



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

November 5, 2020

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

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 1, 2, AND 3; JAMES A. FITZPATRICK NUCLEAR POWER PLANT; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; PEACH BOTTOM ATOMIC POWER STATION, UNITS 1, 2, AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND R. E. GINNA NUCLEAR POWER PLANT - REVIEW OF QUALITY ASSURANCE PROGRAM CHANGES (EPID L-2019-LLQ-0003)

Dear Mr. Hanson:

By application dated December 5, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19339E544), as supplemented by letter dated February 24, 2020 (ADAMS Accession No. ML20055G249), Exelon Generation Company, LLC (Exelon or EGC) requested U.S. Nuclear Regulatory Commission (NRC) approval of changes to its Quality Assurance Topical Report (QATR) in accordance with paragraph 50.54(a)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR). The Exelon QATR describes the quality assurance program (QAP) for the following plants and their co-located independent spent fuel storage installations (ISFSIs): Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 1, 2, and 3; James A. FitzPatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 1, 2, and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant.

Specifically, Exelon requested NRC approval to increase the internal audit interval from 24 months to 36 months for certain audit topics. The increased period between audits will be supplemented by an interim analysis or evaluation of functional area performance. The requested changes are for the subject plants and their co-located ISFSIs. Exelon determined that the changes in these audit intervals, and an associated deviation from NRC Regulatory Guide 1.189, "Fire Protection for Nuclear Power Plants," are a reduction in commitments requiring prior NRC approval to implement pursuant to 10 CFR 50.54(a).

The NRC staff reviewed Exelon's requested changes to its QATR, as documented in the enclosed safety evaluation, and finds that Exelon will continue to comply with 10 CFR 50.34(b)(6)(ii); 10 CFR 50.54(a); Criterion XVIII, "Audits," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50; and Subpart G, "Quality Assurance," to 10 CFR Part 72. In addition, the NRC staff has reasonable assurance that Exelon will continue to comply with other specific regulatory requirements and ASME Code restrictions related to internal audits at its facilities. Therefore, the NRC staff concluded that the requested changes to the Exelon QATR are acceptable. The requested changes in Exelon's application, as supplemented, are hereby approved for the subject plants and their co-located ISFSIs.

Exelon also provided a markup of the requested changes to its QATR in its application, as supplemented. The application states that the markup of the QATR includes additional changes to Exelon's QATR that do not require prior NRC approval, including changes to the QATR requirements for external audits and vendor surveys. The scope of the NRC staff's review of changes to the Exelon's QATR was limited to those changes for which Exelon specifically requested NRC approval. Therefore, the NRC staff did not review these additional changes to the QATR, including changes to the QATR requirements for external audits and vendor surveys, that were included in the application, as supplemented.

Exelon's December 5, 2019, application states, in part:

This change request is written specifically for the EGC QAP, which is based on NQA-1-1994, "Quality Assurance Program Requirement for Nuclear Facilities" (Reference 5). The details of the proposal were developed with industry input through the Nuclear Quality Leadership (NQML) forum. If approved for Exelon, the industry will be able to implement this alternate approach through changes to their QAP under 10 CFR 50.54(a), regardless of the specific version of quality standards that form the basis of their QAP. EGC requests that NRC approval documentation acknowledges this approach for industry reference.

In accordance with 10 CFR 50.54(a)(4), changes to the QAP description that reduce commitments must be submitted to the NRC and receive NRC approval prior to implementation. The regulations in 10 CFR 50.54(a)(3) and (a)(4) provide the requirements for what does not and what does constitute a reduction in commitment, respectively. The regulation in 10 CFR 50.54(a)(3)(i) states that the use of a more recent version of an NRC-approved quality assurance standard is not considered to be a reduction in commitments. However, the Exelon QATR is not a quality assurance standard under 10 CFR 50.54(a)(3)(i).

