

From: [Poole, Justin](#)
To: [Williams, Christian D:\(Exelon Nuclear\)](#); [Sullivan, Richard M:\(Exelon Nuclear\)](#)
Cc: [Danna, James](#)
Subject: Request for Additional Information Regarding FitzPatrick Amendment Request to Modify SR 3.5.1.6 (L-2020-LLA-0269)
Date: Thursday, July 01, 2021 4:13:00 PM
Attachments: [L-2020-LLA-0269 RAIs.pdf](#)

Christian,

By letter dated December 11, 2020, as supplemented by letter dated February 18, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML20346A023 and ML21049A213, respectively), 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) limited condition for operation (LCO) 3.5.1 "ECCS – Operating," surveillance requirement (SR) 3.5.1.6 from "Once each startup prior to exceeding 25% RTP," as modified by a Note stating, "Not required to be performed if performed within the previous 31 days" to 24 months. 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 May 28, 2021, 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 RAIs, and to determine if the information was previously docketed. On June 9, 2021, the NRC and Exelon held a clarifying call. In a follow-up 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.

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REQUEST FOR ADDITIONAL INFORMATION REGARDING
PROPOSED LICENSE AMENDMENT REQUEST
APPLICATION TO REVISE SURVEILLANCE REQUIREMENT 3.5.1.6
EXELON GENERATION COMPANY, LLC
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

By letter dated December 11, 2020, as supplemented by letter dated February 18, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML20346A023 and ML21049A213, respectively), 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) limited condition for operation (LCO) 3.5.1 "ECCS – Operating," surveillance requirement (SR) 3.5.1.6 from "Once each startup prior to exceeding 25% RTP," as modified by a Note stating, "Not required to be performed if performed within the previous 31 days" to 24 months.

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(3) states that, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the license amendment request (LAR), and its supplements, and has determined the following requests for additional information (RAI) are required for the NRC staff to complete its review:

RAI-1

The LAR proposes to change SR 3.5.1.6. The proposed change eliminates the notation of "Not required to be performed if performed within the previous 31 days" and changes the specified frequency from "Once each startup prior to exceeding 25% RTP" to 24 months.

Please explain the reason to modify SR 3.5.1.6 to require a frequency of "24-month" instead of "In accordance with the INSERVICE TESTING PROGRAM," which is specified in TSTF-545, "TS Inservice Testing [IST] Program & Clarify SR Usage Rule Application to Section 5.5 Testing."

RAI-2

The proposed FitzPatrick LAR text of the SURVEILLANCE statement in SR 3.5.1.6 remains the same as "Verify each recirculation pump discharge valve cycles through one complete cycle of full travel or is de-energized in the closed position." The NRC staff is concerned with potential unintended consequences of this proposed change as written. The Bases for SR 3.5.1.6 states, in part, that "Cycling the recirculation pump discharge valves through one complete cycle of full travel demonstrates that the valves are mechanically OPERABLE and will close when required." The proposed change does not appear to provide reasonable assurance that periodic cycling of

the valve will be completed due to the portion of the SR which would state “or is de-energized in the closed position.” Satisfaction of the current proposed wording could be a simple turn of the electric breaker to the “off” position and the back to the “on” position when the valve is in the closed position.

Please explain why the portion of the SR which would state “or is de-energized in the closed position” is needed because the valves will be required to be stroked in accordance with the IST Program. In addition, please clarify the mismatch between the requirements of SR 3.5.1.6 and its Bases.

RAI-3

The proposed change references a precedent relating to a request made by the licensee of the Fermi 2 nuclear power plant in 1999. The Fermi 2 licensee requested to change its SR 4.4.1.1.1 to remove the notation that the surveillance is only required if it has not been performed within the last 31 days, and then to require that each pump discharge valve is OPERABLE by cycling each valve through at least one complete cycle of full travel at least once per 18 months. The request for the Fermi 2 nuclear power plant does not appear to be the same as the request for the FitzPatrick nuclear power plant. The NRC staff is unclear regarding the basis for referencing the Fermi 2 request in the FitzPatrick LAR.

Please clarify the basis for referencing the Fermi 2 request in the FitzPatrick LAR.

RAI-4

The LAR provides a brief list of prior testing of motor-operated valves (MOVs) 053A and 053B, which appears to be stroke-time testing. The LAR also mentions that these valves are periodically tested under the MOV testing program established in accordance with Generic Letter 96-05, “Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves,” dated September 18, 1996.

Please discuss the past historical performance of these valves with respect to how Fitzpatrick is meeting the requirements of 10 CFR 50.55a(b)(3)(ii). Historical performance should include the type of testing performed and any maintenance or modifications that may have been completed.