UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE RD. SUITE 210
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January 2, 2018

Mr. Bryan C. Hanson
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 — NRC TEMPORARY INSTRUCTION 2515/191, MITIGATION STRATEGIES, SPENT FUEL POOL INSTRUMENTATION AND EMERGENCY PREPAREDNESS INSPECTION REPORT 05000237/2017011 and 05000249/2017011

Dear Mr. Hanson:

On December 1, 2017, the U.S. Nuclear Regulatory Commission (NRC) completed a Temporary Instruction 2515/191, "Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans" inspection at your Dresden Nuclear Power Station, Units 2 and 3. On December 19, 2017, the NRC inspectors discussed the results of this inspection with Mr. John Washko and other members of your staff. The results of this inspection are documented in the enclosed report.

The inspection examined activities conducted under your license as they relate to the implementation of mitigation strategies and spent fuel pool instrumentation orders (EA–12–049 and EA–12–051) and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans, your compliance with the Commission's rules and regulations, and with the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and records, observation of activities, and interviews with station personnel.

The NRC inspectors did not identify any findings or violations during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Request for Withholding."

Sincerely,

/RA/

Ann Marie Stone, Team Leader
Technical Support Staff
Division of Reactor Projects

Docket Nos. 50–237; 50–249
License Nos. DPR–19; DPR–25

Enclosure:
Inspection Report 05000237/2017011;
05000249/2017011

cc: Distribution via LISTSERV®

Letter to Bryan Hanson from Ann Marie Stone dated January 2, 2018

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 — NRC TEMPORARY INSTRUCTION 2515/191, MITIGATION STRATEGIES, SPENT FUEL POOL INSTRUMENTATION AND EMERGENCY PREPAREDNESS INSPECTION REPORT 05000237/2017011 and 05000249/2017011

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos:	05000237; 05000249
License Nos:	DPR–19; DPR–25
Report No:	05000237/2017011; 05000249/2017011
Licensee:	Exelon Generation Company, LLC
Facility:	Dresden Nuclear Power Station, Units 2 and 3
Location:	Morris, IL
Dates:	November 27 through December 1, 2017
Inspectors:	Stuart Sheldon, Project Engineer Charles Zoia, Senior Operations Engineer Gregory Roach, Senior Resident Inspector Lionel Rodriguez, Reactor Inspector
Approved by:	Ann Marie Stone, Team Leader Technical Support Staff Division of Reactor Projects

SUMMARY

Inspection Report 05000237/2017011, 05000249/2017011; 11/27/2017 – 12/01/2017; Dresden Nuclear Power Station, Units 2 & 3; Temporary Instruction 2515/191 Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/ Staffing/Multi-Unit Dose Assessment Plans.

This inspection was performed by three NRC regional inspectors and one resident inspector. One Green finding associated with performance verification was identified by the licensee and since the finding did not involve a violation, no further documentation per NRC Inspection Manual Chapter 0612 Appendix B is required. The significance of inspection findings is indicated by their color (i.e., greater than Green, or Green, White, Yellow, Red) and determined using Inspection Manual Chapter (IMC) 0609, “Significance Determination Process,” dated April 29, 2015. Cross-cutting aspects are determined using IMC 0310, “Aspects Within the Cross-Cutting Areas,” dated December 4, 2014. All violations of NRC requirements are dispositioned in accordance with the NRC’s Enforcement Policy, dated November 1, 2016. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG–1649, “Reactor Oversight Process,” Revision 6.

NRC–Identified and Self-Revealing Findings

None.

