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10 CFR 50.90

RS-02-169

September 27, 2002

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

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

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

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

Subject: Request for License Amendment Related to Appendix B, Environmental Protection Plan (Non-Radiological)

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) requests a change to Appendix B, Environmental Protection Plan (Non-Radiological), of Facility Operating License Nos. NPF-37 and NPF-66 for Byron Station, Units 1 and 2; NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2; and DPR-29 and DPR-30 for Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. Specifically, the proposed change removes a parenthetical reference to a superseded section of 10 CFR 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions." This proposed change is consistent with the format of non-radiological Environmental Protection Plans (EPPs) for more recently licensed EGC nuclear stations (i.e., Braidwood Station, Clinton Power Station and Limerick Generating Station), and for the most recently-licensed nuclear station (i.e., Watts Bar Nuclear Plant licensed in 1995).

The requested change is administrative in nature and does not impact the protection of environmental values during operation of Byron Station, LSCS, or QCNPS. EGC requests approval of this amendment by September 30, 2003.

IE25

September 27, 2002
U. S. Nuclear Regulatory Commission
Page 2

This request is subdivided as follows.

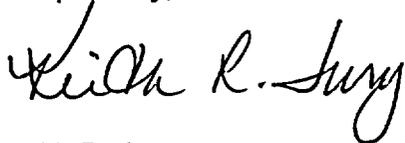
1. Attachment A gives a description and safety analysis of the proposed change.
2. Attachments B-1 through B-4 provide the marked-up Appendix B pages with the proposed change indicated for Byron Station, LSCS, QCNPS Unit 1, and QCNPS Unit 2, respectively.
3. Attachments C-1 through C-4 include the revised Appendix B page with the proposed change incorporated for Byron Station, LSCS, QCNPS Unit 1, and QCNPS Unit 2, respectively.
4. Attachment D describes our evaluation performed using the criteria in 10 CFR 50.91(a), "Notice for public comment," paragraph (1), which provides information supporting a finding of no significant hazards consideration using the standards in 10 CFR 50.92, "Issuance of amendment," paragraph (c).
5. Attachment E provides information supporting an Environmental Assessment.

This proposed change has been reviewed by each applicable Plant Operations Review Committee and approved by the associated Nuclear Safety Review Board in accordance with the requirements of the EGC Quality Assurance Program.

EGC is notifying the State of Illinois of this request for a change to the operating license by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions concerning this letter, please contact Mr. Kenneth M. Nicely at (630) 657-2803.

Respectfully,



Keith R. Jury
Director – Licensing
Mid-West Regional Operating Group

September 27, 2002
U. S. Nuclear Regulatory Commission
Page 3

Attachments:

Affidavit

Attachment A, Description and Safety Analysis for Proposed Change

Attachment B-1, Marked-Up Appendix B Page for Proposed Change, Byron Station, Units 1 and 2

Attachment B-2, Marked-Up Appendix B Page for Proposed Change, LaSalle County Station, Units 1 and 2

Attachment B-3, Marked-Up Appendix B Page for Proposed Change, Quad Cities Nuclear Power Station, Unit 1

Attachment B-4, Marked-Up Appendix B Page for Proposed Change, Quad Cities Nuclear Power Station, Unit 2

Attachment C-1, Typed Appendix B Page, Byron Station, Units 1 and 2

Attachment C-2, Typed Appendix B Page, LaSalle County Station, Units 1 and 2

Attachment C-3, Typed Appendix B Page, Quad Cities Nuclear Power Station, Unit 1

Attachment C-4, Typed Appendix B Page, Quad Cities Nuclear Power Station, Unit 2

Attachment D, Information Supporting a Finding of No Significant Hazards Consideration

