NRR-DRMAPEm Resource

From: Lee, Samson
Sent: Friday, October 18, 2019 7:38 AM
To: Williams, Christian D:(Exelon Nuclear)
Subject: FitzPatrick Supplemental Information Needed for Acceptance: Revise Allowable Value for Reactor Water Cleanup System Primary Containment Isolation (EPID L-2019-LLA-0190)
Attachments: Supplemental Information Needed_FitzPatrick RWCU isolation LAR.docx

Mr. Williams:

By letter dated September 5, 2019 (ADAMS Accession No. ML19248B085), Exelon submitted the subject amendment request for FitzPatrick. The proposed amendment would revise the allowable value for Reactor Water Cleanup (RWCU) system primary containment isolation. The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), whenever a holder of a license, including a construction permit and operating license under this part, or an early site permit, combined license, and manufacturing license under part 52 of this chapter, desires to amend the license or permit, application for an amendment must be filed with the Commission, as specified in §§ 50.4 or 52.3 of this chapter, as applicable, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications. Sections 50.34 or 52.79 of 10 CFR, as applicable, addresses the content of technical information required, and stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the attachment to this e-mail is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that Exelon supplement the application to address the information requested in the enclosure by November 6, 2019. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with you on October 10, 2019.

Samson Lee
FitzPatrick Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
(301)415-3168

Docket No. 50-333

Attachment:
Supplemental Information Needed

Hearing Identifier: NRR_DRMA
Email Number: 273

Mail Envelope Properties (BL0PR0901MB3185A87ABB9F6D76AED549329A6C0)

Subject: FitzPatrick Supplemental Information Needed for Acceptance: Revise Allowable Value for Reactor Water Cleanup System Primary Containment Isolation (EPID L-2019-LLA-0190)
Sent Date: 10/18/2019 7:38:18 AM
Received Date: 10/18/2019 7:38:00 AM
From: Lee, Samson

Created By: Samson.Lee@nrc.gov

Recipients:
"Williams, Christian D:(Exelon Nuclear)" <Christian.Williams@exeloncorp.com>
Tracking Status: None

Post Office: BL0PR0901MB3185.namprd09.prod.outlook.com

Files	**Size**	**Date & Time**	
MESSAGE	3074	10/18/2019 7:38:00 AM	
Supplemental Information Needed_FitzPatrick RWCU isolation LAR.docx			30859

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

SUPPLEMENTAL INFORMATION NEEDED

JAMES A. FITZPATRICK NUCLEAR POWER PLANT LICENSE AMENDMENT REQUEST TO REVISE THE TECHNICAL SPECIFICATIONS ALLOWABLE VALUE FOR INITIATING REACTOR WATER CLEANUP SYSTEM ISOLATION ON REACTOR WATER LEVEL 2 RATHER THAN LEVEL 3 (EPID L-2019-LLA-0190)

By letter dated September 5, 2019 (ADAMS Accession No. ML19248B085), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) to revise the FitzPatrick Technical Specifications (TS) Allowable Value (AV) for the reactor water cleanup (RWCU) system primary containment isolation. NRC staff has reviewed the LAR and determined the following additional information is needed to start the review.

1. Please provide the calculation or a summary of the calculation for the revised allowable value for the RWCU system isolation. If a summary of the calculation is provided it should include the analytical value, the AV, the total loop accuracy, the limiting setpoint, the nominal setpoint, and the As-Left Tolerance and As-Found Tolerance values used for performing calibration surveillances. In addition, please address how the random and bias errors were identified, estimated, and combined. Provide a list of the assumptions and the basis for the assumptions used as part of the summary of the calculation.

2. Please explain the methodology used in the calculation and a brief explanation of how the calculation meets the guidance within Regulatory Guide 1.105 and RIS 2006-17. Is Fitzpatrick committed to TSTF-493? If so explain how the guidance of TSTF-493 has been implemented in the calculation. If not, please describe how the setpoint will be maintained and performance monitoring will be conducted using the As-Left Tolerance and As-Found Tolerance Values.

3. Fitzpatrick uses more than one set of Analytical Limits, Limiting Setpoints, and Allowable Values that have been identified/labeled as Reactor Water Level Low-Low, or Level 2 (L2).

    a. Please provide a brief description as to how plant operators and maintenance staff are trained to use and maintain the Level 2 setting using different level values represented by same level setting name designation (i.e. Level 2), so as to avoid confusion by the operators during normal or plant transient conditions.
    b. Please provide the available precedencies that may have used more than one nominal setpoint value for Reactor Level Low-Low or L2.
    c. Describe why two different nominal set point values are being used for the Reactor Water Level Low-Low Level 2 setting, and briefly explain the bases for the results of the different analyses that have been performed for

determining the different appropriate analytical limits and resulting allowable values for these settings. Finally, please explain why the lower of these two values was selected for initiating the RWCU isolation function.

4. Please provide the basis for the Reactor Water Level references (e.g., Top of Active Fuel (TAF)).