



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

April 25, 2016

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: CLINTON POWER STATION, UNIT NO. 1 – ACCEPTANCE REVIEW  
CONCERNING PERMANENT EXTENSION OF TYPE A AND TYPE C LEAK  
RATE TEST FREQUENCIES (CAC NO. MF7290)(RS-16-015)

Dear Mr. Hanson:

By letter dated January 25, 2016, as supplemented by letter dated March 31, 2016 (Agencywide Document Access and Management System (ADAMS) Accession No. ML116025A182 and ML16076A077, respectively), Exelon Generation Company, LLC (EGC, the licensee) submitted a license amendment request for Clinton Power Station (CPS), Unit 1. The proposed amendment revises the technical specifications (TSs) to allow a permanent extension of the Type A integrated leak rate testing and Type C leak rate testing frequencies. This request also proposes to delete information in TS 5.5.13 regarding a completed requirement to perform Type C testing in 2008. 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 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.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review.

The NRC staff notes that the findings and observations response provided in the March 31, 2016, supplement indicate that an industry-Human Reliability Analysis (HRA) calculator is now used to quantify the human error probabilities. The NRC staff notes that this change in the HRA method may constitute a probabilistic risk assessment model upgrade and, therefore, may need a focused-scope peer review and appropriate resolution of the resulting findings, consistent with the approved risk guidance and staff endorsed industry standards.

You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence. If you have any questions, please contact Ms. Eva Brown, at (301) 415-2315.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Brown". The signature is fluid and cursive, with the first letter of the first name being a large, stylized capital 'E'.

Eva A. Brown, Senior Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-461

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The NRC staff notes that the findings and observations response provided in the March 31, 2016, supplement indicate that an industry-Human Reliability Analysis (HRA) calculator is now used to quantify the human error probabilities. The NRC staff notes that this change in the HRA method may constitute a probabilistic risk assessment model upgrade and, therefore, may need a focused-scope peer review and appropriate resolution of the resulting findings, consistent with the approved risk guidance and staff endorsed industry standards.

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Sincerely,

*/RA/*

Eva A. Brown, Senior Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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**ADAMS Accession No.: ML16104A055**

**\*by email dated**

**NRR-106**

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