

NRR-PMDAPEm Resource

From: Gropp Jr, Richard W:(GenCo-Nuc) [Richard.Gropp@exeloncorp.com]
Sent: Friday, May 15, 2015 2:22 PM
To: Lamb, John
Cc: Helker, David P:(GenCo-Nuc); Gudger, David T:(GenCo-Nuc); Gullott, David M.:(GenCo-Nuc); Simpson, Patrick R.:(GenCo-Nuc); Kluge, Mark W:(GenCo-Nuc); Freeman, John M:(GenCo-Nuc); Hosain, Mohammad Abid:(GenCo-Nuc); Lee, Daniel K:(GenCo-Nuc)
Subject: Comments Concerning Draft Director's Decision Letter (Union of Concerned Scientists 2.206 Petition)

John,

In response to the NRC's request for comments pertaining to the draft Director's Decision that was prepared in response to the 10 CFR 2.206 Petition filed by the Union of Concerned Scientists, Exelon offers the following comments for consideration by the NRC. Exelon considers this the best approach for responding given the minor nature of the comments.

- Section B, *Conformance with the Environmental Qualification Regulation*

1. This section describes the considered environmental conditions required by 10 CFR 50.49 in two places, but does not appear to include radiation.
2. Under the subsection "*Application of 10 CFR 50.49*," the NRC indicates licensees have identified lists of equipment important to safety subject to environmental qualification and states the following:

"...These lists identify the equipment, as well as the performance specifications, electrical characteristics, and environmental conditions for which the equipment was qualified..."

Exelon believes that these lists alone may not contain all of the stated information; therefore, Exelon recommends that the NRC consider adding the phrase "*and supporting documents*" after "*These lists*" in the quoted excerpt above.

3. Under the subsection "*Application of 10 CFR 50.49*," the NRC makes the statement: "*Under the requirements of 10 CFR 50.49(e), the electric EQ program must include....*" Exelon believes that word "*electric*" in the statement is unnecessary and would recommend that the word be deleted.

- Section C, *Safety Significance of a Sustained Loss of Forced Cooling*

1. In the seventh paragraph under subsection "*Effects of a Sustained Loss of Forced Spent Fuel Pool Cooling*" (page 13), the NRC states: "*For BWR secondary containment structures enclosing more than one reactor and its associated SFP, the decay heat rate and, consequently, the water vapor generation rate could be much higher when systems within the reactor building would be important to reactor safety.*" Exelon recommends further clarification as to the connection between systems important to safety being in the reactor building and higher water vapor generation.
2. Under the subsection "*Responses to Requests for Additional Information*," the discussion does contain a factual description of the Dresden Fuel Pool storage structure and cooling system. However, Exelon believes that it may be helpful to indicate that the Shutdown Cooling pumps are also powered from Class 1 electrical supplies.

Exelon appreciates the opportunity to comment on this subject.

Thank you,

Richard

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