Attachment E, Information Supporting an Environmental Assessment

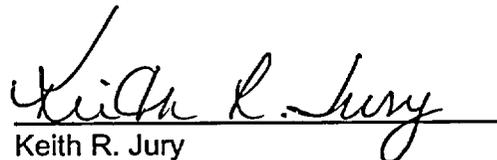
cc: Regional Administrator — NRC Region III
NRC Senior Resident Inspector — Byron Station
NRC Senior Resident Inspector — LaSalle County Station
NRC Senior Resident Inspector — Quad Cities Nuclear Power Station
Office of Nuclear Facility Safety — Illinois Department of Nuclear Safety

STATE OF ILLINOIS)
COUNTY OF DUPAGE)
IN THE MATTER OF)
EXELON GENERATION COMPANY, LLC) Docket Numbers
BYRON STATION, UNITS 1 AND 2) STN 50-454 AND STN 50-455
LASALLE COUNTY STATION, UNITS 1 AND 2) 50-373 AND 50-374
QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2) 50-254 AND 50-265

SUBJECT: Request for License Amendment Related to Appendix B,
Environmental Protection Plan (Non-Radiological)

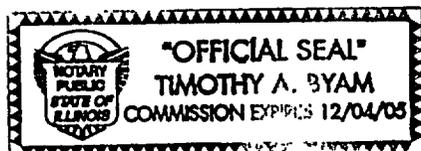
AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



Keith R. Jury
Director – Licensing
Mid-West Regional Operating Group

Subscribed and sworn to before me, a Notary Public in and
for the State above named, this 27th day of
September, 2002





Notary Public

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGE

A. SUMMARY OF PROPOSED CHANGES

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting a change to Appendix B, Environmental Protection Plan (Non-Radiological), of Facility Operating License (OL) Nos. NPF-37 and NPF-66 for Byron Station, Units 1 and 2; NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2; and DPR-29 and DPR-30 for Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. Specifically, the proposed change removes a parenthetical reference to a superseded section of 10 CFR 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions." This proposed change is administrative in nature and does not impact the protection of environmental parameters during operation of Byron Station, LSCS, or QCNPS. Also, the proposed change is consistent with the format of non-radiological Environmental Protection Plans (EPPs) utilized for more recently licensed EGC nuclear stations (i.e., Braidwood Station, Clinton Power Station, and Limerick Generating Station), and for the most recently-licensed nuclear station (i.e., Watts Bar Nuclear Station licensed in 1995).

A complete description of the proposed change is given in Section E, "Description of the Proposed Change," of this Attachment. Attachments B-1 through B-4 provide the marked-up OL Appendix B pages indicating the proposed change for Byron Station, LSCS, QCNPS, Unit 1 and QCNPS, Unit 2, respectively. Attachments C-1 through C-4 provide the typed OL Appendix B page incorporating the proposed change for Byron Station, LSCS, QCNPS Unit 1, and QCNPS, Unit 2, respectively.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

OL Appendix B, Section 3.1 (for Byron Station and LSCS; Section 2.1 for QCNPS, Units 1 and 2), "Plant Design and Operation," provides the requirements to obtain prior approval from the NRC when a proposed change, test or experiment is deemed to involve an unreviewed environmental question. The third paragraph in this section states that a proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by the staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level (in accordance with 10 CFR Part 51.5(b)(2)) or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have significant adverse environmental impact.

C. BASES FOR THE CURRENT REQUIREMENTS

The non-radiological EPP provides for protection of environmental parameters during operation of the station. The principal objectives of the plan are to (1) verify the plant is operated in an environmentally acceptable manner, (2) coordinate NRC requirements and

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGE

maintain consistency with other Federal, State, and local requirements for environmental protection, and (3) keep NRC informed of the environmental effects of facility construction and operation and of actions taken to control those effects.

