



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

September 2, 2014

Mr. Michael J. Pacilio
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR CLINTON POWER STATION, UNIT 1

Dear Mr. Pacilio:

On August 6, 2014, the U.S. Nuclear Regulatory Commission (NRC) staff completed its mid-cycle performance review of Clinton Power Station, Unit 1. The NRC reviewed the most recent quarterly performance indicators in addition to inspection results and enforcement actions from July 1, 2013 through June 30, 2014. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that the performance at Clinton Power Station, Unit 1, during the most recent quarter was within the Regulatory Response column of the NRC's Reactor Oversight Process (ROP) Action Matrix based on all inspection findings being classified as having very low safety significance (i.e., Green) and one performance indicator requiring additional NRC oversight (i.e., White). Specifically, the Unplanned Scrams per 7000 Critical Hours PI crossed the Green-White threshold and caused Clinton Unit 1 to transition from the Licensee Response column to the Regulatory Response column of the ROP Action Matrix in the fourth quarter of 2013. The NRC informed you of this transition in a letter dated February 5, 2014 (ADAMS Accession No. ML14037A328).

The NRC completed a supplemental inspection per Inspection Procedure 95001 for the White performance indicator on July 28, 2014, as documented in our letter to you dated August 28, 2014 (ADAMS Accession No. ML14240A522). Since the White performance indicator had returned to Green in the second quarter of 2014, Clinton Power Station, Unit 1 returned to the Licensee Response column of the ROP Action Matrix as of the date of that letter in accordance with Inspection Manual Chapter 0305.

Therefore, the NRC plans to conduct ROP baseline inspections at your facility. In addition, the NRC also plans to conduct several inspections of your preparations to operate an Independent Spent Fuel Storage Installation (ISFSI). These inspections include IP 60853, "Onsite Fabrication of Components and Construction of an ISFSI," IP 60856 and IP 60856.1, "Review of 10 CFR 72.212(b) Evaluations," IP 60854.1, "Preoperational Testing of Independent Spent Fuel Storage Facility Installation at Operating Plants," and IP 60855.1, "Operation of an Independent Spent Fuel Storage Installation at Operating Plants."

Although plant performance was within the Licensee Response column of the Action Matrix, the NRC has not yet finalized the significance of a security related finding as described in NRC Inspection Report 05000461/2014201 sent to you on July 29, 2014 (ADAMS Accession No. ML14196A313). The final significance determination may affect the NRC's assessment of plant performance and the enclosed inspection plan.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site is being coordinated with your staff. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

M. Pacilio

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Please contact Christine Lipa at 630-829-9703 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Anne T. Boland, Director
Division of Reactor Projects

Docket No. 50-461
License No. NPF-62

Enclosure:
Clinton Power Station Inspection/Activity Plan

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M. Pacilio

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Clinton
Inspection / Activity Plan
09/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			ISFSI - REVIEW OF 10 CFR 72.212 EVALUATIONS		2
1	08/01/2014	10/01/2014	IP 60856	Review of 10 CFR 72.212(b) Evaluations	
			ISFSI - REVIEW OF 10 CFR 72.212 EVALUATIONS		3
1	08/01/2014	11/30/2014	IP 60856.1	Review of 10 CFR 72.212(b) Evaluations at Operating Plants	
			ISFSI - ISFSI ON-SITE FABRICATION INSPECTION		3
1	09/01/2014	11/29/2014	IP 60853	On-Site Fabrication Of Components And Construction On An ISFSI	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	09/22/2014	09/26/2014	IP 71124.05	Radiation Monitoring Instrumentation	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	10/06/2014	10/10/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
			STRIKE - STRIKE PREPS - (AS NEEDED)		3
1	11/03/2014	12/16/2014	IP 92709	Licensee Strike Contingency Plans	
			STRIKE - PLANS DURING STRIKE INSPECTN (AS NEEDED)		3
1	12/01/2014	12/31/2014	IP 92711	Continued Implementation Of Strike Plans During An Extended Strike	
			BI ENG - TRIENNIAL HEAT SINK INSPECTION		2
1	01/05/2015	01/30/2015	IP 7111107T	Heat Sink Performance	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	02/09/2015	02/13/2015	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
			BI MODS - MODIFICATIONS /50.59		3
1	03/02/2015	03/20/2015	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
			OL PREP - INIT EXAM/MARCH 2015		3
1	03/09/2015	03/13/2015	W90326	OL - INITIAL EXAM - 2015 MAR-APR - CLINTON	
			OL EXAM - INIT EXAM/MARCH 2015		3
1	03/16/2015	03/27/2015	W90326	OL - INITIAL EXAM - 2015 MAR-APR - CLINTON	
			BI ISI - ISI INSPECTION		1
1	04/27/2015	05/15/2015	IP 7111108G	Inservice Inspection Activities - BWR	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	05/04/2015	05/08/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
			PI&R - BIENNIAL PI&R INSPECTION		4
1	08/17/2015	09/04/2015	IP 71152B	Problem Identification and Resolution	
			BI OLRQ - BIENNIAL REQUALPROGRAM INSPECTION		2
1	06/08/2015	06/12/2015	IP 7111111B	Licensed Operator Requalification Program	

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

Clinton
Inspection / Activity Plan
09/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			ISFSI - ISFSI PREOP TESTING AND PLANS		2
1	07/01/2015	08/31/2015	IP 60854.1	Preoperational Testing of Independent Spent Fuel Storage Facility Installation at Operating Plants	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	07/27/2015	07/31/2015	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1	07/27/2015	07/31/2015	IP 71151	Performance Indicator Verification	
			ISFSI - ISFSI 72.212 REVIEW		2
1	08/01/2015	08/31/2015	IP 60856	Review of 10 CFR 72.212(b) Evaluations	
			ISFSI - INITIAL LOADING INSPECTION		2
1	09/01/2015	12/31/2015	IP 60855.1	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	10/26/2015	10/30/2015	IP 71124.02	Occupational ALARA Planning and Controls	
			BI EPEX - EP EXERCISE / PI VERIFICATION		2
1	11/16/2015	11/20/2015	IP 7111407	Exercise Evaluation - Hostile Action (HA) Event	
1	11/16/2015	11/20/2015	IP 7111408	Exercise Evaluation – Scenario Review	
1	11/16/2015	11/20/2015	IP 71151	Performance Indicator Verification	

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