

RS-18-001

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U.S. Nuclear Regulatory Commission
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Peach Bottom Atomic Power Station, Unit 3
Renewed Facility Operating License No. DPR-56
NRC Docket No. 50-278

Subject: Report of Full Compliance with Phase 1 and Phase 2 of June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

References:

1. NRC Order Number EA-13-109, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013
2. Exelon Generation Company, LLC's Answer to June 6, 2013, Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 26, 2013
3. NRC Interim Staff Guidance JLD-ISG-2015-01, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated April 2015
4. NEI 13-02, "Industry Guidance for Compliance With Order EA-13-109, BWR Mark I & II Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions", Revision 1, dated April 2015
5. Exelon Generation Company, LLC Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2014 (RS-14-062)
6. Exelon Generation Company, LLC First Six-Month Status Report Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 19, 2014 (RS-14-305)
7. Exelon Generation Company, LLC Second Six-Month Status Report Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2015 (RS-15-151)

8. Exelon Generation Company, LLC Phase 1 (Updated) and Phase 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 15, 2015 (RS-15-303)
9. Exelon Generation Company, LLC Fourth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2016 (RS-16-109)
10. Exelon Generation Company, LLC Fifth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 15, 2016 (RS-16-235)
11. Exelon Generation Company, LLC Sixth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2017 (RS-17-068)
12. NRC letter to Exelon Generation Company, LLC, Peach Bottom Atomic Power Station, Units 2 and 3 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 1 of Order EA-13-109 (Severe Accident Capable Hardened Vents) (TAC Nos. MF4416 and MF4417), dated February 12, 2015
13. NRC letter to Exelon Generation Company, LLC, Peach Bottom Atomic Power Station, Units 2 and 3 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 2 of Order EA-13-109 (Severe Accident Capable Hardened Vents) (TAC Nos. MF4416 and MF4417), dated August 2, 2016
14. NRC letter to Exelon Generation Company, LLC, Peach Bottom Atomic Power Station, Units 2 and 3 – Report for the Audit of Licensee Responses to Interim Staff Evaluations Open Items Related to NRC Order EA-13-109 to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, dated November 30, 2017

On June 6, 2013, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued Order EA-13-109, “Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions,” (Reference 1) to Exelon Generation Company, LLC (EGC). Reference 1 was immediately effective and directs EGC to require their BWRs with Mark I and Mark II containments to take certain actions to ensure that these facilities have a hardened containment vent system (HCVS) to remove decay heat from the containment, and maintain control of containment pressure within acceptable limits following events that result in loss of active containment heat removal capability while maintaining the capability to operate under severe accident (SA) conditions resulting from an Extended Loss of AC Power (ELAP). Specific requirements are outlined in Attachment 2 of Reference 1. Reference 2 provided EGC’s initial answer to the Order.

Reference 3 provided the NRC interim staff guidance on methodologies for compliance with Phases 1 and 2 of Reference 1 and endorsed industry guidance document NEI 13-02, Revision 1 (Reference 4) with clarifications and exceptions. Reference 5 provided the Peach

Bottom Atomic Power Station, Unit 3 Phase 1 Overall Integrated Plan (OIP), which was replaced with the Phase 1 (Updated) and Phase 2 OIP (Reference 8). References 12 and 13 provided the NRC review of the Phase 1 and Phase 2 OIP, respectively, in an Interim Staff Evaluation (ISE).

Reference 1 required submission of a status report at six-month intervals following submittal of the OIP. References 6, 7, 8, 9, 10, and 11 provided the first, second, third, fourth, fifth, and sixth six-month status reports, respectively, pursuant to Section IV, Condition D.3, of Reference 1 for Peach Bottom Atomic Power Station, Unit 3.

The purpose of this letter is to provide the report of full compliance with Phase 1 and Phase 2 of the June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109) (Reference 1) pursuant to Section IV, Condition D.4 of the Order for Peach Bottom Atomic Power Station, Unit 3.

