

ATTENDANCE SHEET
Exelon Licensing Meeting
March 18, 2002

Name	Organization	Phone Number
Chris Gratton	NRC/NRR/DLPM	301-415-1055
Larry Rosbach	NRR/DLPM	415-2863
Bill Macon	NRR/DLPM	415-3965
DAVID C. TUBBS	MidAmerican Energy	563-333-8192
STU RICHARDS	NRC/NRR/DLPM	301-415-1395
John Boska	NRC/NRR/DLPM	415-2901
JON Hopkins	NRC/NRR/DLPM	415-3027
Jim Clifford	NRC/NRR/DLPM	415-1430
Michael P. Gallagher	EXELON - MAROG	610-765-5664
Jeff Benjamin	EXELON - VP LICENSING	630-657-2809
LEITH R. JURY	EXELON - MWROG	630-657-2831
GEORGE B. ROMBOLD	EXELON - MAROG (TM/OC)	610-765-5516
TIMOTHY G. COLBURN	NRC/NRR/DLPM	301-415-7402
Peter S. Tam	NRC/NRR/DLPM/PD3-1	301-415-1457
Mahesh L. Chawla	NRC/NRR/DLPM/PD3-2	301-415-8371
George Dieh	NRC/NRR/DLPM/PD3-2	301-415-3019
Terry Simpkin	EXELON / LIC MGR OPS/LSCS	630-657-2821
Kenneth Ainger	Exelon - Midwest ROG	630 657-2800
Patrick Simpson	Exelon - Lic Mgr Ops/QC	630-657-2823
DAVID P. HELKER	EXELON - LICENSING (PB/LGS)	610-765-5525
E.G. ADENSAH	NRC/NRR/DLPM/LPD1	301-415-1353
FRED LYON	NRC/NRR/DLPM/LPD3	301-415-2296



Agenda

- Introductions – All
- Exelon Items Of Interest – Jeff Benjamin
- Timeliness and Quality Of Submittals – Mike Gallagher
- NRC Items Of Interest
- Break-out Sessions
 - Submittals Planned For 2002 – Licensing Managers
 - Status Of Items Currently With NRC – Project Managers



Licensing Counterpart Meeting With NRC

Exelon Licensing & Regulatory Affairs
March 18, 2002



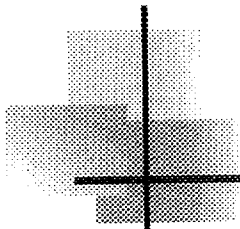
Exelon Items Of Interest

- Key Accomplishments In 2001
 - Facilitated By Excellent NRC Support
- Exelon Regulatory Strategy
- Risk Informed Submittals
 - ISI, ILRT, PASS, AST
- Regulatory Burden Reduction
 - Radiation Protection, FFD, Reporting Requirements



Timeliness and Quality Of Submittals

- Outage Milestone Improvements
- Results To Date
- Precedent Review And Selection



NRC Items Of Interest



Break-out Sessions

- Licensing Managers/Project Managers Meet To Discuss:
 - Submittals Planned For 2002
 - Status Of Items Currently With NRC

BACKGROUND

- NOED guidance has always required demonstration of at least “safety neutral” and at least a supporting qualitative risk assessment
- Part 9900 revision (12/12/00) and RIS 2001-10 (4/2/01) stated: “granting of this type of an NOED shall not involve an increase in radiological risk”.
- Need to clarify current guidance re: no Increase in risk.

REVISION

- At present cannot support quantitative threshold for “no increase in risk”.

- Clarification:

Section B.2.1 revised to read:

Granting this type of NOED shall not involve **any net increase** in radiological risk.

Can be satisfied by at least a qualitative risk assessment, considering any benefits of compensatory measures, and any identifiable risk attendant to complying with the TS action statement with degraded equipment.

EFFORT TO “RISK-INFORM” NOED PROCESS

CONCEPT:

- Review NOED database for past few years to identify categories of NOED requests.
- Review historical data of risk-informed license amendments corresponding to the NOED categories (e.g.; AOT extensions, surveillance extensions, degraded equipment).
- Review studies on transition and shutdown risks under degraded / inoperable conditions.
- Attempt to envelope transition and shutdown risks, and compensatory measure benefits.
- Develop risk-informed NOED guidance.

Mr. Charles H. Cruise

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auxiliary pumps necessary for diesel generator operation. A root cause investigation pointed to an apparent problem with the lube oil drive gear bearing that caused this gear to improperly mesh with the flexible drive assembly, generating excessive wear. You indicated that the other EDGs onsite had been recently tested successfully. The 1B EDG was inspected for similar wear and this worn condition was not found. We understand that your staff was planning to inspect the 2B EDG once the 2A EDG was returned to service. The other two onsite EDGs are of a different design and thus are unaffected by this problem. A new flexible drive gear was being installed; however, installation of this gear required substantial disassembly of the diesel engine, engine reassembly, and post maintenance testing -- work that could not be completed in the existing Allowed Outage Time (AOT).

Your staff requested this NOED after consideration of the safety significance and potential consequences of such an action. Your staff concluded that remaining at power for an additional six-day period while completing the repairs to the 2A EDG would not result in an undue risk to the health and safety of the public. That conclusion was based on risk insights that qualitatively indicated no net increase in radiological risk as a result of having this EDG out of service for up to six additional days, as well as your confidence that the ongoing repairs to the EDG would be effective and would be completed within this discretionary period. Your staff's conclusion that this NOED was safety and risk neutral was, in part, based on a number of compensatory, risk management measures implemented while the 2A EDG was out-of-service.

As compensatory measures during the period of the NOED, your staff committed to: (1) postpone any elective maintenance on the 2B EDG, (2) suspend any discretionary maintenance or testing on any Unit 2 safety-related equipment or the offsite power system, (3) ensure that all four offsite power circuits were available, even though only two were required to be operable by TSS, (4) shut down Unit 2 if threatened by severe weather with the potential to interrupt offsite power during the time the NOED was in effect, (5) train and station a dedicated operator to utilize the non-safety-related 5,400 kW OC EDG to power either Unit 2 vital bus in the event of a loss of offsite power, as well as to cross-connect key motor control centers to provide power to necessary equipment, and (6) assign an operator to control the auxiliary feedwater flow control valves in the event that flow control was lost following a loss of offsite power.

The NRC's basis for this discretion considered: (1) the availability and recent satisfactory testing of the four other EDGs onsite; (2) the availability of all offsite electrical sources; (3) the absence of adverse weather or generation shortages that would impact the reliability of these power supplies; (4) the comprehensive list of compensatory actions undertaken to ensure that the extended LCO did not result in a net increase in radiological risk; (5) indications that your repairs to the 2A EDG would be successfully implemented during the discretionary period, and (6) the fact that the apparent root cause had been identified and that no failure mechanisms common to the EDGs were identified.

Based on the above considerations, the staff concluded that Criterion B.2.1.1.a and the applicable criteria in Section C.4 to NRC Manual Chapter 9900, "Technical Guidance, Operation - Notices of Enforcement Discretion" were met. Criterion B.2.1.1.a states that for an operating plant, the NOED is intended to avoid unnecessary transients as a result of compliance with the license condition and, thus, minimize potential safety consequences and operational risks.

On the basis of the staff's evaluation of your request, we concluded that issuance of this NOED is consistent with the Enforcement Policy and staff guidance, and has no adverse impact on public health and safety. Therefore, it is our intention to exercise discretion not to enforce