

April 8, 2002

APPLICANT: Exelon Generation Company, LLC (Exelon)

FACILITIES: Peach Bottom Atomic Power Station, Units 2 and 3

SUBJECT: TELECOMMUNICATION WITH EXELON GENERATING COMPANY TO
DISCUSS INFORMATION IN THEIR LICENSE RENEWAL APPLICATION ON
SECTION 2, "STRUCTURES AND COMPONENTS SUBJECT TO AGING
MANAGEMENT REVIEW"

On February 20, 2002, after the NRC staff reviewed information provided in Section 2 of the license renewal application (LRA), a conference call was conducted between the staff and representatives of Exelon Generating Company to clarify information requested in Requests for Additional Information (RAIs) 2.0-1, 2.0-2, 2.2-1.1, and 2.3.3.7-3. The information discussed and the follow-up actions are in Attachment 1.

A draft of this telephone conversation summary was provided to the applicant to allow them the opportunity to comment on the contents of its input prior to the summary being issued.

/RA/

Raj K. Anand, Project Manager
License Renewal Section
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Attachment: As stated

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OFFICE	LA	PM:RLEP	DSSA:SPLB	SC:DRIP:RLEP
NAME	E. Hylton*	R. Anand*	G. Hatchett	W. Burton
DATE	04/02/02	03/21/02	04/4/02	04/5/02

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E. Hylton

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W. Borchardt

D. Matthews

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J. Strosnider (RidsNrrDe)

R. Barrett

E. Imbro

G. Bagchi

K. Manoly

W. Bateman

J. Calvo

C. Holden

P. Shemanski

H. Nieh

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S. Black

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D. Thatcher

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B. Thomas

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R. Weisman

M. Mayfield

A. Murphy

W. McDowell

S. Droggitis

S. Duraiswamy

RLEP Staff

J. Bosko

D. Lew

M. Modes

J. Yerokun

SUMMARY OF TELECOMMUNICATION WITH
EXELON GENERATING COMPANY
PEACH BOTTOM UNITS 2 AND 3

Structures and Components Subject to Aging Management Review (Section 2.0)

RAI 2.0-1 The staff is unable to identify, with any reasonable certainty, the components considered in-scope using the license renewal boundary drawings provided by the applicant, particularly for those components which have been re-categorized from out-of-scope systems. The license renewal drawings do not adequately show the boundary of the components subject to license renewal, and if copied the drawings are not discernable. Provide two copies which properly indicate boundary between in-scope and out-of scope components even when copied (multiple copies of any drawings provided will have to be duplicated by the staff for other reviewers).

ISSUE: Exelon stated that a complete set of license renewal drawings was provided to the staff on September 24, 2001. On December 7, 2001, at the conclusion of the scoping methodology audit, a complete set of license renewal drawings was provided which was highlighted to delineate in-scope from out-of-scope components. The staff stated that, although the drawings that were provided were adequate to allow the staff to identify components that were re-categorized from out-of-scope systems to in-scope systems, there was a concern regarding whether the information would be auditable and retrievable for review and inspection during the extended period of operation, as required by 10 CFR 54.37. The purpose of the question was to clarify how the applicant will ensure that the information regarding re-categorized components will meet this requirement. The staff agreed to reword the RAI to clarify what information is requested and the basis for the request. NOTE: Subsequent to this telecon, this RAI was deleted.

RAI 2.0-2 The component groups identified in Tables 2.3.x, 2.4.x, and 2.5.x do not clearly identify the structures and components considered within the scope of license renewal and subject to an AMR. Instead, these tables ambiguously describe components as though they are commodity groups with generic titles such as castings and forgings.

- Clarify the description of structures and components in each table so that these components can be identified in a clear and traceable manner.
- Explain the rationale for the various component groups used in tables 2.3.x, 2.4.x, and 2.5.x.

- Explain how the categories of component groups listed in the various tables were developed and how do those groups relate to the various system components.
- Components re-categorized to within scope systems must be identifiable and traceable to the out-of-scope systems. Provide a method for identifying those components from out-of-scope systems, that are in the scope of license renewal, as re-categorized to in-scope systems.

ISSUE: Exelon wanted to understand the basis for this question. The staff explained that they were attempting to understand how the commodity groups were developed so that they could determine if the conventions were consistently applied. The staff committed to revising the RAI to provide a more clear basis for the question.

Mechanical System Scoping Results (Table 2.2-1)

RAI 2.2-1.1 Table 2.2-1, page 2-18, "Mechanical System Scoping Results," states that the systems identified below are out-of-scope, but specific components of these systems have been re-categorized to other systems for the purposes of license renewal.

