



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 10, 2018

Mr. Bryan C. Hanson  
Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 - STAFF  
REVIEW OF SPENT FUEL POOL EVALUATION ASSOCIATED WITH  
REEVALUATED SEISMIC HAZARD IMPLEMENTING NEAR-TERM TASK  
FORCE RECOMMENDATION 2.1: SEISMIC (EPID L-2017-JLD-0057)

Dear Mr. Hanson:

The purpose of this letter is to inform Exelon Generation Company, LLC (Exelon, the licensee), of the results of the U.S. Nuclear Regulatory Commission (NRC) staff's review of the spent fuel pool (SFP) evaluation for Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom), which was submitted in response to Item (9) of Enclosure 1 of the NRC's March 12, 2012, request for information (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340) issued under Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter referred to as the 50.54(f) letter). The NRC staff concludes that the licensee's assessment was performed consistent with the NRC-endorsed SFP Evaluation Guidance Report and that the licensee has provided sufficient information to complete the response to Item (9) of the 50.54(f) letter.

#### BACKGROUND

On March 12, 2012, the NRC issued the 50.54(f) letter as part of implementing lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 1 to the 50.54(f) letter requested that licensees reevaluate seismic hazards at their sites using present-day methodologies and guidance. Enclosure 1, Item (4), of the 50.54(f) letter requested that licensees perform a comparison of the ground motion response spectrum (GMRS) and the safe shutdown earthquake (SSE). The staff's assessment of the information provided in response to Items (1)-(3) and (5)-(7) and the comparison portion of Item (4) of the 50.54(f) letter was provided by letter dated April 20, 2015 (ADAMS Accession No. ML15051A262). Enclosure 1, Item (9), of the 50.54(f) letter requested that, when the GMRS exceeds the SSE in the 1 to 10 Hertz frequency range, the licensee provide a seismic evaluation of the SFP. More specifically, licensees were asked to consider "...all seismically induced failures that can lead to draining of the SFP."

By letter dated January 31, 2017 (ADAMS Accession No. ML17031A171), the Nuclear Energy Institute (NEI) submitted the Electric Power Research Institute (EPRI) Report No. 3002009564 entitled, "Seismic Evaluation Guidance: Spent Fuel Pool Integrity Evaluation" (SFP Evaluation Guidance Report). The SFP Evaluation Guidance Report provides criteria for evaluating the seismic adequacy of an SFP to the reevaluated GMRS hazard levels. This report supplements the guidance in EPRI Report 1025287, "Seismic Evaluation Guidance: Screening, Prioritization and Implementation Details (SPID)" (ADAMS Accession No. ML12333A170). The NRC endorsed the SFP Evaluation Guidance Report by letter dated February 28, 2017 (ADAMS Accession No. ML17034A408), as an acceptable method for licensees to use when responding to Item (9) in Enclosure 1 of the 50.54(f) letter.

By letter dated October 27, 2015 (ADAMS Accession No. ML15194A015), the NRC staff stated that SFP evaluation submittals for sites with GMRS peak spectral accelerations above 0.8g were expected by December 31, 2017.

By letter dated July 6, 2017 (ADAMS Accession No. ML17177A446), the NRC issued a generic audit plan and entered into the audit process described in Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (ADAMS Accession No. ML082900195), to assist in the timely and efficient closure of activities associated with the 10 CFR 50.54(f) letter. The Peach Bottom site was included in the list of applicable licensees. The staff used the audit process as described below during the SFP evaluation review.

#### REVIEW OF LICENSEE SPENT FUEL POOL EVALUATION

By letter dated December 15, 2017 (ADAMS Accession No. ML17349A096), the licensee submitted its SFP evaluation for Peach Bottom. The NRC staff assessed the licensee's implementation of the SFP Evaluation Guidance Report through the completion of a reviewer checklist, which is included as an enclosure to this letter.

