submitted by NMPC letter dated October 30, 1989 from C.D. Terry and approved by NRC letter dated March 15, 1990 from Robert Martin to Mr. Lawrence Burkhardt, III).

* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report (SER) and/or its supplements wherein the license condition is discussed.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the secondary containment.</p>	<p>C.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of recently irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.1.1 -----NOTE----- Not required to be met for 4 hours if analysis demonstrates one standby gas treatment (SGT) subsystem is capable of establishing the required secondary containment vacuum. ----- Verify secondary containment vacuum is ≥ 0.25 inch of vacuum water gauge.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.1.2 Verify all secondary containment equipment hatches are closed and sealed.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	Verify the secondary containment can be drawn down to ≥ 0.25 inch of vacuum water gauge in ≤ 66.7 seconds using one SGT subsystem.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.5	Verify the secondary containment can be maintained ≥ 0.25 inch of vacuum water gauge for 1 hour using one SGT subsystem at a flow rate ≤ 2670 cfm.	In accordance with the Surveillance Frequency Control Program



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO

AMENDMENT NO. 218 TO FACILITY OPERATING LICENSE NO. NPF-62,

AMENDMENT NO. 228 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-11,

AMENDMENT NO. 214 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-18,

AMENDMENT NO. 229 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-39,

AMENDMENT NO. 192 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-85,

AND AMENDMENT NO. 169 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-69.

EXELON GENERATION COMPANY, LLC

CLINTON POWER STATION, UNIT NO. 1

LASALLE COUNTY STATION, UNITS 1 AND 2

LIMERICK GENERATING STATION, UNITS 1 AND 2

NINE MILE POINT NUCLEAR STATION, UNIT 2

DOCKET NOS. 50-461, 50-373, 50-374, 50-352, 50-353, AND 50-410

1.0 INTRODUCTION

By application dated November 8, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17312A364), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request for Clinton Power Station, Unit No. 1 (Clinton); LaSalle County Station, Units 1 and 2 (LaSalle); Limerick Generating Station, Units 1 and 2 (Limerick); and Nine Mile Point Nuclear Station, Unit 2 (NMP-2) (the facilities). The proposed amendments would revise the technical specification (TS) requirements for secondary containment for each of these facilities based on Technical Specifications Task Force (TSTF) Traveler TSTF-551, "Revise Secondary Containment Surveillance Requirements," Revision 3 (ADAMS Accession No. ML16277A226). The U.S. Nuclear Regulatory Commission (NRC, the Commission) approved TSTF-551, Revision 3, on September 21, 2017 (ADAMS Package Accession No. ML17236A365). The proposed changes would allow the secondary containment vacuum limit to not be met for up to 4 hours, provided that the standby gas treatment (SGT) system remains capable of establishing the required secondary containment vacuum.

The application also included similar license amendment requests for Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2. However, Exelon withdrew the requests for these two facilities by letter dated January 24, 2018 (ADAMS Accession No. ML18024B022), which the NRC staff acknowledged by letter dated January 26, 2018 (ADAMS Accession No. ML18025B443).

2.0 REGULATORY EVALUATION

2.1 System Description

The secondary containment is a structure that encloses the primary containment, including components that may contain primary system fluid. The safety function of the secondary containment is to contain, dilute, and hold up fission products that may leak from primary containment following a design-basis accident (DBA) to ensure the control room operator and offsite doses are within the regulatory limits. There is no redundant train or system that can perform the secondary containment function should the secondary containment be inoperable.

The secondary containment boundary is the combination of walls, floor, roof, ducting, doors, hatches, penetrations, and equipment that physically form the secondary containment. Routinely used secondary containment access openings contain at least one inner and one outer door in an airlock configuration. In some cases, secondary containment access openings are shared such that there are multiple inner or outer doors. All secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit of personnel, equipment, or material.

Secondary containment operability is based on its ability to contain, dilute, and hold up fission products that may leak from primary containment following a DBA. To prevent ground level exfiltration of radioactive material while allowing the secondary containment to be designed as a mostly conventional structure, the secondary containment requires support systems to maintain the pressure at less than atmospheric pressure. During normal operation, nonsafety-related systems are used to maintain the secondary containment at a slight negative pressure to ensure that any leakage is into the building and that any secondary containment atmosphere exiting is via a pathway monitored for radioactive material. However, during normal operation it is possible for the secondary containment vacuum to be momentarily less than the required vacuum for a number of reasons, such as during wind gusts or swapping of the normal ventilation subsystems.