REPORT DETAILS

4. OTHER ACTIVITIES

4OA5 Other Activities (TI 2515/191)

The objective of Temporary Instruction (TI) 2515/191, "Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans," is to verify the licensee has adequately implemented the mitigation strategies as described in the licensee's "Final Integrated Plan [for] Mitigation Strategies for a Beyond-Design-Basis External Event" (ADAMS Accession No. ML16230A487), and the NRC's safety evaluation (ADAMS Accession No. ML17037C929) and to verify the licensee installed reliable water-level measurement instrumentation in their spent fuel pool. The purpose of this TI was also to verify the licensee had implemented Emergency Preparedness enhancements as described in their site-specific submittals and NRC safety assessments, including multi-unit dose assessment capability and enhancements to ensure staffing is sufficient and communications can be maintained during such an event.

The inspection also verifies plans for complying with NRC Orders EA–12–049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (ADAMS Accession No. ML12054A736) and EA–12–051, Order Modifying Licenses With Regard to Reliable Spent Fuel Pool Instrumentation (ADAMS Accession No. ML12054A679) are in place and are being implemented by the licensee. Additionally, the inspection verified implementation of staffing and communications information provided in response to the March 12, 2012, request for information letter and multiunit dose assessment information provided per COMSECY–13–0010, Schedule and Plans for Tier 2 Order on Emergency Preparedness for Japan Lessons Learned, dated March 27, 2013, (ADAMS Accession No. ML12339A262).

The inspectors discussed the plans and strategies with plant staff, reviewed documentation, and where appropriate, performed plant walk downs to verify the strategies could be implemented as stated in the licensee's submittals and the NRC staff prepared safety evaluation. For most strategies, this included verification that the strategy was feasible, procedures and/or guidance had been developed, training had been provided to plant staff, and required equipment had been identified and staged. Specific details of the team's inspection activities are described in the following sections.

This inspection closes TI 2515/191 for the Dresden Nuclear Power Station, Units 2 and 3.

.1 Mitigation Strategies for Beyond-Design Basis External Events

a. Inspection Scope

The inspectors examined the licensee's established guidelines and implementing procedures for the beyond-design basis mitigation strategies. The inspectors assessed how the licensee coordinated and documented the interface/transition between existing off-normal and emergency operating procedures with the newly developed mitigation strategies. The inspectors selected a number of mitigation strategies and conducted

plant walk downs with licensed operators and responsible plant staff to assess: the adequacy and completeness of the procedures; familiarity of operators with the procedure objectives and specific guidance; staging and compatibility of equipment; and the practicality of the operator actions prescribed by the procedures, consistent with the postulated scenarios.

The inspectors verified a preventive maintenance program had been established for the Diverse and Flexible Coping Strategies (FLEX) portable equipment and periodic equipment inventories were in place and being conducted. Additionally, the inspectors examined the introductory and planned periodic/refresher training provided to the Operations staff most likely to be tasked with implementation of the FLEX mitigation strategies. The inspectors also reviewed the introductory and planned periodic training provided to the Emergency Response Organization personnel. Documents reviewed are listed in the attachment.

b. Assessment

Based on samples selected for review, the inspectors verified the licensee satisfactorily implemented appropriate elements of the FLEX strategy as described in the plant specific submittals and the associated safety evaluation and determined the licensee is in compliance with NRC Order EA–12–049. The inspectors verified the licensee satisfactorily:

- developed and issued FLEX Support Guidelines (FSG) to implement the FLEX strategies for postulated external events;
- integrated their FSGs into their existing plant procedures such that entry into and departure from the FSGs were clear when using existing plant procedures;
- protected FLEX equipment from site-specific hazards;
- developed and implemented adequate testing and maintenance of FLEX equipment to ensure their availability and capability;
- trained their staff to assure personnel proficiency in the mitigation of beyond-design basis events; and
- developed the means to ensure the necessary off-site FLEX equipment would be available from off-site locations.

The inspectors verified non-compliances with current licensing requirements, and other issues identified during the inspection were entered into the licensee's corrective action program as appropriate.

c. Findings

No findings were identified.