#### TECHNICAL EVALUATION

Section 4.0 of the SFP Evaluation Guidance Report provides SFP evaluation criteria for plants with GMRS peak spectral accelerations greater than 0.8g. These criteria address SFP structural elements (e.g., floors, walls, and supports); non-structural elements (e.g., penetrations); seismically-induced SFP sloshing; and water losses due to heat-up and boil-off. Section 4.0 also provides applicability criteria that enable licensees to determine if their site-specific conditions are within the bounds considered in developing some of the evaluation criteria in the guidance report. In its review, the staff confirmed that the SFP Evaluation Guidance Report methodology has been followed when calculating the site-specific seismic capacity of the SFP, and that Peach Bottom's site-specific values and conditions are within the acceptable limits and bounds considered for the non-structural evaluation criteria specified in the SFP Evaluation Guidance Report.

#### SPENT FUEL POOL STRUCTURAL EVALUATION

Section 4.1 of the SFP Evaluation Guidance Report provides an SFP structural evaluation approach used to demonstrate that the SFP structure is sufficiently robust for the reevaluated seismic hazard. This approach supplements the guidance in Section 7 of the SPID and follows acceptable methods used to assess the seismic capacity of structures, systems, and components (SSCs) for nuclear power plants. In short, Sections 4.1.1 and 4.1.2 describe an acceptable method for licensees to use to calculate a site-specific seismic high confidence of

low probability of failure (HCLPF) value for the SFP that is then compared to the site-specific GMRS.

The licensee stated that the SFP structural evaluation approach presented in the SFP Evaluation Guidance Report is applicable and, as a part of the audit process, provided site-specific data to the NRC staff to confirm the stated results for Peach Bottom.

As a part of the audit process, the NRC staff reviewed the information provided in Peach Bottom Analysis No. PS-1175, Revision 0, "Spent Fuel Pool Integrity Evaluation" and confirmed that the site-specific HCLPF value calculated for Peach Bottom's SFP followed the methodology of the SFP Evaluation Guidance Report and that the HCLPF value is greater than the GMRS. The staff concludes that SFP SSCs were appropriately evaluated and that the licensee has demonstrated that there is high confidence that the SFP structure is sufficiently robust to withstand ground motions with peak spectral accelerations up to and including the peak spectral acceleration of Peach Bottom's GMRS.

### SPENT FUEL POOL NON-STRUCTURAL EVALUATION

Section 4.2 of the SFP Evaluation Guidance Report provides criteria for evaluating the non-structural aspects of the SFP, such as piping connections, fuel gates, and anti-siphoning devices, as well as SFP sloshing and heat-up and boil-off of SFP water inventory. Additionally, page 4-11 of the SFP Evaluation Guidance Report provides a summary of the pertinent SFP non-structural parameters important to the methodology described in Section 4.2.

The licensee provided a table in its letter dated December 15, 2017, demonstrating that it followed the SFP non-structural evaluation approach presented in the SFP Evaluation Guidance Report and provided site-specific data to confirm its applicability. The staff reviewed the non-structural information provided, which included Peach Bottom's site-specific attributes, against the criteria described in the SFP Evaluation Guidance Report, and confirmed that the methods and conclusions are applicable to the Peach Bottom site. Therefore, the staff concludes that the licensee adequately evaluated the non-structural considerations for SSCs whose failure could lead to potential drain-down of the SFP due to a seismic event. Further, the staff concludes that the licensee demonstrated that a potential drain-down of the SFP as a result of the reevaluated seismic hazard is unlikely.

### AUDIT REPORT

The July 6, 2017, generic audit plan describes the NRC staff's intention to issue an audit report that summarizes and documents the NRC's regulatory audit of licensee's submittals associated with reevaluated seismic hazard analyses. The NRC staff's Peach Bottom audit was limited to the review of the calculation discussed above. An audit summary document is included as Enclosure 2 to this letter.

### CONCLUSION

The NRC staff reviewed the licensee's SFP evaluation report. Based on its review, the NRC staff concludes that the licensee's implementation of the SFP integrity evaluation met the criteria of the SFP Evaluation Guidance Report for Peach Bottom and therefore, the licensee responded appropriately to Item (9) in Enclosure 1 of the 50.54(f) letter. The NRC staff further concludes that the licensee has demonstrated an adequate margin to preclude a potential drain-down of the SFP as a result of the reevaluated seismic hazard at Peach Bottom.

B. Hanson

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If you have any questions, please contact me at (301) 415-1617 or via e-mail at Frankie.Vega@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Vega', written over the printed name.

