

RS-09-137

October 7, 2009

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

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Subject: Update to Application for License Transfers and Conforming
Administrative License Amendments

References: 1) Letter from T. S. O'Neill (Exelon Generation Company) and
J. Christian (*ZionSolutions*) to NRC, "Application for License
Transfers and Conforming Administrative License Amendments,"
dated January 25, 2008

2) Letter from John B. Hickman (NRC) to Patrick T. Daly (*ZionSolutions*),
"Order Approving Transfer of Licenses and Conforming Amendments
Relating to Zion Nuclear Power Station Units 1 and 2," dated March 4,
2009

This letter provides supplemental information in support of the NRC approval requested in the Reference 1 License Transfer Application (LTA). That application requested NRC approval for transfer of the Zion operating licenses from Exelon Generation Company, LLC (Exelon) to *ZionSolutions*, LLC (*ZionSolutions*). Corresponding changes to the Operating Licenses were proposed along with minor editorial changes to the Permanently Defueled Technical Specifications (PDTs). Minor revisions to those changes are now being proposed. These revisions do not constitute a substantive change to the application.

Attachment 3 of Reference 1 contains proposed changes to portions of the Zion PTDS which pertain to access controls for High Radiation Areas. These changes appeared to be necessary for consistency with the corresponding regulatory requirements of 10 CFR 20.1601. Upon further review, we have determined that the proposed changes are unnecessary.

The threshold for designation as a High Radiation Area is defined in 10 CFR 20. An area where the intensity of radiation is greater than 100 mrem/hr at 30 cm from the radiation source is defined as a High Radiation Area. Section 5.8.1 of the Zion PDTS correctly specifies controls for those High Radiation Areas where the levels are between 100 and 1000 mrem/hr. Sections 5.8.2, 5.8.3, and 5.8.4 of PDTS correctly specify additional controls for those High Radiation Areas where the levels are above 1000 mrem/hr. No changes to these PDTS sections are required at this time. Therefore, we are withdrawing the request for changes to PDTS Section 5.8 which was included with Reference 1.

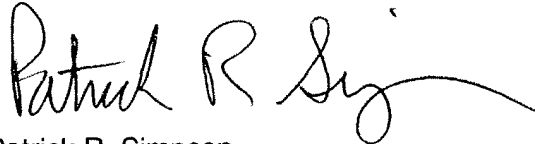
The Enclosure to this letter provides a revised page for Attachment 3 provided in Reference 1. Instructions for deleting and add the page to that document is also provided.

As with the original application, a copy of this letter is being provided to the State of Illinois in accordance with the requirements of 10 CFR 50.91(b)(1).

This letter does not contain any regulatory commitments. If you have any questions about this letter, please contact Patrick Simpson at (630) 657-2823 or Tom Tramm at (847) 379-2725.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 7th day of October 2009.

Respectfully,

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

Patrick R. Simpson
Manager – Licensing
Exelon Generation Company

Enclosure: Update to January 25, 2008 License Transfer Application

cc: Regional Administrator, Region III, US NRC

ENCLOSURE

Update to January 25, 2008 License Transfer Application
(as supplemented on July 28, September 25, and October 23, 2008
and February 4, 2009)

Instructions

Attachment 3

- Delete: Page labeled: "Permanently Defueled Technical Specification Changes," undated
- Replace with: Page labeled: "Permanently Defueled Technical Specification Changes," dated October 2009

Permanently Defueled Technical Specification Changes

**Appendix A
Zion Station**

| Technical Specification Section | Action Description |
|--|---|
| Section 5.2.1.c. | Change Corporate Vice-President to President, ZionSolutions |
| Section 5.9.2.e.2. | Change Corporate Vice-President to President, ZionSolutions |

**Appendix B
Zion Station**

| Technical Specification Section | Action Description |
|--|---------------------------|
| None | |