

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 22, 2011

Mr. Michael J. Pacilio President and Chief Nuclear Officer Exelon Nuclear 4300 Winfield Road Warrenville, IL 60555

SUBJECT:

BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; OYSTER CREEK NUCLEAR GENERATING STATION; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - BULLETIN 2011-01, "MITIGATING STRATEGIES" REQUEST FOR ADDITIONAL INFORMATION REGARDING 60-DAY RESPONSE (TAC NOS. ME6402, ME6403, ME6409, ME6410, ME6416, ME6427, ME6428, ME6444, ME6445, ME6446, ME6447, ME6460, ME6465, ME6466, ME6473, ME6474,

AND ME6493)

Dear Mr. Pacilio:

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued NRC Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The purpose of the bulletin was to obtain a comprehensive verification that licensees' mitigating strategies to maintain or restore core cooling, spent fuel cooling, and containment following a large explosion or fire were compliant with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(hh)(2). The bulletin requested information on the licensee's 10 CFR 50.54(hh)(2) mitigating strategies in light of the recent events at Japan's Fukushima Daiichi facility to determine if (1) additional assessment of program implementation is needed, (2) the current inspection program should be enhanced, or (3) further regulatory action is warranted.

The bulletin required two sets of responses pursuant to the provisions of 10 CFR 50.54(f). The first responses were due 30 days after issuance of the bulletin (June 10, 2011). By letter dated June 8, 2011 (ADAMS Accession No. ML111600096), you provided a response to the first set of questions. The second responses were due 60 days after issuance of the bulletin (July 11, 2011). By letter dated July 8, 2011 (ADAMS Accession No. ML111920162), you responded to the second set of questions.

The NRC staff has reviewed the submitted information and determined that it needs additional information regarding your 60-day response to the bulletin. Please respond to the enclosed request for additional information within 30 days of the date of this letter.

M. Pacilio -2-

If you have any questions regarding this letter, please feel free to contact me at (301) 415-6606.

Sincerely,

Joel S. Wiebe, Senior Project Manager Plant Licensing Branch III-2

Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket Nos. STN 50-456, STN 50-457, STN 50-454, STN 50-455, 50-461, 50-237, 50-249, 50-373, 50-374, 50-352, 50-353, 50-219, 50-277, 50-278, 50-254, 50-265, and 50-289

Enclosure:

Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

RELATED TO NRC BULLETIN 2011-01, "MITIGATING STRATEGIES" 60-DAY RESPONSE

FOR BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1

AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER

STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2;

LIMERICK GENERATING STATION, UNITS 1 AND 2;

OYSTER CREEK NUCLEAR GENERATING STATION; PEACH BOTTOM ATOMIC

POWER STATION, UNITS 2 AND 3; QUAD CITIES NUCLEAR POWER STATION,

UNITS 1 AND 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1,

DOCKET NOS. STN 50-456, STN 50-457, STN 50-454, STN 50-455,

<u>50-461, 50-237, 50-249, 50-373, 50-374, 50-352, 50-353, 50-219, </u>

50-277, 50-278, 50-254, 50-265, AND 50-289

In reviewing the Exelon Generation Company's (Exelon's) submittal dated July 8, 2011, the NRC staff has determined that the following information is needed in order to complete its review:

Braidwood Station, Units 1 and 2

1. Describe in detail how you ensure there is sufficient fuel for the pumping source when needed.

The bulletin requested that each licensee describe in detail the maintenance of equipment supporting the mitigating strategies to ensure that it will be functional when needed. The NRC staff could not determine if you performed activities to ensure that sufficient fuel would be available for the pumping source so that it will be functional when needed.

Byron Station, Unit Nos. 1 and 2

1. Describe in detail how you ensure there is sufficient fuel for the pumping source when needed.

The bulletin requested that each licensee describe in detail the maintenance of equipment supporting the mitigating strategies to ensure that it will be functional when needed. The NRC staff could not determine if you performed activities to ensure that sufficient fuel would be available for the pumping source so that it will be functional when needed.