Frankie Vega, Project Manager  
Beyond-Design-Basis Management Branch  
Division of Licensing Projects  
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosures:

1. Technical Review Checklist
2. NRC Staff Audit Summary

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TECHNICAL REVIEW CHECKLIST  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO SPENT FUEL POOL EVALUATIONS FOR HIGH GROUND MOTION  
RESPONSE SPECTRUM SITES  
IMPLEMENTING NEAR-TERM TASK FORCE RECOMMENDATION 2.1: SEISMIC  
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3  
DOCKET NOS. 50-277 AND 50-278

BACKGROUND

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) (hereafter referred to as the "50.54(f) letter"). Enclosure 1 of the 50.54(f) letter requests addressees to reevaluate the seismic hazard at their site using present-day methods and guidance for licensing new nuclear power plants, and identify actions to address or modify, as necessary, plant components affected by the reevaluated seismic hazards. Enclosure 1, Item (4), of the 50.54(f) letter requested that licensees perform a comparison of the ground motion response spectrum (GMRS) with the safe shutdown earthquake (SSE). Enclosure 1, Item (9), requests that, when the GMRS exceeds the SSE in the 1 to 10 Hertz (Hz) frequency range, a seismic evaluation be made of the spent fuel pool (SFP). More specifically, plants were asked to consider all seismically induced failures that can lead to draining of the SFP.

Additionally, by letter dated January 31, 2017 (ADAMS Accession No. ML17031A171), the Nuclear Energy Institute (NEI) submitted the Electric Power Research Institute (EPRI) Report No. 3002009564 entitled, "Seismic Evaluation Guidance: Spent Fuel Pool Integrity Evaluation" (SFP Evaluation Guidance Report). The SFP Evaluation Guidance Report supports the completion of SFP evaluations for sites with reevaluated seismic hazard exceedance in the 1 to 10 Hz frequency range. The NRC endorsed the SFP Evaluation Guidance Report by letter dated February 28, 2017 (ADAMS Accession No. ML17034A408), as an acceptable method for licensees to use when responding to Item (9) in Enclosure 1 of the 50.54(f) letter. Licensee deviations from the SFP Evaluation Guidance should be discussed in their SFP evaluation submittal.

By letter dated December 15, 2017 (ADAMS Accession No. ML17349A096), Exelon Generation Company, LLC (Exelon, the licensee), provided an SFP report in response to Enclosure 1, Item (9), of the 50.54(f) letter for Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom). The NRC staff performed its review of the licensee's submittal to assess whether the licensee responded appropriately to Item (9) in Enclosure 1 of the 50.54(f) letter. The NRC staff evaluated whether the SFP Evaluation Guidance Report methodology had been followed when calculating the site-specific seismic capacity of the SFP, and that Peach Bottom's site-specific values and conditions are within the acceptable limits and bounds considered for the non-structural evaluation criteria specified in the SFP Evaluation Guidance Report. The NRC staff also confirmed that the requested information in response to Item (9) of the 50.54(f) letter was provided.

A review checklist was used for consistency and efficiency. The application of this staff review is limited to the SFP evaluation as part of the seismic review as part of the Near-Term Task Force (NTTF) Recommendation 2.1.

**NTTF Recommendation 2.1 Spent Fuel Pool Evaluations  
 Technical Review Checklist for Peach Bottom Atomic Power Station,  
 Units 2 and 3**

