

~~Exelon Confidential/Proprietary Information - Withhold Under 10 CFR 2.390~~  
Attachment 3 contains Exelon ~~Confidential/Proprietary Information~~;  
upon separation this cover letter and Attachments 1 and 2 are decontrolled.



Exelon Generation®

10 CFR 50, Appendix E  
10 CFR 50.54(q)(5)  
10 CFR 50.4  
10 CFR 72.44(f)

RS-15-195  
RA-15-063  
TMI-15-080

July 24, 2015

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, 50-457, and 72-73

Byron Station, Units 1 and 2  
Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. 50-454, 50-455, and 72-68

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-53 and DPR-69  
NRC Docket Nos. 50-317 and 50-318

Calvert Cliffs Independent Spent Fuel Storage Installation  
Materials License No. SNM-2505  
NRC Docket No. 72-8

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 1, 2, and 3  
Facility Operating License No. DPR-2  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-010, 50-237, 50-249, and 72-37

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373, 50-374, and 72-70

Limerick Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352, 50-353, and 72-65

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Nine Mile Point Nuclear Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
NRC Docket Nos. 50-220, 50-410, and 72-1036

Oyster Creek Nuclear Generating Station  
Renewed Facility Operating License No. DPR-16  
NRC Docket Nos. 50-219 and 72-15

Peach Bottom Atomic Power Station, Units 1, 2, and 3  
Facility Operating [Possession Only] License No. DPR-12  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-171, 50-277, 50-278 and 72-79

Quad Cities Nuclear Power Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254, 50-265, and 72-53

R.E. Ginna Nuclear Power Station  
Renewed Facility Operating License No. DPR-18  
NRC Docket Nos. 50-244 and 72-67

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility Operating License No. DPR-50  
NRC Docket No. 50-289

Three Mile Island Nuclear Station, Unit 2  
Facility Possession-Only License No. DPR-73  
NRC Docket No. 50-320

Subject: Exelon Generation Company Standardized Radiological Emergency Plan  
Revision

In accordance with 10 CFR 50, Appendix E, Section V, "*Implementing Procedures*," Exelon Generation Company, LLC (EGC) is submitting the Emergency Plan revision listed in the table below for the following plants:

- Braidwood Station
- Byron Station
- Calvert Cliffs Nuclear Power Plant
- Clinton Power Station
- Dresden Nuclear Power Station
- LaSalle County Station
- Limerick Generating Station
- Nine Mile Point Nuclear Station
- Oyster Creek Nuclear Generating Station
- Peach Bottom Atomic Power Station
- Quad Cities Nuclear Power Station
- R.E. Ginna Nuclear Power Station
- Three Mile Island Nuclear Station

Procedure No.	Revision	Title
EP-AA-1000	27	<i>Exelon Nuclear Standardized Radiological Emergency Plan</i>

The changes to the Standardized Emergency Plan were evaluated under the requirements of 10 CFR 50.54(q) and were determined not to result in a reduction in the effectiveness of the Emergency Plan for the affected sites. This notification is being submitted within 30 days of implementation of the changes as required by 10 CFR 50, Appendix E. The changes continue to meet the applicable planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E. In addition, as required by 10 CFR 50.54(q)(5), Attachment 1 of this submittal includes a summary analysis of the changes to the Standardized Emergency Plan.

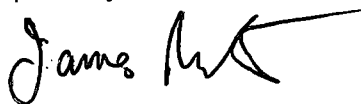
Attachment 3 of this letter contains a copy of the revised Emergency Plan, which is considered proprietary and confidential and contains trade secrets and commercial or financial information. EGC maintains this information on a confidential basis and protects it from disclosure to the general public or unauthorized individuals. EGC requests that Attachment 3 be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4), and has attached an affidavit for this purpose (Attachment 2). However, if the NRC intends to place any of this information in the Public Document Room or on the Agencywide Documents Access and Management System or produce it in response to a Freedom of Information Act (FOIA) request, EGC requests the opportunity to redact the materials consistent with established FOIA exemptions and precedent.

This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the Emergency Plan, the licensee shall submit a report containing a description of the changes to the Director, Division of Spent Fuel Storage and Transportation.

There are no regulatory commitments in this submittal.

If you have any questions or require additional information, please contact Richard Gropp at (610) 765-5557.

Respectfully,



James Barstow  
Director, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

Attachments:

1. 10 CFR 50.54(q)(5) Procedure Change Summary Analysis
2. Affidavit
3. EP-AA-1000, Revision 27, "*Exelon Nuclear Standardized Radiological Emergency Plan*"

cc: w/ Attachments 1 and 2 only  
Regional Administrator - NRC Region I  
Regional Administrator - NRC Region III  
Director, NRC Division of Spent Fuel Storage and Transportation, ONMSS  
NRC Senior Resident Inspector - Braidwood Station  
NRC Senior Resident Inspector - Byron Station  
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power 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 - Nine Mile Point Nuclear 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 - R.E. Ginna 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 - Calvert Cliffs Nuclear Power 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 - