



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

April 24, 2015

Mr. Bryan C. Hanson  
Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Officer (CNO)  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 –  
NONACCEPTANCE OF REQUESTED LICENSING ACTION - LICENSE  
AMENDMENT REQUEST REGARDING SPENT FUEL STORAGE POOL  
CRITICALLY METHODOLOGY AND PROPOSED CHANGE TO THE  
TECHNICAL SPECIFICATION 4.3.1, "CRITICALITY" (TAC NOS. MF5734 AND  
MF5735)

Dear Mr. Hanson:

By application dated December 30, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14364A100), Exelon Generation Company, LLC (the licensee) submitted a license amendment request for Dresden Nuclear Power Station (DNPS), Units 2 and 3. The proposed amendment would change the criticality safety analysis (CSA) methodology in the spent fuel pool, and would change the DNPS Technical Specification (TS) 4.3.1, "Criticality." The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the TSs) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

A public meeting was held on April 7, 2015, in which talking points (ADAMS Accession No. ML15085A575) regarding the submittal were discussed. Item #5 from that meeting stated that the NRC staff has determined that the licensee must develop an acceptable approach to ensure that the coupon surveillance program provides reasonable assurance that assumptions in the CSA are not violated. As a clarification for this item, and in order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested in the enclosure within 13 working days of the issuance of this letter. This will enable the NRC staff to begin its detailed technical review. If the information responsive to

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the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

This request was discussed with Mr. Mitch Matthews, Mr. Tim Byam, and Mr. Patrick Simpson of your staff on April 7, 2015.

If you have any questions, please contact me at (301) 415-2020.

Sincerely,

A handwritten signature in black ink that reads "Brenda Mozafari". The signature is written in a cursive style with a large, stylized 'B' and 'M'.

Brenda Mozafari, Senior Project Manager  
Plant Licensing III-2 and  
Planning and Analysis Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure:  
As stated

SUPPLEMENTAL INFORMATION TO ADDRESS  
NONACCEPTANCE OF REQUESTED LICENSING ACTION  
REGARDING SPENT FUEL STORAGE POOL CRITICALITY METHODOLOGY  
EXELON GENERATION COMPANY, LLC  
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3  
DOCKET NOS. 50-237 AND 50-249

1. Provide the following information about the Boral coupon program in Section 9.1.2.3.1 of the Updated Final Safety Report (UFSAR). Information about this program should include the following information:
  - a) Define the periodicity for coupon testing;
  - b) Describe the coupon testing procedure;
  - c) Define the acceptance criteria for the coupon surveillance program, including what constitutes an adverse condition;
  - d) Describe the process and acceptance criteria for the B-10 loading analyses;
  - e) Describe those measures taken to address a failure to meet the acceptance criteria for either the coupon surveillance program and/or the B-10 loading analyses; and,
  - f) Address any adverse conditions other than identified corrosion that may be identified during testing, and whether different acceptance criteria apply to those other adverse conditions.

Enclosure

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technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

This request was discussed with Mr. Mitch Matthews, Mr. Tim Byam, and Mr. Patrick Simpson of your staff on April 7, 2015.

If you have any questions, please contact me at (301) 415-2020.

Sincerely,

/RA

Brenda Mozafari, Senior Project Manager  
Plant Licensing III-2 and  
Planning and Analysis Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure:  
As stated

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APulvirenti  
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**ADAMS Accession No. ML15105A550**

**NRR-004**

OFFICE	LPL4-2/PM	LPL3-2/PM	LPL3-2/LA
NAME	APulvirenti	BMozafari	SRohrer
DATE	4/16/2015	4/23/2015	4/23/2015
OFFICE	DSS/SRXB	DSS/STSB	NRR/DORL/LPL3-2/BC
NAME	CJackson	RElliot	TTate
DATE	4/22/2015	4/24/2015	4/24/2015

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