



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 28, 2020

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear
Officer Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2 – AUDIT PLAN
IN SUPPORT OF REVIEW OF LICENSE AMENDMENT REQUEST TO REVISE
TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS RELATING
TO EMERGENCY DIESEL GENERATOR (EPID L-2019-LLA-0281)

Dear Mr. Hanson:

By letter dated December 11, 2019, Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) for Calvert Cliffs Nuclear Power Plant, Units 1 and 2, regarding revisions to Technical Specification 3.8.1, "AC [Alternating Current] Sources - Operating." Specifically, the amendments propose to revise Surveillance Requirements 3.8.1.3, 3.8.1.9, 3.8.1.11, and 3.8.1.15 by changing the steady state frequency and voltage acceptance criteria for each emergency diesel generator.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed Exelon's LAR and determined that a regulatory audit would assist in the timely completion of the review. The NRC staff will conduct a regulatory audit to support its review in accordance with the enclosed audit plan. 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 findings. The audit will be conducted from March 16, 2020, to April 24, 2020, through an online portal (also known as electronic portal, ePortal, or electronic reading room) established by Exelon. The enclosed audit plan was discussed with your staff on February 20, 2020.

B. Hanson

- 2 -

If you have any questions, please contact me by telephone at 301-415-2871 or e-mail to Michael.Marshall@nrc.gov.

Sincerely,

/RA/

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

Docket No. 50-317 and 50-318

Enclosure:
Audit Plan

cc: Listserv



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REGULATORY AUDIT PLAN
TO SUPPORT REVIEW OF LICENSE AMENDMENT REQUEST
TO REVISE TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENTS RELATING TO EMERGENCY DIESEL GENERATOR
CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2
DOCKET NOS. 50-317 AND 50-318

1.0 BACKGROUND

By letter dated December 11, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19346E536), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) for Calvert Cliffs Nuclear Power Plant, Units 1 and 2, regarding revisions to Technical Specification 3.8.1, "AC [Alternating Current] Sources - Operating." Specifically, the amendments propose to revise Surveillance Requirements 3.8.1.3, 3.8.1.9, 3.8.1.11, and 3.8.1.15 by changing the steady state frequency and voltage acceptance criteria for each emergency diesel generator (EDG).

The U.S. Nuclear Regulatory Commission (NRC) staff has determined the need for a regulatory audit to be conducted in accordance with Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195), for the NRC staff to examine the licensee's non-docketed information with the intent to gain a better understanding of the LAR, to verify information, and to identify information that may require docketing to support the basis of the NRC staff's licensing decision.

2.0 REGULATORY AUDIT BASIS

The NRC staff (i.e., audit team) will perform the audit to support its evaluation of whether the licensee's request meets the requirements of Section 50.36(c)(3), "Surveillance requirements," of Title 10 of the *Code of Federal Regulation* and continues to meet the plant-specific principal design criteria for electrical systems described in the Calvert Cliffs Nuclear Power Plant Updated Final Safety Analysis Report.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The audit team will review the licensee's analyses and calculations related to the steady state frequency and voltage acceptance criteria for EDGs specified in Surveillance Requirements 3.8.1.3, 3.8.1.9, 3.8.1.11, and 3.8.1.15 to determine if the licensee needs to submit any additional information contained in the analyses and calculations performed in support of the requested change to support or develop conclusions for the NRC staff's safety evaluation.

Enclosure

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The NRC staff requests the licensee to have the following information readily available and accessible for the staff's review via an internet-based portal:

- Evaluation performed to determine components impacted by the EDG frequency and voltage tolerances [Report SL-014205], as described in the LAR, Attachment I, Section 3.1, Phase 1.
- Calculation performed to determine effects of EDG frequency and voltage variations on pumps, motor operated valves, and fans [Calculation CA10309], as described in the LAR, Attachment I, Section 3.1, Phase 2.
- Analysis performed to determine effects of EDG frequency and voltage variations on diesel generator loading [Design Analysis E-88-015], as described in the LAR, Attachment I, Section 3.3.

Based on the review of the above documents, the NRC staff will determine whether it needs to request any additional documents to be made available on the portal or whether additional information needs to be submitted on the docket for the staff to complete the review of the requested changes.

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff:

- Vijay Goel, Team Leader and Electrical Engineer
- Ian Tseng, Mechanical Engineer
- Edmund Kleeh, Electrical Engineer
- Michael Marshall, Project Manager

6.0 LOGISTICS

The audit will be conducted from March 16, 2020, to April 24, 2020, through an online portal (also known as electronic portal, ePortal, electronic reading room) established by Exelon. The audit team's access to the online portal should be terminated on April 30, 2020.

If requested, the audit team will conduct a telephone conference with the licensee for the purposes of introducing the team, discussing the scope of the audit, and describing the information to be made available on the internet portal. The audit team will also confirm with the licensee if the information made available on the online portal contains any sensitive or proprietary information. The audit team may request that representatives of Exelon answer audit team questions during the audit related to information provided on the portal at a mutually agreeable day and time by telephone conference.

The NRC staff does not foresee the need for an onsite visit or in-person discussions between the NRC and licensee staff to discuss information to be provided on the portal at this time. However, if the need for a such a meeting is identified in the future, the audit plan will be

revised, and the schedule for the audit will be adjusted accordingly. The NRC project manager will coordinate any changes to the audit schedule and location with the licensee.

7.0 SPECIAL REQUESTS

The audit team would like access to the documents listed in Section 4.0 above through an online portal (also known as eDocs, electronic reading room, ePortal) that allows the audit team to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the audit team has 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.

8.0 DELIVERABLES

An audit summary, which may be public, will be prepared within 60 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 NRC staff will issue requests for additional information to the licensee.

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TO EMERGENCY DIESEL GENERATOR (EPID L-2019-LLA-0281)
DATED FEBRUARY 28, 2020

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ADAMS Accession No.: ML20052E985

*by e-mail

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|--------|--------------|--------------|--------------|-----------------|
| OFFICE | DORL/LPL1/PM | DORL/LPL1/LA | DEX/EEOB/BC* | DEX/EMIB/BC(A)* |
| NAME | MMarshall | LRonewicz | BTitus | TScarbrough |
| DATE | 02/24/2020 | 02/24/2020 | 02/25/2020 | 02/25/2020 |
| OFFICE | DORL/LPL1/BC | DORL/LPL1/PM | | |
| NAME | JDanna | MMarshall | | |
| DATE | 02/26/2020 | 02/28/2020 | | |

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