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Nuclear

10 CFR 26.203(e) 10 CFR 26.717(e)

RS-11-103

June 16, 2011

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

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 Facility Operating License No. NPF-62 NRC Docket No. 50-461

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 Renewed 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

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

Subject: Revision to Exelon Fitness for Duty Performance Data Reports – Annual 2010

Reference: Letter from J. L. Hansen, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, "Fitness for Duty Performance Data Reports – Annual

2010," (ML110590435)

U.S. Nuclear Regulatory Commission Revision to Exelon FFD Performance Data Reports - Annual 2010 June 16, 2011 Page 2

In the referenced letter, Exelon Generation Company, LLC (Exelon) submitted the Fitness for Duty (FFD) Program Performance Data for the subject list of docketed stations. This report covered the twelve-month period ending December 31, 2010.

A recent review of the referenced submittal by Exelon that was initiated as a result of follow up discussions with NRC staff that revealed a discrepancy in the total number of waivers between the two waiver data tables for Byron Station, Clinton Power Station, Limerick Generating Station, Oyster Creek Nuclear Generating Station, Peach Bottom Atomic Power Station, and Three Mile Island Nuclear Station, Unit 1. The attachment to this letter provides the revisions to the data tables to ensure the total waiver numbers for the two tables are the same.

There are no regulatory commitments contained in this letter. Should you have any questions, please contact Frank J. Mascitelli at (610) 765-5512.

Respectfully

Jeffrey L. Hansen Manager - Licensing

Exelon Generation Company, LLC

Attachment: Revision to 2010 Fitness for Duty Performance Data Personnel Subject to 10 CFR 26

Random Testing Rate

Exelon Generation Company, LLC (EGC) maintains separate testing pools for employees and contractors. For the entire year of 2010 the companywide random testing rate for employees was 52.6% and for contractors the random testing rate was 52%.

Work Hours Control Waivers - Summary of Corrective Actions

EGC issued 334 work hour rule waivers in 2010. Four sites, Braidwood, Dresden, LaSalle,- and Quad Cities, issued no waivers. For the remaining sites, the waivers were entered into the corrective action program as required by procedure with no generic actions being identified. For Limerick, the 175 maintenance waivers were related to the D23 emergency diesel generator bearing failure event and associated repair work. For Oyster Creek, the 39 security waivers- were mostly related to weather events and minimum staffing conditions. There were no significant issues requiring corrective actions.

Additional Information

During the current reporting period, i.e., January - December, 2010, seventeen (17) specimens from all locations were reported as presumptive positive for cocaine as a result of on-site screening. Fourteen (14) of the seventeen (17) specimens were confirmed as positive by the laboratories and were verified as positive by the Medical Review Officer for a confirmation rate of 82.4%. This confirmation rate does not allow Exelon to temporarily suspend individuals from unescorted access or to take lesser administrative actions with individuals based on an unconfirmed presumptive positive test for cocaine as stated in 10 CFR 26.75(i).

During the current reporting period, i.e., January-December, 2010, fifty-seven (57) specimens from all locations were reported as presumptive positive for marijuana as a result of on-site screening. Fifty (50) of the fifty-seven (57) specimens were confirmed as positive by the laboratories and were verified as positive by the Medical Review Officer for a confirmation rate of 87.7%. This confirmation rate allows Exelon to temporarily suspend individuals from unescorted access or to take lesser administrative actions with individuals based on an unconfirmed presumptive positive test for marijuana as stated in 10 CFR 26.75(i).

There were three (3) specimens reported as positive and dilute as permitted in 10 CFR 26.163(a)(2).

BYRON STATION

Waivers

List the number of waivers issued for work hour limits that were exceeded during this reporting period.

