

From: Kuntz, Robert
Sent: Friday, May 8, 2020 9:14 AM
To: Steinman, Rebecca L:(Exelon Nuclear)
Subject: Plan for the Audit of the Quad Cities Nuclear Power Station, Units 1 and 2, Main Steam Isolation Valve Leakage Rates License Amendment Request (EPID L-2019-LLA-0045)

Ms. Steinman,

The NRC staff has determined that an electronic audit is necessary to support its review of the Quad Cities Nuclear Power Station, Units 1 and 2, license amendment request to increase allowable main steam isolation valve leakage rates and revise secondary containment surveillance. The following is the plan for the audit. If Exelon has any questions or requires any additional information to support this request contact me.

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REGULATORY AUDIT PLAN

TO SUPPORT REVIEW OF LICENSE AMENDMENT REQUEST

CONCERNING CHANGES TO TECHNICAL SPECIFICATIONS TO INCREASE ALLOWABLE

MAIN STEAM ISOLATION VALVE LEAKAGE RATES AND REVISE

SECONDARY CONTAINMENT SURVEILLANCE

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. 50-254 AND 50-265

EPID L-2019-LLA-0045

1.0 BACKGROUND

By letter dated March 31, 2020 (ADAMS Accession No. ML20091H576), Exelon Generation Company, LLC, (Exelon) submitted its response to the U.S. Nuclear Regulatory Commission (NRC) staff's "Request for Additional Information [RAI] for Quad Cities Request to Revise Technical Specifications to Increase MSIV Leakage Rate (L-2019-LLA-0045)," dated January 31, 2020 (ADAMS Accession No. ML20031C833). The RAI was based on the NRC staff's review of Exelon's request for an amendment to Renewed Facility Operating License Nos. DPR-29 for Quad Cities Nuclear Power Station (QCNPS), Unit 1 and DPR-30 for QCNPS, Unit 2, dated January 31, 2020 (ADAMS Accession No. ML20031C833). The proposed change would increase the main steam isolation valve (MSIV) leakage rate limit for all four steam lines from 86 to 156 standard cubic feet per hour (scfh) for QCNPS, Unit 1 and from 86 to 218 scfh for QCNPS, Unit 2; credit the residual heat removal (RHR) drywell spray system and add a new technical specification (TS) 3.6.2.6, "Residual Heat Removal (RHR) Drywell Spray"; and adopt Technical Specification Task Force Traveler (TSTF) 551, "Revise Secondary Containment Surveillance Requirements."

On January 29, 2020, a closed meeting was held between the NRC staff and representatives of Exelon (meeting summary available at ADAMS Accession No. ML20044F188). The purpose of

the meeting was to discuss Exelon's planned approach for responding to NRC RAI No. ARCB-RAI-3. NRC RAI No. ARCB-RAI-3 requested information on the licensee's aerosol settling velocity and model and its accounting for the credit of drywell sprays. During the meeting, Exelon staff presented information on its proposed proprietary method and approach to quantify conservatism with input parameters and the proposed aerosol settling velocity and model with case studies to support the NRC RAI response.

The NRC staff has determined the need for a regulatory audit to be conducted in accordance with Office of Nuclear Reactor Regulation Office Instruction LIC-111, Revision 1, "Regulatory Audits" (ADAMS Accession No. ML19226A274), for the NRC staff to examine the licensee's non-docketed information with the intent to gain a better understanding of Exelon's responses to the NRC RAIs, to verify information, and to identify information that may require docketing to support the basis of the NRC staff's licensing decision.

2.0 REGULATORY AUDIT BASIS

The NRC staff (i.e., audit team) will perform the audit to support its evaluation of whether the licensee's request meets the requirements of Section 50.67, "Accident source term," and Appendix A, General Design Criterion (GDC) 19, "Control room," of Title 10 of the *Code of Federal Regulation* and continues to meet the guidance in Regulatory Guide (RG) 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," Revision 0, dated July 2000 (ADAMS Accession No. ML003716792) and the Standard Review Plan (SRP) Section 15.0.1, "Radiological Consequence Analyses Using Alternative Source Term," Revision 0, dated July 2000 (ADAMS Accession No. ML003734190).

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The scope of this regulatory audit will include information referenced in Exelon's responses to ARCB-RAI-3 provided in the letter dated March 31, 2020.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The NRC staff requests that the licensee have the following information readily available and accessible for the NRC staff's review via an internet-based portal:

- Calculation No. QDC-0000-N-2373 Rev. 0, "AST LOCA Aerosol Removal Factors and Margin Assessment" (Ref. 9.60). The NRC staff notes that Calculation QDC-0000-N-1481 Rev. 4 states, in part, that "for additional information on the models, data, and results refer to QDC-0000-N-2373."

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff:

- Richard Clement, NRR/DRA/ARCB, Lead Technical Reviewer
- Mark Blumberg, NRR/DRA/ARCB, Technical Reviewer
- Michael Salay, RES/DSA/FSCB, Technical Reviewer
- Robert Kuntz, NRR/DORL/LPL3, Project Manager

6.0 LOGISTICS

The audit will be conducted from May 11, 2020, to May 15, 2020, through an online portal (also known as electronic portal, ePortal, electronic reading room) established by Exelon.

If requested, the audit team will conduct a telephone conference with the licensee for the purposes of introducing the team, discussing the scope of the audit, and describing the information to be made available on the internet portal. The audit team will also confirm with the licensee if the information made available on the online portal contains any sensitive or proprietary information. The audit team may request that representatives of Exelon answer audit team questions during the audit related to information provided on the portal at a mutually agreeable day and time by telephone conference.

The NRC staff does not foresee the need for an onsite visit or in-person discussions between the NRC and licensee staff to discuss information to be provided on the portal at this time. However, if the need for a such a meeting is identified in the future, the audit plan will be

revised, and the schedule for the audit will be adjusted accordingly. The NRC project manager will coordinate any changes to the audit schedule and location with the licensee.

7.0 SPECIAL REQUESTS

The audit team would like access to the documents listed in Section 4.0 above through an online portal (also known as eDocs, electronic reading room, ePortal) that allows the audit team to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the audit team has access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff participating in the audit.
- The online portal will be sufficiently secure to prevent the NRC staff and contractors from printing, saving, downloading, or collecting any information on the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgement by each user.

Username and password information should be provided directly to the NRC staff. The NRC project manager will provide to Exelon the names and contact information of the NRC staff who will be participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

An audit summary, which may be public, will be prepared within 60 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the NRC staff will issue requests for additional information to the licensee.

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