

From: [Marshall, Michael](#)
To: [\[licensee\] Ron Reynolds \(Exelon\)](#)
Cc: [James Danna \(James.Danna@nrc.gov\)](#)
Subject: NINE MILE POINT, Unit 2 - AUDIT PLAN REGARDING LICENSE AMENDMENT REQUEST TO IMPLEMENT RISK-INFORMED EXTENDED COMPLETION TIMES 50-410 (L-2019-LLA-0234)
Date: Thursday, February 06, 2020 8:12:00 AM

Hello Ron,

The U.S. Nuclear Regulatory Commission (NRC) staff has started our review of the risk-informed completion time license amendment request (LAR) and determined that a regulatory audit of the technical acceptability of the probabilistic risk assessments (PRAs) used to develop insights to support the licensee's proposed approach would assist in the timely completion of the LAR review. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information. The audit will be conducted to increase the NRC staff's understanding of the LAR and identify information that will require docketing to support the NRC staff's regulatory finding. The NRC staff will conduct a regulatory audit to support its review of the LAR in accordance with the following audit plan.

I. BACKGROUND

By letter dated October 31, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19304B653), as supplemented by letter dated December 12, 2019 (ADAMS Accession No. [ML19346F427](#)), Exelon Generation Company, LLC (Exelon, the licensee) requested that the NRC amend the Technical Specifications, Appendix A of Renewed Facility Operating License No. NPF-69 for Nine Mile Point Nuclear Station, Unit 2 (Nine Mile Point 2). Exelon's proposed license amendment request would revise technical specification requirements to permit the use of risk informed completion times for actions to be taken when limiting conditions for operation are not met. The proposed changes are based on Technical Specifications Task Force Traveler (TSTF) 505, Revision 2, "Provide Risk Informed Extended Completion Times – RITSTF Initiative 4b," dated July 2, 2018 (ADAMS Accession No. ML18183A493).

II. REGULATORY AUDIT BASES

The basis of this audit is the licensee's LAR for Nine Mile Point 2, and the Standard Review Plan Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance" (ADAMS Accession No. ML071700658).

The audit will be performed consistent with NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, Revision 1, "Regulatory Audits," dated October 31, 2019 (ADAMS Accession No. ML19226A274). An audit was determined to be the most efficient approach toward a timely resolution of issues associated with this LAR review, since the staff will have an opportunity to minimize the potential for multiple rounds of requests for additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination.

III. PURPOSE AND SCOPE

The purpose of the audit is to gain a more detailed understanding of licensee's Risk Informed Completion Time (RICT) program and its application to the technical specifications (TS) completion times as proposed in the LAR. The NRC staff will review internal events and fire PRA and the risk informed approach for establishing extended completion times.

The areas of focus for the regulatory audit are the information contained in the licensee's submittal, the enclosed audit information needs, and all associated and relevant supporting documentations (e.g., methodology, process information, calculations, etc.). The relevant supporting documents are identified below.

IV. INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The following documentation should be available to the audit team:

1. Facts and Observations (F&O) closure reports for the Independent Assessments conducted in February 2019 for the internal events, internal flooding and fire PRA.
2. Any draft or final RICT program procedures (i.e., Risk Management Action (RMA) procedure, PRA Functionality Determination Procedure, Recording Limiting Condition for Operation (LCO) procedures, etc.)
3. Plant specific documentation related to PRA model assumptions and sources of uncertainty for the internal events, internal flooding, and the fire PRA (i.e., PRA uncertainty).
4. Documentation supporting the example RICT calculations presented in LAR Enclosure 1 Table E1-2

V. AUDIT TEAM

The members of the audit team are:

- Jigar Patel, Team Leader and Risk Analyst
- Mihaela Biro, Risk Analyst
- Garill Coles, Risk Analyst (Contractor)
- Michael Marshall, Project Manager

VI. LOGISTICS

The audit will be conducted from February 10, 2020 to May 29, 2020 through an online portal (i.e., electronic portal, ePortal, electronic reading room) established by Exelon. NRC staff and contractors' access to the online portal should be terminated on June 1, 2020. The NRC project manager will coordinate any changes to the audit schedule and location with the licensee.

VII. SPECIAL REQUESTS

The NRC staff would like access to the documents listed above in Section IV through an online portal that allows the NRC staff and contractors to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the NRC staff and contractors have access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff and contractors who are participating in the audit.
- The online portal will be sufficiently secure to prevent the NRC staff and contractors from printing, saving, downloading, or collecting any information on the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgement by each user.

User name and password information should be provided directly to the NRC staff and contractors. The NRC project manager will provide Exelon the names and contact information of the NRC staff and contractors who will be participating in the audit. All other communications should be coordinated through the NRC project manager.

VIII. DELIVERABLES

An audit summary, which may be public, will be prepared within 90 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the staff will issue RAIs to the licensee.

Sincerely,
Michael L. Marshall, Jr., Senior Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-410