





Nuclear

SECY-00-0045 (NEI 99-04)

January 15, 2010

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

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

Subject:

Submittal of Commitment Revision Report for 2009

Attached is the Commitment Revision Report covering the time period of 1/1/09 to 12/31/09. This report is submitted pursuant to SECY-00-0045 (NEI 99-04).

If you have any questions, feel free to contact Mr. Bill Nelle at 717-456-3422.

William F. Maguire

Site Vice President

Peach Bottom Atomic Power Station

cc:

F. L. Bower, Senior Resident Inspector, USNRC, PBAPS

R. R. Janati, Commonwealth of Pennsylvania

Region 1 Administrator, USNRC

CCN: 10-01

Attachment



Letter Source:

NRC Inspection Report 78-16/20 involving adherence to a

First Aid Drill procedure

Exelon tracking number

T03135

Nature of Commitment

Revise First Aid Emergency Drill procedure to permit

substitution of actual injuries in lieu of simulated.

Summary of Justification:

This is a historical commitment. The revision to the procedure was to reflect actual practices by the Security organization. Security no longer performs these activities and improved standards and practices regarding procedural adherence and update have addressed this issue and are proceduralized within the Exelon standard documents. There is no longer a need to track this commitment.

Letter Source:

NRC Security Frequently Asked Question (SFAQ) 04-09

dated 06/30/05, Compensatory Measures for Vehicle

Barrier Systems.

Exelon tracking number

T04645

Nature of Commitment

Comply with SFAQ 04-09, which provided additional

guidance on compensatory measures for vehicle barrier

systems.

Summary of Justification:

Since the issuance of SFAQ 04-09, NEI has revised the security template, NEI 03-12 Revision 4, to include the requirements in this SFAQ. The security plan has been revised to meet the NEI template. As the revised security plan encompasses the guidance in SFAQ 04-09 and changes to the plan are part of a codified process, tracking as a separate commitment is no longer required.

Letter Source:

Letter to NRC dated 02/27/97 responding to an apparent

violation regarding failure to control safeguards information

(SGI).

Exelon tracking number

T03957

Nature of Commitment

Develop standardized procedures for handling and

distributing SGI.

Summary of Justification:

This is a historical commitment. The corrective actions were effective and the station is in compliance with NRC requirements. Improved standards and practices in the process for handling SGI has addressed this issue and are proceduralized within Exelon standard documents. There is no longer a need to track this commitment.

Letter Source:

NRC Inspection Report 89-80/80 involving security

computer software.

Exelon tracking number

T00389

Nature of Commitment

Develop a verification and validation (V&V) procedure for security computer software and incorporate the

requirement for V&V in the security plan.

Summary of Justification:

This is a historical commitment. The corrective actions were effective and the station is compliance with NRC requirements. Improved standards and practices for V&V of software has addressed this issue and are proceduralized within Exelon standard documents. There is no longer a need to track this commitment.

Letter Source:

Letter to NRC dated 11/16/95 responding to NRC Bulletin

95-02 which addressed the unexpected clogging of a

Residual Heat Removal pump suction strainer.

Exelon tracking number

T03854

Nature of Commitment

Measure ECCS pumps suction strainers strainer delta

pressure.

Summary of Justification:

The commitment was applicable to the suction strainers that were installed at the time. Since then, larger suction strainers have been installed that are of a size that precludes the testing for differential pressure from yielding meaningful data. The NRC acknowledged this in their Safety Evaluation Report for the closeout of NRC Bulletin 95-02 which also involved the existing suction strainers. The larger suction strainers have been installed in both units eliminating the need to track the commitment.

Letter Source:

NRC Inspection Report 89-80/80 involving security tactical

training and defensive positions.

Exelon tracking number

T00385

Nature of Commitment

Develop additional security tactical training and reassess

or revise power block defensive positions.

Summary of Justification:

This is a historical commitment. The corrective actions were effective and the station is compliance with NRC requirements. Changes have occurred in the security plan and protective strategies through the years and have been subjected to NRC drills with successful results. There is no longer a need to track this commitment.

Letter Source:

Letter to NRC dated 5/16/07 providing details for the B.5.b

Phases 2 and 3 Mitigation Strategies, including Responses

to Requests for Additional Information

Exelon tracking number

T04636

Nature of Commitment

Implement a Reactor/Containment mitigation strategy to

reduce the magnitude of any fission product releases by

spraying.

Summary of Justification:

A change was made in the method of containing runoff from the use of sprays to address a weakness discovered in the existing methodology. The revised methodology complies with the NRC endorsed industry guidance established for the strategy regarding containment and monitoring of runoff.