- Drywell Ventilation System
 - Primary Containment Leak Test System
 - Reactor Building Ventilation System
 - Reactor Building Closed Cooling Water System
 - Reactor Water Cleanup System
 - Chilled Water System
 - Instrument Nitrogen System
 - Instrument Air System
 - Service Air System
 - Plant Equipment and Floor drain System
 - Process Sampling System
 - Torus water Cleanup system
 - Post Accident sampling System
 - Traversing In-Core Probe System
- Provide a brief description of each of these out-of-scope systems.
- Provide a textual description of the types of components re-categorized in each of the above listed systems.
- Provide your rationale for re-categorizing the various components (e.g., physical location, fluid system interaction, support to in-scope system, etc.).

- Provide details regarding the various function(s) each component serves.
- State how the re-categorized components meet the criteria of 10 CFR 54.4(a)(1), (2), or (3).

ISSUE: Exelon wanted to understand the basis for this question. Exelon did not feel that a description of these out-of-scope systems is consistent with the treatment of other out-of-scope systems. The staff explained that the treatment of these out-of-scope systems is different because, though these systems may not have intended functions, they contain components with intended functions, and therefore, the staff needs to be sure that the systems from which the components come are truly out-of-scope. With regard to the methodology used to identify these in-scope components, Exelon stated that this will be addressed in response to RAI 2.1.2-2. The staff stated that the response to RAI 2.1.2-2 would be sufficient to answer the methodology question, but the component descriptions would still need to be provided.

Fire Protection System (Section 2.3.3.7)

RAI 2.3.3.7-3 Section 2.4 identifies the fire resistance function of reinforced concrete walls, slabs, columns and beams, and reinforced concrete block walls, but not for any structural steel columns or beams. Table 3.5-14, "Aging Management Revision Results for Hazard Barriers and Elastomers," identifies cementitious fire proofing (spray-on fire proofing) as a material of construction associated with fire wraps. Identify by location, for each structure in Section 2.4, if fire resistive coatings have been applied to structural steel members serving as part of fire barriers and if they are in scope.

ISSUE: Exelon wanted to know if it was necessary to identify by room, elevation, and drawing quadrant where fire resistive coatings have been applied to structural steel. The staff clarified that a general statement stating whether cementitious fire proofing is applied to structural steel would be sufficient.

Peach Bottom Atomic Power Station, Units 2 and 3

cc:

Mr. Edward Cullen
Vice President & General Counsel
Exelon Generation Company, LLC
300 Exelon Way
Kennett Square, PA 19348

Mr. J. Doering
Site Vice President
Peach Bottom Atomic Power Station
1848 Lay Road
Delta, PA 17314

Mr. G. Johnston
Plant Manager
Peach Bottom Atomic Power Station
1848 Lay Road
Delta, PA 17314

Mr. D. A. Henry
Regulatory Assurance Manager
Peach Bottom Atomic Power Station
1848 Lay Road
Delta, PA 17314

Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station
P.O. Box 399
Delta, PA 17314

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Roland Fletcher
Department of Environment
Radiological Health Program
2400 Broening Highway
Baltimore, MD 21224

Correspondence Control Desk
Exelon Generation Company, LLC
200 Exelon Way, KSA 1-N-1
Kennett Square, PA 19348

Chief-Division of Nuclear Safety
PA Dept. of Environmental Protection
P.O. Box 8469
Harrisburg, PA 17105-8469

Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, PA 17314

Public Service Commission of Maryland
Engineering Division
Chief Engineer
6 St. Paul Center
Baltimore, MD 21202-6806

Mr. Richard McLean
Power Plant and Environmental
Review Division
Department of Natural Resources
B-3, Tawes State Office Building
Annapolis, MD 21401

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
433 Orlando Avenue
State College, PA 16803

Manager-Financial Control & Co-Owner
Affairs
Public Service Electric and Gas Company
P.O. Box 236
Hancocks Bridge, NJ 08038-0236

Peach Bottom Atomic Power Station
Units 2 and 3

cc:

Mr. Jeffrey A. Benjamin
Vice President-Licensing
Exelon Generation Company, LLC
4300 Winfield Road
Downers Grove, IL 60515

Mr. Michael P. Gallagher
Director - Licensing
Mid-Atlantic Regional Operating Group
Exelon Generation Company, LLC
200 Exelon Way, KSA 3-E
Kennett Square, PA 19348

Mr. Charles Pardee
Senior Vice President
Mid-Atlantic Regional Operating Group
Exelon Generation Company, LLC
200 Exelon Way, KSA 3-N
Kennett Square, PA 19348

Mr. John Skolds
Chief Operating Officer
Exelon Generation Company, LLC
4300 Winfield Road
Downers Grove, IL 60515

Mr. William Bohlke
Senior Vice President, Nuclear Services
Exelon Generation Company, LLC
4300 Winfield Road
Downers Grove, IL 60515

Mr. Jim Meister
Senior Vice President, Operations Support
Exelon Generation Company, LLC
4300 Winfield Road
Downers Grove, IL 60515