**Site Parameters:**

***I. Site-Specific GMRS***

<p><b>The licensee:</b></p> <ul style="list-style-type: none"> <li>Used the site-specific GMRS hazard, consistent with the information in the Seismic Hazard and Screening Report (SHSR) or its update, that was evaluated and accepted in the NRC staff assessment when calculating the SFP high confidence of low probability of failure (HCLPF) value.</li> </ul>	<p>No</p>
<p><b>Notes from the reviewer:</b></p> <ol style="list-style-type: none"> <li>The licensee used the GMRS, developed for the Peach Bottom Seismic Probabilistic Risk Assessment (SPRA), in the SFP evaluation. The licensee stated that the GMRS was developed using the same approach that was used when developing the GMRS submitted to the NRC in the SHSR. The NRC staff will review this approach and the updated GMRS once submitted by the licensee as part of the SPRA report.</li> <li>The NRC staff reviewed the licensee's calculation No. PS-1175, Revision 0, "Spent Fuel Pool Integrity Evaluation", as a part of the audit process for Peach Bottom. The NRC staff confirmed that the Peach Bottom SFP integrity evaluation derives seismic input values for the Reactor Building from Peach Bottom's SPRA GMRS.</li> </ol> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b></p> <p>The licensee did not used the SHSR GMRS when calculating the SFP HCLPF value. See conclusion below.</p>	
<p><b>The NRC staff concludes that:</b></p> <p>The licensee's derivation of the Reactor Building In-Structure Response Spectra (ISRS) used seismic demand inputs from exsistng SPRA soil structure interaction (SSI) analysis results. Using data from the SPRA GMRS and the SSI analysis to develop the SFP ISRS and calculate the SFP HCLPF value is reasonable for the purposes of this calculation.</p>	

**Structural Parameters:**

**II. Seismic Design of the SFP Structure**

<p><b>The licensee:</b></p> <ul style="list-style-type: none"><li>• Performed site-specific calculations to demonstrate that the limiting SFP HCLPF capacity value is greater than the peak spectral acceleration of the site-specific GMRS.</li><li>•</li></ul>	<p>Yes</p>
<p><b>Notes from the reviewer:</b></p> <p>1. The NRC staff confirmed that the licensee followed the methodology described in the SFP Evaluation Guidance Report in calculation No. PS-1175, Revision 0, "Spent Fuel Pool Integrity Evaluation", to calculate an SFP HCLPF capacity. The resulting HCLPF value is greater than the site-specific GMRS; therefore, it is reasonable to conclude that the SFP has sufficient capacity to withstand a seismic event at least up to the GMRS without failure that would lead to a rapid draindown.</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b></p> <p>No deviations or deficiencies were identified.</p>	
<p><b>The NRC staff concludes that:</b></p> <ul style="list-style-type: none"><li>• The SFP has sufficient capacity to withstand a seismic event at least up to the GMRS without failure that would lead to a rapid draindown.</li></ul>	

**III. SFP Structure Included in the Civil Inspection Program Performed in Accordance with Maintenance Rule**

<p><b>The licensee:</b></p> <ul style="list-style-type: none"><li>• Stated that the SFP structure is included in the Civil Inspection Program performed in accordance with Maintenance Rule (10 CFR 50.65).</li></ul>	<p>Yes</p>
<p><b>Notes from the reviewer:</b></p> <p>1. The licensee stated that the SFP structure is included in the Peach Bottom Civil Inspection Program, Procedure ER-PB-450-1006, Revision4, "Peach Bottom Structures Monitoring Instructures."</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b></p> <p>No deviations or deficiencies were identified.</p>	

<p><b>The NRC staff concludes that:</b></p> <ul style="list-style-type: none"> <li>• The SFP structure is included in the Civil Inspection Program performed in accordance with Maintenance Rule (10 CFR 50.65).</li> </ul>	
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**Non-Structural Parameters:**

**IV. Applicability of Piping Evaluation**

<p><b>The licensee:</b></p> <ul style="list-style-type: none"> <li>• Stated that there are no piping penetrations attached to the SFP more than 6 feet (ft.) below the surface of the water and referenced plant drawings (M-87 and M-156).</li> </ul>	<p>Yes</p>
<p><b>Notes from the reviewer:</b></p> <ol style="list-style-type: none"> <li>1. The licensee referenced plant drawings M-87, Revision 17, "Piping and Mechanical Reactor Building Unit No. 2 Plan at El. 195'-0" Area 7," and M-156, Revision 12, "Piping and Mechanical Reactor Building Unit No. 3 Plan at El. 195'-0" Area 15," which show that there are no piping penetrations attached to the SFP more than 6 ft. below the surface of the water.</li> </ol> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b></p> <p>No deviations or deficiencies were identified.</p>	
<p><b>The NRC staff concludes that:</b></p> <ul style="list-style-type: none"> <li>• There are no piping penetrations attached to the SFP more than 6 ft. below the surface of the water.</li> </ul>	

