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Nuclear

Exelon Generation
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10 CFR 50.54(f)

RS-08-050

April 11, 2008

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

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
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
Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Three Month Response to Generic Letter 2008-01

Reference: NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008

The NRC issued the referenced Generic Letter (GL) to request that each licensee evaluate the licensing basis, design, testing, and corrective action program for the Emergency Core Cooling, Decay Heat Removal, and Containment Spray systems, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the GL to provide the following (summarized) information:

- (a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL;
- (b) A description of all corrective actions that were determined necessary; and
- (c) the schedule for completion of the corrective actions, and the basis for that schedule.

Additionally, the NRC requested that if a licensee cannot meet the requested nine month response date, the licensee, "...shall provide a response within 3 months of the date of this GL." In the three month response, the licensee was requested to describe, "...the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action."

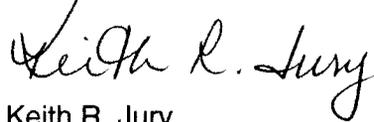
Attachments 1A through 1I to this letter contain the Exelon Generation Company, LLC, (EGC) and AmerGen Energy Company, LLC (AmerGen) three month response to NRC GL 2008-01.

Regulatory commitments are contained in Attachments 2A through 2I of this letter.

Should you have any questions concerning this letter, please contact Mr. Patrick Simpson at (630) 657-2823.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11th day of April 2008.

Respectfully,



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

- Attachment 1A: Generic Letter 2008-01 Three Month Response for Braidwood Station
- Attachment 1B: Generic Letter 2008-01 Three Month Response for Byron Station
- Attachment 1C: Generic Letter 2008-01 Three Month Response for Dresden Nuclear Power Station
- Attachment 1D: Generic Letter 2008-01 Three Month Response for LaSalle County Station
- Attachment 1E: Generic Letter 2008-01 Three Month Response for Limerick Generating Station
- Attachment 1F: Generic Letter 2008-01 Three Month Response for Oyster Creek Nuclear Generating Station
- Attachment 1G: Generic Letter 2008-01 Three Month Response for Peach Bottom Atomic Power Station
- Attachment 1H: Generic Letter 2008-01 Three Month Response for Quad Cities Nuclear Power Station
- Attachment 1I: Generic Letter 2008-01 Three Month Response for Three Mile Island Nuclear Station

- Attachment 2A: Regulatory Commitments for Braidwood Station
- Attachment 2B: Regulatory Commitments for Byron Station
- Attachment 2C: Regulatory Commitments for Dresden Nuclear Power Station
- Attachment 2D: Regulatory Commitments for LaSalle County Station
- Attachment 2E: Regulatory Commitments for Limerick Generating Station
- Attachment 2F: Regulatory Commitments for Oyster Creek Nuclear Generating Station
- Attachment 2G: Regulatory Commitments for Peach Bottom Atomic Power Station
- Attachment 2H: Regulatory Commitments for Quad Cities Nuclear Power Station
- Attachment 2I: Regulatory Commitments for Three Mile Island Nuclear Station

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cc: NRC Regional Administrator - Region I
NRC Regional Administrator - Region III
Senior Resident Inspector - Braidwood Station
Senior Resident Inspector - Byron Station
Senior Resident Inspector - Clinton Power Station
Senior Resident Inspector - Dresden Nuclear Power Station
Senior Resident Inspector - LaSalle County Station
Senior Resident Inspector - Limerick Generating Station
Senior Resident Inspector - Oyster Creek Nuclear Generating Station
Senior Resident Inspector - Peach Bottom Atomic Power Station
Senior Resident Inspector - Quad Cities Nuclear Power Station
Senior Resident Inspector - Three Mile Island Nuclear Station Unit 1

Attachment 1A

Generic Letter 2008-01 Three Month Response for Braidwood Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

Braidwood Station hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

Braidwood Station will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to elevated dose rates. Braidwood Station Unit 1 does not currently have a planned refuel outage to conduct the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next Unit 1 refuel outage, currently planned for spring 2009.

The following Unit 1 systems contain piping sections that will not be accessed until the next refueling outage.

- Safety Injection (SI) System discharge piping – Containment penetration to reactor pressure vessel
- SI System discharge piping – SI accumulator tanks to reactor pressure vessel
- Containment Spray System discharge piping – Containment penetration to riser
- Chemical Volume Control System discharge piping – Containment penetration to reactor pressure vessel
- Residual Heat Removal (RHR) System discharge piping – Containment penetration to reactor pressure vessel
- RHR System suction piping – Containment penetration to reactor pressure vessel

Braidwood Station has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. Braidwood Station will complete all the GL actions for these systems with the exception of the final verification walkdown of the high radiation and containment locations on Unit 1. Our detailed design and operating reviews of

Attachment 1A

Generic Letter 2008-01 Three Month Response for Braidwood Station

these systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage for Unit 1 is an acceptable alternative course of action. Attachment 2A contains the associated regulatory commitments.

