

10CFR20.2301

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5928-04-20254
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December 7, 2004

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 Station, Units 1, 2 and 3
Facility Operating License Nos. DPR-2, DPR-19 and DPR-25
NRC Docket Nos. 50-10, 50-237, 50-249 and 72-37

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 Generating Station
Facility Operating License No. DPR-16
NRC Docket Nos. 50-219 and 72-15

Peach Bottom Atomic Power Station, Units 1, 2 and 3
Facility Operating License Nos. DPR-12, DPR-44 and DPR-56
NRC Docket Nos. 50-171, 50-277, 50-278 and 72-1027

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

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

Subject: Response to Request for Additional Information – Exemption from
10CFR20.1703 and 10CFR20 Appendix A Use of Delta Protection French
Designed Respiratory Protection Equipment

Reference: (1) Letter from M. P. Gallagher (Exelon/AmerGen) to USNRC, “Request for
Exemption from 10CFR20.1703 and 10CFR20 Appendix A Use of Delta
Protection French Designed Respiratory Equipment,” dated October 15,
2004

This letter provides additional information, as discussed on November 23, 2004, regarding the Exelon Generation Company, LLC (Exelon) and AmerGen Energy Company, LLC (AmerGen) request for exemption to allow use of the Delta Protection French-Designed suits as respiratory protection equipment. The Exelon/AmerGen request for exemption from the requirements of 10CFR20.1703 and 10CFR20 Appendix A was previously provided in Reference 1. Enclosed is a detailed response to the NRC request for additional information.

Regulatory commitments as a result of this submittal are identified in Enclosure 2. If any additional information is needed, please contact Mr. David J. Distel at (610) 765-5517.

Very truly yours,

Handwritten signature of Michael P. Gallagher in cursive script, followed by the word "FOR" in capital letters.

Michael P. Gallagher
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC and
AmerGen Energy Company, LLC

Enclosures: (1) Response to Request for Additional Information
(2) Regulatory Commitments

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Project Manager, NRR - Braidwood Station
NRC Project Manager, NRR - Byron Station
NRC Project Manager, NRR - Clinton Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station
NRC Project Manager, NRR - LaSalle County Station
NRC Project Manager, NRR - Limerick Generating Station
NRC Project Manager, NRR - Oyster Creek Generating Station
NRC Project Manager, NRR - Peach Bottom Atomic Power Station
NRC Project Manager, NRR - TMI Unit 1
NRC Project Manager, NRR - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Oyster Creek Generating Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - TMI Unit 1
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
Illinois Emergency Management Agency - Division of Nuclear Safety
Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental
Resources
Director, Bureau of Nuclear Engineering, New Jersey Department of Environmental
Protection
Chairman, Board of County Commissioners of Dauphin County, PA
Chairman, Board of Supervisors of Londonderry Township, PA
Mayor of Lacey Township, Forked River, NJ
R. I. McLean, State of Maryland
R. R. Janati, Commonwealth of Pennsylvania
K. Jabbour, NRC Project Manager, NRR - (Exelon/AmerGen Fleet)

ENCLOSURE 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

1. NRC Question

Based on a review of the attachments provided in the licensee's submittal, the manufacturer states (and the European Certification Authority assumes) that both models of the suits are authorized for single-use only. Please confirm that the suit will be discarded after one use.

Response

Exelon/AmerGen procedures will be revised to include guidance to ensure appropriate suit disposal after each use.

2. NRC Question

While the licensee has established a useful communication with the vendor for suit improvements and lessons learned from other users, it is vital that the vendor establish and alert each product user (licensee) to any significant problems or deficiencies with the suit, similar to the warning/alert system required by NIOSH in the United States. Verify that Exelon and AmerGen have committed to timely reporting of any defects experienced with these suits to the manufacturer and other U.S. users.

Response

The vendor has committed to report product issues on a quarterly basis. Upon discovery of manufacturer defects or usage problems identified by Exelon/AmerGen, the problem will be entered into the Exelon/AmerGen corrective action program. The Exelon/AmerGen corrective action program will enter identified manufacturer defects or significant usage problems into an Operating Experience Report issued to the nuclear power industry via the INPO Nuclear Network. Additionally, procedural guidance will be established to ensure that Exelon/AmerGen identified defects and usage problems are reported to the suit manufacturer.

3. NRC Question

While the licensees committed to use the manufacturer's information in developing implementing procedures (and training lesson plans) for using the suits, please identify any of the manufacturer's "instructions for donning and removal", "instructions for use" and "emergency features" technical information/directions provided, that will not be required by procedures. For each instruction identified, explain the rationale for not including it in the program's procedures/training (and any other compensating actions).

Response

Exelon/AmerGen intends to adhere to all of the manufacturer's "instructions for donning and removal", "instructions for use", and "emergency features" technical information/directions provided, with one exception. Exelon/AmerGen will not

incorporate the “instructions for donning and removal”, Attachment 2.5.5, Caution Step 2, which states, “The buddy system must be in effect with the use of this suit fed with a sufficient breathable air source with either both persons in it or the second person nearby in view with a particulate respirator ready.” The inherent safety features of this suit (mouth and wrist tear-away strips), combined with the use of headsets for communication and remote video monitoring, make the use of a stand-by rescue person or “buddy system” unnecessary. Additionally, it is noted that Exelon/AmerGen standard practice is to have individuals standing by to assist workers in removing the suits.

4. NRC Question

The submittal requests Exelon/AmerGen fleet approval for 10 CFR Part 50 and Part 72 licenses. Briefly describe how the respiratory protection suits will be used for Part 72 licenses.

Response

Use of these suits at the Exelon/AmerGen sites that have 10 CFR Part 72 licenses will primarily include usage, if needed, for activities around the spent fuel pool involving spent fuel cask evolutions in support of Independent Spent Fuel Storage Installation activities.

ENCLOSURE 2

REGULATORY COMMITMENTS

List of Regulatory Commitments

The following table identifies commitments made in this document by Exelon/AmerGen. Any other Actions discussed in the submittal representing intended or planned actions by Exelon/AmerGen are described to the NRC for the NRC's information and are not regulatory commitments.

COMMITMENTS	COMMITTED DATE
Procedural guidance will ensure appropriate suit disposal after each use.	February 1, 2005, upon NRC approval.
Procedural guidance will be established to ensure Exelon/AmerGen identified defects and usage problems are reported to the suit manufacturer.	February 1, 2005, upon NRC approval.
All of the manufacturer's "instructions for donning and removal", "instructions for use", and "emergency features" technical information/directions provided will be adhered to, with the exception of "instructions for donning and removal", Attachment 2.5.5, Caution Step 2.	February 1, 2005, upon NRC approval.