.2 Spent Fuel Pool Instrumentation

a. Inspection Scope

The inspectors examined the licensee’s newly installed spent fuel pool instrumentation. Specifically, the inspectors verified the sensors were installed as described in the plant specific submittals and the associated safety evaluation and that the cabling for the power supplies and the indications for each channel are physically and electrically

separated. Additionally, environmental conditions and accessibility of the instruments were evaluated. Documents reviewed are listed in the attachment.

b. Assessment

Based on samples selected for review, the inspectors determined the licensee satisfactorily installed and established control of the spent fuel pool (SFP) instrumentation as described in the plant specific submittals and the associated safety evaluation and determined the licensee is in compliance with NRC Order EA–12–051. The inspectors verified the licensee satisfactorily:

- installed the SFP instrumentation sensors, cabling and power supplies to provide physical and electrical separation as described in the plant specific submittals and safety evaluation;
- installed the SFP instrumentation display in the location, environmental conditions and accessibility as described in the plant specific submittals;
- trained their staff to assure personnel proficiency with the maintenance, testing, and use of the SFP instrumentation; and
- developed and issued procedures for maintenance, testing and use of the reliable SFP instrumentation.

The inspectors verified non-compliances with current licensing requirements, and other issues identified during the inspection were entered into the licensee's corrective action program.

c. Findings

No findings were identified.

.3 Staffing and Communication Request for Information

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs, the inspectors verified the licensee has implemented required changes to staffing, communications equipment and facilities to support a multi-unit extended loss of AC power (ELAP) scenario as described in the licensee's staffing assessment and the NRC safety assessment. The inspectors also verified the licensee has implemented multi-unit dose assessment (including releases from spent fuel pools) capability using the licensee's site-specific dose assessment software and approach as described in the licensee's multi-unit dose assessment submittal. Documents reviewed are listed in the attachment.

b. Assessment

The inspectors reviewed information provided in the licensee's multi-unit dose submittal and in response to the NRC's March 12, 2012, request for information letter and verified that the licensee satisfactorily implemented enhancements pertaining to Near-Term Task Force Recommendation 9.3 response to a large scale natural emergency event that results in an ELAP to all site units and impedes access to the site. The inspectors verified the following:

- the licensee satisfactorily implemented required staffing change(s) to support a multi-unit ELAP scenario;
- Emergency Preparedness communications equipment and facilities are sufficient for dealing with a multi-unit ELAP scenario; and
- the licensee implemented multi-unit dose assessment capabilities (including releases from spent fuel pools) using the licensee's site-specific dose assessment software and approach.

The inspectors verified non-compliances with current licensing requirements, and other issues identified during the inspection were entered into the licensee's corrective action program.

c. Findings

No findings were identified.

4OA6 Management Meeting

.1 Exit Meeting Summary

On December 19, 2017, the inspectors presented the inspection results to Mr. John Washko and other members of the licensee's staff. The licensee acknowledged the issues presented. The inspectors confirmed none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

P. Karuba Jr.,	Site Vice President
J. Washko,	Station Plant Manager
P. Hansett,	Operations Director
J. Reda,	Engineering Manager
D. Thomas,	Training Director
H. Bush,	Radiation Protection Manager
D. Doggett,	Emergency Preparedness Manager
D. Francis,	Operations Services Manager
K. Koller,	Operations Support Manager
M. Martin,	Operations Support Manager
B. Franzen,	Regulatory Assurance Manager
R. Bauman,	Shift Operations Superintendent
N. Kopczynski,	Engineering
D. Walker,	Regulatory Assurance – NRC Coordinator

U.S. Nuclear Regulatory Commission

Ann Marie Stone, Team Leader, Division of Reactor Projects, Technical Support Staff