Attachment 1B

Generic Letter 2008-01 Three Month Response for Byron Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

Byron Station hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

Byron Station will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to elevated dose rates. Byron Station Unit 2 does not currently have a planned refuel outage to conduct the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next Unit 2 refuel outage, currently planned for fall 2008.

The following Unit 2 systems contain piping sections that will not be accessed until the next refueling outage.

- Safety Injection (SI) System discharge piping – Containment penetration to reactor pressure vessel
- SI System discharge piping – SI accumulator tanks to reactor pressure vessel
- Containment Spray System discharge piping – Containment penetration to riser
- Chemical Volume Control System discharge piping – Containment penetration to reactor pressure vessel
- Residual Heat Removal (RHR) System discharge piping – Containment penetration to reactor pressure vessel
- RHR System suction piping – Containment penetration to reactor pressure vessel

Byron Station has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. Byron Station will complete all the GL actions for these systems with the exception of the final verification walkdown of the high radiation and containment locations for Unit 2. Our detailed design and operating reviews of these systems, including the areas accessible only during outages, will provide a high degree of

Attachment 1B

Generic Letter 2008-01 Three Month Response for Byron Station

confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage for Unit 2 is an acceptable alternative course of action. Attachment 2B contains the associated regulatory commitments.

Attachment 1C

Generic Letter 2008-01 Three Month Response for Dresden Nuclear Power Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

Dresden Nuclear Power Station (DNPS) hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

DNPS will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to their location in the primary containment and steam tunnel area for both Units 2 and 3. The primary containment is inerted with a nitrogen atmosphere during power operation prohibiting entry for inspection. Additionally, both the primary containment and steam tunnel area are high radiation areas that contain high energy lines. Access to these areas is restricted during power operation for ALARA and safety concerns. DNPS does not currently have a planned refuel outage to conduct the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next refuel outage, currently planned for Unit 3 in fall 2008 and for Unit 2 in fall 2009.

The following systems contain piping sections that will not be accessed until the next refueling outage for each unit.

- High Pressure Coolant Injection discharge piping – Inside the steam tunnel area up to and including the connection to feedwater
- Core Spray discharge piping - Containment penetration to reactor pressure vessel
- Shutdown Cooling (SDC) discharge piping - Containment penetration to reactor pressure vessel
- SDC suction piping – Containment penetration to reactor pressure vessel
- Low Pressure Coolant Injection (LPCI) discharge piping - Containment penetration to reactor pressure vessel

DNPS has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which

Attachment 1C

Generic Letter 2008-01 Three Month Response for Dresden Nuclear Power Station

includes system walkdowns, detailed evaluations, and testing performed since plant licensing. DNPS will complete all the GL actions for these systems with the exception of the final verification walkdown of the primary containment and steam tunnel locations. Our detailed design and operating reviews of these systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage for each unit is an acceptable alternative course of action. Attachment 2C contains the associated regulatory commitments.

Attachment 1D

Generic Letter 2008-01 Three Month Response for LaSalle County Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

LaSalle County Station hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

LaSalle County Station will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to high radiation areas and/or a nitrogen-inerted containment atmosphere during power operation. Access to these areas is restricted during power operation for ALARA and safety concerns. LaSalle County Station does not currently have a planned refuel outage to conduct the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next refuel outage, currently planned for spring 2009 for Unit 2 and spring 2010 for Unit 1.

The following systems contain piping sections that will not be accessed until the next refueling outage for each unit.

- Low Pressure Core Spray (LPCS) discharge piping - Containment penetration to reactor pressure vessel
- High Pressure Core Spray (HPCS) discharge piping – Containment penetration to reactor pressure vessel
- Residual Heat Removal (RHR) (Low Pressure Coolant Injection and Shutdown Cooling modes) discharge piping - Containment penetration to reactor pressure vessel
- RHR (Shutdown Cooling mode) suction piping – Containment penetration to reactor pressure vessel
- RHR piping – RHR heat exchanger room

LaSalle County Station has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. LaSalle County Station will complete all the GL

Attachment 1D

Generic Letter 2008-01 Three Month Response for LaSalle County Station

actions for these systems with the exception of the final verification walkdown of the high radiation and containment locations. Our detailed design and operating reviews of these systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage for each unit is an acceptable alternative course of action. Attachment 2D contains the associated regulatory commitments.

Attachment 1E

Generic Letter 2008-01 Three Month Response for Limerick Generating Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

Limerick Generating Station hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

Limerick Generating Station will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are in the Unit 2 primary containment and main steam pipe tunnel. These areas are inaccessible during power operation due to high radiation areas and/or a nitrogen-inerted atmosphere. Limerick Generating Station Unit 2 does not currently have a planned refuel outage to conduct the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next Unit 2 refuel outage, currently planned for spring 2009.

