



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

September 2, 2014

Mr. Michael J. Pacilio
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR DRESDEN NUCLEAR POWER
STATION, UNITS 2 AND 3**

Dear Mr. Pacilio:

On August 6, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed its mid-cycle performance review of Dresden Nuclear Power Station, Units 2 and 3. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2013, through June 30, 2014. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, Dresden Nuclear Power Station, Units 2 and 3 was operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Dresden Nuclear Power Station, Units 2 and 3 during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The NRC determined the performance at Dresden Nuclear Power Station, Units 2 and 3, during the fourth quarter of 2013 was within the Regulatory Response Column of the NRC's ROP Action Matrix because of one White finding associated with a deficiency in your external flood response procedure in addressing makeup to the reactor vessel during a potential flooding event. The finding was identified in the first quarter of 2013 and was applicable to both Units 2 and 3, in the Mitigating Systems Cornerstone. Additionally, the NRC advised you the finding would remain open until you notified us that you were ready for the NRC to conduct a supplemental inspection using Inspection Procedure 95001, "Inspection for One or Two White Inputs in Strategic Performance Area," and the inspection was successfully completed.

On November 25, 2013, your staff notified the NRC of your readiness for a supplemental inspection, using Inspection Procedure 95001, to review the actions taken to address the performance issues associated with the deficiency in the flood response procedure. On December 20, 2013, the NRC completed the supplemental inspection using NRC Inspection Procedure 95001 and in NRC Inspection Report 05000237/2013010; 05000249/2013010 (ADAMS Ascension Number ML14023A004), dated January 22, 2014,

documented that completed or planned corrective actions were sufficient to address the performance that led to the White finding. Therefore, you were advised that the performance issue would not be considered as an Action Matrix input after the end of the fourth quarter of 2013. As a result, the NRC determined the performance at Dresden Nuclear Power Station, Units 2 and 3, to be in the Licensee Response Column of the ROP Action Matrix as of January 1, 2014.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last 9-months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

The enclosed plan does include a triennial "Evaluations of Changes, Tests and Experiments and Permanent Plant Modifications" inspection per procedure 71111.17T and triennial "Heat Sink" inspection per procedure 71111.07T.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site is being coordinated with your staff. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

M. Pacilio

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In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 630-829-9833 with any questions you have regarding this letter.

Sincerely,

/RA/

Jamnes L. Cameron, Chief
Branch 4
Division of Reactor Projects

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosure:
Dresden Nuclear Power Station
Inspection/Activity Plan

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Inspection/Activity Plan

cc w/encl: Distribution via LISTSERV®

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DOCUMENT NAME: Dresden 2014 Mid-Cycle Assessment Letter

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Dresden
Inspection / Activity Plan
09/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			BI ISI - INSERVICE INSPECTION UNIT 3		1
2	10/27/2014	11/15/2014	IP 7111108G	Inservice Inspection Activities - BWR	
			BI RP - RADIATION INSPECTION		1
2	11/03/2014	11/07/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
2	11/03/2014	11/07/2014	IP 71124.02	Occupational ALARA Planning and Controls	
			BI HS - TRIENNIAL HEAT SINK INSPECTION		2
2, 3	12/01/2014	12/05/2014	IP 7111107T	Heat Sink Performance	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
2	01/26/2015	01/30/2015	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
			OL PREP - INIT EXAM/MARCH 2015		3
2	03/02/2015	03/06/2015	W90328	OL - INITIAL EXAM - 2015 MAR-APR - DRESDEN	
			OL EXAM - INIT EXAM/MARCH 2015		3
2	04/06/2015	04/17/2015	W90328	OL - INITIAL EXAM - 2015 MAR-APR - DRESDEN	
			BL EPX - EP EXECISE INSPECTION / PI VERIFICATION		2
2, 3	05/04/2015	05/08/2015	IP 7111401	Exercise Evaluation	
2, 3	05/04/2015	05/08/2015	IP 7111408	Exercise Evaluation – Scenario Review	
2	05/04/2015	05/08/2015	IP 71151	Performance Indicator Verification	
			BI MODS - MODIFICATIONS / 50.59 INSPECTION		3
2, 3	05/11/2015	05/29/2015	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
2	05/18/2015	05/22/2015	IP 71124.07	Radiological Environmental Monitoring Program	
2	05/18/2015	05/22/2015	IP 71151-PR01		
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
2	07/13/2015	07/17/2015	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
2	07/13/2015	07/17/2015	IP 71151-BI01		
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
2	11/02/2015	11/06/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
2	11/02/2015	11/06/2015	IP 71124.02	Occupational ALARA Planning and Controls	
2	11/02/2015	11/06/2015	IP 71151-OR01		

This report does not include INPO and OUTAGE activities.
 This report shows only on-site and announced inspection procedures.