D. NEED FOR REVISION OF THE REQUIREMENTS

The current parenthetical reference to a superseded regulation (i.e., 10 CFR 51.5(b)(2)) is no longer applicable nor in conformance with existing regulations. This CFR reference was superseded in 1984 by a complete revision of 10 CFR 51. The revised CFR makes the non-radiological EPP reference to 10 CFR 51.5(b)(2) obsolete. The NRC-recommended format for non-radiological EPPs utilized by more recently-licensed EGC nuclear facilities (e.g., Braidwood Station, Clinton Power Station, Limerick Generating Station, etc.) does not contain this CFR reference. In addition, the most recently licensed nuclear station in the nation (i.e., Watts Bar Nuclear Plant licensed in 1995) does not contain this CFR reference. The proposed change will eliminate this superseded CFR reference and provide consistency with the current NRC recommended non-radiological EPP format.

E. DESCRIPTION OF THE PROPOSED CHANGES

The following OL Appendix B changes are proposed.

- For Byron Station - delete the term “[in accordance with 10 CFR Part 51.5(b)(2)]” in the third paragraph of Section 3.1.
- For LSCS - delete the term “(in accordance with 10 CFR Part 51.5(b)(2))” in the third paragraph of Section 3.1.
- For QCNPS, Unit 1 - delete the term “(in accordance with 10 CFR Part 51.5(b)(2))” in the third paragraph of Section 2.1.
- For QCNPS, Unit 2 - delete the term “(in accordance with 10 CFR Part 51.5(b)(2))” in the third paragraph of Section 2.1.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

The change proposed by this request is administrative in nature. The purpose of the proposed change is to remove a superseded 10 CFR 51 reference. A major revision to 10 CFR 51 in 1984 deleted the original CFR section that was referenced and replaced it with a reformatted CFR. The subject matter of the original CFR referenced was not carried over into the reformatted CFR during this major revision. The proposed change is consistent with the NRC OL Appendix B format utilized for more recently-licensed nuclear facilities. The removal of this reference does not impact any potential future submittals, to the NRC for prior approval, when the criteria of an unreviewed environmental question are

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGE

satisfied. Therefore, plant safety is unaffected by this change.

G. IMPACT ON PREVIOUS SUBMITTALS

EGC has reviewed the proposed change for impact on any previous submittals, and has determined that there is no impact on any license amendment requests being reviewed by the NRC.

H. SCHEDULE REQUIREMENTS

We request approval of this proposed change by September 30, 2003 with a 30-day implementation period.

I. REFERENCES

None

Attachment B-1

**MARKED-UP
APPENDIX B PAGE
FOR
PROPOSED CHANGE**

BYRON STATION, UNITS 1 AND 2

REVISED APPENDIX B PAGE

No CHANGES ON this page.
Provided for REVIEW
PURPOSES ONLY.

3.0 Consistency Requirements

3.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such activities do not involve an unreviewed environmental question and do not involve a change in the EPP*. Changes in station design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this Section.

Before engaging in additional construction or operational activities which may significantly affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. Activities are excluded from this requirement if all measurable nonradiological environmental effects are confined to the on-site areas previously disturbed during site preparation and plant construction. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activity and obtain prior NRC approval. When such activity involves a change in the EPP, such activity and change to the EPP may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3 of this EPP.

* This provision does not relieve the licensee of the requirements of 10 CFR 50.59.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level ~~(in accordance with 10 CFR Part 51.5(b)(2))~~ or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

Attachment B-2

**MARKED-UP
APPENDIX B PAGE
FOR
PROPOSED CHANGE**

LASALLE COUNTY STATION, UNITS 1 AND 2

REVISED APPENDIX B PAGE

3.0 CONSISTENCY REQUIREMENTS

3.1 Plant Design and Operation

No changes on this page.
Provided for REVIEW
purposes ONLY.

The licensee may make changes in plant design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the Environmental Protection Plan.* Changes in plant design or operation and performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity.** When the evaluation indicates that such activity involves an unreviewed environmental questions, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation. When such activity involves a change in the Environmental Protection Plan, such activity and change to Environmental Protection Plan may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3.