Peach Bottom Atomic Power Station, Unit 3 has designed and installed a venting system that provides venting capability from the wetwell during severe accident conditions in response to Phase 1 of NRC Order EA-13-109. Peach Bottom Atomic Power Station, Unit 3 has implemented a reliable containment venting strategy that makes it unlikely that the plant would need to vent from the containment drywell before alternative reliable containment heat removal and pressure control is reestablished in response to Phase 2 of NRC Order EA-13-109. The information provided herein documents full compliance for Peach Bottom Atomic Power Station, Unit 3 with NRC Order EA-13-109.

Peach Bottom Atomic Power Station, Unit 3 Phase 1 OIP Open Items have been addressed and closed as documented in Reference 10, and are considered complete per Reference 14. It is noted that there were no Phase 2 OIP Open Items.

EGC's response to the NRC Interim Staff Evaluation (ISE) Phase 1 Open Items identified in Reference 12 have been addressed and closed as documented in Reference 10, and are considered complete per Reference 14. The following table provides completion references for each OIP and ISE Phase 1 Open Item.

Reference 14 provided the results of the audit of ISE Open Item closure information provided in References 10 and 11. All Phase 1 and 2 ISE Open Items are statused as closed in Reference 14.

OIP Phase 1 Open Item No. 1 Confirm that the Remote Operating Station (ROS) will be in an accessible area following a Severe Accident (SA).	Deleted (Closed to ISE Open Item No. 9 below)
OIP Phase 1 Open Item No. 2 Provide procedures for HCVS Operation.	Deleted (Closed to ISE Open Item No. 1 below)

OIP Phase 1 Open Item No. 3 Identify site specific controlling document for HCVS out of service and compensatory measures.	Deleted (Closed to ISE Open Item No. 2 below)
OIP Phase 1 Open Item No. 4 Determine the approach for combustible gases.	Deleted (Closed to ISE Open Item No. 8 below)
OIP Phase 1 Open Item No. 5 Perform radiological evaluation for Phase 1 vent line impact on ERO response actions.	Closed per References 10 and 14.
ISE Phase 1 Open Item No. 1 Make available for NRC staff audit guidelines and procedures for HCVS operation. (Section 3.2.3.1)	Closed per References 10 and 14.
ISE Phase 1 Open Item No. 2 Make available for the NRC staff audit the site specific controlling document for HCVS out of service and compensatory measures. (Section 3.4.1)	Closed per References 10 and 14.
ISE Phase 1 Open Item No. 3 Make available for NRC staff audit a technical justification for use of jumpers in the HCVS strategy. (Section 3.1.3)	Closed per References 10 and 14.
ISE Phase 1 Open Item No. 4 Make available for NRC staff audit analyses demonstrating that the HCVS has the capacity to vent the steam/energy equivalent of one percent of licensed/rated thermal power (unless a lower value is justified), and that the suppression pool and the HCVS together are able to absorb and reject decay heat, such that following a reactor shutdown from full power containment pressure is restored and then maintained below the primary containment design pressure and the primary containment pressure limit. (Sections 3.2.2.1 and 3.2.2.2)	Closed per References 10 and 14.
ISE Phase 1 Open Item No. 5 Make available for NRC staff audit descriptions or diagrams of reactor building ventilation including exhaust dampers failure modes to support licensee justification for the HVAC release point being below and 150 feet from the reactor building ventilation release point. (Section 3.2.2.3)	Closed per References 10 and 14.