The following systems contain piping sections that will not be accessed until the next Unit 2 refueling outage.

- High Pressure Coolant Injection discharge piping - Inside the main steam pipe tunnel up to and including the connection to feedwater
- Core Spray discharge piping - Containment penetration to reactor pressure vessel
- Residual Heat Removal (RHR) (Shutdown Cooling mode) discharge piping - Containment penetration to reactor pressure vessel
- RHR (Shutdown Cooling mode) suction piping – Containment penetration to reactor pressure vessel
- RHR (Low Pressure Coolant Injection mode) discharge piping - Containment penetration to reactor pressure vessel

Limerick Generating Station has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. Limerick Generating Station will complete all the GL actions for these systems with the exception of the final verification walkdown of the high radiation and containment locations. Our detailed design and operating reviews of these

Attachment 1E

Generic Letter 2008-01 Three Month Response for Limerick Generating Station

systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage for Unit 2 is an acceptable alternative course of action. Attachment 2E contains the associated regulatory commitments.

Attachment 1F

Generic Letter 2008-01 Three Month Response for Oyster Creek Nuclear Generating Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

Oyster Creek Nuclear Generating Station (OCNGS) hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

OCNGS will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to the containment being inerted. OCNGS does not currently have a planned refuel outage that will allow completion of the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next refuel outage, currently planned to start in fall 2008.

The following systems contain piping sections that will not be accessed until the next refueling outage.

- Isolation Condenser piping - Containment penetration to reactor pressure vessel
- Core Spray discharge piping - Containment penetration to reactor pressure vessel
- Shutdown Cooling piping - Containment penetration to reactor pressure vessel

OCNGS has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. OCNGS will complete all the GL actions for these systems with the exception of the final verification walkdown of the containment locations. Our detailed design and operating reviews of these systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Attachment 1F

Generic Letter 2008-01 Three Month Response for
Oyster Creek Nuclear Generating Station

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage is an acceptable alternative course of action. Attachment 2F contains the associated regulatory commitments.

Attachment 1G

Generic Letter 2008-01 Three Month Response for Peach Bottom Atomic Power Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

Peach Bottom Atomic Power Station (PBAPS) hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

PBAPS will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to being located in high radiation areas and nitrogen-inerted containments. PBAPS Units 2 and 3 do not currently have planned refuel outages to conduct the walkdowns and evaluations in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next refuel outage, currently planned for fall 2008 and fall 2009 for Unit 2 and Unit 3, respectively.

The following systems contain piping sections that will not be accessed until the next refueling outage for each unit.

- High Pressure Coolant Injection discharge piping – Piping and valves in outboard MSIV room to feedwater line
- Core Spray discharge piping - Containment penetration to reactor pressure vessel
- Residual Heat Removal (RHR) (Low Pressure Coolant Injection and Shutdown Cooling modes) discharge piping - Containment penetration to reactor pressure vessel
- RHR (Shutdown Cooling mode) suction piping – Containment penetration to reactor pressure vessel

PBAPS has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. PBAPS will complete all the GL actions for these systems with the exception of the final verification walkdown of the high radiation and containment locations.

Attachment 1G

Generic Letter 2008-01 Three Month Response for Peach Bottom Atomic Power Station

Our detailed design and operating reviews of these systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage for each unit is an acceptable alternative course of action. Attachment 2G contains the associated regulatory commitments.

Attachment 1H

Generic Letter 2008-01 Three Month Response for Quad Cities Nuclear Power Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

Quad Cities Nuclear Power Station (QCNPS) hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

QCNPS will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to the need for access to high radiation areas and a nitrogen-inerted containment. QCNPS does not currently have a planned Unit 1 outage to conduct the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next Unit 1 refueling outage, currently planned for spring 2009.

The following systems contain piping sections that will not be accessed until the next Unit 1 refueling outage.

- High Pressure Coolant Injection discharge piping – Piping in MSIV room to the outboard isolation valve
- Core Spray discharge piping - Containment penetration to reactor pressure vessel
- Residual Heat Removal (RHR) (Low Pressure Coolant Injection and Shutdown Cooling modes) discharge piping - Containment penetration to reactor pressure vessel
- RHR (Shutdown Cooling mode) suction piping – Containment penetration to reactor pressure vessel, piping in the high pressure heater bay, and piping in the MSIV room

QCNPS has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. QCNPS will complete all the GL actions for these systems with the exception of the final verification walkdown of the high radiation and containment locations. Our detailed design and operating reviews of these systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will

Attachment 1H

Generic Letter 2008-01 Three Month Response for Quad Cities Nuclear Power Station

perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage for Unit 1 is an acceptable alternative course of action. Attachment 2H contains the associated regulatory commitments.