*This provision does not relieve the licensee of the requirements of 10 CFR 50.59.

**Activities are excluded from this requirement if all measurable environmental effects are confined to on-site areas previously disturbed during site preparation and plant construction.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level ~~(in accordance with 10 CFR Part 51.5(b)(2))~~ or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in the plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permits and State Certification

The licensee shall provide the NRC with copies of the results of the special studies conducted in accordance with the Clean Water Act, at the same time they are submitted to the permitting agency, namely, the Demonstration Study pursuant to Section 316(b) of the Clean Water Act.

Attachment B-3

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APPENDIX B PAGE

FOR

PROPOSED CHANGE

QUAD CITIES NUCLEAR POWER STATION, UNIT 1

REVISED APPENDIX B PAGE

2-1

2.0 Consistency Requirements

2.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to this requirement. Activities governed by Section 2.3 are not subject to the requirements of this section.

Before engaging in unauthorized construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity.* When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the NRC.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level ~~(in accordance with 10 CFR Part 51.5(b)(2))~~ or (3) a matter not previously reviewed and evaluated in the

*Activities are excluded from this requirement if all measurable nonradiological effects are confined to the on-site areas previously disturbed during site preparation and plant construction.

Attachment B-4

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APPENDIX B PAGE

FOR

PROPOSED CHANGE

QUAD CITIES NUCLEAR POWER STATION, UNIT 2

REVISED APPENDIX B PAGE

2-1

2.0 Consistency Requirements

.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to this requirement. Activities governed by Section 2.3 are not subject to the requirements of this section.

Before engaging in unauthorized construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity.* When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the NRC.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level ~~(in accordance with 10 CFR Part 51.5(b)(2))~~ or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

*Activities are excluded from this requirement if all measurable nonradiological effects are confined to the on-site areas previously disturbed during site preparation and plant construction.

Attachment C-1

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APPENDIX B PAGE

BYRON STATION, UNITS 1 AND 2

APPENDIX B PAGE

3-2

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES - OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

Attachment C-2

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APPENDIX B PAGE

LASALLE COUNTY STATION, UNITS 1 AND 2

APPENDIX B PAGE

3-2

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in the plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permits and State Certification

The licensee shall provide the NRC with copies of the results of the special studies conducted in accordance with the Clean Water Act, at the same time they are submitted to the permitting agency, namely, the Demonstration Study pursuant to Section 316(b) of the Clean Water Act.

Attachment C-3

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APPENDIX B PAGE

QUAD CITIES NUCLEAR POWER STATION, UNIT 1

APPENDIX B PAGE

2-1

2.0 Consistency Requirements

2.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to this requirement. Activities governed by Section 2.3 are not subject to the requirements of this section.

Before engaging in unauthorized construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity.* When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the NRC.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter not previously reviewed and evaluated in the

*Activities are excluded from this requirement if all measurable nonradiological effects are confined to the on-site areas previously disturbed during site preparation and plant construction.

Attachment C-4

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APPENDIX B PAGE

QUAD CITIES NUCLEAR POWER STATION, UNIT 2

APPENDIX B PAGE

2-1

2.0 Consistency Requirements

2.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to this requirement. Activities governed by Section 2.3 are not subject to the requirements of this section.

Before engaging in unauthorized construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity.* When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the NRC.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter not previously reviewed and evaluated in the in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

*Activities are excluded from this requirement if all measurable nonradiological effects are confined to the on-site areas previously disturbed during site preparation and plant construction.

Attachment D

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

According to 10 CFR 50.92, "Issuance of amendment," paragraph (c), a proposed amendment to an operating license involves a no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

In support of this determination, an evaluation of each of the three criteria set forth in 10 CFR 50.92 is provided below regarding the proposed license amendment.

