From: Purnell, Blake

Sent: Thursday, February 10, 2022 3:12 PM **To:** Christian.Williams@constellation.com

Cc: Salgado, Nancy; David.Gudger@constellation.com

Subject: Constellation Energy Generation, LLC - Request for Additional Information

Regarding Fleet License Amendment Request to Adopt TSTF-541

Attachments: RAI CEG TSTF-541.pdf

Mr. Williams.

By application dated September 27, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21181A180), Exelon Generation Company, LLC submitted a license amendment request for Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. FitzPatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant. On February 1, 2022 (ADAMS Accession No. ML22032A333), Exelon Generation Company, LLC was renamed Constellation Energy Generation, LLC.

The proposed amendments would revise the technical specifications (TSs) for each facility based on Technical Specification Task Force (TSTF) traveler TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position" (ADAMS Accession No. ML19240A315). The proposed amendments would also make similar changes to surveillance requirements not included in TSTF 541, Revision 2, and additional editorial changes to the TSs.

The NRC staff is reviewing the application and has determined that additional information is needed to complete the review. A response to the attached request for additional information is requested to be provided by March 11, 2022. If you have any questions, please contact me by email or phone at (301) 415-1380.

Sincerely,

Blake Purnell, Project Manager

Plant Licensing Branch III

Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission

Docket Nos. STN 50-456, STN 50-457, STN

50-454, STN 50-455, 50-317, 50-318, 50-461,

50-237, 50-249, 50-333, 50-373, 50-374,

50-352, 50-353, 50-410, 50-277, 50-278,

50-254, 50-265, and 50-244

EPID L-2021-LLA-0169

OFFICE	NRR/DORL/LPL3/PM	NRR/DSS/STSB/BC	NRR/DORL/LPL3/BC
NAME	BPurnell	VCusumano	NSalgado
DATE	2/10/22	2/9/22	2/9/22

Hearing Identifier: NRR_DRMA

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Subject: Constellation Energy Generation, LLC - Request for Additional Information

Regarding Fleet License Amendment Request to Adopt TSTF-541

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From: Purnell, Blake

Created By: Blake.Purnell@nrc.gov

Recipients:

"Salgado, Nancy" <Nancy.Salgado@nrc.gov>

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Tracking Status: None

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REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO ADOPT TSTF-541

BRAIDWOOD STATION, UNITS 1 AND 2

BYRON STATION, UNIT NOS. 1 AND 2

CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2

CLINTON POWER STATION, UNIT NO. 1

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

LASALLE COUNTY STATION, UNITS 1 AND 2

LIMERICK GENERATING STATION, UNITS 1 AND 2

NINE MILE POINT NUCLEAR STATION, UNIT 2

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NOS. STN 50-456, STN 50-457, STN 50-454, STN 50-455,

50-317, 50-318, 50-461, 50-237, 50-249, 50-333, 50-373, 50-374, 50-352,

50-353, 50-410, 50-277, 50-278, 50-254, 50-265, AND 50-244

By application dated September 27, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21181A180), Exelon Generation Company, LLC submitted a license amendment request for Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station (Dresden), Units 2 and 3; James A. FitzPatrick Nuclear Power Plant (FitzPatrick); LaSalle County Station, Units 1 and 2; Limerick Generating Station (Limerick), Units 1 and 2; Nine Mile Point Nuclear Station, Unit 2 (NMP-2); Peach Bottom Atomic Power Station (Peach Bottom), Units 2 and 3; Quad Cities Nuclear Power Station (Quad Cities), Units 1 and 2; and R. E. Ginna Nuclear Power Plant. On February 1, 2022 (ADAMS Accession No. ML22032A333), Exelon Generation Company, LLC (the licensee) was renamed Constellation Energy Generation, LLC.

The proposed amendments would revise the technical specifications (TSs) for each facility based on Technical Specification Task Force (TSTF) traveler TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position" (ADAMS Accession No. ML19240A315). The proposed amendments would also

make similar changes to surveillance requirements (SRs) not included in TSTF-541, Revision 2, and additional editorial changes to the TSs.

The U.S. Nuclear Regulatory Commission staff has reviewed the application and determined that the information below is needed to complete its review.

Request Additional Information (RAI) 1

The TS markups provided in the application include several changes that are not consistent with TSTF-541, Revision 2, and are not identified as variations in the application. The differences between the markup and the changes in TSTF-541, Revision 2, are as follows:

<u>Dresden</u>

In its TS markup for SR 3.6.4.3.3, the licensee added "except for dampers **and valves** that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup does not include valves.

<u>Fitzpatrick</u>

In its TS markup for SR 3.6.4.3.3, the licensee added "except for dampers **and valves** that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup does not include valves.

Limerick

In its TS markup for SR 4.6.5.3.d.2, the licensee added "except for **valves** that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup includes only dampers, not valves for this SR.

NMP-2

In its TS markup for SR 3.6.4.3.3, the licensee added "except for dampers **and valves** that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup does not include valves.

Peach Bottom

In its TS markup for SR 3.6.4.3.3, the licensee added "except for **valves** that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup only includes dampers, not valves.

Quad Cities

In its TS markup for SR 3.6.4.3.3, the licensee added "except for dampers **and valves** that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup does not include valves.

In its TS markup for SR 3.7.4.3, the licensee added "except for **dampers** that are locked, sealed, or otherwise secured in the actuated position." The TSTF-541 markup includes dampers and valves.

Confirm that these differences are variations from TSTF-541, Revision 2, that are necessary to reflect plant-specific configurations. Otherwise, provide an explanation for these variations from the TSTF traveler.

RAI 2

The TS markup for Limerick, Unit 2, proposes to add the following footnote to SR 4.7.3.c.1: "Except for valves that [are] locked, sealed, or otherwise secured in the actuated position." However, the word "are" is missing as indicated by the bracketed text. Provide the correct wording for this proposed footnote.