			Work Ho	our Limit		
Group	> 16 in 24 hours	> 26 in 48 hours	> 72 in 7 days	> 10 hour break	< 34 hour break in any 9-day period	< Minimum day off requirement
Operations	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Maintenance	Outage -0 Online- 1	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Chemistry	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
RP	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Security	Outage -0 Online- 2	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online 0
Contractors/ Vendors	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Total	Outage -0 Online- 3	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0

$\textbf{Number of Individual Waivers:} \ \ \textbf{List the number of individuals who received waivers based on the number is sued.}$

# Waivers Issued to Individual	Operations	Maintenance	Chemistry	RP	Security	Contractors	Vendors
1	0	1	0	0	0	0	0
2	0	0	0	0	2	0	0
3	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0
Total	0	1	0	0	4	0	0

Summary of Corrective Actions:

The waivers were entered into the corrective action program as required by procedure for tracking and resolution. There were no significant issues requiring corrective actions.

CLINTON POWER STATION

Waivers - List the number of waivers issued for work hour limits that were exceeded during this reporting period.

				our Limit	g time reperting peri	
Group	> 16 in 24 hours	> 26 in 48 hours	> 72 in 7 days	> 10 hour break	< 34 hour break in any 9-day period	< Minimum day off requirement
Operations	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0			
Maintenance	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0			
Chemistry	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0			
RP	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0			
Security	Outage -0 Online- 4	Outage -0 Online- 5	Outage -0 Online- 0	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 0
Contractors/ Vendors	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0			
Total	Outage -0 Online- 4	Outage -0 Online- 5	Outage -0 Online- 0	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 0

Number of Individual Waivers: List the number of individuals who received waivers based on the number issued.

# Waivers Issued to Individual	Operations	Maintenance	Chemistry	RP	Security	Contractors	Vendors
1	0	0	0	0	1	0	0
2	0	0	0	0	2	0	0
3	0	0	0	0	2	0	0
4	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0
Total	0	0	0	0	11	0	0

<u>Summary of Corrective Actions:</u>
The waivers were entered into the corrective action program as required by procedure for tracking and resolution. There were no significant issues requiring corrective actions.

LIMERICK GENERATING STATION

Waivers

List the number of waivers issued for work hour limits that were exceeded during this reporting period.

			Work Ho	our Limit		
Group	> 16 in 24 hours	> 26 in 48 hours	> 72 in 7 days	> 10 hour break	< 34 hour break in any 9-day period	< Minimum day off requirement
Operations	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Maintenance	Outage -0 Online- 7	Outage -0 Online- 11	Outage -0 Online- 66	Outage -0 Online- 0	Outage -0 Online- 67	Outage -0 Online- 24
Chemistry	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
RP	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 1	Outage -0 Online- 0	Outage -0 Online- 0
Security	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Contractors/ Vendors	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Total	Outage -0 Online- 7	Outage -0 Online- 11	Outage -0 Online- 66	Outage -0 Online- 1	Outage -0 Online- 67	Outage -0 Online- 24

Number of Individual Waivers: List the number of individuals who received waivers based on the number issued.

# Waivers Issued to Individual	Operations	Maintenance	Chemistry	RP	Security	Contractors	Vendors
1	0	8	0	1	0	0	0
2	0	44	0	0	0	0	0
3	0	25	0	0	0	0	0
4	0	1	0	0	0	0	0
5	0	0	0	0	0	0	0
Total	0	175	0	1	0	0	0

Summary of Corrective Actions:

There were 175 waivers- issued in maintenance during the second quarter of 2010 due to gross failure of the emergency diesel generator (D23) main bearing. The event resulted in extensive damage to the diesel and a small fire. The repair work necessitated the issuance of waivers to restore the safety system to operability within the time requirements of the technical specification Limited Condition of Operation (30 days). This event was not due to daily routine maintenance and therefore was determined not to require any additional corrective actions.

OYSTER CREEK GENERATING STATION

<u>Waivers -</u>
List the number of waivers issued for work hour limits that were exceeded during this reporting period.

