Exelon Generation®

RS-13-210

10 CFR 50.54(f)

August 28, 2013

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
11555 Rockville Pike,
Rockville. MD 20852

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

Subject: Supplemental Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident

References:

1. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012
2. Exelon Generation Company, LLC letter to USNRC, Response to March 12, 2012, Request for Information Enclosure 2, Recommendation 2.1, Flooding, Required Response 2, Flooding Hazard Reevaluation Report, dated May 10, 2013 (RS-13-110)

On March 12, 2012, the NRC issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 2 of Reference 1 requested that each licensee perform a reevaluation of external flooding sources and report the results in accordance with the NRC's prioritization plan. Exelon Generation Company, LLC (EGC) submitted the flood reevaluation for Dresden Nuclear Power Station, Units 2 and 3 in Reference 2. Reference 2 contains interim actions that EGC has taken or plans to take to address higher flooding hazards relative to the design basis until the integrated assessment is completed.

The enclosed table provides a list of the interim actions taken or planned to be taken as contained in Reference 2 along with additional information and the dates by which they have or will be implemented. These interim actions have been converted into commitments as requested by the NRC and are identified in the enclosed table. Also as requested by the NRC, EGC will not modify these commitments or completion dates without notifying the NRC in advance.

This letter contains new regulatory commitments as identified in the enclosed table.

Should you have any questions concerning the content of this letter, please contact Ron Gaston at (630) 657-3359.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 28thth day of August 2013.

Respectfully submitted,

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

Enclosure:

1. Dresden Nuclear Power Station, Units 2 and 3 – Flood Hazard Reevaluation Report Interim Action Commitments

cc: Director, Office of Nuclear Reactor Regulation
Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
Mr. Eric E. Bowman, NRR/DPR/PGCB, NRC or Ms. Eileen M. McKenna, NRO/DSRA/BPTS, NRC
Illinois Emergency Management Agency - Division of Nuclear Safety

Enclosure 1: Dresden Nuclear Power Station, Units 2 and 3 – Flood Hazard Reevaluation Report Interim Action Commitments* ("Commitments" are bolded header columns)

Item Number	**Interim Actions Taken or Planned to Take as Included in the Reevaluation Report (Commitment*)**	Report Reference	Additional Information	**Implementation Date (Committed* Date or Outage)**	**Commitment Type One-Time Action* (Yes/No)**	**Commitment Type Programmatic* (Yes/No)**
1.	Enhanced river and rainfall forecasting information in flood emergency procedures.	Report Cover Letter, Section d.ii	Verified that procedure DOA 0010-04, FLOODS, Rev. 35, contains enhanced river and rainfall forecasting information. The procedure includes detailed instructions for rain/flood forecasting using information available from National Weather Service and Army Corps of Engineers.	Completed January 25, 2013	Yes	No
2.	Installed markers at the Dresden 2/3 cribhouse between elevations 509 and 517 feet MSL, to support the enhanced river forecasting procedures.	Report Cover Letter, Section d.ii	Additional elevation markers have been installed in 2/3 Reactor Building Trackway. This location will be used to place the Diesel Driven Emergency Makeup Pump on a floating platform in case of flood.	Completed January 25, 2013	Yes	No

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3.	Installed permanent flood barriers, in lieu of sandbagging, to protect the isolation condenser makeup pump building.	Report Cover Letter, Section d.ii	The flood panels have been installed/staged. The hardware and associated tools and gaskets are staged in a dedicated tool box in the isolation condenser makeup pump building.	Completed January 25, 2013	Yes	No
4.	Purchased and mobilized floatable platform to raise the diesel driven pump as high as elevation 545 feet MSL (with the crane being the backup option); included in the latest update to flood emergency procedure.	Report Cover Letter, Section d.ii	Procedure DOA 0010-04, FLOODS, Rev. 39, Attachment D, provides step by step instructions to place the diesel driven pump on the floating platform and make the necessary connections.	Completed January 25, 2013	Yes	No

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5.	Modification plans are currently being evaluated to harden 11 penetrations around the reactor building with passive flood protection features to enhance current flood coping strategies.	Report Cover Letter, Section d.ii	The design and installation of the initial 11 flood barriers is complete. The drop anchors have been installed. The flood protection panels and the associated framework were installed to ensure proper fit. The panels were then removed and staged on carts nearby. An additional penetration was identified and its barrier design is currently underway.	March 31, 2014	Yes	No

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6.	An evaluation of the Unit 2/3 Emergency Diesel Generator Building for exposure to flooding is currently in progress to enhance current flood coping strategies.	Report Cover Letter, Section d.ii	A Technical Evaluation of the roof has been performed. Its review and documentation is underway. A new roof was installed in 2009 and is found to be leak proof. A periodic maintenance (5 year interval) is part of ongoing surveillance program.	December 31, 2013	Yes	No

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7.	Exelon has procured approximately 4,000 feet of Aqua Dam material and associated supplies to protect the power block and the administration building to enhance current flood coping strategies. The filled height of the Aqua Dam is 8 feet and the vendor's user guide recommends a flood protection height of 6 feet with an 8-foot high dam. With a plant grade elevation of 517 feet MSL, the Aqua Dam will provide protection for floods up to elevation 523 feet MSL. The Aqua Dam provides defense in depth while protecting the station assets for flood levels up to 523 feet MSL.	Report Cover Letter, Section d.ii	The vendor of the Aqua Dam has performed a simulation of its deployment. The results are under review.	Completed November 5, 2012	Yes	No