The Clinton secondary containment completely encloses the primary containment, except for the upper personnel hatch, and consists of the containment gas control boundary, the containment gas control boundary extension (siding within the auxiliary building), the fuel building, the emergency core cooling system residual heat removal heat exchanger rooms, the pump rooms, the reactor water cleanup pump room, and the main steam pipe tunnel.

At LaSalle, each unit has its own secondary containment, but share a common SGT system. Each secondary containment consists of the associated reactor building, equipment access structure, and a portion of the main steam tunnel. Each reactor building completely encloses the associated reactor and its primary containment.

The Limerick secondary containment consists of three distinct isolable zones. Zones I and II are the Unit 1 and Unit 2 reactor enclosures, respectively, and Zone III is the common refueling area. Each zone has an independent normal ventilation system that is capable of providing

secondary containment isolation as required. Each reactor enclosure zone completely encloses and provides secondary containment for its corresponding primary containment and supporting equipment. The common refueling area zone completely encloses and provides secondary containment for the refueling floor and spent fuel storage facilities for Unit 1 and Unit 2. At Limerick, the SGT system operates in conjunction with the reactor enclosure recirculation system (RERS), which is provided to filter the halogens and particulates in gases potentially present in the reactor enclosure secondary containment following a loss-of-coolant accident. The RERS is the initial cleanup system and the SGT system is the final cleanup system before release to the environment.

The NMP-2 secondary containment consists of the reactor building and auxiliary bay structures and completely surrounds the primary containment.

During emergency conditions, the SGT system for each facility is designed to be capable of drawing down the secondary containment to a required vacuum within a prescribed time and continue to maintain the negative pressure as assumed in the accident analysis. For Clinton, LaSalle, Limerick, and NMP-2, the accident analysis assumes the SGT system will establish the required vacuum within 19 minutes, 15 minutes, 15.5 minutes, and 60 minutes, respectively. The leak tightness of the secondary containment together with the SGT system ensure that radioactive material is either contained in the secondary containment or filtered through the SGT system filter trains before being discharged to the outside environment via the elevated release point.

2.2 Description of Proposed TS Changes

For Clinton, LaSalle, and NMP-2, the proposed TS changes would allow the secondary containment vacuum limit to not be met for up to 4 hours, provided the SGT system remains capable of establishing the required secondary containment vacuum. For Limerick, the proposed TS changes would allow the reactor enclosure secondary containment vacuum limit and the refueling floor secondary containment vacuum limit to not be met for up to 4 hours, provided the SGT system remains capable of establishing the required secondary containment vacuum.

2.2.1 Proposed TS Changes for Clinton, LaSalle, and NMP-2

For Clinton, LaSalle, and NMP-2, surveillance requirement (SR) 3.6.4.1.1 currently requires periodic verification that secondary containment vacuum is greater than or equal to 0.25 inch of vacuum water gauge. This SR would be modified by a note that states:

Not required to be met for 4 hours if analysis demonstrates one standby gas treatment (SGT) subsystem is capable of establishing the required secondary containment vacuum.

An editorial change is proposed for Clinton SR 3.6.4.1.4, LaSalle SR 3.6.4.1.3, and NMP-2 SR 3.6.4.1.4 to replace "standby gas treatment (SGT)" with "SGT," because the abbreviation "SGT" will be defined in the proposed note.

2.2.2 Proposed TS Changes for Limerick

Although Limerick has separate TSs for each unit, the TSs associated with the proposed changes are the same for each unit. Currently, Limerick SR 4.6.5.1.1a and SR 4.6.5.1.2a

require periodic verification that the pressure within the reactor enclosure secondary containment and the refueling area secondary containment,¹ respectively, are greater than or equal to 0.25 inch of vacuum water gauge. These SRs would be modified by a footnote that states:

Not required to be met for 4 hours if analysis demonstrates one standby gas treatment subsystem is capable of establishing the required secondary containment vacuum.

