



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

October 7, 2016

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

SUBJECT: OYSTER CREEK NUCLEAR GENERATING STATION - REQUEST FOR
ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT
REQUEST FOR CHANGES TO TECHNICAL SPECIFICATIONS SECTION 6.0,
"ADMINISTRATIVE CONTROLS" FOR PERMANENTLY DEFUELED
CONDITION (CAC NO. MF8108)

Dear Mr. Hanson:

By letter dated May 17, 2016 (Agencywide Documents Access and Management System Accession No. ML16138A129), Exelon Generation Company, LLC (Exelon or the licensee) submitted to the U.S. Nuclear Regulatory Commission (NRC) a license amendment request for changes to Technical Specification Sections 6.0, Administrative Controls," for permanently defueled condition for Oyster Creek Nuclear Generating Station.

The NRC staff has reviewed the licensee's submittal and determined additional information is required to enable the NRC staff to make an independent assessment regarding its technical review. The enclosure to this letter describes this request for additional information (RAI). On September 26, 2016, the draft questions were sent to Mr. David Helker, Mr. Richard Gropp, and Mr. Paul Bonnet of your staff to ensure that they were understandable, the regulatory bases for the questions were clear, and to determine if the information was previously docketed. A teleconference was held on October 5, 2016, to clarify the RAI questions. Exelon stated that they would respond to the RAI within 30 days of the date of this letter.

B. Hanson

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If you have any questions, please contact me at 301-415-3100 or via e-mail at John.Lamb@nrc.gov.

Sincerely,

A handwritten signature in black ink, reading "John G. Lamb". The signature is fluid and cursive, with the first name "John" being the most prominent.

John G. Lamb, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
RELATED TO LICENSE AMENDMENT REQUEST FOR CHANGES TO
TECHNICAL SPECIFICATIONS 6.0, "ADMINISTRATIVE CONTROLS"
FOR PERMANENTLY DEFUELED CONDITION
EXELON GENERATION COMPANY, LLC
OYSTER CREEK NUCLEAR GENERATING STATION
DOCKET NO. 50-219

By letter dated May 17, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16138A129), Exelon Generation Company, LLC (Exelon or the licensee) submitted to the U.S. Nuclear Regulatory Commission (NRC) a license amendment request (LAR) for changes to Technical Specifications (TS) Section 6.0, Administrative Controls," for permanently defueled condition for the Oyster Creek Nuclear Generating Station (OCNGS).

The NRC staff has reviewed the licensee's submittal and has determined that additional information is required to enable the NRC staff to make an independent assessment regarding its technical review.

RAI

1. Currently, the Vice President is responsible for overall facility operation in TS 6.1. The Vice President is clearly a "Responsible officer" in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 2, "Definitions." *Responsible officer* means, for the purposes of § 50.55(e) of this chapter, the president, vice-president, or other individual in the organization of a corporation, partnership, or other entity who is vested with executive authority over activities subject to this part. Will the Plant Manager be vested with similar executive authority that the current Vice President has?
2. In the proposed change to TS 6.1.1, you state the following: "The Plant Manager or delegated designee shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect safe storage and maintenance."

Briefly explain your succession plan for the "delegated designee?"

Enclosure

3. Currently, in TS 6.2: "The Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety...."

The proposed change states "A specified corporate officer shall have corporate responsibility for overall facility nuclear safety...."

Responsible officer means, for the purposes of § 50.55(e) of this chapter, the president, vice-president, or other individual in the organization of a corporation, partnership, or other entity who is vested with executive authority over activities subject to this part.

The term "specified corporate officer" is not defined in the Oyster Creek TSs. Define the definition of "specified corporate officer" in the Oyster Creek TSs or change the "specified corporate officer" to an existing defined term. Will the "specified corporate officer" be located onsite at OCNGS or at another location? Will the "specified corporate officer" be vested with similar executive authority that the current Chief Nuclear Officer has? Will the Plant Manager be the "specified corporate officer" or will it be another person? If the "specified corporate officer" is not the Plant Manager, briefly explain who will fill the "specified corporate position?"

4. Currently, in proposed TS 6.2, the term "non-certified operator" is used. The term "non-certified operator" is not defined in the Oyster Creek TSs. Define the definition of "non-certified operator" in the Oyster Creek TSs or change the "non-certified operator" to an existing defined term.
5. As documented in Enforcement Guidance Memorandum (EGM) 2012-001, "Dispositioning Noncompliance with Administrative Controls Technical Specifications Programmatic Requirements That Extend Test Frequencies and Allow Performance of Missed Tests," the allowances permitted by TS 4.0.2 and TS 1.24 cannot be applied to TS Administrative Controls Program activities such as Oyster Creek's TS Section 6.8.4.a, "Radioactive Effluent Controls Program" unless such activity is associated with a Limiting Condition for Operation Surveillance Requirement. NRC-approved Technical Specifications Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-545, Revision 3, "TS Inservice Testing [IST] Program Removal & Clarify SR [Surveillance Requirement] Usage Rule Application to Section 5.5 Testing" (ADAMS Accession No. ML15294A555), dated October 21, 2015, addressed the issues identified in EGM 2012-001.

Provide a technical justification on the acceptability of allowing the use of TS 4.0.2 and 1.24 for TS 6.8.4.a activities.

B. Hanson

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If you have any questions, please contact me at 301-415-3100 or via e-mail at John.Lamb@nrc.gov.

Sincerely,

/RA/

John G. Lamb, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:
Request for Additional Information

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ADAMS Accession No.: ML16244A311

***via email**

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