



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

July 19, 2019

LICENSEE: Exelon Generation Company, LLC

FACILITY: Nine Mile Point Nuclear Station, Unit 2

SUBJECT: SUMMARY OF THE JUNE 10, 2019, PUBLIC MEETING WITH EXELON GENERATION COMPANY, LLC, REGARDING PLANNED CONCURRENT SUBMITTAL OF RISK-INFORMED COMPLETION TIME AND RISK-INFORMED CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS, AND COMPONENTS LICENSE AMENDMENT REQUESTS (EPID L-2019-LRM-0030)

On June 10, 2019, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company, LLC (Exelon, licensee). The purpose of the meeting was for the NRC and Exelon to discuss the benefits, if any, from concurrent submittal of risk-informed completion time and risk-informed categorization and treatment of structures, systems, and components (SSCs) license amendment requests for Nine Mile Point Nuclear Station, Unit 2 (Nine Mile Point 2). Also, the licensee provided an overview of each planned submittal. The meeting notice and agenda, dated May 24, 2019, are available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML19144A202. The slide presentation used by the licensee during the meeting is available in ADAMS under Accession No. ML19158A120. A list of attendees is enclosed.

The Exelon representatives stated that the risk-informed completion time and risk-informed categorization license amendment requests would be submitted separately on the same day (or close to the same day) at the end of July 2019 or beginning of August 2019. Exelon stated that the risk-informed completion time request would be based on TSTF-505, Rev. 2, "Provide Risk Informed Extended Completion Times – RITSTF Initiative 4B," (ADAMS Accession No. ML18183A493) with variance from TSTF-505 due to differences in technical specification style, nomenclature, numbering, plant-specific limiting condition for operations (LCOs) and standard LCOs not applicable to Nine Mile Point 2. Exelon stated that the risk-informed categorization request would be based on Nuclear Energy Institute NEI-004, Rev. 0, "10 CFR 50.69 SSC Categorization Guideline, July 2005" (ADAMS Accession No. ML052910035). The Exelon representatives discussed Nine Mile Point 2 probabilistic risk assessment adequacy, uncertainties, and assumptions.

The Exelon representatives described the review "efficiencies" that the licensee expected to be available to the NRC staff during the concurrent review of the risk-informed completion time and risk-informed categorization and treatment of SSCs license amendment requests for Nine Mile Point 2. Exelon did not offer an explicit definition of "efficiencies" or the amount of "efficiency" the licensee expected. The NRC staff informed the Exelon representatives that the NRC considers review "efficiency" in terms of completing either a review with lower level-of-effort, a shorter duration, or both. The NRC staff informed the Exelon representatives that the NRC staff believed that only limited opportunities for review "efficiency" would be available from concurrent review of the risk-informed completion time and risk-informed categorization and treatment of

SSCs license amendment requests for Nine Mile Point 2, because there would be limited overlap between the two reviews other than both involved a review of Nine Mile Point 2 probabilistic risk assessment. Although both involve the review of the use of probabilistic risk assessment, the application of probabilistic risk assessment does not overlap.

The NRC staff informed the licensee that an opportunity to achieve efficiency, in terms of a possible lower level-of-effort from concurrent review of the two license amendment requests, would be to conduct a joint regulatory audit. If the two requests were submitted at roughly the same time, a joint regulatory audit would extend the duration of the risk-informed categorization review, because it will take the staff longer to prepare for an audit of a risk-informed completion time request. In response to this information, the Exelon representatives stated that the licensee did not want to delay one review for the other. The NRC staff and Exelon representatives discussed several factors that could affect the level-of-effort and duration of concurrent reviews. Additionally, the NRC staff and Exelon representatives discussed the typical tools that the NRC staff uses to obtain lower level-of-effort and a shorter duration for separate, unlinked reviews. No decisions or assurances were made during the meeting about how the NRC staff would conduct the review of either of the planned submittals.

No regulatory decisions were made during the public meeting. Members of the public did not attend the meeting. Three public feedback meeting forms were received from meeting attendees.

Please direct any inquiries to me at 301-415-2871 or Michael.Marshall@nrc.gov.

Sincerely,

/RA/

Michael L. Marshall, Jr., Senior Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

PUBLIC MEETING WITH EXELON GENERATION COMPANY, LLC, REGARDING PLANNED
CONCURRENT SUBMITTAL OF NINE MILE POINT NUCLEAR STATION, UNIT 2,
RISK-INFORMED COMPLETION TIME AND RISK-INFORMED CATEGORIZATION AND
TREATMENT OF STRUCTURES, SYSTEMS, AND COMPONENTS
LICENSE AMENDMENT REQUESTS

Name	Organization
David Passehl	Exelon Generation Company, LLC (Exelon)
Shannon Rafferty-Czincila	Exelon
Ronnie Reynolds	Exelon
Barry Sloane	Jensen Hughes
Nicholas Sternowski	Jensen Hughes
Stephen Dinsmore	U.S. Nuclear Regulatory Commission (NRC)
Michael Levine	NRC
Ming Li	NRC
Khoi Nguyen	NRC
Michael Marshall	NRC
Ed Miller	NRC
Stacey Rosenberg	NRC
Jeffrey Stone	NRC
Philip Tarpinian	NRC
Bob Tjader	NRC

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KNguyen, NRR	

ADAMS Accession Nos.: Meeting Notice ML19144A202, Meeting Summary ML19183A238, Handouts ML19158A120

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LAiT	NRR/DORL/LPL1/LA
NAME	MMarshall	KEntz	CSmith (LRonewicz for)
DATE	07/10/2019	07/09/2019	7/19/2019
OFFICE	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM	
NAME	JDanna	MMarshall	
DATE	07/19/2019	07/19/2019	

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