

From: Ennis, Rick
Sent: Monday, March 06, 2017 9:18 AM
To: Stephanie.Hanson@exeloncorp.com
Cc: David Helker
Subject: Acceptance Review - Peach Bottom 2 and 3 - License Amendment Request to Adopt TSTF-542 - OPDRVs (CACs MF9138 & 39)

Stephanie,

By letter dated January 30, 2017 (ADAMS Accession No. ML17030A302), Exelon Generation Company, LLC (Exelon) submitted a license amendment request for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The amendment would replace existing Technical Specification (TS) requirements related to "operations with a potential for draining the reactor vessel" (OPDRVs) with new requirements on reactor pressure vessel (RPV) water inventory control (WIC) to protect Safety Limit 2.1.1.3. Safety Limit 2.1.1.3 requires RPV water level to be greater than the top of active irradiated fuel. The proposed changes are based on Technical Specification Task Force (TSTF) Traveler TSTF-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control."

The purpose of this e-mail is to provide the results of the 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.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the staff to proceed with its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment request 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. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 715 hours to complete. Exelon's application dated January 30, 2017, requested that the NRC staff complete its review by September 30, 2017, in order to support the PBAPS Unit 3 fall 2017 refueling outage (i.e., 8 month review schedule). However, due to the complexity of the review, the NRC staff expects to complete this review in approximately 10 months, with a forecast completion date of December 5, 2017. If there are emergent complexities or challenges in our review that would cause changes to the initial

forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during our routine interactions.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information and unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities.

If you have any questions, please contact me at (301) 415-1420.

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