

From: [Lee, Samson](#)
To: [Villar, Enrique:\(Exelon Nuclear\)](#)
Subject: FitzPatrick request for additional information: License Amendment Request for Change to the Technical Specifications to Revise the Allowable Value for Reactor Water Cleanup (RWCU) System Primary Containment (EPID: L-2019-LLA-0190)
Date: Thursday, March 05, 2020 7:43:00 AM

By letter dated September 5, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19248B085), as supplemented by letter dated November 6, 2019 (ADAMS Accession No. ML19310D579), Exelon Generation Company, LLC (Exelon, the licensee), submitted a license amendment request (LAR) proposing changes to the technical specifications (TS) for the James A. FitzPatrick Nuclear Power Plant (JAF). The proposed changes revise the JAF TS Allowable Value for Reactor Water Cleanup (RWCU) System isolation on low Reactor Pressure Vessel (RPV) water level from Level 3 (= 177 inches) to Level 2 (= 107 inches) in Tables 3.3.6.1-1 and 3.3.5.2-1. The NRC staff has reviewed the LAR and determined that additional information is required to complete the review. The NRC staff's requests for additional information (RAIs) are listed below. These RAIs are in the instrumentation and controls area. A clarification call was held on March 3, 2020. The Exelon staff indicated that there was no proprietary or sensitive information. The Exelon staff requested, and NRC agreed, to a RAI response by April 6, 2020.

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.

Instrumentation and Controls

The following information is needed to verify compliance with 10 CFR 50.36(c)(1)(ii)(A). To assess the acceptability of the setpoints, the staff is using the guidance of NRC Regulatory Guide 1.105, Revision 3, to evaluate whether the licensee has reasonably demonstrated that the channel setting has adequate margin to enable the timely correction of an abnormal situation that could exceed safety limits.

EICB-RAI 1

The Elevated Static Pressure Effect for Rosemount 1153 transmitters (SP1) is described in Section 6.2.1.6 of calculations JAF-CALC-NBI-00205, Rev. 0 and JAF-CALC-NBI-00206, Rev. 0. The calculations consider the elevated static pressure zero shift effect as a random term and not as a bias term. Based on the range (variation) of possible reactor pressure conditions that are expected to be present during design basis events, and the manner in which the static pressure zero shift has been accounted for in the calibration of the transmitter, please explain why this effect has been treated as a random uncertainty term. If the transmitter calibration procedures have been used to account for the elevated static pressure zero effect, then describe the provisions within the calibration procedure or within the calculation methodology that enable the resulting estimated static pressure effect uncertainty to be treated as a random error term.

EICB-RAI 2

The Radiation Effect for Rosemount 1153 transmitters (RE1) is described in Section 6.2.1.4 of calculations JAF-CALC-NBI-00205, Rev. 0 and JAF-CALC-NBI-00206, Rev. 0. The calculations assume this effect to be zero (0). Please justify why the radiation effect on the reactor water level transmitters located inside the reactor building may be assumed to be zero (0) for the high energy line break events expected to be mitigated by the RWCU isolation system.