Limerick TS definition 1.33 states the criteria to establish reactor enclosure secondary containment integrity. The licensee proposes to modify criterion g of TS definition 1.33 as follows (added text shown in bold):

The pressure within the reactor enclosure secondary containment is less than or equal to the value required by Specification 4.6.5.1.1a, **except as indicated by the footnote for Specification 4.6.5.1.1a.**

Limerick TS definition 1.36 states the criteria to establish refueling floor secondary containment integrity. The licensee proposes to modify criterion f of TS definition 1.36 as follows (added text shown in bold):

The pressure within the refueling floor secondary containment is less than or equal to the value required by Specification 4.6.5.1.2a, **except as indicated by the footnote for Specification 4.6.5.1.2a.**

Although Limerick TS 3/4.6.5 uses the phrase "refueling area secondary containment integrity," it is equivalent to the definition of "refueling floor secondary containment integrity" in TS definition 1.36.

2.3 Regulatory Requirements and Guidance

The regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(a)(1) requires an applicant for an operating license to include in the application proposed TSs in accordance with the requirements of 10 CFR 50.36, "Technical specifications." The applicant must include in the application a "summary statement of the bases or reasons for such specifications, other than those covering administrative controls." However, per 10 CFR 50.36(a)(1), these TS bases "shall not become part of the technical specifications."

Additionally, 10 CFR 50.36(b) states:

Each license authorizing operation of a ... utilization facility ... will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to [10 CFR] 50.34 ["Contents of applications;

¹ For Limerick, when the term "secondary containment" appears in this SE it refers to both the reactor enclosure secondary containment and the refueling area secondary containment, unless one of those structures is specifically identified.

technical information”]. The Commission may include such additional technical specifications as the Commission finds appropriate.

The categories of items required to be included in the TSs are provided in 10 CFR 50.36(c). As required by 10 CFR 50.36(c)(2)(i), the TSs will include limiting conditions for operation (LCOs), which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. Per 10 CFR 50.36(c)(2)(i), when an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met.

The regulation at 10 CFR 50.36(c)(3) requires TSs to include items in the category of SRs, which are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

The NRC staff’s guidance for the review of the TSs is in Chapter 16, “Technical Specifications,” Revision 3, dated March 2010 (ADAMS Accession No. ML100351425), of NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition.”

The regulation at 10 CFR 50.67, “Accident source term,” sets limits for the radiological consequences of a postulated DBA using an alternative source term (AST). Paragraph 50.67(b)(2) states:

The NRC may issue the amendment only if the applicant’s analysis demonstrates with reasonable assurance that:

- (i) An individual located at any point on the boundary of the exclusion area for any 2-hour period following the onset of the postulated fission product release, would not receive a radiation dose in excess of 0.25 Sv [Sievert] (25 rem [Roentgen equivalent man])² total effective dose equivalent (TEDE).
- (ii) An individual located at any point on the outer boundary of the low population zone, who is exposed to the radioactive cloud resulting from the postulated fission product release (during the entire period of its passage), would not receive a radiation dose in excess of 0.25 Sv (25 rem) total effective dose equivalent (TEDE).
- (iii) Adequate radiation protection is provided to permit access to and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 0.05 Sv (5 rem) total effective dose equivalent (TEDE) for the duration of the accident.

² The use of 0.25 Sv (25 rem) TEDE is not intended to imply that this value constitutes an acceptable limit for emergency doses to the public under accident conditions. Rather, this 0.25 Sv (25 rem) TEDE value has been stated in this section as a reference value, which can be used in the evaluation of proposed design basis changes with respect to potential reactor accidents of exceedingly low probability of occurrence and low risk of public exposure to radiation.

The NRC approved implementation of an AST methodology for each facility by amendments dated September 19, 2005, for Clinton³ (ADAMS Package Accession No. ML052570475), September 6, 2010, for LaSalle (ADAMS Accession No. ML101750625), August 23, 2006, for Limerick (ADAMS Package Accession Nos. ML062210207 and ML062510055), and May 29, 2008, for NMP-2 (ADAMS Package Accession No. ML081560637).

Section 15.0.1, "Radiological Consequence Analyses Using Alternative Source Terms," Revision 0, dated July 2000 (ADAMS Accession No. ML003734190), of NUREG-0800 provides guidance to the NRC staff for the review of AST amendment requests. It states that the NRC reviewer should evaluate the proposed change using the guidance in Regulatory Guide (RG) 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," Revision 0, dated July 2000 (ADAMS Accession No. ML003716792). RG 1.183 provides an acceptable methodology for analyzing the radiological consequences of several DBAs to show compliance with 10 CFR 50.67.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the licensee's application in accordance with the regulatory requirements and guidance discussed in Section 2.3 of this safety evaluation (SE) and the NRC-approved TSTF-551, Revision 3. The application also included proposed changes to the TS bases for each plant; however, per 10 CFR 50.36(a)(1) the TS bases shall not become part of the TSs. Therefore, the NRC staff did not make a finding regarding the acceptability of the TS bases changes.

