From:	Haskell, Russell
To:	"Mitchel.Mathews@exeloncorp.com"
Subject:	RAI Re: Dresden/Clinton Request for LAR to Modify TSs Following Adoption of TSTF-542 (EPID L-2019-LLA-0124)
Date:	Monday, November 25, 2019 11:16:33 AM
Importance:	High

Dear Mr. Mathews,

By application dated June 18, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19169A146), Exelon Generation Company, LLC (the licensee, Exelon), requested to revise Technical Specifications (TSs) following the license amendment approving the adoption of Technical Specifications Task Force (TSTF) Traveler 542 (TSTF-542), "Reactor Pressure Vessel Water Inventory Control," Revision 2, which changed the TSs for Clinton Power Station (CPS), Unit 1, and Dresden Nuclear Power Station (DNPS), Units 2 and 3. TSTF-542, Revision 2 (ADAMS Accession No. ML16074A448) is related to operations with a potential for draining the reactor vessel (OPDRVs) which revises the Standard Technical Specifications providing an alternative for Reactor Pressure Vessel (RPV) Water Inventory Control. These alternative requirements would protect Safety Limit 2.1.1.3, which requires RPV water level to be greater than the top of active fuel.

The Nuclear Regulatory Commission's (NRC) staff is reviewing your submittal and has determined that additional information is needed to complete its review. On November 5, 2019, the NRC staff provided Exelon a DRAFT request for information on the subject matter. Following a conversation you and I had today, you stated Exelon required no additional clarification regarding this DRAFT RAI. Therefore, the NRC staff will reclassify the RAI as a formal request for information, as noted:

RAI-1

Background: In Attachment 1, page 4 of 11, of the application (LAR), the licensee proposed to delete current surveillance requirement (SR) SR 3.5.2.8 for CPS and SR 3.5.2.7 for DNPS, which states, "Verify the required ECCS injection/spray subsystem can be manually operated." The licensee stated in the LAR that CPS SR 3.5.2.6 and DNPS SR 3.5.2.5 "effectively verifies that the require subsystem(s) can be manually operated."

(For CPS): Although current CPS SRs 3.5.2.8 and 3.5.2.6 both test ECCS spray/injection subsystem function, the NRC staff have determined the two SRs are not equivalent tests. The intent of CPS SR 3.5.2.8 is to verify that the required ECCS subsystem can be manually actuated, including pump start and alignment of all necessary valves to their required positions. CPS SR 3.5.2.6 requires testing ECCS operation via the recirculation line but does not require testing of the injection valves.

(For DNPS): Although current DNPS SRs 3.5.2.7 and 3.5.2.5 both test ECCS spray/injection subsystem function, the NRC staff have determined the two SRs are not equivalent tests. The intent of DNPS SR 3.5.2.7 is to verify that the required ECCS subsystem can be manually actuated, including pump start and alignment of all necessary valves to their required positions. DNPS SR 3.5.2.5 requires testing ECCS operation via the recirculation line but does not require testing of the injection

valves.

<u>Request:</u> Please provide a response to the following for both CPS and DNPS:

1) Describe how verification is obtained that the required low pressure ECCS spray/injection subsystem valves will operate, if necessary, since these valves are normally closed during Modes 4 and 5. Your response should include the SR that addresses this functional testing.

The NRC is requesting Exelon's response to this RAI to be provided, as a supplement to the application, no later than December 31, 2019.

Thank you.

Russell S. Haskell II

United States Nuclear Regulatory Commission (NRC)
Licensing Project Manager - NRR/DORL/LPL 3
Dresden Nuclear Power Station, Units 2 and 3
Russell.Haskell@NRC.Gov; ☎ (301) 415-1129; Office: O-8C01; Mail-Stop O-8B1A

From: Haskell, Russell
Sent: Tuesday, November 05, 2019 1:17 PM
To: 'Mitchel.Mathews@exeloncorp.com' <Mitchel.Mathews@exeloncorp.com>
Subject: DRAFT RAI Re: Dresden/Clinton Request for LAR to Modify TSs Following Adoption of TSTF-542 (EPID L-2019-LLA-0124)
Importance: High

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The Nuclear Regulatory Commission's (NRC) staff is reviewing your submittal and has determined that additional information is needed to complete its review. The following is a DRAFT request for additional information (RAI). If Exelon would require clarification on the DRAFT RAI contact me and I will schedule a teleconference between the NRC/Exelon staff. If no clarification is required this DRAFT RAI becomes a formal RAI and the staff would expect a response within 30 days.

The draft RAI is shown below.

(DRAFT): RAI-1

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Request: Please provide a response to the following for both CPS and DNPS:

1. Describe how verification is obtained that the required low pressure ECCS spray/injection subsystem valves will operate, if necessary, since these valves are normally closed during Modes 4 and 5. Your response should include the SR that addresses this functional testing.

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Russell S. Haskell II

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