The regulation in 10 CFR 50.54(a)(3)(ii) states that the use of a quality assurance alternative or exception approved by an NRC safety evaluation is not considered to be a reduction in commitments, provided that the bases of the NRC approval are applicable to the licensee's facility. As noted above, Exelon's requested change to its QATR was written specifically for the Exelon QAP. The NRC staff's approval of the requested changes to the Exelon QATR was based, in part, on the specific content of Exelon's QATR and Exelon's specific commitments to quality assurance standards. The QAP descriptions and commitments to quality standards differ on a plant-specific basis. The NRC's approval of changes to Exelon's QATR is based on Exelon's well-established activities for the functional areas denoted in the submittal and the proposed extension is contingent on the results of annual evaluations, which provide objective evidence that the functional areas will be satisfactorily accomplished. Therefore, the NRC staff's approval of Exelon's request does not establish that similar changes could be made to

other QAPs without prior NRC approval. Each licensee is still responsible for determining whether changes to their plant-specific QAPs constitute a reduction in commitments that requires NRC approval prior to implementation, in accordance with the regulations at 10 CFR 50.54(a)(3) and 50.54(a)(4). Therefore, the NRC staff disagrees with Exelon's statement that "the industry will be able to implement this alternate approach through changes to their QAP under 10 CFR 50.54(a), regardless of the specific version of quality standards that form the basis of their QAP."

If you have any questions, please contact Blake Purnell at 301-415-1380 or via e-mail at [Blake.Purnell@nrc.gov](mailto:Blake.Purnell@nrc.gov).

Sincerely,

Nancy L. Salgado, Chief  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos.: STN 50-456, STN 50-457, 72-73,  
STN 50-454, STN 50-455, 72-68, 50-317,  
50-318, 72-8, 50-461, 72-1046, 50-010,  
50-237, 50-249, 72-37, 50-333, 72-12,  
50-373, 50-374, 72-70, 50-352, 50-353,  
72-65, 50-220, 50-410, 72-1036, 50-171,  
50-277, 50-278, 72-29, 50-254, 50-265,  
72-53, 50-244, and 72-67

Enclosure:  
Safety Evaluation

cc: Listserv



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST TO REVISE THE QUALITY ASSURANCE TOPICAL REPORT

EXELON GENERATION COMPANY, LLC

BRAIDWOOD STATION, UNITS 1 AND 2

BYRON STATION, UNIT NOS. 1 AND 2

CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2

CLINTON POWER STATION, UNIT NO. 1

DRESDEN NUCLEAR POWER STATION, UNITS 1, 2, AND 3

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

LASALLE COUNTY STATION, UNITS 1 AND 2

LIMERICK GENERATING STATION, UNITS 1 AND 2

NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2

PEACH BOTTOM ATOMIC POWER STATION, UNITS 1, 2, AND 3

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NOS. STN 50-456, STN 50-457, 72-73, STN 50-454, STN 50-455, 72-68,

50-317, 50-318, 72-8, 50-461, 72-1046, 50-010, 50-237, 50-249, 72-37, 50-333, 72-12,

50-373, 50-374, 72-70, 50-352, 50-353, 72-65, 50-220, 50-410, 72-1036, 50-171, 50-277,

50-278, 72-29, 50-254, 50-265, 72-53, 50-244, and 72-67

## 1.0 INTRODUCTION

By application dated December 5, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19339E544), as supplemented by letter dated February 24, 2020 (ADAMS Accession No. ML20055G249), Exelon Generation Company, LLC (Exelon) requested U.S. Nuclear Regulatory Commission (NRC) approval of changes to the Exelon Quality Assurance Topical Report (QATR)<sup>1</sup> in accordance with paragraph 50.54(a)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR). The Exelon QATR describes the quality assurance program (QAP) for the following plants and their co-located independent spent fuel storage installations (ISFSIs): Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 1, 2, and 3; James A. FitzPatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 1, 2, and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant.