3.1 Clinton, LaSalle, and NMP-2 SR 3.6.4.1.1; Limerick SR 4.6.5.1.1a and SR 4.6.5.1.2a

The application proposed that a note be added to SR 3.6.4.1.1 for Clinton, LaSalle, and NMP-2 and that a footnote be added to SR 4.6.5.1.1a and SR 4.6.5.1.2a for Limerick. The proposed note (footnote) would allow these SRs to not be met for up to 4 hours if an analysis demonstrates that one SGT subsystem is capable of establishing the required secondary containment vacuum. During normal operation, conditions may occur that result in the secondary containment vacuum requirements in these SRs not being met for short durations (e.g., wind gusts that lower external pressure or loss of the normal ventilation system). These conditions may not be indicative of degradations of the secondary containment boundary or of the ability of the SGT system to perform its specified safety function.

The proposed note (footnote) would provide an allowance for the licensee to confirm secondary containment operability by confirming that one SGT subsystem is capable of performing its specified safety function. This confirmation is necessary to apply the exception to meeting the SR acceptance criterion. While the duration of these occurrences is anticipated to be very brief, the allowance would be permitted for a maximum of 4 hours, which is consistent with the time permitted in TS for secondary containment to be inoperable.⁴

³ The Clinton AST methodology was revised by amendment dated August 17, 2016 (ADAMS Accession No. ML16217A332).

⁴ See the action statements for Clinton, LaSalle, and NMP-2 TS 3.6.4.1, Condition A, and Limerick TS 3.6.5.1.1.

The NRC staff has evaluated the impact of the proposed note (footnote) on the design-basis radiological consequence analyses for each facility to ensure that the proposed change will not result in an increase in the dose consequences and that the resulting calculated doses remain within the current radiological consequence analyses.

Clinton SR 3.6.4.1.4, LaSalle SR 3.6.4.1.3, and NMP-2 SR 3.6.4.1.4 require periodic verification that the secondary containment can be drawn down to greater than or equal to 0.25 inch of vacuum water gauge within the time required⁵ using one SGT subsystem. Clinton SR 3.6.4.1.5, LaSalle SR 3.6.4.1.4, and NMP-2 SR 3.6.4.1.5 require periodic verification that the secondary containment can be maintained greater than or equal to 0.25 inch of vacuum water gauge for 1 hour using one SGT subsystem at a limiting flow rate.⁶ The proposed addition of the note to SR 3.6.4.1.1 for Clinton, LaSalle, and NMP-2 would not change the TS requirement to meet these other SRs.

Limerick SR 4.6.5.1.1c.1 requires periodic verification that one SGT subsystem will draw down the reactor enclosure secondary containment to greater than or equal to 0.25 inch of vacuum water gauge in less than or equal to 916 seconds with the RERS in operation. Limerick SR 4.6.5.1.1c.2 requires the licensee to periodically operate one SGT subsystem for 1 hour and maintain greater than or equal to 0.25 inch of vacuum water gauge in the reactor enclosure secondary containment at a flow rate not exceeding 2500 cubic feet per minute with wind speeds of less than or equal to 7.0 miles per hour.⁷ SR 4.6.5.1.2c requires the licensee to periodically operate one SGT subsystem for 1 hour and maintain greater than or equal to 0.25 inch of vacuum water gauge in the refueling area secondary containment at a flow rate not exceeding 764 cubic feet per minute. The proposed addition of the footnotes to Limerick SR 4.6.5.1.1a and SR 4.6.5.1.2a would not change the TS requirement to meet these other SRs.

In addition, TS LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for Clinton, LaSalle, and NMP-2 and TS LCO 3.6.5.3, "Standby Gas Treatment System – Common System," for Limerick, requiring two SGT subsystems to be operable, must also be met; otherwise, the licensee shall shut down the reactor or follow any remedial action permitted by TSs until this condition can be met.

