

# **NRC Pre-Submittal Meeting for Exelon Fleet LAR to Relocate the TS Unit Staff Qualification ANSI Requirements to the Exelon QATR February 27, 2018**



**Exelon** Generation®

## Purpose for Discussion

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- Discuss evolution of current proposed Fleet License Amendment Request (LAR)
- Provide overview of current LAR
- Discuss 6-month turnaround request
- Discuss the QATR proposed Mark-ups
- Adoption of ANSI/ANS 3.1-2014 via RG 1.8 Rev 4 QATR revision

## Opening Remarks

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- Executive Sponsor for LAR– Julie Sickle
- Chair of the ANS working level committee that developed ANSI/ANS-3.1-2014

## Evolution

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- 11/14 ANSI/ANS-3.1-2014 approved
- 3/22/16 Initial Exelon Pre-submittal meeting
- 4/6/16 Pre-Submittal NRC meeting summary
- 3/27/17 NRC approves TVA LAR to relocate TS ANSI requirements to TVA QAP
- Fall/17 Exelon decides to change original LAR scope to: Relocate the TS ANSI requirements to the Exelon Quality Assurance Topical Report
- Feb/18 Fleet LAR internally reviewed and approved
- 2/27/18 Pre-submittal meeting
- 3/1/18 Submit Fleet LAR to NRC

## LAR Overview

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- **Current Technical Specification Requirements for TS 5/6.3.1(Unit/Plant/Facility Staff Qualifications):**
  - **ANS-3.1/N18.1-1971**
    - Braidwood, Byron, Calvert Cliffs, Dresden, Ginna, LaSalle, Peach Bottom, Nine Mile Point Unit 1, Quad Cities
  - **ANSI/ANS-3.1-1978**
    - Clinton, Limerick, FitzPatrick, Nine Mile Point Unit 2, Three Mile Island Unit 1
- **Proposed Technical Specification Requirements:**

“Each member of the unit [facility or plant] staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Exelon Quality Assurance Topical Report”

## LAR Overview

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- TS verbatim wording relocated to QATR
- Minor exceptions for FitzPatrick
- Oyster Creek not included in Fleet Submittal
- Complies with the requirements of AL 95-06 (Relocation of Technical Specification Administrative Controls Related to Quality Assurance)
- These ANSI Standards are considered quality assurance controls
- Consistent with TVA precedence for Browns Ferry and Sequoyah (ML16105A287)

## 6-Month Turnaround

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- The 6-month turnaround will position Exelon to more efficiently adopt and implement the ANSI-2014 standard upon issuance of RG 1.8 Rev 4
  - Prevents an additional year delay in Exelon achieving a common fleet standard and alignment for staff qualifications if no LAR is needed at the time RG 1.8 Rev 4 is issued
- In 3/22/16 pre-submittal meeting NRC advised not to submit until NRC vetted the ANSI-2014 standard via the RG 1.8 Rev 4 process
- In 3/22/16 meeting NRC had anticipated that the draft RG 1.8 Rev 4 would be noticed for public comments by end of May 2016
- Draft RG 1.8 Rev 4 was noticed for public comments on 2/12/18
- Exelon has had a project in place for 3 years to adopt the ANSI-2014 standard

## QATR-Mark-ups

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- TS wording relocated verbatim to QATR
- FitzPatrick minor exceptions:
  - Referenced “Entergy” QAP exceptions
  - TS 5.3.1 is already in most recent QATR revision
  - TS 5.2.2.f requires STAs at FitzPatrick to comply to the ANSI 1993 standard
- Mark-ups throughout QATR Appendix C (Codes, Standards and Guides)
- Proposed revisions are consistent with existing format for taking exceptions to RG compliance on a station by station basis



## **RG 1.8 Rev 4 QATR revision**

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- Exelon will implement the approved TS amendments within 60 days
- No training standards are changed; only change management is to issue revised TS and revise the QATR as proposed
- After ANSI/ANS-3.1-2014 is endorsed via approved RG 1.8 Rev 4, Exelon will again revise the QATR via 10 CFR 50.54(a) evaluation process to adopt it
- NRC exceptions to the ANSI/ANS-3.1-2014 that will be in the approved RG 1.8 Rev 4 will be carefully reviewed
- It is expected that the subsequent 10 CFR 50.54(a) evaluation will not be a reduction in commitment