



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

February 10, 2021

Mr. David P. Rhoades
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT – SUPPLEMENTAL
INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING
ACTION RE: REVISING SURVEILLANCE REQUIREMENT 3.5.1.6 INVOLVING
RECIRCULATION PUMP DISCHARGE VALVES (EPID L-2020-LLA-0269)

Dear Mr. Rhoades:

By letter dated December 11, 2020 (Agencywide Documents Access and Management System Accession No. ML20346A023), Exelon Generation Company, LLC (Exelon) submitted a license amendment request for James A. FitzPatrick Nuclear Power Plant (FitzPatrick). The proposed amendment request would revise Technical Specification (TS) Limiting Condition For Operation (LCO) 3.5.1 "ECCS [Emergency Core Cooling System] – Operating," Surveillance Requirement (SR) 3.5.1.6 from "Once each startup prior to exceeding 25% RTP [rated thermal power]," as modified by a Note stating, "Not required to be performed if performed within the previous 31 days" to 24 months. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements for the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that Exelon supplement the application to address the information requested in the enclosure by February 18, 2021. This

will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Mr. Rick Villar of your staff on January 28, 2021.

If you have any questions, please contact me at (301) 415-2048 or Justin.Poole@nrc.gov.

Sincerely,

/RA/

Justin C. Poole, Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-333

cc: Listserv

Enclosure:
Supplemental Information Needed

SUPPLEMENTAL INFORMATION NEEDED

AMENDMENT REQUEST REGARDING REVISING SURVEILLANCE REQUIREMENT 3.5.1.6

INVOLVING RECIRCULATION PUMP DISCHARGE VALVES

EXELON GENERATION COMPANY, LLC

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

By letter dated December 11, 2020 (Agencywide Documents Access and Management System Accession No. ML20346A023), Exelon Generation Company, LLC (Exelon) submitted a license amendment request for James A. FitzPatrick Nuclear Power Plant (FitzPatrick). The proposed amendment request would revise Technical Specification (TS) Limiting Condition for Operation (LCO) 3.5.1 "ECCS [Emergency Core Cooling System] – Operating," Surveillance Requirement (SR) 3.5.1.6 from "Once each startup prior to exceeding 25% RTP [rated thermal power]," as modified by a Note stating, "Not required to be performed if performed within the previous 31 days" to 24 months.

The frequency for performing SR 3.5.1.6 in the current FitzPatrick TSs is identical to the frequency in the Standard TS (STS) NUREG-1433, "Standard Technical Specifications – General Electric Plants (BWR/4)." The bases for the frequency in the current FitzPatrick bases are essentially identical to the bases in STS NUREG-1433. Section 2.0 of Attachment 1 of the application states that there is no specific reason to test the valves at a frequency different than that required by the inservice testing (IST). The current FitzPatrick TS bases provide the following reason for the SR frequency:

Verification during reactor startup prior to reaching >25% RTP is an exception to the normal Inservice Testing Program generic valve cycling Frequency of 92 days, but is considered acceptable to the demonstrated reliability of these valves.

It appears the current licensing basis provides a specific reason why the valves are tested to a frequency different than that required by the IST and that reason already takes the reliability of the valves into account, though the application doesn't address why this reason is no longer required. While the application points to the historical performance of the valves and the licensee's desire to align with the IST requirements, the application does not provide an analysis or evaluation to show why the change is warranted. The licensee should provide a detailed technical evaluation that justifies changing the frequency from a conditional value (once each startup, including mid-cycle startups) to a set value of 24 months.

Enclosure

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT – SUPPLEMENTAL
INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING
ACTION RE: REVISING SURVEILLANCE REQUIREMENT 3.5.1.6 INVOLVING
RECIRCULATION PUMP DISCHARGE VALVES (EPID L-2020-LLA-0269)
DATED FEBRUARY 10, 2021

DISTRIBUTION:

Public
PM File Copy
RidsACRS_MailCTR
RidsNrrDorl
RidsNrrDorlLpl1
RidsNrrDssStsb
RidsNrrLAJBurkhardt
RidsNrrPMFitzPatrick
RidsRgn1MailCenter

ADAMS Accession No.: ML21029A341

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DSS/STSB/BC
NAME	JPoole	JBurkhardt	VCusumano
DATE	02/01/2021	02/01/2021	02/01/2021
OFFICE	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM	
NAME	JDanna	JPoole	
DATE	02/10/2021	02/10/2021	

OFFICIAL RECORD COPY