

RS-22-027

February 23, 2022

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. 50-456 and 50-457

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. 50-454 and 50-455

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

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

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Nine Mile Point Nuclear Station, Unit 2
Renewed Facility Operating License No. DPR-69
NRC Docket No. 50-410

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

R.E. Ginna Nuclear Power Plant
Facility Operating License No. DPR-18
NRC Docket No. 50-244

SUBJECT: Response to Request for Additional Information regarding Application to Revise Technical Specifications to Adopt TSTF-541 Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

- REFERENCES:
1. Letter from David T. Gudger (Exelon Generation Company, LLC now Constellation Energy Generation) to U.S. Nuclear Regulatory Commission, "Application to Revise Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position." Dated September 27, 2021
 2. Electronic Mail from Blake Purnell (Nuclear Regulatory Commission) to Christian Williams (Exelon Generation Company, LLC) "Request for Additional Information Regarding Fleet License Amendment Request to Adopt TSTF-541" dated February 10, 2022

By letter dated September 27, 2021 (Reference 1), Exelon Generation Company, LLC (Exelon), now Constellation Energy Generation (CEG), submitted a license amendment request for 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 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, Unit 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant.

The proposed amendments would revise the technical specifications (TSs) for each facility based on Technical Specification Task Force (TSTF) traveler TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position" (ADAMS Accession No. ML19240A315). The proposed amendments would also make similar changes to surveillance requirements not included in TSTF-541, Revision 2, and additional editorial changes to the TSs.

By electronic mail dated February 10, 2022 (Reference 2), the NRC requested additional information that was necessary to complete its review.

Attachment 1 to this letter contains the NRC's requests for additional information (RAIs) followed by the CEG response.

CEG 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 regulatory commitments made in this submittal.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated State Officials.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23rd day of February 2022.

If you should have any questions regarding this submittal, please contact Christian Williams at (732) 281-9104.

Sincerely,



David T. Gudger
Senior Manager, Licensing
Constellation Energy Generation, LLC

Attachment: 1) NRC Request for Additional Information and Detailed Response

Enclosure: 1) Corrected Technical Specification Changes (Mark-Up)

cc: NRC Regional Administrator - Region I
NRC Regional Administrator – Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station
NRC Senior Resident Inspector – Calvert Cliffs Nuclear Power Plant
NRC Senior Resident Inspector – Clinton Power Station
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – James A. FitzPatrick Nuclear Power Plant
NRC Senior Resident Inspector – LaSalle County Station
NRC Senior Resident Inspector – Limerick Generating Station
NRC Senior Resident Inspector – Nine Mile Point Nuclear Station
NRC Senior Resident Inspector – Peach Bottom Atomic Power Station
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station
NRC Senior Resident Inspector – R.E. Ginna Nuclear Power Plant
Illinois Emergency Management Agency – Division of Nuclear Safety
Director, Bureau of Radiation Protection – Pennsylvania Department of
Environmental Protection
A. L. Peterson, NYSERDA
Bridget Frymire, NYSPSC
S. Seaman, MD-DNR
W. DeHaas, Pennsylvania Bureau of Radiation Protection

Attachment 1

Request for Additional Information and Detailed Response

Request For Additional Information and Detailed Response

Background

By letter dated September 27, 2021 (Reference 1) , Exelon Generation Company, LLC (Exelon), now Constellation Energy Generation (CEG), submitted a license amendment request for 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 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, Unit 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant.

The proposed amendments would revise the technical specifications (TSs) for each facility based on Technical Specification Task Force (TSTF) traveler TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position" (ADAMS Accession No. ML19240A315). The proposed amendments would also make similar changes to surveillance requirements not included in TSTF-541, Revision 2, and additional editorial changes to the TSs.

The NRC made requests for additional information (RAI) in an email dated February 10, 2022 (Reference 2). The additional information requests and the CEG responses are provided below.

RAI-1

The TS markups provided in the application include several changes that are not consistent with TSTF-541, Revision 2, and are not identified as variations in the application. The differences between the markup and the changes in TSTF-541, Revision 2, are as follows:

Dresden

In its TS markup for SR 3.6.4.3.3, the licensee added "except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup does not include valves.

Fitzpatrick

In its TS markup for SR 3.6.4.3.3, the licensee added "except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup does not include valves.

Limerick

In its TS markup for SR 4.6.5.3.d.2, the licensee added "except for valves that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup includes only dampers, not valves for this SR.

NMP-2

In its TS markup for SR 3.6.4.3.3, the licensee added "except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup does not include valves.

Peach Bottom

In its TS markup for SR 3.6.4.3.3, the licensee added “except for valves that are locked, sealed, or otherwise secured in the actuated position.” The TSTF-541 markup only includes dampers, not valves.

Quad Cities

In its TS markup for SR 3.6.4.3.3, the licensee added “except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.” The TSTF-541 markup does not include valves.

In its TS markup for SR 3.7.4.3, the licensee added “except for dampers that are locked, sealed, or otherwise secured in the actuated position.” The TSTF-541 markup includes dampers and valves.