<p>ISE Phase 1 Open Item No. 6</p> <p>Make available for NRC staff audit details to justify the deviation from tornado protection standards provided in NEI 13-02 or make available a description of how the HCVS will comply with the tornado protection standards provided in NEI-13-02. (Section 3.2.2.3)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 7</p> <p>Make available for NRC staff audit documentation that demonstrates adequate communication between the remote HCVS operation locations and HCVS decision makers during ELAP and severe accident condition. (Section 3.2.2.5)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 8</p> <p>Provide a description of the final design of the HCVS to address hydrogen detonation and deflagration. (Section 3.2.2.6)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 9</p> <p>Make available for NRC staff audit an evaluation of temperature and radiological conditions to ensure that operating personnel can safely access and operate controls and support equipment. (Sections 3.2.1, 3.2.2.3, 3.2.2.4, 3.2.2.5, 3.2.2.10, 3.2.4.1, 3.2.4.2, 3.2.5.2, and 3.2.6)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 10</p> <p>Make available for NRC staff audit descriptions of all instrumentation and controls (existing and planned) necessary to implement this order including qualification methods. (Sections 3.2.2.9 and 3.2.2.10)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 11</p> <p>Make available for NRC staff audit the final sizing evaluation for HCVS batteries/battery charger including incorporation into FLEX DG loading calculation. (Sections 3.2.2.4, 3.2.3.1, 3.2.3.2, 3.2.4.1, 3.2.4.2, 3.2.5.1, 3.2.5.2, and 3.2.6)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 12</p> <p>Make available for NRC staff audit the descriptions of local conditions (temperature, radiation and humidity) anticipated during ELAP and severe accident for the components (valves, instrumentation, sensors, transmitters, indicators, electronics, control devices, etc.) required for HCVS venting including confirmation that the components are capable of performing their functions during ELAP and severe accident conditions. (Sections 3.2.2.3, 3.2.2.5, 3.2.2.9, and 3.2.2.10)</p>	<p>Closed per References 10 and 14.</p>

<p>ISE Phase 1 Open Item No. 13</p> <p>Make available for NRC staff audit documentation of an evaluation verifying the existing containment isolation valves, relied upon for the HCVS, will open under the maximum expected differential pressure during BDBEE and severe accident wetwell venting. (Section 3.2.2.9)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 14</p> <p>Provide a description of the strategies for hydrogen control that minimizes the potential for hydrogen gas migration and ingress into the reactor building or other buildings. (Section 3.2.2.6 and 3.2.2.7)</p>	<p>Closed per References 10 and 14.</p>
<p>ISE Phase 1 Open Item No. 15</p> <p>Make available for NRC audit documentation confirming that HCVS will remain isolated from standby gas treatment system during ELAP and severe accident conditions. (Section 3.2.2.7)</p>	<p>Closed per References 10 and 14.</p>

EGC's response to the NRC ISE Phase 2 Open Items identified in Reference 13 have been addressed and closed as documented in Reference 11, and are considered complete per Reference 14. The following table provides completion references for each ISE Phase 2 Open Item.

<p>ISE Phase 2 Open Item No. 1</p> <p>Licensee to demonstrate the SAWA equipment and controls, as well as ingress and egress paths for the expected severe accident conditions (temperature, humidity, radiation) remain operational throughout the sustained operating period. (Section 3.3.2.3)</p>	<p>Closed per References 11 and 14 utilizing BWROG generic response template.</p>
<p>ISE Phase 2 Open Item No. 2</p> <p>Licensee to demonstrate that instrumentation and equipment being used for SAWA and supporting equipment is capable to perform for the sustained operating period under the expected temperature and radiological conditions. (Section 3.3.2.3)</p>	<p>Closed per References 11 and 14 utilizing BWROG generic response template.</p>
<p>ISE Phase 2 Open Item No. 3</p> <p>Licensee to demonstrate that containment failure as a result of overpressure can be prevented without a drywell vent during severe accident conditions. (Section 3.3.3)</p>	<p>Closed per References 11 and 14 utilizing BWROG generic response template.</p>

