From:	Haskell, Russell
To:	"mitchel.mathews@exeloncorp.com"; Steinman, Rebecca L:(Exelon Nuclear)
Cc:	Salgado, Nancy
Subject:	Dresden, Units 2 and 3 - Increase Allowable MSIV Leakage Rates (EPID L-2019-LLA-0232)
Date:	Wednesday, November 20, 2019 2:17:18 PM

Mr. Mathews and Ms. Steinman,

By application dated October 8, 2019, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19282D938), Exelon Generation Company, LLC (EGC) submitted a license amendment request (LAR) for Dresden Nuclear Power Station, Units 2 and 3 (DNPS). Specifically, the amendment would revise Technical Specification (TS) 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," Surveillance Requirement (SR) 3.6.1.3.10 to increase the combined main steam isolation valve (MSIV) leakage rate limit for all four steam lines, as well as the leakage rate through each MSIV leakage path, resulting in new leakage rate limits which requires an exemption request (included as part of the LAR) to 10 CFR 50, Appendix J, Option B, Paragraph III.A; creates a new TS 3.6.2.6, "Drywell Spray," to reflect the crediting of the drywell sprays for fission product removal as part of the revised loss-of-coolant accident analysis; and revises TS 3.6.4.1, "Secondary Containment," SR 3.6.4.1.1 to address short-duration conditions during which the secondary containment pressure may not meet the SR pressure requirement, in accordance with Technical Specifications Task Force Traveler (TSTF) 551, "Revise Secondary Containment Surveillance Requirements," Revision 3.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the proposed LAR. 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,* an amendment to the license must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications.

The NRC staff has reviewed your application, and concludes that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and 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. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

The NRC staff will review the DNPS LAR to ensure that it meets the NRC regulations specified in 10 CFR 50.67, *Accident source term*. The staff will conduct the review using the guidance contained in NUREG-0800, Chapter 15, Section 15.0.1, Revision. 0, "Radiological Consequence Analysis Using Alternate Source Terms," dated July 2000 (ADAMS Accession No. ML003734190), which identifies Regulatory Guide 1.183,

“Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors,” dated July 2000 (ADAMS Accession No. ML003716792). In its review, the staff will also consider Regulatory Issue Summary 2006-04, “Experience with Implementation of Alternative Source Terms,” dated March 7, 2006 (ADAMS Accession No. ML063460347), and the previously issued safety evaluation on the MSIV leakage pathway (ADAMS Accession No. ML062070290) that discussed technical concerns with AEB 98-03, “Assessment of Radiological Consequences for the Perry Pilot Plant Application Using the Revised (NUREG-1465) Source Term,” dated December 6, 1998 (ADAMS Accession No. ML011230531).

Based on the information provided in your application, the NRC staff has estimated that this licensing request will take approximately 1,300 hours to complete. The NRC staff expects to complete this review by your requested date of October 8, 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates will be communicated, during the staffs routine interactions with Exelon.

These estimates are based on the NRC staff’s initial review of the application and they could change due to several factors including requests for additional information (RAIs), timely responses to RAIs (i.e., within 30 days), ability of EGC to support any audit requests, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Delays by EGC in responding to RAIs or inability to support audits will likely impact the NRC staff’s ability to adhere to the review schedule.

If you have any questions, please contact me at (301) 415-1129.

Thank you.

Russell S. Haskell II

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