

From: [Poole, Justin](#)
To: [Villar, Enrique:\(Exelon Nuclear\)](#)
Cc: [Danna, James](#)
Subject: Request for Additional Information Regarding FitzPatrick Primary Containment Isolation Valve Amendment (L-2020-LLA-0145)
Date: Monday, October 19, 2020 2:42:00 PM
Attachments: [L-2020-LLA-0145 RAI EMIB.pdf](#)

Rick,

By letter dated June 30, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20182A198), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) to revise the TS 3.6.1.3, "Primary Containment Isolation Valves," for James A. FitzPatrick Nuclear Power Plant. Specifically, the LAR would modify the containment venting flow path in Surveillance Requirement 3.6.1.3.1 of TS 3.6.1.3. In reviewing the submitted information, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is necessary to complete its review.

On October 9, 2020, the NRC staff sent Exelon the DRAFT RAIs to ensure that the questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the RAI, and to determine if the information was previously docketed. On October 19, 2020, the NRC and Exelon held a clarifying call. During the call, Exelon requested a response date of 30 days from the date of this email. The NRC staff informed Exelon that this timeframe is acceptable. The attached is the final version of the RAIs. These RAIs will be put in ADAMS as a publicly available document.

Justin C. Poole
Project Manager
NRR/DORL/LPL I
U.S. Nuclear Regulatory Commission
(301)415-2048

REQUEST FOR ADDITIONAL INFORMATION REGARDING
TECHNICAL SPECIFICATION 3.6.1.3 PRIMARY CONTAINMENT
ISOLATION VALVES
EXELON GENERATION COMPANY, LLC
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

By letter dated June 30, 2020, Exelon Generation Company, LLC (“Exelon” or “the licensee”) submitted a license amendment request to modify Technical Specifications 3.6.1.3, “Primary Containment Isolation Valves,” for James A. FitzPatrick Nuclear Power Plant (FitzPatrick). In this request, the licensee has requested to modify the configuration requirements for the reactor building suction valves (referred to as 01-125-MOV-12 in the submittal) during inerting and de-inerting the containment atmosphere. Specifically, the valves were previously required to be open, but may be closed if the request is approved. Title 10 of the Code of *Federal Regulations* (10 CFR) Section 50.55a(f)(4) states, in part, that valves that are within the scope of the American Society of Mechanical Engineer (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) must meet the inservice test requirements set forth in the ASME OM Code and that valves that are within the scope of the ASME OM Code but are not classified as ASME Boiler and Pressure Vessel Code (BPV Code) Class 1, Class 2, or Class 3 may be satisfied as an augmented IST program. The licensee states in its submittal that there is no impact to the design basis function of the valves to open upon receipt of a safety signal. The U.S. Nuclear Regulatory Commission (NRC) staff requests confirmation of the following, to support a finding that the subject valves continue to be operationally ready to perform their required functions:

1. 01-125-MOV-12 is the only valve specifically named associated with this request. However, the one-line diagram included in the submittal includes two valves that change configuration as part of this amendment request. Is the other valve 01-125-MOV-11? Do statements made about 01-125-MOV-12 also apply to this MOV? Are there unique attributes of the other MOV that require additional consideration?
2. Do the performance requirements of valve 01-125-MOV-12 (and the other suction valve, as noted above) remain bounded with regards to characteristics such as stroke time after the requested changes have been implemented?
3. 01-125-MOV-12 (and 01-125-MOV-11) are listed as augmented valves in the FitzPatrick IST Program. Do the requested changes in this LAR alter the importance such that their treatment should change within the IST Program? Are any additional changes expected to the IST Program as a result of this LAR?
4. How will these closed valves be tested for operational readiness after implementation of the proposed LAR?