Specifically, Exelon requested NRC approval to increase the internal audit interval from 24 months to 36 months for certain audit topics. The increased period between audits will be supplemented by an interim analysis or evaluation of functional area performance. The requested changes are for the subject plants and their co-located ISFSIs. Exelon determined that the changes in these audit intervals, and an associated deviation from NRC Regulatory Guide (RG) 1.189, "Fire Protection for Nuclear Power Plants," are a reduction in commitments requiring prior NRC approval to implement pursuant to 10 CFR 50.54(a).

Exelon provided a markup of the requested changes to its QATR in its application, as supplemented. The application states that the markup of the QATR includes additional changes to Exelon's QATR that do not require prior NRC approval, including changes to the QATR requirements for external audits and vendor surveys. The scope of the NRC staff's review of changes to the Exelon's QATR was limited to those changes for which Exelon specifically requested NRC approval. Therefore, the NRC staff did not review the additional changes to the QATR, including changes to the QATR requirements for external audits and vendor surveys, that were included in the application, as supplemented.

## 2.0 REGULATORY EVALUATION

### 2.1 Description of Requested Changes to the Exelon QATR

The Exelon QAP is based on the American Society of Mechanical Engineers (ASME) standard NQA-1-1994, "Quality Assurance Program Requirement for Nuclear Facilities." Chapter 18, "Audits," of the Exelon QATR currently states that the internal audit program is conducted on a performance-driven frequency that is commensurate with the status and importance of the activity to be completed but does not exceed 24 months. Internal audit frequencies required by regulation that are different than the 24-month period are indicated within Appendix B, "Internal

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<sup>1</sup> Revision 94 of the Exelon QATR is available in ADAMS under Accession No. ML19039A007.

Audits,” of the QATR. Exelon requested NRC approval to revise the QATR to increase the internal audit interval from 24 months to 36 months for the following audit topics:

- chemistry
- engineering design control
- engineering programs
- maintenance
- nuclear fuels
- procurement/materials management
- operations
- quality assurance functions
- fire protection
- station blackout
- radiation protection
- decommissioned unit not under the control of an NRC-approved decommissioning plan
- training
- radiological environmental monitoring program
- offsite dose calculation manual
- process control
- non-radiological environmental monitoring
- spent fuel storage installations
- plant operation review committee
- technical specifications and other license conditions.

To support the increased audit interval, the requested changes include a revision to Chapter 18 of the QATR to require an evaluation once per calendar year to determine the need for additional audit activities. Exelon will assess the results of these evaluations, and, when necessary, a review of the identified areas of performance weakness will be planned at the earliest possible opportunity. The QATR will continue to permit a 25 percent grace period, which means that, with the requested changes, the maximum allowed time period between audits is 45 months.

The requested change is applicable to audits implemented to meet the requirements of Appendix B, “Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” to 10 CFR Part 50, for non-safety programs and programs that do not have a defined audit frequency, as described in the Exelon QAP. Exelon stated that the change does not impact audits performed to meet specific regulations (e.g., physical security or emergency preparedness) or audits of suppliers.

## 2.2 Regulatory Requirements and Guidance

The regulatory requirements for nuclear power plant QAPs are set forth in Appendix B to 10 CFR Part 50, 10 CFR 50.34(b)(6)(ii), and 10 CFR 50.54(a). The regulatory requirements for ISFSI QAPs are described in Subpart G, “Quality Assurance,” to 10 CFR Part 72. An NRC-approved QAP that complies with 10 CFR Part 50, Appendix B, is acceptable for meeting the requirements in 10 CFR Part 72, Subpart G, except that the licensee shall also meet the recordkeeping requirements of 10 CFR 72.174, “Quality assurance records.” Exelon’s request does not affect recordkeeping.