Generic Letter 2008-01 Three Month Response for Three Mile Island Nuclear Station

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine month period to inform the NRC within three months of the date of the GL; propose alternative actions; and provide sufficient justification for such alternatives.

TMI Unit 1 hereby notifies the NRC that we do not anticipate being able to fully complete the requested evaluations within the proposed nine month period and offer the following proposed alternative actions and supporting justifications of adequacy.

TMI Unit 1 will be able to complete a significant amount of the requested actions, in particular those involving reviews of plant design, licensing basis documentation, system operating and testing procedures. However, the GL requested evaluations also require physical walkdowns of the subject systems to confirm pertinent design details (e.g., locations of high point vents), and as-built configurations (e.g., pipe elevations and slope). Portions of these piping systems are inaccessible during power operation due to being located in high radiation areas and the containment. TMI Unit 1 does not currently have a planned refuel outage to conduct the walkdowns in these areas and complete the associated evaluations within the nine month period requested by the GL (i.e., by October 11, 2008). The next such opportunity is the next refuel outage, currently planned for fall 2009.

The following systems contain piping sections that will not be accessible until the next refueling outage.

- Make Up (MU) – High Pressure Injection (HPI)
 - Normal Reactor Coolant System (RCS) Make-up injection line from containment penetration to RCS injection point
 - HPI Injection lines from containment penetrations to RCS injection nozzles
 - HPI injection cross-connect lines inside containment
- Core Flooding (CF) – All piping inside containment
- Decay Heat (DH) – Low Pressure Injection (LPI)
 - Injection lines from containment penetrations to core flood system injection point
 - DH dropline from RCS to containment penetration

TMI Unit 1 has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required functions, based upon our operating experience, which includes system walkdowns, detailed evaluations, and testing performed since plant licensing. TMI Unit 1 will complete all the GL actions for these systems with the exception of the final verification walkdown of the high radiation and containment

Attachment 11

Generic Letter 2008-01 Three Month Response for Three Mile Island Nuclear Station

locations. Our detailed design and operating reviews of these systems, including the areas accessible only during outages, will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing performance of the detailed walkdowns of a portion of piping sections, outside the requested nine month period, but no later than startup from the next refuel outage is an acceptable alternative course of action. Attachment 21 contains the associated regulatory commitments.

Attachment 2A

Regulatory Commitments for Braidwood Station

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) for the Braidwood Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 1 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 1 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 1 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No

Attachment 2B

Regulatory Commitments for Byron Station

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) for the Byron Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 2 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 2 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 2 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No

Attachment 2C

Regulatory Commitments for Dresden Nuclear Power Station

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) for the Dresden Nuclear Power Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 2 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 2 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 2 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No
Complete the detailed walkdowns of Unit 3 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 3 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 3 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No

Attachment 2D

Regulatory Commitments for LaSalle County Station

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) for the LaSalle County Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 1 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for spring 2010)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 1 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for spring 2010)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 1 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for spring 2010)	Yes	No
Complete the detailed walkdowns of Unit 2 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 2 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 2 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No

Attachment 2E

Regulatory Commitments for Limerick Generating Station

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) for the Limerick Generating Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 2 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 2 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 2 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No

Attachment 2F

Regulatory Commitments for Oyster Creek Nuclear Generating Station

The following list identifies those actions committed to by AmerGen Energy Company, LLC (AmerGen) for the Oyster Creek Nuclear Generating Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by AmerGen, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Submit supplemental response to the NRC documenting completion of the walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No

Attachment 2G

Regulatory Commitments for Peach Bottom Atomic Power Station

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) for the Peach Bottom Atomic Power Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 2 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 2 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 2 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for fall 2008)	Yes	No
Complete the detailed walkdowns of Unit 3 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 3 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 3 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No

Attachment 2H

Regulatory Commitments for Quad Cities Nuclear Power Station

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) for the Quad Cities Nuclear Power Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 1 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 1 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 1 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for spring 2009)	Yes	No

Attachment 2I

Regulatory Commitments for Three Mile Island Nuclear Station

The following list identifies those actions committed to by AmerGen Energy Company, LLC (AmerGen) for the Three Mile Island Nuclear Station in this submittal. Any other actions discussed in the submittal represent intended or planned actions by AmerGen, are described only for information, and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Complete the detailed walkdowns of Unit 1 inaccessible piping sections of GL 2008-01 subject systems.	Prior to startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No
Complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of Unit 1 inaccessible piping sections.	Within 60 days following startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No
Submit supplemental response to the NRC documenting completion of the Unit 1 walkdowns and any impact upon the GL 2008-01 nine month response as a result of completed evaluations.	Within 90 days following startup from the next refuel outage (currently scheduled for fall 2009)	Yes	No