

Exelon Generation
4300 Winfield Road
Warrenville, IL 60555

www.exeloncorp.com

SAFEGUARDS INFORMATION

Nuclear

Withhold From Public Disclosure Under 10 CFR 2.390

RS-04-165

October 28, 2004

Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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

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

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

Subject: Response to NRC Request for Supplemental/Clarification Information on
Supplemental Response to Issuance of Order to Modify License for Revised
Design Basis Threat

References: (1) NRC Letter from Samuel J. Collins to Holders of Licenses for Operating
Power Reactors as listed in Enclosure 2, dated April 29, 2003, Regarding
Issuance of Order Requiring Compliance with Revised Design Basis Threat for
Operating Power Reactors (EA-03-086)

(2) Letter from J. A. Benjamin to U. S. NRC, "Supplemental Response to
Issuance of Order to Modify License for Revised Design Basis Threat," dated
October 26, 2004

The NRC issued an Order (i.e., Reference 1) ("Order EA-03-086" or "Order") to Exelon Generation Company, LLC (Exelon) on April 29, 2003. Order EA-03-086 imposed license conditions on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations (CFR). Section III.A of the Order required licensees to revise their physical security plans and safeguards contingency plans to provide protection against the revised design basis threat

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The Attachments Contain Safeguards Information
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(DBT) set forth in Attachment 2 to the Order. These actions were required to be implemented no later than October 29, 2004.

As described in Reference 2, our activities were scheduled to be implemented by October 29, 2004, as required by the Order. Exelon has implemented a comprehensive response to the Order and has in place the levels of protection against the DBT contemplated in the Order. Also, compensatory measures for the few planned activities associated with the Order that will not be fully implemented by October 29, 2004 will in place. These compensatory measures provide a level of protection at least as effective as those contemplated in the Order.

These few outstanding activities are largely due to delays associated with vendor supply issues for specific items and the subsequent testing of systems and components following delayed vendor shipments. These few outstanding items for Exelon represent a small percentage of the overall number of activities taken at the Exelon facilities in response to the Order.

The objectives of the enhanced protective actions set forth in the Order would be met by these compensatory measures. However, since these compensatory measures could be viewed as a temporary departure from the expected permanent features and activities needed for full compliance with the Order, Exelon as part of Reference 2 requested an extension of time beyond the implementation date for these few activities.

In response to Reference 2, the NRC on October 28, 2004 requested supplemental/clarification information for the requests related to Dresden, Limerick, and Peach Bottom. The Attachments to this letter provide the requested information. The Attachments in this letter retain the same designation as used in Reference 2 for ease of referencing.

The Attachments of this response contain Safeguards Information that must be protected from public disclosure pursuant to 10 CFR 73.21, "Requirements for the Protection of Safeguards Information." Exelon therefore requests that the Attachments be withheld from public disclosure. In addition, in accordance with 10 CFR 2.390(d)(1), Exelon requests that this letter be withheld from public disclosure since this letter contains information concerning the physical protection of the affected facilities not otherwise designated as Safeguards Information.

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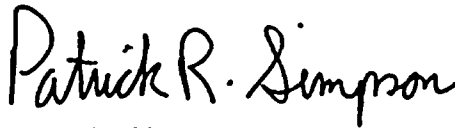
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If you have any questions regarding this submittal, please contact me at (630) 657-2823.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 28th day of October, 2004.

Respectfully,

A handwritten signature in black ink that reads "Patrick R. Simpson". The signature is written in a cursive, flowing style.

Patrick R. Simpson
Manager – Licensing

Attachments

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cc:

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

Assistant General Counsel for Materials
Litigation and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

U. S. Nuclear Regulatory Commission
ATTN: Mr. James E. Dyer, Director
Office of Nuclear Reactor Regulation
Mail Stop O5-E-07
One White Flint North
11555 Rockville Pike
Rockville, MD20852-2738

Regional Administrator – Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Office of the Secretary
U. S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Regional Administrator – Region III
U.S. Nuclear Regulatory Commission
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

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