



Order No. EA-12-051

RS-12-181  
RA-12-109  
TMI-12-149

October 25, 2012

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2  
Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2  
Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352 and 50-353

Oyster Creek Nuclear Generating Station, Unit 1  
Renewed Facility Operating License No. DPR-16  
NRC Docket No. 50-219

Peach Bottom Atomic Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility Operating License No. DPR-50  
NRC Docket No. 50-289

**Subject:** Exelon Generation Company, LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

**References:**

1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation
2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Exelon Generation Company, LLC (Exelon). Reference 1 was immediately effective and directs Exelon to have a reliable indication of the water level in associated spent fuel storage pools. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms Exelon has received Reference 2 and is in the process of evaluating the guidance for the purpose of providing a reliable indication of the water level in associated spent fuel storage pools as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Resources have been identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.
- Exelon completed a study to evaluate available level sensing technologies to determine the best technology or technologies to meet the requirements of NRC Order EA-12-051 and the associated Interim Staff Guidance (ISG). Based on the preliminary selection of two level sensing technologies, a conceptual design was developed using one station, Limerick, as a pilot. Upon completion of this effort, additional walkdowns were conducted of the SFP areas at the other nine Exelon nuclear sites to identify any significant physical differences with Limerick that may affect spent fuel pool instrumentation (SFPI) system installation.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

- Development of a Request for Proposal (RFP) for procurement of detailed engineering design services for the SFPI system for all 10 Exelon nuclear sites.
- Receipt and evaluation of bids and contract award for SFPI system detailed design.
- Begin SFPI system detailed design.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

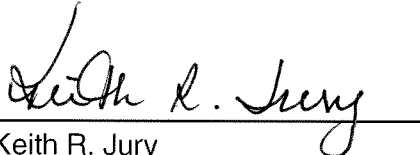
Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Braidwood Units 1 & 2 prior to startup from Refueling Outage (RFO) A1R18 (Spring 2015).
- Implementation of the order will be completed for Byron Units 1 & 2 prior to startup from RFO B2R18 (Fall 2014).
- Implementation of the order will be completed for Clinton Unit 1 prior to startup from RFO C1R15 (Spring 2015).
- Implementation of the order will be completed for Dresden Unit 2 prior to startup from RFO D2R24 (Fall 2015).
- Implementation of the order will be completed for Dresden Unit 3 prior to startup from RFO D3R24 (Fall 2016).
- Implementation of the order will be completed for LaSalle Units 1 & 2 prior to startup from RFO L2R15 (Spring 2015).
- Implementation of the order will be completed for Limerick Units 1 & 2 prior to startup from RFO Li2R13 (Spring 2015).
- Implementation of the order will be completed for Oyster Creek Unit 1 prior to startup from RFO OC1R26 (Fall 2016).
- Implementation of the order will be completed for Peach Bottom Unit 2 prior to startup from RFO P2R21 (Fall 2016).
- Implementation of the order will be completed for Peach Bottom Unit 3 prior to startup from RFO P3R20 (Fall 2015).
- Implementation of the order will be completed for Quad Cities Units 1 & 2 prior to startup from RFO Q1R23 (Spring 2015).
- Implementation of the order will be completed for Three Mile Island Unit 1 prior to startup from RFO T1R21 (Fall 2015).

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David P. Helker at 610-765-5525.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 25th day of October 2012.

Respectfully submitted,

A handwritten signature in cursive script, reading "Keith R. Jury", is written over a horizontal line.

Keith R. Jury  
Vice President, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC