



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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May 14, 2014

Mr. Michael J. Pacilio
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO)
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION, UNIT 1 - STAFF ASSESSMENT OF THE SEISMIC WALKDOWN REPORT SUPPORTING IMPLEMENTATION OF NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NO. MF0108)

Dear Mr. Pacilio:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information letter per Title 10 of the *Code of Federal Regulations*, Paragraph 50.54(f) (50.54(f) letter). The 50.54(f) letter was issued to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. The request addressed the methods and procedures for nuclear power plant licensees to conduct seismic and flooding hazard walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program, and to verify the adequacy of the monitoring and maintenance procedures.

By letter dated November 27, 2012, Exelon Generation Company, LLC (Exelon) submitted a seismic walkdown report for Clinton Power Station, Unit 1, as requested in Enclosure 3, "Recommendation 2.3: Seismic," of the 50.54(f) letter. By letter dated November 27, 2013, Exelon provided a response to the NRC request for additional information for the staff to complete its assessments. By letter dated September 16, 2013, Exelon provided additional information on the completion of inaccessible items and the substitutions made to the list of inaccessible items in order to complete all walkdowns and submit the final walkdown report by December 31, 2014.

The NRC staff reviewed the information provided and, as documented in the enclosed staff assessment, determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter. The staff acknowledges that a supplemental letter will be provided by December 31, 2014, addressing the remaining inaccessible items consistent with the regulatory commitment.

M. Pacilio

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If you have any questions, please contact me at 301-415-1380 or by e-mail at Blake.Purnell@nrc.gov.

Sincerely,

/ RA E. Brown for /

Blake Purnell, Project Manager
Plant Licensing III-2 and
Planning and Analysis Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure:
Staff Assessment of Seismic Walkdown Report

cc w/encl: Distribution via Listserv

STAFF ASSESSMENT OF SEISMIC WALKDOWN REPORT
NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO
THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT
EXELON GENERATION COMPANY, LLC
CLINTON POWER STATION
DOCKET NO. 50-461

1.0 INTRODUCTION

On March 12, 2012,¹ the U.S. Nuclear Regulatory Commission (NRC) issued a request for information per Title 10 of the *Code of Federal Regulations*, Paragraph 50.54(f) (50.54(f) letter), to all power reactor licensees and holders of construction permits in active or deferred status. The request was part of the implementation of lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 3, "Recommendation 2.3: Seismic," of the 50.54(f) letter, requested licensees to conduct seismic walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions using the corrective action program (CAP), verify the adequacy of monitoring and maintenance procedures, and report the results to the NRC.

The 50.54(f) letter requested licensees to provide the following:

- a. Information concerning the plant-specific hazard licensing bases and a description of the protection and mitigation features considered in the licensing basis evaluation.
- b. Information related to the implementation of the walkdown process.
- c. A list of plant-specific vulnerabilities identified by the Individual Plant Examination of External Events (IPEEE) program and a description of the actions taken to eliminate or reduce them.
- d. Results of the walkdown including key findings and identified degraded, nonconforming, or unanalyzed conditions.
- e. Any planned or newly installed protection and mitigation features.
- f. Results and any subsequent actions taken in response to the peer review.

In accordance with the 50.54(f) letter, Enclosure 3, Required Response Item 2, licensees were required to submit a response within 180 days of the NRC's endorsement of the seismic walkdown process. By letter dated May 29, 2012,² the Nuclear Energy Institute submitted Electric Power Research Institute document 1025286, "Seismic Walkdown Guidance for

¹ ADAMS Accession No. ML12053A340

² ADAMS Package Accession No. ML121640872

Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," (walkdown guidance) to the NRC staff to consider for endorsement. By letter dated May 31, 2012,³ the NRC staff endorsed the walkdown guidance.

By letter dated November 27, 2012,⁴ Exelon Generation Company, LLC (the licensee) provided a seismic walkdown report in response to Enclosure 3 of the 50.54(f) letter, Required Response Item 2, for Clinton Power Station, Unit 1 (CPS). By letter dated September 16, 2013⁵, the licensee provided additional information on the completion of inaccessible items and the substitutions made to the list of inaccessible items in order to complete all walkdowns and submit the final walkdown report by December 31, 2014. The NRC staff reviewed the walkdown report and determined that additional supplemental information would assist the staff in completing its review. In a letter dated November 1, 2013⁶, the NRC staff requested additional information to gain a better understanding of the processes and procedures used by the licensee in conducting the walkdowns and walk-bys. The licensee responded to the NRC staff request by letter dated November 27, 2013.⁷

The NRC staff evaluated the licensee's submittals to determine if the information provided in the walkdown report met the intent of the walkdown guidance and if the licensee responded appropriately to Enclosure 3 of the 50.54(f) letter.

