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To: [Helker, David P:\(GenCo-Nuc\)](#)
Cc: ["Gropp Jr, Richard W:\(Exelon Nuclear\)"](#)
Subject: Peach Bottom Units 2 and 3 - Request for Additional Information - TSTF-505 (EPID L-2019-LLA-0120)
Date: Monday, December 21, 2020 2:56:00 PM

Dear Mr. Helker,

By application dated May 29, 2020, Exelon Generation Company, LLC (the licensee) submitted a license amendment request (LAR) for Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20150A007). The proposed amendment would modify TS requirements to permit the use of Risk Informed Completion Times (RICT) in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b," (ADAMS Accession No. ML18183A493). A model safety evaluation was provided by the NRC to the TSTF on November 21, 2018 (ADAMS Accession No. ML18253A085).

The Nuclear Regulatory Commission's (NRC) staff is reviewing your submittal and has determined that additional information is needed to complete its review. The purpose of this email is to provide a draft copy of a request for additional information (RAI) for your review to ensure that:

- the draft RAI question is understandable,
- the basis for the question is clear, and
- to determine whether the information being requested has been previously docketed.

The specific requests for additional information (RAI) questions are provided below.

RAI #1

By application dated May 29, 2020, Exelon Generation Company, LLC (the licensee) submitted a license amendment request (LAR) for Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20150A007). Section 2.3 of LAR Attachment 1 states that the application of a risk-informed completion time (RICT) will be evaluated using the guidance provided in Nuclear Energy Institute (NEI) Topical Report NEI 06-09, Revision 0-A, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines, Industry Guidance Document," dated November 6, 2006 (ADAMS Package Accession No. ML122860402) (hereafter NEI 06-09). NEI 06-09 was approved by the NRC on May 17, 2007 (ADAMS Accession No. ML071200238). The NRC safety evaluation (SE) for NEI 06-09, states, "[t]he impact of the proposed change should be monitored using performance measurement strategies." NEI 06-09 considers the use of NUMARC 93-01, Revision 4F, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants (ADAMS Accession No. ML18120A069), as endorsed by Regulatory Guide (RG) 1.160, Revision 4 (ADAMS Accession No. ML18220B281), for the implementation of the Maintenance Rule. NUMARC 93-01, Section 9.0, contains guidance for the establishment of performance criteria.

Furthermore, Section 2.3 of LAR Attachment 1 states:

In addition, the NEI 06-09-A, Revision 0 methodology satisfies the five key safety principles specified in Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications," dated August 1998 (ADAMS Accession No. ML003740176), relative to the risk impact due to the application of a RICT.

NRC staff position C.3.2 provided in RG 1.177 for meeting the fifth key safety principle acknowledges the use of performance criteria to assess degradation of operational safety over a period of time. It is unclear to the NRC staff how the licensee's process for the risk-informed application captures performance monitoring for the structures, systems, and components (SSCs) within-scope of the application. In light of these observations, address either (a) or (b) below.

a) Confirm that the Peach Bottom Maintenance Rule program incorporates the use of performance criteria to evaluate SSC performance as described in the NRC-endorsed guidance in NUMARC 93-01.

OR

b) Describe the approach/method used by Peach Bottom for SSC performance monitoring as described in Regulatory Position C.3.2 referenced in RG 1.177 for meeting the fifth key safety principle. In the description, include criteria (e.g., qualitative or quantitative), along with the appropriate risk metrics, and explain how the approach and criteria demonstrate the intent to monitor the potential degradation of SSCs in accordance with the NRC SE for NEI 06-09.

RAI #2

RG 1.174, Revision 3 states the licensee should assess whether the proposed licensing basis change meets the defense-in-depth principle by not over-relying on programmatic activities as compensatory measures associated with the change in the licensing basis. RG 1.174 further elaborates that human actions (e.g., manual system actuation) are considered as one type of compensatory measure.

In LAR Attachment 5, if the only diverse means identified are the manual actuations, then provide a summary of the evaluation that these means are adequate. For example, confirm that these "manual actuations" identified as the only diverse means are modeled in the plant PRA, defined in plant operation procedures to which operators are trained, and confirm the manual action completion times associated with these actions are evaluated as adequate.

This information is needed to demonstrate compliance with 10 CFR 50.36 and 50.55(a).

Please submit your response to this request for additional information by January 29th. A clarification call was not needed.

If you have questions please don't hesitate to contact me.

Thanks!
-Jenny