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

Issue Reports Initiated as a Result of the Inspection
- IR 4078613; NRC FLEX Inspection Reveals Hose Trailer Issue; 11/28/17
- IR 4078616; NRC FLEX Inspection Identified Issue FLEX/SAWA Manifold Cart; 11/28/17
- IR 4078781; NRC FLEX Inspection Identified Flex Deployment Route Blocked; 11/29/17
- IR 4079002; NRC FLEX Inspection: Preferred Hose Not Used for Fuel XFR; 11/29/17
- IR 4079209; DGA-22 Station Blackout Procedure Revision; 11/30/2017
- IR 4079273; NRC FLEX Inspection: FSG-11 Attachment A Does Not Have Drwgs; 11/30/17
- IR 4079320; NRC FLEX Inspection: DOS 0010–43 Flex Inventory Issues; 11/30/17
- IR 4079379; NRC FLEX Inspection: FSG-11 Enhancement Identified; 11/30/17
- IR 4079397; NRC FLEX Inspection: Enhancements for FSG-08 and FSG-11; 11/30/17
- IR 4079401; No Provision to Move Back-up Sat Dish Equip During Floods; 11/30/17
- IR 4079455; Wet Pump Run not Performed on FLEX Flood Pumps; 11/30/17
- IR 4079486; DOA 0010-04 Enhancements Identified; 11/30/17
- IR 4079506; Red Alarm LED Lit on Spent Fuel Pool Level UPS; 11/30/17
- IR 4079794; NRC FLEX Inspection Discovered FSG-60 Procedure Enhancement; 12/1/17

Issue Reports Reviewed
- IR 2664050; Safety Diesel Skid on Barge; 5/2/16
- IR 2679823; “A” Flex Building Cable Hatch Misaligned, Not Secured Closed; 06/09/16
- IR 2689057; Park-It-Dolly in B Flex Bldg is Damaged; 07/05/16
- IR 2714347; Flex Diesel Pump ‘A’ Engine Block Heaters Not Heating; 9/10/16
- IR 2722791; Missing Flex Equipment; 10/1/16
- IR 2722927; Missing Flex Equipment; 10/1/16
- IR 2741684; “Park It Dolly” Inop; 11/16/16
- IR 3952937; Flex Equipment Fuel Tank Level Control; 12/14/16
- IR 3968621; East Overhead Door in C Flex Building Broken; 01/31/17
- IR 4054125; Flex Inspection Self-Assessment OPS Deficiencies; 9/20/17
- IR 4059485; Flex Building C Equipment Issues; 10/5/17
- IR 4059486; C Flex Building Door Spring Tension Not Correct; 10/05/17
- IR 4060442; Missing Items in Flex Building B; 10/7/17
- IR 4060540; Equipment Missing Per DOS 0010–43; 10/7/17
- IR 4062404; Need to Change Oil in Yanmar Generators; 10/12/17
- IR 4069960; Park-It-Dolly in ‘C’ Flex Building is Not Turning On; 11/02/17

Calculations
- DRE 14-0018; Evaluation of Supports for New FLEX Connections U2; Rev 3
- DRE 14-0040; FLEX Robust Enclosure HVAC Equipment Sizing; Rev 0
- DRE14-0013; Piping Stress Report for FLEX Unit 2 and 3 Makeup Demin Lines 2/3-43261-8”-L and 2/3-43262-6”-L; Rev 0
- DRE15-0029; Soil Liquefaction Potential – Dresden; Rev 0
- DRE17-0008; HCVS Phase 2 SAWA/SAWM Hydraulic Analysis; Rev 0
- EC 391973; Extend 125VDC and 250VDC Battery Coping Time with Load Shedding; Rev 000
- EXDR027-RPT-001; MSA Seismic Path 4 Evaluation Dresden Station Unit 2 & 3; Rev 1

Drawings
- M-26; Diagram of Nuclear Boiler & Reactor Recirculating Piping; Rev KR
- M-28; Diagram of Isolation Condenser Piping; Rev LR
- M-29; Diagram of L.P. Coolant Injection piping; Rev CQ
- M-32; Diagram of Shutdown Reactor Cooling Piping; Rev BC
- M-35; Diagram of Demineralized Water System Piping; Rev EP
- M-4203; Flow Diagram Isolation Condenser Make Up System; Rev G

