

RS-14-005

January 13, 2014

U.S. Nuclear Regulatory Commission
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Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Supplemental Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident

References:

1. Exelon Generation Company, LLC 180-day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated November 27, 2012 (RS-12-160)
2. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012

In Reference 1, Exelon Generation Company, LLC (EGC) provided the Braidwood Station, Units 1 and 2 flooding walkdown report in accordance with the NRC Request for Information (Reference 2). The Braidwood Station, Units 1 and 2 flooding walkdown report documented the plant walkdowns performed to verify that plant features credited in the current licensing basis for protection and mitigation from external flood events are available, functional, and properly maintained. In Table 2 of Reference 1, EGC provided the list of the Braidwood Station, Unit 1 plant features that were not able to be inspected due to restricted access. EGC committed to complete the inspection of the Unit 1 Auxiliary Feedwater tunnel feature classified as restricted access in the A1R17 (Fall 2013) Refuel Outage. These inspections have been completed.

Additionally, this report provides the results of the Braidwood Station, Unit 2 Auxiliary Feedwater tunnel walkdown inspection. This inspection had been performed in October 2012 but the evaluation of the inspection results had not been completed in time to incorporate into Reference 1.

This letter provides the results of the completed supplemental flooding walkdown inspections of plant features located in the Braidwood Station, Units 1 and 2 Auxiliary Feedwater Tunnel areas. The enclosed tables document the specific walkdown results for each of the subject plant features.

The results of the visual inspections during the supplemental flooding walkdowns for Braidwood Station, Units 1 and 2 showed that the Auxiliary Feedwater Tunnel areas meet the NEI 12-07 acceptance criteria. Table 1 provides the list of the two (2) features that were immediately judged to be acceptable; however, certain locations within these features required additional evaluation as noted below.

Although the Braidwood Station, Units 1 and 2 Auxiliary Feedwater Tunnel areas satisfied the NEI 12-07 criteria, several locations within the tunnels were noted where minor conditions were identified and further evaluated. Table 2 provides the list of these locations that were not immediately judged as acceptable during the supplemental walkdowns and further evaluated. The table provides the tracking mechanism for Corrective Action Program (CAP) resolution of the identified conditions.

There were no findings identified as deficient per the current licensing basis. The findings that were documented using CAP have been resolved or will be resolved using the station's Corrective Action Program. No other findings challenge the current licensing basis.

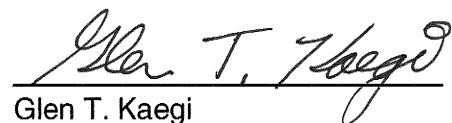
The supplemental flooding walkdown record forms document the details of all observations for all flood features inspected, and are available for on-site review. Except as noted above, flood protection features met the NEI 12-07 Supplemental Guidance acceptance criteria and were found to be in accordance with the site current licensing basis. This report completes the Braidwood Station, Units 1 and 2 flood walkdown commitments contained in Reference 1, Enclosure 2.

This letter contains no new regulatory commitments.

Should you have any questions concerning the content of this letter, please contact Ron Gaston at (630) 657-3359.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of January 2014.

Respectfully,



Glen T. Kaegi
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Enclosure:

1. Table 1: Braidwood Station, Units 1 And 2, Auxiliary Feedwater Tunnels Supplemental List of Features Immediately Judged as Acceptable
2. Table 2: Braidwood Station, Units 1 And 2, Auxiliary Feedwater Tunnels Supplemental List of Locations Not Immediately Judged as Acceptable

cc: Director, Office of Nuclear Reactor Regulation
Regional Administrator - NRC Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Project Manager, NRR – Braidwood Station
Illinois Emergency Management Agency – Division of Nuclear Safety

ENCLOSURE 1

Braidwood Station, Units 1 and 2

Auxiliary Feedwater Tunnels

Supplemental List of Features Immediately Judged as Acceptable

Table 1 - Braidwood Station, Units 1 and 2 Auxiliary Building Supplemental List of Features Immediately Judged as Acceptable			
#	Feature ID Number	Building	Room
1	BRW-18 Unit 1 Auxiliary Feedwater Tunnel Floors and Walls	Auxiliary Building Areas 1 & 2	N/A
2	BRW-19 Unit 2 Auxiliary Feedwater Tunnel Floors and Walls	Auxiliary Building Areas 4, 5 & 6	N/A

ENCLOSURE 2

Braidwood Station, Units 1 and 2

Auxiliary Feedwater Tunnels

Supplemental List of Locations Not Immediately Judged as Acceptable

Table 2 - Braidwood Station, Units 1 and 2 Auxiliary Building Supplemental List of Locations Not Immediately Judged as Acceptable				
IR Number	Feature ID	IR Subject (from CAP)	Proposed Resolution	Status/Resolution
01557124 (9 locations)	BRW-18	(OSP) Groundwater in-leakage walkdown/inspect U1 AF Tunnel	Clean and re-seal the concrete wall as noted in Issue Report (IR) condition description as required. Clean and paint affected components as noted in IR description. Component Operability – Yes, Documented in IR 01557124.	Closed - Completed Work Order (WO) 01535804-01 (10/17/2013) and WO 01535804-02 (10/17/2013). WO did not require sealing. Components were cleaned and painted.
01559422 (34 locations)	BRW-18	Fukushima flooding walkdown inactive leaks in U1 AF Tunnel	Close to actions taken and trending. Component Operability – Yes, Documented in IR 01559422.	Closed, references IR 01557124 above.

**Table 2 - Braidwood Station, Units 1 and 2
Auxiliary Building
Supplemental List of Locations Not Immediately Judged as Acceptable**

IR Number	Feature ID	IR Subject (from CAP)	Proposed Resolution	Status/Resolution
01428041 (31 locations)	BRW-19	Fukushima flooding walkdown inactive leaks in U2 AF Tunnel	Close to actions taken and trending. Component Operability – Yes, Documented in IR 01428041.	Close to documentation in the IR– This issue is for evidence of previous leaks and is not active.
01427471 (3 locations)	BRW-19	Groundwater in-leakage Fukushima Walkdown U2 AF Tunnel	Remove the puddle, clean and paint the areas as noted in the IR. Component Operability – Yes, Documented in IR 01427471.	Open - WO 01586010-01 opened to remove puddle and clean groundwater in-leakage deposits, including Items 1 & 2 from IR 01427471. (Scheduled for A2R17)
				Open - WO 01586010-03 planned to mitigate the in-leakage per IR 01427471. (Scheduled for A2R17)
				Note: Feature BRW-19 References IR 01426707, which then directs to actions in IR 01427471 generated specifically for the Fukushima walkdown.
01427832 (1 location)	BRW-19	Fukushima flooding walkdown identified deficiency tag with no WO	Determine applicable repair, if any, and create WO for the repair. Component Operability – Yes, Documented in IR 01427832.	Closed - Completed WO 01585678-01 for cleaning and coating. (11/03/2013)