

200 Exelon Way Kennett Square, PA 19348 www.exeloncorp.com

10 CFR 50.90

JAFP-21-0081

September 3, 2021

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

> James A. FitzPatrick Nuclear Power Plant Renewed Facility Operating License No. DPR-59 <u>NRC Docket No. 50-333</u>

SUBJECT: Supplement to Application to Revise Technical Specifications to Adopt TSTF-582, Revision 0, Reactor Pressure Vessel Water Inventory Control (RPV WIC) Enhancements

References:

- Letter from Dave T. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Application to Revise Technical Specifications to Adopt TSTF-582, Revision 0 "Reactor Pressure Vessel Water Inventory Control (RPV WIC) Enhancements" dated April 16, 2021.
- 2. E-mail from Justin Poole (Nuclear Regulatory Commission Project Manager for the James A. FitzPatrick Nuclear Power Plant) to Christian Williams (Exelon Nuclear Principal Licensing Engineer) titled "Items the staff noticed while reviewing TSTF-582 LAR" dated August 11, 2021.

By letter dated April 16, 2021, Exelon Generation Company, LLC (Exelon) submitted a license amendment request to revise Technical Specifications (TS) to Adopt TSTF-582 Revision 0, "Reactor Pressure Vessel Water Inventory Control (RPV WIC) Enhancements."

By electronic mail dated August 11, 2021 (Reference 2), the NRC identified areas where corrections to the submitted TS Markup pages were necessary to complete the review. These corrections were discussed with the NRC Staff in a clarification call held on August 12, 2021. It was agreed that corrected TS Markup pages would be submitted in the form of this supplement.

Attachment 1 to this letter contains the superseded TS Markup pages followed by the corrected TS Markup pages which will replace the corresponding TS Markup pages provided in the original submittal.

Supplement to Application to Adopt TSTF-582, Revision 0 September 3, 2021 Page 2

Exelon has reviewed the information supporting a finding of no significant hazards consideration and the environmental consideration provided to the NRC in Reference 1. The information attached to this letter does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. Furthermore, the information attached to this letter does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no commitments contained in this response.

If you should have any questions regarding this submittal, please contact Christian Williams at 610-765-5729.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 3rd day of September 2021.

Respectfully,

David T. Gudger David T. Gudger

David T. Gudger Senior Manager, Licensing Exelon Generation Company, LLC

Attachments: 1. Superseded and Corrected Technical Specification Markup pages

cc: Regional Administrator – NRC Region I NRC Senior Resident Inspector – JAF NRC Project Manager, NRR – JAF A. L. Peterson, NYSERDA

ATTACHMENT 1

Superseded and Corrected Technical Specification Markup pages

TS Markup Pages

Superseded 3.3.5.2.1 Corrected 3.3.5.2-1

Superseded 3.5.1-1 Corrected 3.5.1-1

Superseded 3.8.2-4 Corrected 3.8.2-4

3.3 INSTRUMENTATION 3.3.5.2 Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation LCO 3.3.5.2 The Reactor Pressure Vessel (RPV) Water Inventory Control instrumentation for each Function in Table 3.3.5.2-1 shall be OPERABLE. APPLICABILITY: According to Table 3.3.5.2-1. immediately ACTIONS -----NOTE--Separate Condition entry is allowed for each channel. REQUIRED ACTION COMPLETION TIME CONDITION Enter the Condition A. One or more channels A.1 **Immediately** inoperable. referenced in A.1 Initiate action to place Table 3.3.5.2 1 for the channel in trip channel. OR B. As required by Required Declare associated Immediately Action A.1 and penetration flow path(s) incapable of automatic referenced in Table 3.3.5.2-1. isolation. A.2.1 AND A. One or more channels A.2.2 inoperable. **B**.2 Galculate DRAIN TIME. Immediately Initiate action to c C. As required by Required C.1 Place channel in trip. 1 hour Action A.1 and referenced in Table 3.3.5.2-1. D. As required by Required $\mathbf{D.1}$ Restore channel to 24 hours Action A.1 and **OPERABLE status**. referenced in Table 3.3.5.2-1.