**V. Ductile Behavior of SFP Gates**

<p><b>The licensee:</b></p> <ul style="list-style-type: none"> <li>• Stated that the SFP gate is constructed from a ductile material (e.g. aluminum or stainless steel alloys).</li> </ul>	<p>Yes</p>
<p><b>Notes from the reviewer:</b></p> <ol style="list-style-type: none"> <li>1. The licensee stated that the SFP gates are constructed from aluminium with some stainless steel parts as documented in Drawing M-1-M-61, Revision 1, "Fuel Pool Gate Fuel Storage, Refueling System". This is consistent with the materials specified in the SFP Evaluation Guidance to ensure ductile behavior of the gates.</li> </ol>	



<b>Deviation(s) or Deficiency(ies), and Resolution:</b>	
No deviations or deficiencies were identified.	
<b>The NRC staff concludes that:</b>	
<ul style="list-style-type: none"> <li>The SFP gates are constructed from a material expected to exhibit ductile behavior under higher seismic demands.</li> </ul>	

**VI. Siphoning Evaluation**

<b>The licensee:</b>	
<ul style="list-style-type: none"> <li>Stated that anti-siphoning devices are installed on piping systems that could lead to siphoning inventory from the SFP.</li> </ul>	Yes
<ul style="list-style-type: none"> <li>In cases where anti-siphoning devices were not included on the applicable piping, a description documenting the evaluation performed to determine the seismic adequacy of the piping is provided.</li> </ul>	N/A
<ul style="list-style-type: none"> <li>Stated that the piping of the SFP cooling system cannot lead to rapid drain down due to siphoning.</li> </ul>	Yes
<ul style="list-style-type: none"> <li>Stated that no anti-siphoning devices are attached to 2" or smaller piping with extremely large extended operators.</li> </ul>	Yes
<ul style="list-style-type: none"> <li>Provided a seismic adequacy evaluation, in accordance with NP-6041, for cases where active siphoning devices are attached to 2" or smaller piping with extremely large extended operators.</li> </ul>	N/A
<b>Notes from the reviewer:</b>	
<p>1. The licensee stated that anti-siphoning devices are installed on all lines penetrating the SFP to prevent siphoning. The licensee referenced plant drawings M-363 Sheet 1, Revision 43, "Unit 2 P&amp;I Diagram Fuel Pool Cooling &amp; Clean-up," and M-363 Sheet 2, Revision 44, "Unit 3 P&amp;I Diagram Fuel Pool Cooling &amp; Clean-up," which provide details regarding these anti-siphoning devices. The staff verified that the Final Safety Analysis Report (FSAR) supports this statement (FSAR Section 10.5.3).</p>	
<b>Deviation(s) or Deficiency(ies), and Resolution:</b>	
No deviations or deficiencies were identified.	
<b>The NRC staff concludes that:</b>	
<ul style="list-style-type: none"> <li>Anti-siphoning devices exist in applicable piping systems that could lead to siphoning water from the SFP.</li> </ul>	Yes
<ul style="list-style-type: none"> <li>Piping of the SFP cooling system is not likely to lead to rapid draindown due to siphoning.</li> </ul>	Yes
<ul style="list-style-type: none"> <li>No active anti-siphoning devices are attached to 2" or smaller piping with extremely large extended operators.</li> </ul>	Yes

**VII. Sloshing Evaluation**

<p><b>The licensee:</b></p> <ul style="list-style-type: none"> <li>Specified the SFP dimensions (length, width, and depth).</li> <li>Specified that the SFP dimensions are bounded by the dimensions specified in the report (i.e., SFP length and width &lt;125 ft.; SFP depth &gt;36 ft.).</li> </ul>	<p>Yes Yes</p>
<p><b>Notes from the reviewer:</b></p> <ol style="list-style-type: none"> <li>SFP approximate dimensions (Drawing S-139, Revision 5, "Reactor Building Area 7&amp;8 Interior Wall Elevations 195' - 0" to 234' -0"")             <ul style="list-style-type: none"> <li>SFP Length – 40 ft.</li> <li>SFP Width – 35 ft.</li> <li>SFP Depth – 38 ft. 9 in.</li> </ul> </li> </ol> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b></p> <p>No deviations or deficiencies were identified.</p>	
<p><b>The NRC staff concludes that:</b></p> <ul style="list-style-type: none"> <li>SFP dimensions are bounded by the dimensions specified in the report (i.e., SFP length and width &lt;125 ft.; SFP depth &gt;36 ft.).</li> </ul>	