<p>ISE Phase 2 Open Item No. 4</p> <p>Licensee shall demonstrate whether a site specific MAAP evaluation will be used to determine an initial SAWA flow rate. If the evaluations performed in BWROG TP-15-011 is considered, provide a description of how the plant is bounded by the reference plant analysis that shows the SAWM strategy is successful in making it unlikely that a drywell vent is needed. (Section 3.3.3.1)</p>	<p>Closed per References 11 and 14 utilizing BWROG generic response template.</p>
<p>ISE Phase 2 Open Item No. 5</p> <p>Licensee to demonstrate that there is adequate communication between the MCR and the Intake Structure operator at the FLEX manual valve during severe accident conditions. (Section 3.3.3.4)</p>	<p>Closed per References 11 and 14 utilizing BWROG generic response template.</p>
<p>ISE Phase 2 Open Item No. 6</p> <p>Licensee to demonstrate the SAWM flow instrumentation qualification for the expected environmental conditions. (Section 3.3.3.4)</p>	<p>Closed per References 11 and 14 utilizing BWROG generic response template.</p>

MILESTONE SCHEDULE – ITEMS COMPLETE

Peach Bottom Atomic Power Station, Unit 3 - Phases 1 and 2 Specific Milestone Schedule

Milestone	Target Completion Date	Activity Status	Comments
Submit Phase 1 Overall Integrated Plan	Jun. 2014	Complete	
Submit Phase 2 Overall Integrated Plan	Dec. 2015	Complete	
Submit 6 Month Updates:			
Update 1	Dec. 2014	Complete	
Update 2	Jun. 2015	Complete	
Update 3	Dec. 2015	Complete	Simultaneous with Phase 2 OIP

Milestone	Target Completion Date	Activity Status	Comments
Update 4	Jun. 2016	Complete	
Update 5	Dec. 2016	Complete	
Update 6	Jun. 2017	Complete	
Phase 1 Specific Milestones			
Phase 1 Modifications:			
Hold preliminary/conceptual design meeting	Jun. 2014	Complete	
Unit 3 Design Engineering On-site/Complete	Feb. 2017	Complete	
Unit 3 Implementation Outage	Nov. 2017	Complete	
Unit 3 Walk Through Demonstration/Functional Test	Nov. 2017	Complete	
Phase 1 Procedure Changes			
Operations Procedure Changes Developed	Nov. 2017	Complete	
Site Specific Maintenance Procedure Developed	Nov. 2017	Complete	
Procedure Changes Active	Nov. 2017	Complete	
Phase 1 Training:			
Training Complete	Nov. 2016	Complete	
Phase 1 Completion			
Unit 3 HCVS Implementation	Nov. 2017	Complete	
Phase 2 Specific Milestones			
Phase 2 Modifications:			
Hold preliminary/conceptual design meeting	May 2016	Complete	
Unit 3 Design Engineering On-site/Complete	Jul. 2017	Complete	
Unit 3 Walk Through Demonstration/Functional Test	Nov. 2017	Complete	

Milestone	Target Completion Date	Activity Status	Comments
Unit 3 Implementation Outage	Nov. 2017	Complete	
Phase 2 Procedure Changes			
Operations Procedure Changes Developed	Nov. 2017	Complete	
Site Specific Maintenance Procedure Developed	Nov. 2017	Complete	
Procedure Changes Active	Nov. 2017	Complete	
Phase 2 Training:			
Training Complete	Nov. 2017	Complete	
Phase 2 Completion			
Unit 3 HCVS Implementation	Nov. 2017	Complete	
Submit Unit 3 Phases 1 and 2 Completion Report	Jan. 2018	Complete with this submittal.	

ORDER EA-13-109 COMPLIANCE ELEMENTS SUMMARY

The elements identified below for Peach Bottom Atomic Power Station, Unit 3, as well as the Phase 1 (Updated) and Phase 2 OIP response submittal (Reference 8), and the 6-Month Status Reports (References 6, 7, 8, 9, 10, and 11), demonstrate compliance with NRC Order EA-13-109. The Peach Bottom Atomic Power Station, Units 2 and 3 Final Integrated Plan for reliable hardened containment vent Phase 1 and Phase 2 strategies will be provided upon full compliance for Peach Bottom Atomic Power Station, Unit 2 (Fall 2018).