2.0 REGULATORY EVALUATION

The structures, systems, and components (SSCs) important to safety in operating nuclear power plants are designed either in accordance with, or meet the intent of, Appendix A to 10 CFR Part 50, General Design Criteria (GDC) 2: "Design Bases for Protection Against Natural Phenomena," and Appendix A to 10 CFR Part 100, "Reactor Site Criteria." GDC 2 states that SSCs important to safety at nuclear power plants shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunamis, and seiches without loss of capability to perform their safety functions.

For initial licensing, each licensee was required to develop and maintain design bases that, as defined by 10 CFR 50.2, "Definitions," identify the specific functions that an SSC of a facility must perform, and the specific values or ranges of values chosen for controlling parameters as reference bounds for the design.

The design bases for the SSCs reflect appropriate consideration of the most severe natural phenomena that have been historically reported for the site and surrounding area. The design bases also reflect sufficient margin to account for the limited accuracy, quantity, and period of time in which the historical data have been accumulated.

The current licensing basis is the set of NRC requirements applicable to a specific plant, including the licensee's docketed commitments for ensuring compliance with, and operation within,

³ ADAMS Accession No. ML12145A529

⁴ ADAMS Package Accession No. ML12340A346

⁵ ADAMS Accession No. ML13260A083

⁶ ADAMS Accession No. ML13304B418

⁷ ADAMS Accession No. ML13331B501

applicable NRC requirements and the plant-specific design basis, including all modifications and additions to such commitments over the life of the facility operating license.

3.0 TECHNICAL EVALUATION

3.1 Seismic Licensing Basis Information

The licensee provided information on the plant-specific licensing basis for the Seismic Category I SSCs for CPS in Section 1.0 of the walkdown report. Consistent with the walkdown guidance, the NRC staff noted that the report includes a summary of the safe-shutdown earthquake and a description of the codes, standards, and methods that were used in the design of the Seismic Category I SSCs for meeting the plant-specific seismic licensing basis requirements.

Based on the NRC staff's review, the staff concludes that the licensee has provided information on the plant-specific seismic licensing basis and a description of the protection and mitigation features considered in the licensing bases evaluation consistent with Section 8, "Submittal Report," of the walkdown guidance.

3.2 Seismic Walkdown Methodology Implementation

Section 2, "Personnel Qualifications"; Section 3, "Selection of SSCs"; Section 4, "Seismic Walkdowns and Area Walk-Bys"; and Section 5, "Seismic Licensing Basis Evaluations," of the walkdown guidance provide information to licensees regarding the implementation of an appropriate seismic walkdown methodology. By letter dated July 2, 2012,⁸ the licensee confirmed that it would use the walkdown guidance to perform the seismic walkdowns at CPS.

The walkdown report dated November 27, 2012, did not identify deviations from the walkdown guidance.

The NRC staff reviewed the following sections of the walkdown methodology implementation provided in the walkdown report:

- Personnel Qualifications
- Development of the Seismic Walkdown Equipment Lists (SWELs)
- Implementation of the Walkdown Process
- Licensing Basis Evaluations and Results

3.2.1 Personnel Qualifications

Section 2, "Personnel Qualifications," of the walkdown guidance provides licensees with qualification information for personnel involved in the conduct of the seismic walkdowns and area walk-bys.

The NRC staff reviewed the information provided in Section 3 and Appendix A of the walkdown report, which includes information on the walkdown personnel and their qualifications. Specifically, the NRC staff reviewed the summary of the background, experience, and level of

⁸ ADAMS Accession No. ML12193A081

involvement for the following personnel involved in the seismic walkdown activities: equipment selection personnel, seismic walkdown engineers (SWEs), licensing basis reviewers, IPEEE reviewers, peer review team, and operations staff.

The NRC staff noted that the walkdown report did not clearly describe the role of the operations staff beyond the selection of the SWEL items. In its response to a request for additional information (RAI) 1, the licensee clarified that operations personnel reviewed the final SWEL and were involved in the walkdowns when potential operability issues were noted by the SWEs.

Based on the review of the licensee's submittals, the NRC staff concludes that those involved in the seismic walkdown activities have the appropriate seismic background, knowledge and experience, as specified in Section 2 of the walkdown guidance.

