

RS-19-112

10 CFR 50.90

December 5, 2019

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Response to Request for Additional Information Regarding License Amendment Request to Revise Technical Specifications Following Adoption of TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

- References:
1. Letter from P. R. Simpson (Exelon Generation Company, LLC (EGC) to U.S. NRC, "Application to Revise Technical Specifications Following Adoption of TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,'" dated June 18, 2019
 2. Email from R. S. Haskell II (NRC) to M. A. Mathews (EGC), "RAI Re: Dresden/Clinton Request for LAR to Modify TSs Following Adoption of TSTF-542 (EPID L-2019-LLA-0124)," dated November 25, 2019

In Reference 1, EGC submitted a request for amendments to Facility Operating License No. NPF-62 for Clinton Power Station, Unit 1, and Renewed Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station (DNPS), Units 2 and 3. Specifically, EGC requested that the NRC review and approve proposed Technical Specifications (TS) changes that modify existing TS requirements following the adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-542, "Reactor Pressure Vessel Water Inventory Control."

In Reference 2, the NRC documented its determination that additional information is required for the completion of its review of the Reference 1 request. EGC's response to Reference 2 is included in the attachments to this letter.

EGC has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Reference 1.

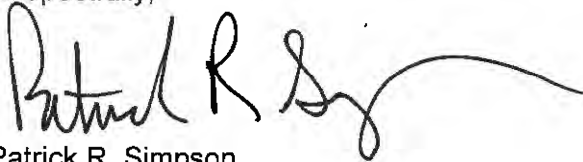
The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendments do not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendments.

EGC is notifying the State of Illinois of this supplement to a previous application for a change to the TS by sending a copy of this letter and its attachment to the designated State Official in accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Paragraph (b).

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Mr. Mitchel A. Mathews at (630) 657-2819.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 5th day of December 2019.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long, sweeping horizontal line extending to the right.

Patrick R. Simpson
Sr. Manager – Licensing

Attachments:

1. Response to Request for Additional Information
2. Updated Proposed Technical Specifications Changes for Clinton Power Station (Modified Affected Mark-Up)
3. Updated Proposed Technical Specifications Changes for Dresden Nuclear Power Station (Modified Affected Mark-Up)

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station
Illinois Emergency Management Agency – Division of Nuclear Safety

ATTACHMENT 1:

Response to Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION

RE: DRESDEN/CLINTON REQUEST FOR LICENSE AMENDMENT REQUEST TO MODIFY TECHNICAL SPECIFICATIONS FOLLOWING ADOPTION OF TSTF-542 (EPID L-2019-LLA-0124)

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.

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.

ATTACHMENT 1:

Response to Request for Additional Information

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.**

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.

Exelon Generation Company, LLC (EGC) Response

EGC no longer proposes to delete current Surveillance Requirement (SR) SR 3.5.2.8 for Clinton Power Station (CPS), Unit 1, or SR 3.5.2.7 for Dresden Nuclear Power Station (DNPS), Units 2 and 3. These SRs are being retained and renumbered as SR 3.5.2.7 and SR 3.5.2.6 for CPS and DNPS, respectively.

Additionally, minor editorial changes have been made to the Notes associated with CPS renumbered SR 3.5.2.5 and DNPS renumbered SR 3.5.2.4. These minor changes do not modify the intent or application of these notes. The affected TS mark-up pages (i.e., CPS TS Page 3.5-10 and DNPS TS Page 3.5.2-5) have been modified to reflect these changes, and included as Attachments 2 and 3 for CPS, Unit 1 and DNPS, Units 2 and 3, respectively.

These revised mark-ups supersede the corresponding pages provided in Attachments 2 and 3 of EGC's June 18, 2019, application.

Clinton Power Station, Unit 1,

Response to Request for Additional Information Re: Application to Revise Technical Specifications Following the Adoption of TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

ATTACHMENT 2 –

**UPDATED PROPOSED TECHNICAL SPECIFICATIONS CHANGES
FOR CLINTON POWER STATION (MODIFIED AFFECTED MARK-UP)**

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.2.5 NOTE</p> <p>Not required to be met for system vent flow paths opened under administrative control.</p> <hr/> <p>Verify, for the required ECCS injection/spray subsystem, each manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.56 -----NOTES-----</p> <p>1. Operation may be through the test return line.</p> <p>2. Credit may be taken for normal system operation to satisfy this SR.</p> <p>-----</p> <p>Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.67</p> <p>Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.78 -----NOTE-----</p> <p>Vessel injection/spray may be excluded.</p> <p>-----</p> <p>Verify the required ECCS injection/spray subsystem can be manually operated.</p>	<p>In Accordance with the Surveillance Frequency Control Program</p>

Dresden Nuclear Power Station, Units 2 and 3

Response to Request for Additional Information Re: Application to Revise Technical Specifications Following the Adoption of TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

ATTACHMENT 3 –

**UPDATED PROPOSED TECHNICAL SPECIFICATIONS CHANGES
FOR DRESDEN NUCLEAR POWER STATION (MODIFIED AFFECTED MARK-UP)**

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.2.4 NOTE</p> <p>Not required to be met for system vent flow paths opened under administrative control.</p> <p>Verify for the required ECCS injection/spray subsystem each manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.45 -----NOTES-----</p> <p>1. Operation may be through the test return line.</p> <p>2. Credit may be taken for normal system operation to satisfy this SR.</p> <p>-----</p> <p>Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.56 Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.67 -----NOTE-----</p> <p>Vessel injection/spray may be excluded.</p> <p>-----</p> <p>Verify the required ECCS injection/spray subsystem can be manually operated.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>