

Order No. EA-12-051

RS-12-052
RA-12-038
TMI-12-040

March 30, 2012

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 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
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

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

Subject: Exelon Generation Company, LLC's Answer to March 12, 2012 Commission Order Modifying License with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

Reference: Letter from Eric J. Leeds and Michael R. Johnson, U.S. Nuclear Regulatory Commission, to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status – "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012.

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective Order in the captioned matter entitled Order Modifying License with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately) ("Order") to, *inter alia*, Exelon Generation Company, LLC (Exelon). The Order states that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC had decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically, the NRC is requiring additional defense-in-depth measures to address uncertainties associated with protection from beyond-design-basis events. With respect to this Order, licensees are specifically directed to provide a reliable means of remotely monitoring "wide-range spent fuel pool levels" to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan, including a description of how compliance with the requirements described in Attachment 2 will be achieved, to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

Pursuant to 10 CFR 2.202 and the terms specified in the Order, Exelon hereby submits its answer to the Order. Exelon consents to the Order and does not request a hearing. Based on information currently available, Exelon has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, Exelon has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever is earlier. Exelon

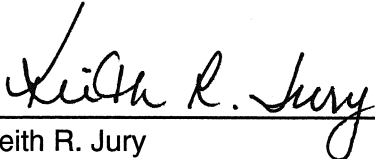
will provide further responses as required by Section IV.C., in accordance with the specified deadlines. Given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, however, and the impact on the ability of Exelon to comply with the specific compliance deadline dates based on the probable availability of that guidance, Exelon's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

There are no regulatory commitments contained in this letter.

If there are any questions concerning this letter, then please contact David P. Helker at (610) 765-5525.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of March 2012.

Respectfully,



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

cc: Director, Office of Nuclear Reactor Regulation
Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
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 Nuclear Generating Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - Three Mile Island Nuclear Station, Unit 1
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 Nuclear Generating Station
NRC Project Manager, NRR - Peach Bottom Atomic Power Station
NRC Project Manager, NRR - Quad Cities Nuclear Power Station

cc: (continued)

NRC Project Manager, NRR - Three Mile Island Nuclear Station, Unit 1
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
S. T. Gray, State of Maryland
R. R. Janati, Commonwealth of Pennsylvania