As discussed above, secondary containment operability is based on its ability to contain, dilute, and hold up fission products that may leak from primary containment following a DBA. To prevent ground level exfiltration of radioactive material the secondary containment pressure must be maintained at a pressure that is less than atmospheric pressure. The secondary containment requires support systems to maintain the control volume pressure less than atmospheric pressure. Following an accident, the SGT system ensures that the secondary containment pressure is less than the external atmospheric pressure. During normal operation, nonsafety-related systems are used to maintain the secondary containment at a negative

⁵ The Clinton SR does not list a specific time limit, but the accident analysis assumes a drawdown time of 19 minutes. The required time listed in the SRs for LaSalle and NMP-2 is less than or equal to 900 seconds and 66.7 seconds, respectively.

⁶ The flow rate must be less than or equal to 4400 cubic feet per minute at Clinton and LaSalle, and less than or equal to 2670 cubic feet per minute at NMP-2.

⁷ The wind speed must be measured on the wind instrument on Tower 1, elevation 30 feet or, if that instrument is unavailable, Tower 2, elevation 159 feet.

pressure. However, during normal operation it is possible for the secondary containment vacuum to be momentarily less than the required vacuum for a number of reasons. These conditions may not be indicative of degradations of the secondary containment boundary or of the ability of the SGT system to perform its specified safety function.

Clinton must continue to meet SR 3.6.4.1.4, SR 3.6.4.1.5, and TS 3.6.4.3; LaSalle must continue to meet SR 3.6.4.1.3, SR 3.6.4.1.4, and TS 3.6.4.3; Limerick must continue to meet SR 4.6.5.1.1c.1, SR 4.6.5.1.1c.2, SR 4.6.5.1.2c, and TS LCO 3.6.5.3; and NMP-2 must continue to meet SR 3.6.4.1.4, SR 3.6.4.1.5, and TS 3.6.4.3. In addition, the licensee must have an analysis demonstrating that one SGT subsystem is capable of establishing the required secondary containment vacuum to use the proposed note. Based on these requirements, there is reasonable assurance that the secondary containment and SGT subsystem will maintain the vacuum requirements during a DBA at Clinton, LaSalle, Limerick, and NMP-2.

Therefore, the NRC staff has determined that if the conditions do not affect (1) the ability to maintain the secondary containment pressure during an accident, at a vacuum that is consistent with the accident analyses, and (2) the time assumed in the accident analyses to draw down the secondary containment pressure, then the secondary containment can perform its safety function and may be considered TS operable. This is evident by being able to successfully perform and meet SR 3.6.4.1.4 and SR 3.6.4.1.5 at Clinton and NMP-2, SR 3.6.4.1.3 and SR 3.6.4.1.4 at LaSalle, and SR 4.6.5.1.1c.1, SR 4.6.5.1.1c.2, and SR 4.6.5.1.2c at Limerick. These SRs require the SGT system to establish and maintain the required vacuum in the secondary containment as assumed in the accident analyses.

Furthermore, because the specified safety functions of the secondary containment and SGT subsystem can be performed in the time assumed in the licensee's accident analysis, then the fission products that bypass or leak from primary containment, or are released from the reactor coolant pressure boundary components located in secondary containment prior to release to the environment, will be contained and processed as assumed in the licensee's design-basis radiological consequence dose analyses. Therefore, the NRC staff finds that the proposed change does not affect the current radiological consequence analyses and concludes that the proposed change is acceptable with respect to the radiological consequences of DBAs.

3.2 Limerick TS Definitions 1.33 and 1.36

Limerick has not converted its TS to the improved standard technical specifications (STS) format, and it contains TS definitions not included in the TS for Clinton, LaSalle, and NMP-2. Limerick TS definitions 1.33 and 1.36 state the criteria to establish reactor enclosure secondary containment integrity and refueling floor secondary containment integrity, respectively. Criterion g of TS definition 1.33 currently states:

The pressure within the reactor enclosure secondary containment is less than or equal to the value required by Specification 4.6.5.1.1a.

Criterion f of TS definition 1.36 currently states:

The pressure within the refueling floor secondary containment is less than or equal to the value required by Specification 4.6.5.1.2a.

Therefore, TS definitions 1.33 and 1.36 must also be modified to permit the use of the proposed footnotes added to SR 4.6.5.1.1a and SR 4.6.5.1.2a. The licensee has proposed to add

exceptions to TS definition 1.33, criterion g, and TS definition 1.36, criterion f, to permit the use of the proposed footnotes added to SR 4.6.5.1.1a and SR 4.6.5.1.2a, respectively.

