



RS-13-166
RA-13-058

Order No. EA-13-109

June 26, 2013

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

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

Subject: Exelon Generation Company, LLC's Answer to June 6, 2013, Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

References:

Letter from Eric J. Leeds, U.S. Nuclear Regulatory Commission, to All Operating Boiling-Water Reactor Licensees with Mark I and Mark II Containments – "Issuance of Order to Modify Licenses With Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued an immediately effective order to all licensees that operate boiling-water reactors (BWRs) with Mark I and Mark II containment designs, including Exelon Generation Company, LLC (EGC), entitled, "Issuance of Order To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions" (EA-13-109). Order EA-13-109 supersedes and rescinds an order issued by the NRC on March 12, 2012 (EA-12-050), that required all BWRs with Mark I and Mark II containments to take certain actions to ensure the operability of a reliable hardened vent system to remove decay heat and maintain control of containment pressure following events that result in loss of active containment heat removal capability or prolonged loss of AC power.

In addition to the requirements previously imposed by EA-12-050, the superseding Order EA-13-109 requires EGC to ensure that the venting functions can be maintained during severe accident conditions, (i.e., following significant core damage). The substantive requirements of the Order are contained in Attachment 2 of the Order. EGC is required to submit an integrated plan for Phase 1 requirements (for the torus/wetwell venting system) to the NRC by June 30, 2014, and is required to complete full implementation of Phase 1 requirements no later than startup from the second refueling outage that begins after June 30, 2014, or by June 30, 2018, whichever is earlier. EGC is also required to submit an integrated plan for Phase 2 requirements (for the drywell venting system) to the NRC by December 31, 2015, and is required to complete full implementation of Phase 2 requirements no later than startup from the first refueling outage that begins after June 30, 2017, or by June 30, 2019, whichever is earlier.

The NRC states in the Order that it anticipates issuing the interim staff guidance (ISG) for the torus/wetwell venting system by October 31, 2013, and for the drywell venting system by April 30, 2015. Upon issuance of the ISGs, EGC understands that it will have twenty days to assess the impact of the guidance and notify the NRC of any challenges with implementation of the Order in accordance with Paragraphs IV.C.1 thru IV.C.4 of the Order.

Pursuant to 10 CFR § 2.202(a)(2), EGC hereby submits its answer to the Order. EGC consents to the Order and does not request a hearing. However, because the torus/wetwell venting system ISG is not expected to be available until October 31, 2013, and the drywell venting system ISG until April 30, 2015, there remain significant uncertainties about the scope of the work that will be required by EA-13-109. As a result, EGC is unable to state with certainty that it will be able to meet all of the specified compliance deadlines in the Order. As such, EGC's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or ISGs 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.

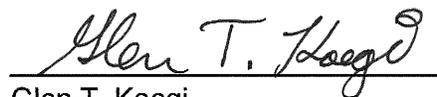
Because EA-12-050 is rescinded and superseded by EA-13-109, EGC understands that all implementation deadlines and submittal requirements for EA-12-050 are no longer in force. As such, EGC considers the integrated plans associated with EA-12-050 that were submitted to the NRC on February 28, 2013, to be withdrawn, and no further action is required by EGC with respect to that submittal or any other requirement specific to EA-12-050.

There are no regulatory commitments contained in this letter.

If there are any questions concerning this letter, 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 26th day of June 2013.

Respectfully submitted,



Glen T. Kaegi
Director - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

cc: Director, Office of Nuclear Reactor Regulation
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Regional Administrator - NRC Region III
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NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Oyster Creek Nuclear Generating Station
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