Overview

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC, requests a change to Appendix B, Environmental Protection Plan (Non-Radiological), of Facility Operating License Nos. NPF-37 and NPF-66 for Byron Station, Units 1 and 2; NPF-11 and NPF-18 for LaSalle County Station, Units 1 and 2; and DPR-29 and DPR-30 for Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. Specifically, the proposed change removes a parenthetical reference to a superseded section of 10 CFR 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," found in Section 3.1 (Section 2.1 for QCNPS), "Plant Design and Operation," of Appendix B. This proposed change is consistent with the current NRC format for non-radiological Environmental Protection Plans.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change deletes a reference to a superseded section of 10 CFR 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," found in the non-radiological Environmental Protection Plans (EPPs) for Byron Station, LaSalle County Station and Quad Cities Nuclear Power Station, Units 1 and 2. The EPP (Non-Radiological) is Appendix B to the Facility Operating License. The change is administrative in nature. No physical changes to the facilities will result from the proposed change. The initial conditions and methodologies used in accident analyses remain unchanged. The proposed change does not revise or alter the design assumptions for systems or components used to mitigate the consequences of accidents. Thus, accident analyses results are not impacted by this proposed change.

Therefore, this proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Attachment D

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change deletes a reference to a superseded section of 10 CFR 51.5. The change is administrative in nature. No physical or operational changes to the facilities will result from the proposed change.

The proposed change does not affect the design or operation of any system, structure, or component (SSC) in the plant. The safety functions of the related SSCs are not changed in any manner, nor is the reliability of any SSC reduced. The change does not affect the manner by which the facility is operated and does not change any facility, structure, system, or component. No new or different type of equipment will be installed by this proposed change.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change does not involve a significant reduction in a margin of safety.

The proposed change is administrative in nature and has no impact on the margin of safety of any Technical Specification. There is no impact on safety limits or limiting safety system settings. The change does not affect any plant safety parameters or setpoints. The proposed change deletes an inaccurate reference to a section of 10 CFR 51 that has been superseded. No physical or operational changes to the facility will result from the proposed changes. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Conclusion

Based upon the above evaluation, EGC has concluded that the criteria of 10 CFR 50.92(c) are satisfied and that the proposed change involves no significant hazards consideration.

Attachment E

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC, requests a change to Appendix B, Environmental Protection Plan (Non-Radiological), of Facility Operating License Nos. NPF-37 and NPF-66 for Byron Station, Units 1 and 2; NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2; and DPR-29 and DPR-30 for Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. The proposed change removes a parenthetical reference to a superseded section of 10 CFR 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions." This proposed change is administrative in nature and does not impact the protection of environmental values during operation of Byron Station, LSCS, or QCNPS. Also, the proposed change is consistent with the format of non-radiological Environmental Protection Plans (EPPs) utilized for more recently licensed EGC nuclear stations (i.e., Braidwood Station, Clinton Power Station, and Limerick Generating Station), and for the most recently-licensed nuclear station (i.e., Watts Bar Nuclear Station licensed in 1995).

EGC has evaluated this proposed change against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." EGC has determined that this proposed change meets the criteria for a categorical exclusion set forth in 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," paragraph (c)(9), and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92, "Issuance of amendment," paragraph (b). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria:

(i) The amendment involves no significant hazards consideration.

As demonstrated in Attachment D, this proposed change does not involve any significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

The proposed change is limited to deleting a parenthetical reference to a superseded section of 10 CFR 51 in Appendix B to the operating license (i.e., non-radiological Environmental Protection Plan). This change is administrative in nature. It does not allow for an increase in the unit power level, does not increase the production, nor alter the flow path or method of disposal of radioactive waste or byproducts. Therefore, the proposed change does not affect actual unit effluents.

Attachment E

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

- (iii) **There is no significant increase in individual or cumulative occupational radiation exposure.**

The proposed change will not result in changes in the operation or configuration of the facility. The proposed change only deletes an inaccurate reference, in the non-radiological Environmental Protection Plan, to a section of 10 CFR 51 that has been superseded. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from this change.