



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

October 26, 2018

LICENSEE: EXELON GENERATION COMPANY, LLC

FACILITIES: 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; JAMES A. FITZPATRICK NUCLEAR POWER PLANT; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION UNIT NO. 1; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND R. E. GINNA NUCLEAR POWER PLANT

SUBJECT: SUMMARY OF OCTOBER 23, 2018, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING PLANNED LICENSE AMENDMENT REQUEST TO ADOPT TSTF-427 (EPID L-2018-LRM-0062)

On October 23, 2018, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Exelon Generation Company, LLC (Exelon, the licensee) via teleconference. The purpose of the meeting was to discuss a planned Exelon fleet license amendment request to adopt Technical Specifications Task Force (TSTF) traveler TSTF-427, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY," Revision 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML061240055). The meeting notice and agenda dated October 10, 2018, are available in ADAMS at Accession No. ML18283A083. A list of attendees is enclosed.

The TSTF-427 added a new limiting condition for operation (LCO) to the standard technical specifications. The new LCO allows barriers to be unable to perform their related support function for up to 30 days before declaring the supported system inoperable. The NRC staff issued the notice of availability of TSTF-427 in the *Federal Register* on October 3, 2006 (71 FR 58444), with a model application and model safety evaluation (SE). However, several guidance references in TSTF-427 and the associated model SE have been superseded. In particular, NRC Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants" (ADAMS Accession No. ML003740117), was withdrawn in 2012. The guidance in RG 1.182 has been incorporated into NRC RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 4, dated August 2018 (ADAMS Accession No. ML18220B281).

Exelon stated that its application will follow the most recent precedents. Specifically, Exelon will follow the applications for Arkansas Nuclear One, Units 1 and 2, submitted on August 14, 2017, and the application for Grand Gulf Nuclear Station submitted on October 26, 2016 (ADAMS Accession Nos. ML17226A207, ML17226A210 and ML16301A150, respectively). In its application, Exelon will note that RG 1.160 superseding RG 1.182 is an exception to TSTF-427 and the associated model SE. Exelon noted that the Arkansas Nuclear One applications included a section on applicable regulatory requirements and criteria that was not included in

the model application. The NRC staff stated that the model application can still be used without this additional section.

Exelon also asked about NRC Regulatory Issue Summary (RIS) 2001-09, "Control of Hazard Barriers," dated April 2, 2001 (ADAMS Accession No. ML003768935), which is mentioned in TSTF-427. Exelon questioned whether the RIS is still valid and if they should not mention it in the proposed bases for the new LCO. The NRC staff noted that the RIS has not been revised or withdrawn, so it still remains valid. The staff noted that not including the reference to the RIS in the application may result in question by the staff.

The NRC staff also mentioned that some plants have relocated certain barrier requirements to the technical requirements manual. The staff stated that this should be taken into consideration when developing the application. The staff also noted that there are more current risk values than what is presented in TSTF-427 and the model SE, and in some cases there are significant differences.

Public meeting feedback forms were not received. Please direct any inquiries to me at 301-415-1380, or Blake.Purnell@nrc.gov.



Blake Purnell, Project Manager
Plant Licensing Branch III
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, 50-333, 50-373,
50-374, 50-352, 50-353, 50-220,
50-277, 50-278, 50-254, 50-265,
and 50-244

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

OCTOBER 23, 2018, MEETING WITH EXELON GENERATION COMPANY, LLC

Name	Affiliation
Blake Purnell	NRC
Caroline Tilton	NRC
Jeff Circle	NRC
Stephen Dinsmore	NRC
Michael Levine	NRC
Shilp Vasavada	NRC
Thomas Loomis	Exelon
James Orr	Exelon
Shannon Rafferty-Czincila	Exelon
John Schrage	Entergy

SUBJECT: SUMMARY OF OCTOBER 23, 2018, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING PLANNED LICENSE AMENDMENT REQUEST TO ADOPT TSTF-427 (EPID L-2018-LRM-0062) DATED OCTOBER 26, 2018

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RidsNrrDraAplb Resource
RidsNrrDssStsb Resource
JJohnston, NRR
LBurkhart, EDO
CTilton, NRR
JCircle, NRR
SDinsmore, NRR
MLevine, NRR
SVasavada, NRR

ADAMS Accession No. Meeting Summary ML18297A172

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	BPurnell	SRohrer	DWrona	BPurnell
DATE	10/24/18	10/24/18	10/26/18	10/26/18

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