Appendix B to 10 CFR Part 50 establishes the quality assurance requirements for the design, fabrication, construction, and testing of structures, systems, and components for nuclear power plants. Criterion XVIII, “Audits,” of 10 CFR Part 50, Appendix B, requires a comprehensive system of planned and periodic audits to be carried out to verify compliance with all aspects of the QAP and to determine the effectiveness of the program. The audits shall be performed in accordance with written procedures or check lists by appropriately trained personnel not having direct responsibilities in the areas being audited. Audit results shall be documented and

reviewed by management having responsibility in the area audited. Follow-up action, including re-audit of deficient areas, shall be taken where indicated. The audit requirements for ISFSIs in 10 CFR 72.176, "Audits," are equivalent to Criterion XVIII of 10 CFR Part 50, Appendix B.

The regulations in 10 CFR 50.34(b)(6)(ii) require the final safety analysis report for a nuclear power facility to include information on the managerial and administrative controls to be used to ensure safe operation. The information on the controls shall also include a discussion on how the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.

The regulations in 10 CFR 50.54(a) require each nuclear power plant licensee subject to the requirements of 10 CFR Part 50, Appendix B, to implement the QAP described or references in the safety analysis report, including changes to that report. Additionally, 10 CFR 50.54(a) specifies the requirements for making changes to the QAP description. In accordance with 10 CFR 50.54(a)(4), changes to the QAP description that reduce commitments must be submitted to the NRC and receive NRC approval prior to implementation. The submittal must include all pages affected by the change and must be accompanied by a forwarding letter identifying the change, the reason for the change, and the basis for concluding that the revised QAP incorporating the change continues to satisfy the criteria of 10 CFR Part 50, Appendix B, and the QAP description commitments previously accepted by the NRC.

Regulatory Guide 1.28, Revision 5, "Quality Assurance Program Criteria (Design and Construction)" (ADAMS Accession No. ML17207A293), describes, in part, methods acceptable to the NRC staff for complying with the provisions of 10 CFR Part 50, Appendix B, for establishing and implementing a QAP for the design and construction of nuclear power plants. RG 1.28, Revision 5, endorses Part I and Part II of multiple revisions of the ASME standard NQA-1, "Quality Assurance Requirements for Nuclear Facility Applications," including Part I of NQA-1-2015, with clarifications and exceptions. Although RG 1.28, Revision 5, and NQA-1-2015 are not currently applicable to Exelon's facilities, these guidance documents were cited in application to support the requested changes.

The regulations in 10 CFR 20.1101(c) require licensees to "periodically (at least annually) review the radiation protection program content and implementation." The answer to Question 118 in the Health Physics Questions and Answers<sup>2</sup> provides guidance to nuclear power plants on using a combination of reviews and audits to comply with 10 CFR 20.1101(c).

### 3.0 TECHNICAL EVALUATION OF REQUESTED CHANGES TO EXELON'S QATR

The NRC staff reviewed Exelon's QATR and the requested changes to the internal audit requirements described in Exelon's application, as supplemented, against the requirements listed in Section 2.2 of this safety evaluation. Although the Exelon QAP is based on NQA-1-1994, the NRC staff also reviewed the requested changes to the QATR against the provisions in NQA-1-2015 for scheduling internal audits for nuclear facilities after placing the facility into operation, as endorsed in RG 1.28, Revision 5. NQA-1-2015 states that it is applicable to different types of nuclear facilities, including power reactors and spent fuel storage facilities, and can be applied to all phases of a nuclear facility life cycle (e.g., operation and

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<sup>2</sup> The answer to Question 118 is available on the NRC's public Website at <https://www.nrc.gov/about-nrc/radiation/protects-you/hppos/qa118.html>. Additional information is available in NUREG-1736, "Consolidated Guidance: 10 CFR 20 — Standards for Protection Against Radiation," October 2001 (ADAMS Package Accession No. ML013330179).

decommissioning) and all types of activities. Therefore, the NRC staff determined that the activities at Exelon's facilities, which include operating power reactors, decommissioning power reactors, and ISFSIs, are within the scope of activities covered by NQA-1-2015. The NRC endorsed Part I and Part II of NQA-1-2015, with exceptions and clarifications, in RG 1.28, Revision 5, as one acceptable method for establishing and implementing a QAP for the design and construction of nuclear power plants in compliance with 10 CFR Part 50, Appendix B. The RG applies to all applicants for a construction permit and operating license subject to 10 CFR Part 50, Appendix B. RG 1.28, Revision 5, is not applicable to Exelon's facilities and Exelon has not adopted, and is not proposing to adopt, NQA-1-2015. However, the NRC staff determined that the activities at Exelon's facilities subject to internal audits under its QAP would not require different treatment than an applicant for an operating license, because NQA-1-2015 includes provisions for the scheduling internal audits for nuclear facilities after placing the facility into operation.