3.2.2 Development of the SWELs

Section 3, "Selection of SSCs," of the walkdown guidance provides information to licensees for selecting the SSCs that should be placed on the SWELs, so that they can be walked down by qualified personnel.

The NRC staff reviewed the overall process used by the licensee to develop the CPS base list, SWEL 1 (sample list of designated safety functions equipment), and SWEL 2 (sample list of spent fuel pool-related equipment). The licensee provided the base list, SWEL 1 and SWEL 2, in Appendix B of the walkdown report and discussed these lists in Section 4.2.1 of the walkdown report.

The overall equipment selection process followed the screening process shown in Figures 1-1 and 1-2 of the walkdown guidance. Based on Appendix B of the walkdown report, CPS SWEL 1 and 2 meet the inclusion requirements of the walkdown guidance. Specifically, the following attributes were considered in the sample selection:

- A variety of systems, equipment and environments
- IPEEE equipment
- Major new or replacement equipment
- Risk considerations

It is possible that some classes of equipment will not be represented on the SWEL due to individual plant configurations and the walkdown guidance screening process followed to select the final SWEL equipment. The walkdown guidance recognizes this is due to the equipment not being present in the plant (e.g., some plants generate direct current (dc) power using inverters and, therefore, do not have motor generators) or the equipment being screened out during the screening process (the screening process is described in Section 3 of the walkdown guidance). Based on the information provided, the NRC staff noted that a detailed explanation was provided justifying cases where specific classes of equipment were not included as part of the SWEL, and concludes that these exclusions are acceptable.

The NRC staff also noted that a rapid drain-down list was not included as part of the SWEL 2, as described in Section 3 of the guidance. In Section 4.2.2.4 of the walkdown report, the licensee stated there are no components that could, upon failure, result in rapid drain-down of the spent

fuel pool water level to below 3 meters (m)(10 feet (ft)) above the top of the fuel. After reviewing the information provided in this section, the NRC staff concludes that the licensee provided adequate justification for not including a rapid drain-down list as part of the SWEL 2.

In its letter dated September 16, 2013, the licensee stated that it made nine component substitutions in order to complete the walkdowns of inaccessible items by the end of 2014. The licensee stated that the substituted items represent equipment of a comparable condition, design, and environment. The NRC staff reviewed the licensee's proposed plans and the justification provided for the equipment substitution and agrees that the substituted items are comparable to the previous ones and located in similar environmental conditions. In addition, the staff concludes that the substitutions maintained the diversity of the equipment classes represented in the original SWEL.

After reviewing the SWEL 1 and 2 and substitutions, the NRC staff concludes that the sample of SSCs represents a diversity of component types and assures inclusion of components from critical systems and functions, thereby meeting the intent of the walkdown guidance. In addition, the NRC staff notes that the equipment selection personnel were appropriately supported by plant operations staff as described in the walkdown guidance.

3.2.3 Implementation of the Walkdown Process

Section 4, "Seismic Walkdowns and Area Walk-Bys," of the walkdown guidance provides information to licensees regarding the conduct of the seismic walkdowns and area walk-bys for each site.

The NRC staff reviewed Section 5 of the walkdown report, which summarizes the results of the seismic walkdowns and area walk-bys, including an overview of the number of items walked down and the number of areas walked-by. The walkdown report states that teams, which consisted of at least two qualified SWEs conducted the seismic walkdowns and area walk-bys. According to the signed seismic walkdown checklists (SWCs) and area walkdown checklists (AWCs), these activities were conducted during the week of September 10, 2012. The walkdown report also states that the SWEs discussed their observations and judgments with each other during the walkdowns. Additionally, the SWEs agreed on the results of their seismic walkdowns and area walk-bys before reporting the results of their review. Appendices C and D of the walkdown report provide the completed SWCs and AWCs, documenting the results for each item of equipment on the SWELs and each area containing SWEL equipment. The licensee used the checklists provided in Appendix C of the walkdown guidance report without modification.

The licensee documented cases of potentially adverse seismic conditions (PASCs) in the checklists for further evaluation. Tables 5-2 and 5-3 of the walkdown report list the PASCs identified during the seismic walkdowns and the area walk-bys. The tables describe how each condition was addressed (e.g., placement in the CAP), its resolution and current status.

