



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

March 7, 2012

LICENSEE: Exelon Generation Company, LLC (Exelon)  
FACILITY: Peach Bottom Atomic Power Station, Units 2 and 3  
SUBJECT: SUMMARY OF DECEMBER 7, 2011, MEETING WITH EXELON RE:  
PROPOSED AMENDMENT REQUEST TO IMPLEMENT AN EXTENDED  
POWER UPRATE

On December 7, 2011, a Category 1 public meeting was held between members of the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Exelon Generation Company, LLC (Exelon) at NRC Headquarters, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss Exelon's proposal to submit a license amendment request to implement an extended power uprate (EPU) at Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The proposed license amendment would increase the power to 112.5% of the current licensed power for both units. Exelon representatives delivered a presentation<sup>1</sup> describing the results of preliminary analyses and major plant modifications that will be required to support the proposed EPU. This was the second pre-submittal meeting between Exelon representatives and NRC staff. The previous meeting was held on June 14, 2011.<sup>2</sup>

Exelon representatives stated that submission of the PBAPS Units 2 and 3, EPU submittal is currently targeted for the 3<sup>rd</sup> quarter of 2012. It was noted that Exelon management is currently evaluating replacement of the Steam Dryers and the results of this evaluation could impact the EPU submittal schedule.

Discussions between the NRC staff and Exelon representatives regarding the presentation resulted in several comments related to the proposed submittal. The comments included that the NRC staff has communicated to industry that a revision to Regulatory Guide 1.183,<sup>3</sup> "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," Revision 0, is in process and may be issued before or shortly after the EPU is submitted. Since the Alternate Source Term radiological analyses provided with the EPU submittal will be based on the current revision of RG 1.183, the NRC staff will have to determine how to evaluate the submittal in light of the revised guidance.

Exelon presented a basis for accepting the EPU application concurrent with a separate PBAPS spent fuel pool (SFP) neutron absorber rack insert license amendment request (LAR) that was submitted in November of 2011.<sup>4</sup> The NRC staff noted that current acceptance review

<sup>1</sup> NRC Agencywide Documents Access and Management System (ADAMS) under Accession No. ML113410172.

<sup>2</sup> Meeting Summary: ADAMS Accession No. ML111740739.

<sup>3</sup> ADAMS Accession No. ML003716792.

<sup>4</sup> ADAMS Accession No. ML113081441.

concerns, associated with the LAR, would need to be resolved before an EPU application was submitted. However, the NRC's requests for additional information have now been resolved and the SFP LAR has been accepted for review.<sup>5</sup> The NRC staff considers that there is sufficient time to assess reviewing the EPU application concurrently.

The NRC staff noted that a sample calculation associated with the EPU related Technical Specification (TS) setpoint changes would be expected to be included in the submittal. The NRC staff also advised that the Agency's review of the submittal will be more efficient if the information in the amendment request is presented consistent with the format contained in the EPU review standard, RS-001,<sup>6</sup> "Review Standard for Extended Power Uprates," Revision 0. In addition, the NRC staff would appreciate a comprehensive list of all envisioned TS changes be presented at a future pre-submittal meeting. This will assist the NRC staff in assessing all groups impacted by the submittal. The NRC staff also agreed to gather more topics of interest related to EPU submittals and provide them to Exelon. This information was provided to Exelon on February 23, 2012, via e-mail.<sup>7</sup>

The NRC staff and Exelon representatives discussed the open item regarding the technical basis for crediting containment accident pressure (CAP) for non-loss-of-coolant accident (LOCA) design-basis events discussed during the previous EPU pre-submittal meeting held on June 14, 2011. The NRC meeting summary issued for this meeting on September 28, 2011,<sup>8</sup> stated that Exelon asserts that PBAPS credits containment overpressure margin for station blackout events. The meeting summary incorrectly referenced this assertion to slide number 13<sup>9</sup> of the Exelon presentation for the June 14, 2011, public meeting. The correct reference is slide number 5<sup>10</sup> of the Exelon presentation for the public meeting held on February 22, 2012, regarding proposed actions to address CAP credit.