**VIII. Evaporation Evaluation**

<p><b>The licensee:</b></p> <ul style="list-style-type: none"> <li>Provided the surface area of the plant's SFP.</li> <li>Stated that the surface area of the plant's SFP is greater than 500 ft.<sup>2</sup>.</li> <li>Provided the licensed reactor core thermal power.</li> <li>Stated that the reactor core thermal power is less than 4,000 megawatt thermal (MW<sub>t</sub>) per unit.</li> </ul>	<p>Yes Yes Yes No</p>
<p><b>Notes from the reviewer:</b></p> <ol style="list-style-type: none"> <li>Surface area of pool = 1413 ft.<sup>2</sup></li> <li>Reactor thermal power = 4,016 MW<sub>t</sub></li> </ol> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b></p> <p>The licensed reactor core thermal power of 4,016 MW<sub>t</sub> is above the maximum thermal power of 4,000 MW<sub>t</sub> specified in the SFP Evaluation Guidance. In order to confirm that this exceedance would not have a significant impact on the plant-specific</p>	

<p>evaluations and results described in SFP Evaluation Guidance, the licensee performed a sensitivity study considering the 16 MWt additional thermal power. The sensitivity study concluded that the 16 MWt additional power has a negligible impact on the estimated time to boil-off the upper 1/3 of the fuel height. Based on the licensee's analysis, it would take approximately 234 hours to uncover 1/3 of the fuel which is considerable higher than the allowable 72 hours described in the SFP Evaluation Guidance.</p>	
<p><b>The NRC staff concludes:</b></p> <ul style="list-style-type: none"> <li>• The surface area of the plant's SFP is greater than 500 ft.<sup>2</sup>.</li> <li>• The reactor core thermal power is less than 4,000 MW<sub>t</sub> per unit. (The staff reviewed the sensitivity analysis results provided by the licensee and agrees that the reactor core thermal power exceedance referenced above has negligible impact on the estimated time to uncover the spent fuel. )</li> </ul>	<p>Yes No</p>

**Conclusions:**

The NRC staff reviewed the licensee's SFP evaluation report. Based on its review, the NRC staff concludes that the SFP Evaluation Guidance Report methodology has been followed when calculating the site-specific seismic capacity of the SFP, and that Peach Bottom's site-specific values and conditions are within the acceptable limits and bounds considered for the non-structural evaluation criteria specified in the SFP Evaluation Guidance Report. Therefore, the licensee responded appropriately to Item (9) in Enclosure 1 of the 50.54(f) letter. The NRC staff further concludes that the licensee has demonstrated an adequate margin to preclude a potential drain-down of the SFP as a result of the reevaluated seismic hazard at Peach Bottom.

AUDIT SUMMARY BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO  
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3  
SPENT FUEL POOL EVALUATION ASSOCIATED WITH REEVALUATED SEISMIC HAZARD  
IMPLEMENTING NEAR-TERM TASK FORCE RECOMMENDATION 2.1: SEISMIC  
(EPID NO. L-2017-JLD-0057)

BACKGROUND AND AUDIT BASIS

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) (hereafter referred to as the 50.54(f) letter). Enclosure 1 to the 50.54(f) letter requested that licensees reevaluate the seismic hazards for their sites using present-day methods and regulatory guidance used by the NRC staff when reviewing applications for early site permits and combined licenses.

By letter dated October 27, 2015 (ADAMS Accession No. ML15194A015), the NRC made a determination of which licensees were to perform: (1) a seismic probabilistic risk assessment (SPRA), (2) limited scope evaluations, or (3) no further actions based on a comparison of the reevaluated seismic hazard and the site's design-basis earthquake. (Note: Some plant-specific changes regarding whether an SPRA was needed or limited scope evaluations were needed at certain sites have occurred since the issuance of the October 27, 2015, letter.)

By letter dated July 6, 2017 (ADAMS Accession No. ML17177A446), the NRC issued a generic audit plan and entered into the audit process described in Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (ADAMS Accession No. ML082900195), to assist in the timely and efficient closure of activities associated with the 50.54(f) letter. Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom) was included in the list of applicable licensees.