By letter dated November 1, 2013, the NRC staff issued two questions in an RAI in order to obtain additional clarification regarding the process followed by the licensee when evaluating conditions identified in the field during the walkdowns and walk-bys. Specifically, in RAI 1, the staff requested the licensee to provide further explanation regarding how a field observation was determined to be a PASC, and to ensure that the basis for the determination was addressed using

normal plant processes and documented in the walkdown report. In its November 27, 2013, response, the licensee confirmed that all conditions identified during the walkdowns and walk-bys were documented as issue reports in the CPS CAP. The licensee referred to Tables 5-2 and 5-3 of the walkdown report, which include all the PASCs identified during the walkdowns and area walk-bys for CPS as well as other potentially adverse conditions. The licensee stated that in addition to addressing the PASCs through the CAP, other non-seismic potentially adverse conditions, such as housekeeping and material conditions items, were identified by SWEs and addressed through the CAP.

After evaluating the licensee's response and reviewing Tables 5-2 and 5-3, the NRC staff concludes that the licensee properly identified and documented the PASCs and summary Tables 5-2 and 5-3 are complete.

In addition to the information provided above, the NRC staff notes that anchorage configurations were verified to be consistent with existing plant documentation for at least 50 percent of the SWEL items, in accordance with Section 4 of the walkdown guidance.

The equipment and areas that were inaccessible during the 180-day period are listed in Table E-1 of the walkdown report. The list of inaccessible items also includes the condition which caused the delay of the walkdown. A limited number of SWEL components (14 total) were inaccessible at the time of the initial walkdowns. The reasons for the inaccessibility were among those allowed by the walkdown guidance.

In addition, the licensee stated that the internally mounted items on 11 electrical cabinets were inaccessible due to the energized nature of the cabinets. Section 5.4 of the walkdown report states that although cabinets were not opened during the initial walkdowns, the cabinets will be opened during a later walkdown to ensure that visibly accessible internal component mountings are adequate. However, the external anchorage conditions and the immediate area surrounding these components were included during the initial walkdown. Additionally, the licensee stated that for the inaccessible cabinets, completed walkdowns for similar pieces of equipment did not identify any adverse seismic conditions. Tables A and B of the September 16, 2013, letter, provide the revised list of inaccessible SWEL items and cabinets, respectively, including the expected date of completion, noting that in some cases the inaccessible cabinets will be walked down during a system outage after the most recent refueling outage.

In its September 16, 2013, letter, the licensee committed to complete all walkdowns at CPS for the limited number of inaccessible items and cabinets by September 30, 2014, and submit the final walkdown report to the NRC by December 31, 2014.

The NRC staff concludes that the inaccessible equipment list was developed consistent with the walkdown guidance. The licensee's schedule for completion is acceptable, since it is consistent with the timing of Fall 2013 refueling outage and the next scheduled system outages.

Based on the information provided in the licensee's submittals, the NRC staff concludes that the licensee's implementation of the walkdown process meets the intent of the walkdown guidance.

3.2.4 Licensing Basis Evaluations and Results

Section 5, "Seismic Licensing Basis Evaluations," of the walkdown guidance provides information to licensees regarding the conduct of licensing basis evaluations for items identified during the seismic walkdowns as degraded, nonconforming, or unanalyzed that might have potential seismic significance.

The NRC staff reviewed Section 6 of the CPS walkdown report, which discusses the process for conducting the seismic licensing basis evaluations of the PASCs identified during the seismic walkdowns and area walk-bys. The licensee stated that it performed licensing basis evaluations and resolved PASCs using the plant's CAP. Tables 5-2 and 5-3 of the walkdown report list the key licensee findings and provide a complete list of the potentially degraded, nonconforming, or unanalyzed conditions. These tables also describe the actions taken or planned to address these conditions, including the current status of each of the items the licensee entered into the CAP.

The NRC staff reviewed the CAP entries and the description of the actions taken or planned to address potential deficiencies. The staff concludes that the licensee appropriately identified degraded, nonconforming, or unanalyzed conditions and entered them into the CAP, which meets the intent of the walkdown guidance.

3.2.5 Conclusion

Based on the discussion above, the NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance for personnel qualifications, development of SWELs, implementation of the walkdown process, and seismic licensing basis evaluations.

3.3 Peer Review

Section 6, "Peer Review," of the walkdown guidance provides licensees with information regarding the conduct of peer reviews for the activities performed during the seismic walkdowns. Page 6-1 of the walkdown guidance identifies the following activities to be conducted during the peer review process:

- Review the selection of the SSCs included on the SWELs.
- Review a sample of the checklists prepared for the seismic walkdowns and area walk-bys.
- Review the licensing basis evaluations.
- Review the decisions for entering the potentially adverse conditions into the CAP.
- Review the walkdown report.
- Summarize the results of the peer review process in the walkdown report.