The licensee provided information via e-mail on July 19, 2011,<sup>11</sup> regarding this open item and referenced Section 5.2.4.3.2, "Minimum Containment Pressure Available," of the PBAPS Updated Facility Safety Analysis Report (UFSAR), during the December 7, 2011, meeting for further clarification.<sup>12</sup> The NRC staff observed that the text regarding containment over pressure credit for non-LOCA events in Section 5.2.4.3.2, "Minimum Containment Pressure Available," was changed in the current Revision 23 of the PBAPS UFSAR. The NRC staff will review the details of the justification associated with this change under the review currently being performed on Exelon's latest submittal of the PBAPS UFSAR.<sup>13</sup>

No regulatory decisions were made during the meeting. The meeting concluded with an open portion for public questions and comment. There were no members of the public in attendance at the meeting; however, several members of the public participated via teleconference. Representatives of the Pennsylvania Department of Environmental Protection also participated by teleconference. A list of the meeting attendees is provided in the Enclosure.

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<sup>5</sup> ADAMS Accession No. ML120170128.

<sup>6</sup> ADAMS Accession No. ML033640024.

<sup>7</sup> ADAMS Accession No. ML120600316.

<sup>8</sup> Ibid No. 2.

<sup>9</sup> ADAMS Accession No. ML111610558.

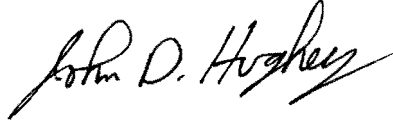
<sup>10</sup> ADAMS Accession No. ML110490251.

<sup>11</sup> ADAMS Accession No. ML112030648.

<sup>12</sup> Slide number 26 of the December 7, 2012, public meeting, ADAMS Accession No. ML113410172.

<sup>13</sup> ADAMS Accession No. ML11117A161.

Please direct any inquiries to me at 301-415-3204 or [John.Hughey@nrc.gov](mailto:John.Hughey@nrc.gov).

A handwritten signature in black ink that reads "John D. Hughey". The signature is written in a cursive style with a prominent loop at the end of the last name.

John D. Hughey, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosure:  
List of Attendees

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LIST OF ATTENDEES

DECEMBER 7, 2011, MEETING WITH EXELON GENERATION COMPANY, LLC

DISCUSSION OF PROPOSED AMENDMENT REQUEST TO

IMPLEMENT AN EXTENDED POWER UPRATE

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

NRC

Harold Chernoff

John Hughey

Greg Casto

Pete Hernandez

Nageswara Karipineri

Molly Keefe

Mark Blumberg

Nicholas DiFrancesco

Rick Plasse

Andrew Johnson

Carleen Sanders

Tony Nakanishi

Neil Sheehan (via teleconference)

Gerry Waig (via teleconference)

Andrea Russell

David Rahn

Christopher Hunt

Leta Brown

Tony Nakanishi

William Ford

Tai Huang

Andy Rosebrook (via teleconference)

William Jessup

EXELON

Kevin Borton

Jenna Lichtenwalner

Todd Wickel

Kenneth Ainger

Michael Jesse

John Rommel

Steve Minnick

Jim Armstrong

Jessica Krejcie

Jason Murphy

Tracy Siglin

Douglas Neve

Craig Lambert (via teleconference)

Annie Wong (via teleconference)

Ron Janowiak (via teleconference)

Mike Weidman

PA Department of Environmental Protection

Rich Janati (via teleconference)

Brad Fuller (via teleconference)

Members of the Public

Eric Epstein – Three Mile Island Alert (via teleconference)

William Bentley - Tennessee Valley Authority (via teleconference)

Christina Kauffman – The York Dispatch (via teleconference)

Enclosure

Please direct any inquiries to me at 301-415-3204 or John.Hughey@nrc.gov.

John D. Hughey, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

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List of Attendees

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DATE	03/05/2012	03/05/2012	03/06/2012	03/07/2012

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