

From: Villar, Enrique:(GenCo-Nuc)
To: [Marshall, Michael](#)
Subject: [External_Sender] Exelon's response to NRC questions
Date: Thursday, June 21, 2018 8:47:03 AM

Michael,

Below are Exelon's response to the NRC questions for this afternoon call.

If you have any questions or need further clarification on any of them, please let me know.

Answers to NRC questions on the use of risk metrics for sump operability determinations.

1. *Is Exelon proposing to use risk metrics to decide whether CONDITION A of LCO 3.6.9 (Slide 1) is met or satisfy REQUIRED ACTION A.3 of LCO 3.6.9?*

Yes, Exelon is proposing to use risk metrics to decide whether CONDITION A of LCO 3.6.9 is met

2. *What are the analyzed limits mentioned in CONDITION A of LCO 3.6.9 (Slide 1), and are the analyzed limits risk metrics are deterministic parameters?*

For this proposal the analyzed limits are risk metrics, Δ CDF and Δ LERF based on deterministic parameters.

3. *How is the use of risk metrics risk-informed (i.e., is the use risk-based or risk-informed)?*

The use of the risk metrics is risk-informed. It is a combination of risk-based metrics (CDF and LERF from the PRA) and deterministic considerations (debris quantities and Δ debris quantities to determine Δ CDF and Δ LERF from the GSI-191 NARWHAL model).

4. *Does Exelon consider its planned use of risk consistent with the guidance in IMC 0326 on use of PRA and operability determinations.*

The operability of the containment emergency recirculation sump at Calvert Cliffs will be based on a risk-informed assessment after the Risk-Informed GSI-191 license amendment is granted, consistent with the STP Pilot Project. This same risk-informed assessment will be used as the basis for deciding whether CONDITION A of LCO 3.6.9 is met. The quantitative evaluation is not performed using the plant-specific PRA. Therefore, Exelon considers the planned use of risk consistent with the guidance in IMC 0326 on use of PRA and operability determinations.

Thanks
Ehv

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