

## **NRR-DRMAPEm Resource**

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**From:** Lee, Samson  
**Sent:** Friday, October 4, 2019 5:01 PM  
**To:** Williams, Christian D:(Exelon Nuclear)  
**Subject:** FitzPatrick request for additional information: Emergency amendment to extend completion time of transformer to 21 days (EPID: L-2019-LLA-0214)

By letter dated October 4, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19277G085), Exelon Generation Company, LLC (Exelon, the licensee), submitted an emergency license amendment request (LAR) for a one-time change to the completion time for James A. FitzPatrick Nuclear Power Plant (JAF) Technical Specification (TS) 3.8.1, "AC Sources-Operating," Action A.3 from 7 days to 21 days. The NRC staff has reviewed the LAR and determined that additional information is required to complete the review. The NRC staff's request for additional information (RAI) is listed below. The RAI was clarified during a public phone call on October 4, 2019 and Exelon staff indicated that there was no proprietary or sensitive information. The Exelon staff requested, and NRC agreed, to a RAI response by October 6, 2019.

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. Please note that if you do not respond to this request by the agreed-upon date or provide an acceptable alternate date, we may deny your application for amendment under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108. If circumstances result in the need to revise the agreed upon response date, please contact me at (301) 415-3168 or via e-mail [Samson.Lee@nrc.gov](mailto:Samson.Lee@nrc.gov).

### REGULATORY BASIS

10 CFR 50.36, Technical Specifications  
10 CFR 50.63, Loss of all alternating current  
10 CFR 50.65, Requirements for monitoring the effectiveness of maintenance at nuclear power plants  
10 CFR 50 Appendix A: General Design Criterion 17 – Electric Power Systems

### REQUESTS FOR ADDITIONAL INFORMATION

#### RAI-EICB-1

For Surveillance 3.3.5.1.3, associated with Technical Specification (TS) table 3.3.5.1-1, functions 4.e and 5.e., and 3.3.5.1.6, associated with TS 3.3.5.1-1, functions 3.f and 3.g, what historical evidence is there to show that performance is satisfactory? For example, for Surveillance Requirement (SR) 3.3.5.1.3, have the most recent past several surveillances shown that the As-Found condition of the instruments is consistently within the As-Found Tolerance limits, and within the Allowable Value, especially when the Calibration Surveillance falls within the grace period? For SR 3.3.5.1.6, have the results of the Logic System Functional Test been consistently achieving the test acceptance criteria? Is there any other evidence that would indicate that these instrument channels have been performing reliably? Also, what does the LAR mean, exactly, when it says:

- The A and B Emergency Diesel Generators and their associated cooling water pumps and power supplies will be protected.
- The 4160V emergency buses will be protected.
- HPCI and Reactor Core Isolation Cooling (RCIC) will be protected.
- Both trains of Residual Heat Removal (RHR) and CSP will be protected.

#### RAI-EMIB-1

SRs 3.5.1.2, 3.5.2.5, 3.5.3.2, 3.6.1.9.1, 3.6.2.3.1, 3.7.1.1 – Explain why these valve position verifications must be delayed.

#### RAI-EMIB-2

SR 3.5.1.7 – Discuss whether or not the core spray and LPCI pumps have shown degradation in past surveillances, or have failed a surveillance.

#### RAI-EMIB-3

SRs 3.5.1.8 and 3.5.1.9 - Discuss whether or not the HPCI pump has shown degradation in past surveillances, or have failed a surveillance.

#### RAI-EMIB-4

SR 3.6.1.3.5 – Discuss whether or not any valves have shown degradation or failed this SR in the past.

#### RAI-EMIB-5

SRs 3.6.1.9.2 and 3.6.2.3.2 – Discuss whether any RHR pump has shown degradation in past surveillances, or has failed a surveillance.

#### RAI-EMIB-6

SRs 3.8.1.2 and 3.1.8.2 – Discuss whether or not there have been any recent failures of these surveillances.

#### RAI-EMIB-7

SR 3.8.1.6 – Discuss whether or not there have been any recent failures of this surveillance.

#### RAI-EMIB-8

SRs 3.8.1.4, 3.8.3.1, 3.8.3.2, 3.8.3.4 – Explain why these SRs must be delayed.

#### RAI-SCPB-1

Provide specific information for the NRC staff to adequately determine that delaying SRs 3.8.1.4 and 3.8.1.5 would have no adverse impact on the Emergency Diesel Generators (EDGs), if EDG operation becomes necessary during the extended surveillance period.

#### RAI-EEOB-1

In the LAR, Attachment 1, Page 7, the licensee stated: “The preferred resolution is to restore the installed transformer to service based on the age and limited functionality of the replacement transformer.”

Please explain the term “limited functionality” of the alternative of replacement transformer. List the major differences between the installed transformer and the replacement transformer. Please explain whether the replacement transformer will have an On-Load Tap Changer. If not, whether it will impact the current licensing basis.

#### RAI-STSB-1

The Risk Management Actions (RMAs) proposed in pages 10 and 11 of Attachment 5 of the LAR reference two 115kV transmission lines. The second RMA specifically identifies that Nine Mile Point Lines #1 and #4 will be controlled such that maintenance and switching on the lines will be done in emergency situations only. Per the Final Safety Analysis Report as updated in section 8.3.2.4 it describes that the line terminates at Nine Mile

Point Nuclear Station Unit 1 before being connected to the National Grid's South Oswego Substation. Does the RMA described above include controlling any work in the switchyard associated with Nine Mile Point Unit 1? If so please describe. If not will controls be put in place in the switchyard associated with Nine Mile Point Unit 1?

RAI-SCPB-1

Provide specific information for the NRC staff to adequately determine that delaying SRs 3.8.1.4 and 3.8.1.5 will have no adverse impact on the EDGs, if the EDG operation becomes necessary during the extended surveillance period.

Thanks,  
Sam Lee

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