2. Describe in detail how you ensure the availability of local law enforcement agencies relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies are relied upon for emergency response to a B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies as being relied upon to respond to a B.5.b event.

Clinton Power Station, Unit No. 1

1. Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. The NRC staff could not determine if you performed activities to ensure that these devices will be functional when needed.

2. Describe in detail how you ensure the availability of local law enforcement agencies and hospitals relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies and hospitals are relied upon for emergency response to a B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies or hospitals as being relied upon to respond to a B.5.b event.

Dresden Nuclear Power Station, Units 2 and 3

- 1. Describe in detail the testing of radios to ensure that they will be functional when needed.
 - The bulletin requested that each licensee describe in detail the testing of equipment supporting the mitigating strategies to ensure that it will be functional when needed. Communications equipment needed to support the mitigating strategies was described in the NRC Safety Evaluation documenting the NRC review of your response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026), and typically includes radios, satellite phones, spare batteries, and chargers. Your response states that you perform periodic testing of satellite phones and pagers, but does not indicate that similar testing is performed on radios.
- 2. Describe in detail how you ensure there is sufficient fuel for the pumping source when needed.

The bulletin requested that each licensee describe in detail the maintenance of equipment

supporting the mitigating strategies to ensure that it will be functional when needed. The NRC staff could not determine if you performed activities to ensure that sufficient fuel would be available for the pumping source so that it will be functional when needed.

3. Describe in detail how you ensure the availability of local law enforcement agencies and hospitals relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies and hospitals are relied upon for emergency response to a B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies or hospitals as being relied upon to respond to a B.5.b event.

LaSalle County Station, Units 1 and 2

The NRC staff has no questions regarding the completeness of the 60-day response.

Limerick Generating Station, Units 1 and 2

1. Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. The NRC staff could not determine if you performed activities to ensure that these devices will be functional when needed.

2. Describe in detail how you ensure the availability of local law enforcement agencies relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies are relied upon for emergency response to a B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies as being relied upon to respond to a B.5.b event.

Oyster Creek Nuclear Generating Station

1. Describe in detail how you ensure the availability of local law enforcement agencies relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies are relied upon for emergency response to a B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies as being relied upon to respond to a B.5.b event.

Peach Bottom Atomic Power Station, Units 2 and 3

The NRC staff has no questions regarding the completeness of the 60-day response.

Quad Cities Nuclear Power Station, Units 1 and 2

1. Describe in detail how you ensure there is sufficient fuel for the pumping source when needed.

The bulletin requested that each licensee describe in detail the maintenance of equipment supporting the mitigating strategies to ensure that it will be functional when needed. The NRC staff could not determine if you performed activities to ensure that sufficient fuel would be available for the pumping source so that it will be functional when needed.

2. Describe in detail how you ensure the availability of local law enforcement agencies and hospitals relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies and hospitals are relied upon for emergency response to a B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies or hospitals as being relied upon to respond to a B.5.b event.

Three Mile Island Nuclear Station, Unit 1

1. Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. The NRC staff could not determine if you performed activities to ensure that these devices will be functional when needed.

- 2. Describe in detail how you ensure that a vehicle is available to move the B.5.b portable pump and other B.5.b equipment to the appropriate place when needed.
 - The bulletin requested that each licensee describe in detail the controls for assuring equipment needed to execute the mitigating strategies will be available when needed. A vehicle is typically needed to implement the strategies since the portable pump and other equipment is stored away from target areas. The NRC staff could not determine if you performed activities to ensure that a tow vehicle would be available when needed.
- 3. Describe in detail how you ensure the availability of local law enforcement agencies relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. Typically, local law enforcement agencies are relied upon for emergency response to a

B.5.b event. In response to Question 5 of the bulletin, you did not identify any local law enforcement agencies as being relied upon to respond to a B.5.b event.

M. Pacilio - 2 -

If you have any questions regarding this letter, please feel free to contact me at (301) 415-6606.

Sincerely,

/RA/

Joel S. Wiebe, Senior Project Manager Plant Licensing Branch III-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

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