



RS-15-118

April 13, 2015

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Subject: Supplemental Information for Request for Relaxation of Condition V(A)(A.1(1)) of
Confirmatory Order EA-13-068

References:

- 1) Letter from S. Marik (Exelon Generation Company, LLC (EGC)) to C.D. Pederson (NRC), Request for Relaxation of Condition V(A)(A.1(1)) of Confirmatory Order, EA-13-068, dated January 26, 2015, SVPLTR# 15-0009
- 2) Letter from C.D. Pederson (NRC), C. D. Pederson (NRC) to M. J. Pacilio (Exelon Generation Company, LLC (EGC)), "Confirmatory Order; NRC Report Nos. 05000237/2013407 (DRS); 05000249/2013407 (DRS) and Investigation Report No. 3-2012-020; Dresden Nuclear Power Station, Units 2 and 3," dated October 28, 2013

This letter summarizes the substance of information Exelon Generation Company, LLC (EGC) provided during a March 23, 2015 conference call to discuss EGC's Reference 1 request to temporarily relax Section V(A)(A.1(1)) of the October 28, 2013 Confirmatory Order (i.e., Reference 2). During the March 23 conference call, you noted that Reference 1 only seeks relaxation of Section V(A)(A.1(1)) of the Confirmatory Order, but does not seek relaxation of the training or effectiveness assessment provisions addressed in Sections A.2 and A.3, respectively (i.e., V(A)(A.2) and (A.3)), of the Confirmatory Order. During the March 23 conference call, EGC noted that it had already complied with the training requirements and intended to perform the effectiveness assessment in accordance with the schedule requirements of Reference 2, but acknowledged that additional training may be appropriate if the Confirmatory Order is temporarily relaxed. This training would address new or updated guidance on the types of offsite activities to report to reviewing officials as provided in the revision to the Behavioral Observation Program.

As a result, during the March 23 conference call, EGC proposed that, if the Confirmatory Order is temporarily relaxed pursuant to EGC's Reference 1 request, then the training (i.e., V(A)(A.2))

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and effectiveness assessment (i.e., V(A)(A.3)) provisions of the Confirmatory Order should be relaxed as well, as follows:

A.2. With respect to training, following completion of negotiations and implementation of the additional guidance required by A.1 of the Confirmatory Order, EGC will provide familiarization training through a supervisory briefing or some other broad communication to make employees aware of the additional guidance provided in the new revision to the BOP. EGC proposes that this familiarization training be provided no later than 45 days from the date of implementation at each work location.

A.3. With respect to the effectiveness assessment, EGC proposes that Section V(A)(A.3) be temporarily relaxed and the current deadline for conducting the effectiveness assessment be held in abeyance until completion of negotiations and implementation of a revised BOP. EGC further proposes that, within 6 months of implementation of the additional guidance required by A.1 of the Confirmatory Order, EGC will develop and conduct an effectiveness assessment of its revised procedure and of the familiarization training (referenced above with respect to Section V(A)(A.2)) to determine if EGC personnel remain aware of the need to report observed offsite aberrant behavior or credible information.

The information in this letter supplements EGC's request (i.e., Reference 1) to relax the Confirmatory Order (i.e., Reference 2). This letter does not contain new regulatory commitments. If you have any questions, please contact me or Mitchel Mathews at (630) 657-2819.

Respectfully,



Tamra Domeyer
Associate General Counsel
Exelon Generation Company, LLC