HCVS PHASE 1 AND PHASE 2 FUNCTIONAL REQUIREMENTS AND DESIGN FEATURES – COMPLETE

The Peach Bottom Atomic Power Station, Unit 3, Phase 1 HCVS provides a vent path from the wetwell to remove decay heat, vent the containment atmosphere, and control containment pressure within acceptable limits. The Phase 1 HCVS will function for those accident conditions for which containment venting is relied upon to reduce the probability of containment failure, including accident sequences that result in the loss of

active containment heat removal capability during an extended loss of alternating current power.

The Peach Bottom Atomic Power Station, Unit 3, Phase 2 HCVS provides a reliable containment venting strategy that makes it unlikely that the plant would need to vent from the containment drywell before alternative reliable containment heat removal and pressure control is reestablished. The Peach Bottom Atomic Power Station, Unit 3, Phase 2 HCVS strategies implement Severe Accident Water Addition (SAWA) with Severe Accident Water Management (SAWM) as an alternative venting strategy. This strategy consists of the use of the Phase 1 wetwell vent and SAWA hardware to implement a water management strategy that will preserve the wetwell vent path until alternate reliable containment heat removal can be established.

The Peach Bottom Atomic Power Station, Unit 3, Phase 1 and Phase 2 HCVS strategies are in compliance with Order EA-13-109. The modifications required to support the HCVS strategies for Peach Bottom Atomic Power Station, Unit 3 have been fully implemented in accordance with the station processes.

HCVS PHASE 1 AND PHASE 2 QUALITY STANDARDS – COMPLETE

The design and operational considerations of the Phase 1 and Phase 2 HCVS installed at Peach Bottom Atomic Power Station, Unit 3 complies with the requirements specified in the Order and described in NEI 13-02, Revision 1, "Industry Guidance for Compliance with Order EA-13-109". The Phase 1 and Phase 2 HCVS has been installed in accordance with the station design control process.

The Phase 1 and Phase 2 HCVS components including piping, piping supports, containment isolation valves, containment isolation valve actuators and containment isolation valve position indication have been designed consistent with the design basis of the plant. All other Phase 1 and Phase 2 HCVS components including electrical power supply, valve actuator pneumatic supply and instrumentation have been designed for reliable and rugged performance that is capable of ensuring Phase 1 and Phase 2 HCVS functionality following a seismic event.

HCVS PHASE 1 AND PHASE 2 PROGRAMMATIC FEATURES - COMPLETE

Storage of portable equipment for Peach Bottom Atomic Power Station, Unit 3 Phase 1 and Phase 2 HCVS use provides adequate protection from applicable site hazards, and identified paths and deployment areas will be accessible during all modes of operation and during severe accidents, as recommended in NEI 13-02, Revision 1, Section 6.1.2.

Training in the use of the Phase 1 and Phase 2 HCVS for Peach Bottom Atomic Power Station, Unit 3 has been completed in accordance with an accepted training process as recommended in NEI 13-02, Revision 1, Section 6.1.3.

Operating and maintenance procedures for Peach Bottom Atomic Power Station, Unit 3 have been developed and integrated with existing procedures to ensure safe operation

of the Phase 1 and Phase 2 HCVS. Procedures have been verified and are available for use in accordance with the site procedure control program.

Site processes have been established to ensure the Phase 1 and Phase 2 HCVS is tested and maintained as recommended in NEI 13-02, Revision 1, Sections 5.4 and 6.2.

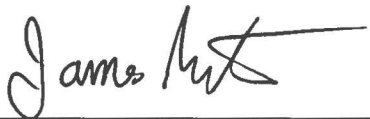
Peach Bottom Atomic Power Station, Unit 3 has completed validation in accordance with industry developed guidance to assure required tasks, manual actions and decisions for HCVS strategies are feasible and may be executed within the constraints identified in the HCVS Phases 1 and 2 OIP for Order EA-13-109 (Reference 8).

Peach Bottom Atomic Power Station, Unit 3 has completed evaluations to confirm accessibility, habitability, staffing sufficiency, and communication capability in accordance with NEI 13-02, Sections 4.2.2 and 4.2.3.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David J. Distel at 610-765-5517.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 5th day of January 2018.

Respectfully submitted,



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