Miscellaneous Documents
- Cable Certificate of Conformance
- CC–AA–118; Diverse and Flexible Coping Strategies (FLEX) and Spent Fuel Pool Instrumentation Program Document; Rev 2
- CC–AA–118–1001; Dresden Nuclear Power Station Safer Response Plan; Revision 001
- CC-DR-118; Site Implementation of Diverse and Flexible Coping Strategies (FLEX) and Spent Fuel Pool Instrumentation Program; Rev3
- CC-DR-118-1003; Final Integrated Plan Document; Rev 1
- Design Consideration Summary for EC 398864; Design of New Robust 31'x40' FLEX Storage Building A
- Design Consideration Summary for EC 398866, Rev 000; Design of New Non-Robust 50' x 125' FLEX Storage Building Outside of Protected Area
- Dresden FLEX Validation Plan; Rev 0
- FLEX Pump Test Report; 5/20/15
- HU-AA-1211-F-01; Pre-Job Briefing Checklist; Rev 4
- Performance Test Report – "Modified" Mini-Monsoon Pump (XL60); 1/21/14
- Self-Assessment for IR 4011929; Pre-NRC Flex TI 2515–191; 10/31/17
- Surveillance History Report for PMRQ 00193490-01; D2/3 1M OPS Flex Inspections
- SY–DR–101–115–1002; Dresden Gate Control; Rev 04

Modifications
- EC 398999; Spent Fuel Pool Instrumentation—Fukushima; Rev 2

Procedures
- CC-DR-118; Site Implementation of Diverse and Flexible Coping Strategies (FLEX) and Spent Fuel Pool Instrumentation Program; Rev 03
- CC-DR-118-1001; Dresden SAFER Response Plan; Rev 1
- CC-DR-118-1003; Dresden FLEX Final Integrated Plan Document; Rev 001
- DAN 902(3)-5 D-4; Group 1 Isolation Initiated; Rev 23
- DAN 902(3)-5 D-5; Group 3 Isolation Initiated; Rev 14
- DAN 902(3)-5 E-5; Group 2 Isolation Initiated; Rev 34
- DEOP 0010-00; Guidelines for use of Dresden Emergency Operating Procedures and Severe Accident Management Guidelines; Rev 17
- DEOP 0100-00; RPV Control; Rev 13
- DEOP 0200-01; Primary Containment Control; Rev 13
- DEOP 0300-01; Secondary Containment Control; Rev 12
- DEOP 0400-02; Emergency Depressurization; Rev 9
- DGA-22; Station Blackout; Rev 01
- DIS 1900-01; Spent Fuel Pool Level Primary Indication Calibration; Rev 5
- DOA 0010-04; Floods; Rev 51 and 53
- DOA 6900-T2; Unit 2 and Unit 3 125 VDC Battery System Load Reduction List; Rev 13
- DOS 0010-43; Operations Flex Equipment Inventory; Rev 02, Rev 05
- DOS 0010-47; Operations Monthly Flex Inspections; Rev 08

