



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

August 25, 2025

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

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 – CORRECTION LETTER FOR AMENDMENT NOS. 286 AND 279 RE: ADOPTION OF TSTF-505, “PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES – RITSTF INITIATIVE 4B” AND TSTF-591, “REVISE RISK INFORMED COMPLETION TIME PROGRAM” (EPID L-2024-LLA-0061)

Dear Mr. Rhoades:

On July 30, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25196A299, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 286 and 279 to Renewed Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station, Units 2 and 3, respectively. These amendments revised Renewed Facility Operating Licenses and the Technical Specifications (TSs) in response to your license amendment request (LAR) dated May 8, 2024 (ML24129A135), as supplemented by letters dated October 21, 2024 (ML24295A350), March 21, 2025 (ML25080A153), April 23, 2025 (ML25113A134), and June 2, 2025 (ML25153A051).

Subsequent to issuance of the above amendments, by letter dated August 19, 2025 (ML25231A279), Constellation Energy Generation, LLC (CEG) informed the NRC that TS page 5.5-15 provided by them and inserted in the amendment package was incorrect as it was missing verbiage about “High Wind/Tornado Missile Penalty Factor” in paragraph “e.” The verbiage was required to be added based on CEG’s response to the NRC staff’s Question 11, which was approved by the NRC staff. This verbiage is documented on page 17 of Attachment 2 of the LAR Supplement dated March 21, 2025 (ML25080A153).

Enclosed with this letter is the corrected TS page 5.5-15, with which we ask you to replace the previously issued TS page 5.5-15. The NRC concludes that this correction is entirely editorial in nature and does not change the staff’s conclusions in the safety evaluation for the amendments, nor does it affect the no significant hazard consideration, as published in the *Federal Register* on July 9, 2024 (89 FR 56441).

D. Rhoades

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If you have any questions regarding this matter, please contact me at (301) 415-1421 or by email at [Surinder.Arora@nrc.gov](mailto:Surinder.Arora@nrc.gov).

Sincerely,

*/RA/*

Surinder S. Arora, Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure:  
Correct TS Page 5.5-15 for  
Amendment Nos. 286/279

cc: Listserv

**Enclosure**  
**Correct TS Page 5.5-15**

5.5 Programs and Manuals

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5.5.16 Risk Informed Completion Time Program (continued)

2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
  3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
  2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.
- e. A RICT calculation must include the following hazard groups: internal flood and internal events PRA model, internal fire PRA model, high wind/tornado missile penalty factor, seismic penalty factor, and external flood penalty factor. Changes to these means of assessing the hazard groups require prior NRC approval.
- f. The PRA models used to calculate a RICT shall be maintained and upgraded in accordance with the processes endorsed in the regulatory positions of Regulatory Guide 1.200, Revision 3, "Acceptability of Probabilistic Risk Assessment Results for Risk-Informed Activities."
- g. A report shall be submitted in accordance with Specification 5.6.7 before a newly developed method is used to calculate a RICT.
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**ADAMS Accession No.: ML25233A232**

**NRR-106**

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