REGULATORY AUDIT SCOPE AND METHODOLOGY

The areas of focus for the regulatory audit are the information contained in the spent fuel pool (SFP) evaluation submittal and all associated and relevant supporting documentation used in the development of the SFP evaluation including, but not limited to, methodology, process information, calculations, computer models, etc.

AUDIT ACTIVITIES

The Peach Bottom audit took place at the NRC Headquarters in Rockville, MD, beginning on June 14, 2018. Licensee personnel participated remotely, via email, from their respective offices. A list of the licensee staff and NRC staff that participated in the audit is contained in Table 1.

**Table 1**

<b>NRC Staff</b>		<b>Licensee Staff</b>	
<b>Name</b>	<b>Title</b>	<b>Name</b>	<b>Title</b>
Frankie Vega	Project Manager	David Distel	Sr. Licensing Engineer

On June 14, 2018, the NRC staff requested, via e-mail, that the licensee upload Peach Bottom Analysis No. PS-1175, Revision O, "Spent Fuel Pool Integrity Evaluation" which was the calculation that was performed to determine the high confidence low probability of failure (HCLPF) value for the SFP onto the licensee's ePortal (electronic reading room). In addition, the staff requested a series of plant drawings (detailed below) that were refereced as part of the SFP submmital. The licensee uploaded the requested documents onto the ePortal on June 19, 2018, as requested by the NRC staff.

**DOCUMENTS AUDITED**

Peach Bottom Analysis No. PS-1175, Revision 0, "Spent Fuel Pool Integrity Evaluation"

Drawing M-87, Revision 17, Piping and Mechanical Reactor Building Unit No. 2 Plan at El. 195'-0" Area 7

Drawing M-156, Revision 12, Piping and Mechanical Reactor Building Unit No. 3 Plan at El. 195'-0" Area 15

Drawing M-363 Sheet 1, Revision 43, Unit 2 P&I Diagram Fuel Pool Cooling & Clean-up

Drawing M-363 Sheet 2, Revision 44, Unit 3 P&I Diagram Fuel Pool Cooling & Clean-up

Drawing S-211, Revision 3, Reactor Building - Unit #2 Spent Fuel & Dryer Separator Pools Plan

Drawing S-139, Revision 5, Reactor Building Area 7&8 Interior Wall Elevations 195' - 0" to 234'-0"

Drawing M-1-M-61, Revision 1, Fuel Pool Gate Fuel Storage, Refueling System

Procedure ER-PB-450-1006, Revision 4, "Peach Bottom Structures Monitoring Instructions"

**OPEN ITEMS AND REQUEST FOR INFORMATION**

Following the review of the SFP HCLPF calculation, there were no open items identified by the NRC staff that required proposed closure paths, and there were no requests for information discussed or planned to be issued.

**DEVIATIONS FROM AUDIT PLAN**

There were no deviations from the July 6, 2017, generic audit plan.

**AUDIT CONCLUSION**

The issuance of this document, containing the staff's review of the SFP evaluation submittal, concludes the SFP audit process for Peach Bottom.

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 - STAFF REVIEW OF SPENT FUEL POOL EVALUATION ASSOCIATED WITH REEVALUATED SEISMIC HAZARD IMPLEMENTING NEAR-TERM TASK FORCE RECOMMENDATION 2.1: SEISMIC DATED JULY 10, 2018

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FVega, NRR  
RidsACRS\_MailCTR Resource

PBMB R/F  
BTitus, NRR  
RidsNrrPMPeachBottomResource  
RidsNrrLASLent Resource  
RidsRgn1MailCenter Resource

**ADAMS Accession No.: ML18187A403**

**\* via e-mail**

<b>OFFICE</b>	NRR/DLP/PBMB/PM	NRR/DLP/PBMB/LA	NRR/DLP/PBMB/BC(A)
<b>NAME</b>	FVega	SLent	BTitus
<b>DATE</b>	07/10/2018	07/09/2018	07/10/2018
<b>OFFICE</b>	NRR/DLP/PBMB/PM		
<b>NAME</b>	FVega		
<b>DATE</b>	07/10/2018		

**OFFICIAL RECORD COPY**