- FSG-01; Extended Loss of AC Power / Loss of Ultimate Heat Sink Flowchart; Rev 1
- FSG-02; FLEX Strategy for HPCI Operation During an ELAP Event; Rev 1
- FSG-03; FLEX Strategy for Supplying Power to FLEX Pumps; Rev 2
- FSG-04; Aligning FLEX Pumps for Operation; Rev 2
- FSG-05; FLEX Isolation Condenser Make-up and Level Control; Rev 2
- FSG-06; FLEX Strategy for Aligning Power to U2(3) 480 Volt Safety Related Busses 28(38) and 29(39); Rev 2
- FSG-07; FLEX Strategy for Isolating Recirc Loops; Rev 1
- FSG-08; Flex High Pressure and Low Pressure RPV Level Control Using SBLC; Rev 2
- FSG-09; Ultimate Heat Sink Supply to FLEX/SAWA Manifold; Rev 3
- FSG-10; FLEX Spent Fuel Pool Make-up; Rev 3
- FSG-11; FLEX Injection Through LPCI; Rev 2
- FSG-13; FLEX Diesel Generator Operation; Rev 3
- FSG-14; Transition From Phase 2 to Phase 3 Equipment; Rev 03
- FSG-31; FLEX Ventilation Strategies; Rev 3
- FSG-32; Fueling FLEX Portable Equipment; Rev 3
- FSG-36; FLEX Damage Assessment; Rev 1
- FSG-38; FLEX Auxiliary Equipment Deployment; Rev 3
- FSG-40; FLEX Deployment Path and Debris Removal; Rev 01
- FSG-60; FLEX Flood Pump Deployment/Operation; Rev 2
- FSG-61; FLEX Fire System Isolation; Rev 1
- FSG-62; FLEX Generator Deployment During a Flood; Rev 1
- HU-AA-104-101; Procedure Use and Adherence; Rev 5
- Loss of 125 VDC Battery Chargers with Simultaneous Loss of Auxiliary Electric Power; Rev 21
- Loss of 250 VDC Battery Chargers with Simultaneous Loss of Auxiliary Electric Power; Rev 17
- MA-DR-MM-6-00101; Maintenance Activities for Site Flooding; Revision 4
- OP-DR-104-1001; Shutdown Risk Management Contingency Plans; Rev 09
- OU-AA-103; Shutdown Safety Management Program; Rev 17
- QCIPM 1900-01; Spent Fuel Pool Level Indication System Calibration; Rev 0

Training Documents
- DRE2015CTLP06; FLEX Modification Overview; Rev 0
- DRE296LN001; FLEX Systems & Strategies; Rev 3
- DRE296LN002-LORT-17-01; FLEX Strategies – Electrical; Rev 0
- DRELOC5; DEOP Simulator Training / Introduction to EPG Revision 3; Rev 0
- N-CE-EPBERT-CBT; BERT CBT DBIG; Rev 0
- N-DRELOC8; B.5.b and FLEX Equipment Walkthrough; Rev 0
- N-DR-OPS-EO-WTE; FSG-15 In Plant Walkthrough; Rev 0

Work Orders
- WO 01738370 21; Perform Testing of U2 Electrical FLEX Mod Installation; 11/15/15
- WO 01738370 25; PMG Operate and Inspect FLEX BLDG “C” Diesel Generator #1; 11/13/15
- WO 01738371 22; Operate and Inspect FLEX BLDG “A” Diesel Generator #2; 11/13/15
- WO 01738371 49; Perform Testing of U3 Electrical FLEX Mod Installation; 11/16/15
- WO 01783816 67; EC 398999, Perform 2-PT. Verification on SFPIS per DIS 1900; 11/16/15
- WO 01817203 56; Perform FLEX Motor Rotation Checks; 11/14/15
- WO 01904005 01; 12M FLEX Barge Pump/ Motor “A” OP; 12/6/16
- WO 01957148 01; OPS 1Y Flex Equipment Inventory Check; 09/05/17
- WO 04574690 02; PM - D2/3 SA FLEX Pump/Motor; 6/22/17
- WO 04575088 01; D2/3 SA FLEX Barge Pump/Motor B; 6/22/17
- WO 04682153 01; D2/3 1M OPS FLEX Inspections; 10/6/17

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access Management System
CFR	Code of Federal Regulations
ELAP	Extended Loss of AC Power
FLEX	Diverse and Flexible Coping Strategies
FSG	FLEX Support Guidelines
IMC	Inspection Manual Chapter
IR	Issue Report
NRC	U.S. Nuclear Regulatory Commission
SFP	Spent Fuel Pool
TI	Temporary Instruction
WO	Work Order