			Work Ho	our Limit		
Group	> 16 in 24		> 10 hour break	< 34 hour break in any 9-day period	< Minimum day off requirement	
Operations	Outage -0 Online- 5	Outage -0 Online- 8	Outage -0 Online- 1	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Maintenance	Outage -3 Online- 0	Outage -3 Online- 0	Outage -14 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -11 Online- 0
Chemistry	Outage -0 Online- 2	Outage -0 Online- 1	Outage -0 Online- 3	Outage -0 Online- 2	Outage -0 Online- 0	Outage -2 Online- 1
RP	Outage -0 Online- 2	Outage -0 Online- 1	Outage -2 Online- 1	Outage -0 Online- 1	Outage -0 Online- 0	Outage -2 Online- 0
Security	Outage -0 Online- 19	Outage -0 Online- 18	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Contractors/ Vendors	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Total	Outage -3 Online- 28	Outage -3 Online- 28	Outage -16 Online- 7	Outage -0 Online- 3	Outage -0 Online- 0	Outage -15 Online- 1

Number of Individual Waivers: List the number of individuals who received waivers based on the number issued.

# Waivers Issued to Individual	Operations	Maintenance	Chemistry	RP	Security	Contractors	Vendors
1	2	0	1	1	1	0	0
2	6	11	0	2	16	0	0
3	0	3	0	0	2	0	0
4	0	0	0	1	0	0	0
10	0	0	1	0	0	0	0
Total	14	31	11	9	39	0	0

Summary of Corrective Actions:

The waivers were entered into the corrective action program as required by procedure for tracking and resolution. The 39 security waivers were necessary to meet minimum staffing due primarily -to inclement winter weather or call-offs/late arrivals. There were no significant issues requiring corrective actions.

PEACH BOTTOM ATOMIC POWER STATION

Waivers

List the number of waivers issued for work hour limits that were exceeded during this reporting period.

			Work Ho	our Limit		
Group	> 16 in 24 hours	> 26 in 48 hours	> 72 in 7 days	> 10 hour break	< 34 hour break in any 9-day period	< Minimum day off requirement
Operations	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Maintenance	Outage -1 Online- 0	Outage -1 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Chemistry	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
RP	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Security	Outage -0 Online- 6	Outage -2 Online- 5	Outage -0 Online- 0	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 1
Contractors/ Vendors	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Total	Outage -1 Online- 6	Outage -3 Online- 5	Outage -0 Online- 0	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 1

Number of Individual Waivers: List the number of individuals who received waivers based on the number issued.

# Waivers Issued to Individual	Operations	Maintenance	Chemistry	RP	Security	Contractors	Vendors
1	0	0	0	0	8	0	0
2	0	1	0	0	4	0	0
3	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0
Total	0	2	0	0	16	0	0

Summary of Corrective Actions:

The waivers were entered into the corrective action program as required by procedure for tracking and resolution. The 16 security waivers were necessary to meet minimum staffing due- primarily to inclement winter weather or call-offs/late arrivals. There were no significant issues requiring corrective actions

THREE MILE ISLAND NUCLEAR GENERATING STATION

Waivers - List the number of waivers issued for work hour limits that were exceeded during this reporting period.

VVAIVCIS - LIST	the number of waiv	reis issueu ioi worr		our Limit	g tills reporting pen	ou.
Group	> 16 in 24 hours	> 26 in 48		> 10 hour break	< 34 hour break in any 9-day period	< Minimum day off requirement
Operations	Outage -0 Online- 1	Outage -0 Online- 1	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Maintenance	Outage -0 Online- 1	Outage -0 Online- 1	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Chemistry	Outage -0 Online- 0	Outage -0 Online- 1	Outage -0 Online- 2	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 2
RP	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Security	Outage -0 Online- 6	Outage -0 Online- 4	Outage -0 Online- 1	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Contractors/ Vendors	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 0
Total	Outage -0 Online- 8	Outage -0 Online- 7	Outage -0 Online- 3	Outage -0 Online- 0	Outage -0 Online- 0	Outage -0 Online- 2

Number of Individual Waivers: List the number of individuals who received waivers based on the number issued.

# Waivers Issued to Individual	Operations	Maintenance	Chemistry	RP	Security	Contractors	Vendors
1	0	0	1	0	9	0	0
2	1	1	2	0	1	0	0
3	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0
Total	2	2	5	0	11	0	0

Summary of Corrective Actions:

The waivers were entered into the corrective action program as required by procedure for tracking and resolution. The 20 waivers were necessary to meet minimum staffing due primarily to inclement winter weather or call-offs/late arrivals. There were no significant issues requiring corrective actions.