Exelon requested to change its internal audit interval from 24 months to 36 months, while retaining a 25 percent grace period. The QATR will continue to permit a 25 percent grace period, which means that, with the requested changes, the maximum allowed time period between audits is 45 months. To support the increased audit interval, the QATR will be revised to require an evaluation once per calendar year to determine the need for additional audit activities. Exelon will assess the results of these evaluations, and, when necessary, a review of the identified areas of performance weakness will be planned at the earliest possible opportunity. Exelon also stated that: "Each functional audit area will receive an additional performance analysis (evaluation) within 2 years of the last performed audit based on internal and external data; functional area changes in responsibility, resources, or management; and consideration of the impacts, as applicable, to determine if additional audit activities are necessary prior to the 36-month scheduled performance."

The current QATR for Exelon allows for some extension of the internal audit intervals, except where other specific regulatory requirements or ASME Code restrictions apply to the functional areas to be audited. Exelon stated that the requested changes to the QATR do not impact audits that are required by specific NRC regulations. In addition, Exelon stated that audits required by specific regulations will continue to be conducted in a manner that complies with those requirements. As discussed in a separate section below, the NRC staff performed a more detailed review of the requested change to the internal audits of radiation protection activities, as these activities have specific regulatory requirements related to audits.

Exelon's application states, in part, that its requested change to the internal audit frequency, supplemented by annual evaluations, is similar to the internal audit provisions in NQA-1-2015, as endorsed by the NRC in RG 1.28, Revision 5. Section 201.2 of Requirement 18, "Audits," in NQA-1-2015, Part I, includes the following provisions for scheduling internal audits for nuclear facilities after placing the facility into operation:

All applicable quality assurance program elements for each functional area<sup>1</sup> shall be audited within a period of 2 yr [years]. For well-established activities, the period may be extended 1 yr at a time beyond the 2-yr interval based on the results of an annual evaluation of the applicable functional area and objective evidence that the functional area activities are being satisfactorily accomplished. However, the internal audit interval shall not exceed a maximum of 4 yr.



The NRC endorsement of NQA-1-2015 in RG 1.28, Revision 5, includes the following clarification regarding internal audits:

Applicable elements of an organization's QA [quality assurance] program should be audited at least once each year or at least once during the life of the activity, whichever is shorter. In determining the scope of the audit, an evaluation of the activity being audited may be useful. The evaluation may include results of previous QA program audits and the results of audits from other sources, including the nature and frequency of identified deficiencies and any significant changes in personnel, the organization, or the QA program.

The QAPs and activities at Exelon's facilities subject to internal audit are well-established. Thus, the NRC staff determined that the internal audit provisions in NQA-1-2015, if applied to Exelon's facilities, would permit an extension of the internal audit period based on acceptable results from an annual evaluation of the applicable function areas. Exelon requested to change its internal audit interval from 24 months to 36 months, while retaining a 25 percent grace period. The QATR will continue to permit a 25 percent grace period, which means that, with the requested changes, the maximum allowed time period between audits is 45 months. The NRC staff determined that Exelon's requested internal audit interval of 36 months, with a 25 percent grace period, is acceptable because the maximum interval between internal audits at Exelon's facilities is less than the maximum 4-year (i.e., 48-month) audit interval allowed by NQA-1-2015.