The NRC staff reviewed the information provided in Section 7 of the CPS walk down report which describes the conduct of the peer review. In addition, the NRC staff reviewed the licensee's response to RAI 2. In RAI 2, the staff requested the licensee to provide additional information on the overall peer review process that was followed as part of the walkdown activities. Specifically, the NRC staff requested the licensee to confirm that the activities identified on page 6-1 of the

walkdown guidance were assessed and documented in the report. The licensee was also requested to confirm that any individual involved in performing any given walkdown activity was not a peer reviewer for that same activity. In its November 27, 2013, letter, the licensee confirmed that all the activities identified on page 6-1 of the walkdown guidance were included as part of the peer review process and referred to the summary of the peer review activities provided in Section 8 and the full peer review report in Appendix F of the walkdown report.

The NRC staff reviewed the licensee's summary of each of these activities, which included a discussion of the peer review team members' qualifications and level of involvement, the peer review findings, and resolution of peer review comments. After reviewing the licensee's submittals, the NRC staff concludes that the licensee sufficiently documented the results of the peer review activities and how these reviews affected the work described in the walkdown report.

Based on the discussion above, the NRC staff concludes that the licensee's results of the peer review and subsequent actions taken in response to the peer review meets the intent of Section 6 of the walkdown guidance.

3.4 IPEEE Information

Section 7, "IPEEE Vulnerabilities," of the walkdown guidance provides information to licensees regarding the reporting of the evaluations conducted and actions taken in response to seismic vulnerabilities identified during the IPEEE program. Through the IPEEE program and Generic Letter 88-20, "Individual Plant Examination of External Events for Severe Accident Vulnerabilities," licensees previously performed a systematic examination to identify any plant-specific vulnerabilities to severe accidents.

The licensee provided background information regarding its IPEEE program and referenced several submittals to the NRC. The licensee stated that there were no vulnerabilities, anomalies, or outliers noted during the IPEEE and no improvements were made to the plant following the completion of the IPEEE.

Based on the NRC staff's review of Section 7 of the walkdown report, the staff concludes that the licensee's summary of the IPEEE is consistent with, and meets the intent of, Section 7 of the walkdown guidance.

3.5 Planned Upgrades

The licensee did not identify any planned or newly installed protection and mitigation features in the walkdown report.

3.6 NRC Oversight

3.6.1 Independent Verification by Resident Inspectors

On July 6, 2012,⁹ the NRC issued Temporary Instruction (TI) 2515/188 "Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns." In accordance with the TI, NRC

⁹ ADAMS Accession No. ML12156A052

inspectors independently verified that the licensee implemented the seismic walkdowns at CPS in accordance with the walkdown guidance. Additionally, the inspectors independently performed walkdowns of a sample of seismic protection features. The inspection report dated January 28, 2013,¹⁰ documents the results of this inspection.

4.0 INACCESSIBLE ITEMS

The equipment and areas that were inaccessible during the 180-day period are listed in Table E-1 of the walkdown report. The list of inaccessible items also includes the condition which caused the delay of the walkdown. A limited number of SWEL components (14 total) were inaccessible at the time of the initial walkdowns. In its September 16, 2013, letter, the licensee committed to complete all walkdowns at CPS for the limited number of inaccessible items and cabinets by September 30, 2014, and submit the final walkdown report to the NRC by December 31, 2014. The licensee's schedule for completion is acceptable, since it is consistent with the timing of Fall 2013 refueling outage and the next scheduled system outages.

5.0 CONCLUSION

The NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance. The staff concludes that the licensee, through the implementation of the walkdown guidance activities in accordance with plant processes and procedures, verified the plant configuration with the current seismic licensing basis; addressed degraded, nonconforming, or unanalyzed seismic conditions; and verified the adequacy of monitoring and maintenance programs for protective features. Furthermore, the staff notes that no immediate safety concerns were identified. The staff acknowledges that a supplemental letter will be provided by December 31, 2014, addressing the remaining inaccessible items consistent with the regulatory commitment. The NRC staff reviewed the information provided and determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter.

¹⁰ ADAMS Accession No. ML13028A501

M. Pacilio

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If you have any questions, please contact me at 301-415-1380 or by e-mail at Blake.Purnell@nrc.gov.

Sincerely,

/ RA E. Brown for /

Blake Purnell, Project Manager
Plant Licensing III-2 and
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Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure:
Staff Assessment of Seismic Walkdown Report

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