	3.3 INST	FRUMENTATION				
	3.3.5.2	Reactor Pressure V	Vessel (R	PV) Water Inventory Control I	Instrum	entation
3.3 II 3.3.5.2 LCO APPL ACTIO Separa 	LCO 3.3	LCO 3.3.5.2 The Read instrume OPERAE		sure Vessel (RPV) Water Inve or each Function in Table 3.3	ntory C .5.2-1 s	ontrol hall be
	APPLICABILITY: Accordin		ng to Tab	le 3.3.5.2-1.		
	ACTIONS	3				
	Separate	Separate Condition entry is allowed for each channel.				
			1		\	
	CONDITION			REQUIRED ACTION	СС	DMPLETION TIME
	A. One or more channels inoperable.		A.1	Enter the Condition referenced in Table 3.3.5.2-1 for the channel.	Imn	nediately A.1 Initiate action to place channel in trip.
	B. As re Action refere Table	quired by Required n A.1 and enced in ∋ 3.3.5.2-1.	B.1 A.2.1	Declare associated penetration flow path(s) incapable of automatic isolation.	∨ Imn	nediately
A. One o inoperabl	e.	annels	AND B.2	A.2.2 Galculate DRAIN TIME.	Imn culate	nediately
	C. As re Action refere Table	quired by Required n A.1 and enced in ∋ 3.3.5.2 1.	C.1	Place channel in trip.	1-h	- Duf
	D. As re Action refere Table	quired by Required n A.1 and enced in e 3.3.5.2–1.	D.1	Restore channel to OPERABLE status.	241	hours

- 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), REACTOR PRESSURE VESSEL (RPV) WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM
- 3.5.1 ECCS-Operating

LCO 3.5.1	Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.			
	NOTE			
	Low pressure coolant injection (LPCI) subsystems may be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than the Residual Heat Removal (RHR) cut in permissive pressure in MODE 3, if capable of being manually realigned and not otherwise inoperable.			
APPLICABILITY:	MODE 1, MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.			
ACTIONS	Core Spray (HPCI)			

LCO 3.0.4.b is not applicable to HPCI.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
A.	One low pressure ECCS injection/spray subsystem inoperable. <u>OR</u> One low pressure coolant injection (LPCI) pump in both LPCI subsystems inoperable.	A.1	Restore low pressure ECCS injection/spray subsystem(s) to OPERABLE status.	7 days
В.	Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u> B.2	Be in MODE 3. Be in Mode 4.	12 hours 36 hours

(continued)

- 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), REACTOR PRESSURE VESSEL (RPV) WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM
- 3.5.1 ECCS-Operating

LCO 3.5.1	Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.			
	NOTE			
	Low pressure coolant injection (LPCI) subsystems may be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than the Residual Heat Removal (RHR) cut in permissive pressure in MODE 3, if capable of being manually realigned and not otherwise inoperable.			
APPLICABILITY:	MODE 1, MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure \leq 150 psig.			
	high pressure			
ACTIONS	coolant injection			
LCO 3.0.4.b is no	t applicable to HPCI.			

CONDITION			REQUIRED ACTION	COMPLETION TIME
Α.	One low pressure ECCS injection/spray subsystem inoperable. <u>OR</u> One low pressure coolant injection (LPCI) pump in both LPCI subsystems inoperable.	A.1	Restore low pressure ECCS injection/spray subsystem(s) to OPERABLE status.	7 days
В.	Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u> B.2	Be in MODE 3. Be in Mode 4.	12 hours 36 hours
				(a a vativa v a al)

(continued)

SURVEILLANCE REQUIREMENTS



SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY		
SR 3.8.2.1	 SR 3.8.2.1 SR 3.8.2.1 The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.11, SR 3.8.1.12, and SR 3.8.1.13. SR 3.8.1.10 and SR 3.8.1.12 are not required to be met when associated ECCS subsystem(s) are not required to be OPERABLE per LCO 3.5.2, "Reactor Pressure Vessel (RPV) Water Inventory Control." 			
	For AC sources required to be OPERABLE the SRs of Specification 3.8.1, except SR 3.8.1.7, are applicable.	In accordance with applicable SRs		
owing SRs are appli SLE: SR 3.8.1.1, SR 3 SR 3.8.1.6, SR 3.8.1	cable for AC sources required to be .8.1.2, SR 3.8.1.3, SR 3.8.1.4, SR .8, and SR 3.8.1.11.			

I