



RS-22-049

April 4, 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: Supplemental Information to correct typographical errors in Constellation's 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, LLC) 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
 3. 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," dated February 25, 2022

By letters dated September 27, 2021 (Reference 1) and February 25, 2022 (Reference 3), Exelon Generation Company, LLC (Exelon), now Constellation Energy Generation, LLC (CEG), submitted a license amendment request for Braidwood Station, Units 1 and 2; Byron Station, Units 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit 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.

During a review of the proposed changes, a typographical error was identified on the markup technical specifications (TS) pages for Limerick Unit 1 and Unit 2 (Attachment 2h of Reference 1). Specifically, an unnecessary period (.) was included in the statement added to surveillance requirement 4.6.5.3.d.2, TS page 3/4 6-54. This error was present on both the Unit 1 and Unit 2 page. Corrected TS Markup pages are being submitted as Enclosure 1 to eliminate this error.

Supplemental Information to Correct Typographical
Errors in Constellation's Application to Revise
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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 4th day of April 2022.

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

Sincerely,

David T. Gudger

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

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

Supplemental Information to Correct Typographical
Errors in Constellation's Application to Revise
Technical Specifications to Adopt TSTF-541, Revision 2
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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

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

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
REVISED TECHNICAL SPECIFICATION PAGE
3/4 6-54

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying that the fan starts and isolation valves necessary to draw a suction from the refueling area or the reactor enclosure recirculation discharge open on each of the following test signals:
 - a) Manual initiation from the control room, and
 - b) Simulated automatic initiation signal.
3. Verifying that the temperature differential across each heater is $\geq 15^{\circ}\text{F}$ when tested in accordance with ANSI N510-1980.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter bank satisfies the in-place penetration and leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 while operating the system at a flow rate of 5764 cfm $\pm 10\%$.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorber bank satisfies the in-place penetration and leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 5764 cfm $\pm 10\%$.
- g. After any major system alteration:
 1. Verify that when the SGTS fan is running the subsystem flowrate is 2800 cfm minimum from each reactor enclosure (Zones I and II) and 2200 cfm minimum from the refueling area (Zone III).
 2. Verify that one standby gas treatment subsystem will drawdown reactor enclosure Zone I secondary containment to greater than or equal to 0.25 inch of vacuum water gauge in less than or equal to 916 seconds with the reactor enclosure recirculation system in operation and the adjacent reactor enclosure and refueling area zones are in their isolation modes.

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

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying that the fan starts and isolation valves necessary to draw a suction from the refueling area or the reactor enclosure recirculation discharge open on each of the following test signals:
 - a) Manual initiation from the control room, and
 - b) Simulated automatic initiation signal.
3. Verifying that the temperature differential across each heater is $\geq 15^{\circ}\text{F}$ when tested in accordance with ANSI N510-1980.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter bank satisfies the inplace penetration and leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 while operating the system at a flow rate of 5764 cfm $\pm 10\%$.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorber bank satisfies the inplace penetration and leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 5764 cfm $\pm 10\%$.
- g. After any major system alteration:
 1. Verify that when the SGTS fan is running the subsystem flowrate is 2800 cfm minimum from each reactor enclosure (Zones I and II) and 2200 cfm minimum from the refueling area (Zone III).
 2. Verify that one standby gas treatment subsystem will drawdown reactor enclosure Zone II secondary containment to greater than or equal to 0.25 inch of vacuum water gauge in less than or equal to 916 seconds with the reactor enclosure recirculation system in operation and the adjacent reactor enclosure and refueling area zones are in their isolation modes.

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