Confirm that these differences are variations from TSTF-541, Revision 2, that are necessary to reflect plant-specific configurations. Otherwise, provide an explanation for these variations from the TSTF traveler.

Response to RAI-1

Except for Limerick SR 4.6.5.3.d.2 and Quad Cities SR 3.7.4.3, the above referenced SRs do not require variances due to plant specific configurations. The inclusion of “dampers and valves” or “valves” instead of “dampers” in the referenced Standby Gas Treatment System (SGT) SRs was an oversight during the development of the amendment request. Corrected pages for the above referenced SRs consistent with the TSTF, except for Limerick SR 4.6.5.3.d.2 and Quad Cities SR 3.7.4.3, are provided as an enclosure to this response and shall replace the corresponding pages from Reference 1.

Regarding Limerick SR 4.6.5.3.d.2, this SR specifically refers to the tested components as “valves” and not “dampers”. This is a function of Limerick maintaining custom Technical Specifications. Although the affected components are ventilation system isolation devices, the nomenclature used in the Limerick SR varies from the nomenclature of the TSTF. This is an administrative variance from the TSTF based on the naming of the components.

Regarding Quad Cities SR 3.7.4.3, this SR exercises only the Control Room Emergency Ventilation (CREV) systems dampers and is not a full system actuation. This is a variance from the approved TSTF that is necessary based on the difference between the Quad Cities SR 3.7.4.3 and the Standard Tech Spec (STS) 3.7.4.3 on which the TSTF is based. STS SR 3.7.4.3 requires actuation of the Main Control Room Environmental Control (MCREC) system which might include both valves and dampers whereas the Quad Cities SR only exercises dampers. The justification for applying the note to the STS SR 3.7.4.3 also applies to the Quad Cities SR 3.7.4.3 as the intent of the Quad Cities SR is consistent with the intent of the STS SR.

RAI-2

The TS markup for Limerick, Unit 2, proposes to add the following footnote to SR 4.7.3.c.1: "Except for valves that [are] locked, sealed, or otherwise secured in the actuated position." However, the word "are" is missing as indicated by the bracketed text. Provide the correct wording for this proposed footnote.

Response to RAI-2

A corrected markup of Limerick Unit 2 SR 4.7.3.c.1 is provided with the enclosure to this response and shall replace the associate page from Reference 1.

Enclosure 1
Corrected Technical Specification Changes (Mark-Up)

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
REVISED TECHNICAL SPECIFICATION PAGE
3.6.4.3-3

James A. FitzPatrick Nuclear Power Plant, Unit 1
Renewed Facility Operating License No. DPR-59
REVISED TECHNICAL SPECIFICATION PAGE
3.6.4.3-3

Limerick Generating Station, Unit 2
Facility Operating License Nos. NPF-39 and NPF-85
REVISED TECHNICAL SPECIFICATION PAGE
3/4 7-10

Nine Mile Point Nuclear Station, Unit 2
Renewed Facility Operating License No. NPF-69
REVISED TECHNICAL SPECIFICATION PAGE
3.6.4.3-3

Peach Bottom Atomic Power Station, Unit 2
Renewed Facility Operating License Nos. DPR-44 and DPR-56
REVISED TECHNICAL SPECIFICATION PAGE
3.6-42

Peach Bottom Atomic Power Station, Unit 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
REVISED TECHNICAL SPECIFICATION PAGE
3.6-42

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
REVISED TECHNICAL SPECIFICATION PAGE
3.6.4.3-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

INSERT ", except for dampers that are locked, sealed, or otherwise secured in the actuated position."

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SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4	Manually cycle each SGT subsystem filter cooling cross-tie valve.	In accordance with the Surveillance Frequency Control Program

INSERT “, except for dampers that are locked, sealed, or otherwise secured in the actuated position.”

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. In accordance with the Surveillance Frequency Control Program by:
1. Performing a system functional test which includes simulated automatic actuation and restart and verifying that each automatic valve in the flow path actuates to its correct position. Actual injection of coolant into the reactor vessel may be excluded.
 2. Verifying that the system will develop a flow of greater than or equal to 600 gpm in the test flow path when steam is supplied to the turbine at a pressure of 150 + 15, - 0 psig.*
 3. Verifying that the suction for the RCIC system is automatically transferred from the condensate storage tank to the suppression pool on a condensate storage tank water level-low signal.
 4. Performing a CHANNEL CALIBRATION of the RCIC system discharge line "keep filled" level alarm instrumentation.

INSERT "***"

*The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the tests. If OPERABILITY is not successfully demonstrated within the 12-hour period, reduce reactor steam dome pressure to less than 150 psig within the following 72 hours.

← INSERT "*** Except for valves that are locked, sealed, or otherwise secured in the actuated position."



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SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4	Verify each SGT decay heat removal air inlet valve can be opened.	In accordance with the Surveillance Frequency Control Program

INSERT ", except for dampers that are locked, sealed, or otherwise secured in the actuated position."

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INSERT “, except for dampers that are locked, sealed, or otherwise secured in the actuated position”

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