These proposed changes allow the exception to the required pressure in the secondary containment as indicated by the footnotes in SR 4.6.5.1.1a and SR 4.6.5.1.2a, and do not affect the assumptions in the licensee's design-basis radiological consequence dose analyses. As concluded in Section 3.1 of this SE, the NRC staff found the addition of the footnotes to be acceptable with respect to the radiological consequences of DBAs. Therefore, the NRC staff concludes that the proposed changes to Limerick TS definitions 1.33 and 1.36 are acceptable with respect to the radiological consequences of DBAs.

3.3 Clinton SR 3.6.4.1.4, LaSalle SR 3.6.4.1.3, and NMP-2 SR 3.6.4.1.4

An editorial change is proposed for Clinton SR 3.6.4.1.4, LaSalle SR 3.6.4.1.3, and NMP-2 SR 3.6.4.1.4 to replace "standby gas treatment (SGT)" with "SGT," because the abbreviation "SGT" will be defined in the proposed note. This change is acceptable because it does not change the technical requirements.

3.4 Variations from the Approved Traveler

TSTF-551, Revision 3, identified several changes to the improved STS. The licensee identified the variations from TSTF-551, Revision 3, listed below. The NRC staff considered these variations in its review and finds that they do not affect the applicability of TSTF-551, Revision 3.

- The Clinton, LaSalle, Limerick, and NMP-2 TS already include an allowance for the use of access openings for entry and exit. Therefore, the proposed change did not include the TS changes in TSTF-551, Revision 3, to add this allowance.
- The LaSalle TS has different SR numbering than the improved STS. Specifically, LaSalle SR 3.6.4.1.3 is the equivalent of improved STS SR 3.6.4.1.4.
- The Limerick TS are based on an older version of the STS, and have different numbering, format, and titles than the improved STS on which TSTF-551, Revision 3, was based. Limerick TS Section 3.6.5, "Secondary Containment," is similar to improved STS TS 3.6.4.1, "Secondary Containment," but it is split between two separate TS LCOs. For Limerick, TS 3.6.5.1.1 applies to reactor enclosure secondary containment integrity, and TS 3.6.5.1.2 applies to refueling area secondary containment integrity when recently irradiated fuel is being handled in the secondary containment. For Limerick, SR 4.6.5.1.1a and SR 4.6.5.1.2a require verification that the pressure within each area of secondary containment is greater than or equal to 0.25 inch of vacuum water gauge, which is consistent with improved STS SR 3.6.4.1.1.
- Limerick also has two separate TS definitions related to reactor enclosure secondary containment integrity and refueling floor secondary containment integrity (i.e., TS 1.33 and 1.36, respectively). These TS definitions are being revised for consistency to reflect the changes proposed to SR 4.6.5.1.1a and SR 4.6.5.1.2a.

3.5 Summary

The NRC staff reviewed the proposed changes for each facility and determined that the changes to the TSs meet the standards for TSs in 10 CFR 50.36(b). The proposed SRs assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met, and satisfy 10 CFR 50.36(c)(3). Additionally, the changes to the TSs were reviewed for technical clarity and consistency with customary terminology and format in accordance with NUREG-0800 Chapter 16.

The NRC staff has evaluated the impact of the proposed changes on the design-basis radiological consequence analyses against the regulatory requirements and guidance identified in Section 2.3 of this SE. The staff finds that with the proposed changes, the TSs for each facility will continue to comply with the requirements of the current radiological consequence analyses. Therefore, the proposed changes are acceptable with regard to the radiological consequences of the postulated DBAs.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois, Pennsylvania, and New York State officials were notified of the proposed issuance of the amendments on March 6, 2018. The State officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to the installation or use of facility components located within the restricted areas as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission previously issued a proposed finding, which was published in the *Federal Register* (FR) on December 19, 2017 (82 FR 60227), that the amendments involve no significant hazards consideration, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Kristy Bucholtz, NRR

Date of issuance: May 29, 2018

SUBJECT: CLINTON POWER STATION, UNIT NO. 1; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; AND NINE MILE POINT NUCLEAR STATION, UNIT 2 - ISSUANCE OF AMENDMENTS TO REVISE TECHNICAL SPECIFICATION REQUIREMENTS FOR SECONDARY CONTAINMENT (EPID L-2017-LLA-0378) DATED MAY 29, 2018

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