Exelon's request includes a revision to the QATR to require an evaluation once per calendar year to determine the need for additional audit activities. Exelon will assess the results of this evaluation, and, when necessary, a review of the identified areas of performance weakness will be planned at the earliest possible opportunity. Exelon also stated that: "Each functional audit area will receive an additional performance analysis (evaluation) within 2 years of the last performed audit based on internal and external data; functional area changes in responsibility, resources, or management; and consideration of the impacts, as applicable, to determine if additional audit activities are necessary prior to the 36-month scheduled performance." The NRC staff determined that the additional evaluation requirement will ensure that for Exelon's facilities the extension of internal audit intervals beyond 2 years will be based on the results of an annual evaluation of the applicable functional area and objective evidence that the functional area activities are being satisfactorily accomplished.

The NRC staff reviewed the internal audit requirements in Exelon's QATR with the requested changes. The staff finds that Exelon will continue to implement, at each facility, a comprehensive system of planned and periodic audits to verify compliance with all aspects of the QAP and to determine the effectiveness of the QAP. These audits will continue to be performed in accordance with written procedures or check lists by appropriately trained personnel not having direct responsibilities in the areas being audited. The audit results will continue to be documented and reviewed by Exelon management having responsibility in the area audited, and follow-up action, including re-audit of deficient areas, will be taken where indicated. The approval of changes to Exelon's QATR is based on Exelon's well-established activities for the functional areas denoted in the submittal and the proposed extension is contingent on the results of annual evaluations, which provide objective evidence that the functional areas will be satisfactorily accomplished. The NRC staff determined that with the requested changes the QATR will continue to adequately describe how the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied. Based on the above, the NRC staff finds that Exelon will continue to comply with Section 50.34(b)(6)(ii), Section 50.54(a), and Criterion XVIII of Appendix B to 10 CFR Part 50.

### Internal Audits of Radiation Protection Activities

Exelon's requested changes to the QATR includes a change to the internal audit of radiation protection activities. Exelon stated that the requested changes to the QATR do not impact audits that are required by specific NRC regulations. In addition, Exelon stated that audits required by specific regulations will continue to be conducted in a manner that complies with those requirements. The regulations in 10 CFR 20.1101(c) require licensees to "periodically (at least annually) review the radiation protection program content and implementation." The answer to Question 118 in the Health Physics Questions and Answers clarified that this periodic review could be completed by any combination of radiation protection supervisory reviews, corporate or third-party audits, or periodic quality assurance audits. The requested change only impacts one method a licensee can use to comply with the regulatory requirement to conduct an annual radiation protection program review. The NRC staff finds that the requested change to the internal audits of radiation protection activities is acceptable because Exelon may use other methods besides quality assurance audits to comply with 10 CFR 20.1101(c) and Exelon will continue to comply with audit requirements specified in NRC regulations.

#### 4.0 CONCLUSION

As discussed above, the NRC staff reviewed Exelon's requested changes to the internal audit requirements in the Exelon QATR, as described in its application, as supplemented. The NRC staff found that Exelon will continue to comply with Section 50.34(b)(6)(ii), Section 50.54(a), and Criterion XVIII of Appendix B to 10 CFR Part 50. Therefore, the staff finds that Exelon will also continue to comply with the quality assurance requirements for ISFSIs in 10 CFR Part 72, Subpart G. In addition, the staff has reasonable assurance that Exelon will continue to comply with other specific regulatory requirements or ASME Code restrictions related to internal audits at its facilities. Therefore, the NRC staff concludes that the requested changes to the internal audit requirements in the Exelon QATR are acceptable.

Principal Contributors: Aaron Armstrong, NRR  
David Garmon, NRR

Date of issuance: November 5, 2020

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 1, 2, AND 3; JAMES A. FITZPATRICK NUCLEAR POWER PLANT; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; PEACH BOTTOM ATOMIC POWER STATION, UNITS 1, 2, AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND R. E. GINNA NUCLEAR POWER PLANT - REVIEW OF QUALITY ASSURANCE PROGRAM CHANGES (EPID L-2019-LLQ-0003) DATED NOVEMBER 5, 2020

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\*by email

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