



Order No. EA-12-049

RS-12-183  
RA-12-111  
TMI-12-150

October 25, 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, Unit 1  
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 Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

**References:**

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Exelon Generation Company, LLC (Exelon). Reference 1 was immediately effective and directs Exelon to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms Exelon has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- Site-specific evaluations are in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).

- Resources have been identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.
- Complete site-specific evaluations to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Identify modifications to meet NEI 12-06 (Reference 4).
- Develop conceptual designs for plant modifications.
- Identify procedure/strategy guidance development.
- Develop action plans for long-term storage that meet NEI 12-06 (Reference 4).

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestone schedule through completion of installation and testing:

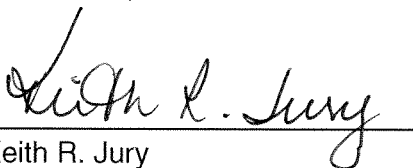
- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Braidwood Unit 1 prior to startup from Refueling Outage (RFO) A1R18 (Spring 2015).
- Implementation of the order will be completed for Braidwood Unit 2 prior to startup from RFO A2R18 (Fall 2015).
- Implementation of the order will be completed for Byron Unit 1 prior to startup from RFO B1R20 (Fall 2015).
- Implementation of the order will be completed for Byron Unit 2 prior to startup from RFO B2R18 (Fall 2014).
- Implementation of the order will be completed for Clinton Unit 1 prior to startup from RFO C1R15 (Spring 2015).
- Implementation of the order will be completed for Dresden Unit 2 prior to startup from RFO D2R24 (Fall 2015).
- Implementation of the order will be completed for Dresden Unit 3 prior to startup from RFO D3R24 (Fall 2016).
- Implementation of the order will be completed for LaSalle Unit 1 prior to startup from RFO L1R16 (Spring 2016).
- Implementation of the order will be completed for LaSalle Unit 2 prior to startup from RFO L2R15 (Spring 2015).

- Implementation of the order will be completed for Limerick Unit 1 prior to startup from RFO Li1R16 (Spring 2016).
- Implementation of the order will be completed for Limerick Unit 2 prior to startup from RFO Li2R13 (Spring 2015).
- Implementation of the order will be completed for Oyster Creek Unit 1 prior to startup from RFO OC1R26 (Fall 2016).
- Implementation of the order will be completed for Peach Bottom Unit 2 prior to startup from RFO P2R21 (Fall 2016).
- Implementation of the order will be completed for Peach Bottom Unit 3 prior to startup from RFO P3R20 (Fall 2015).
- Implementation of the order will be completed for Quad Cities Unit 1 prior to startup from RFO Q1R23 (Spring 2015).
- Implementation of the order will be completed for Quad Cities Unit 2 prior to startup from RFO Q2R23 (Spring 2016).
- Implementation of the order will be completed for Three Mile Island Unit 1 prior to startup from RFO T1R21 (Fall 2015).

This letter contains no new regulatory commitments. If you have any questions regarding this report, 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 25th day of October 2012.

Respectfully submitted,



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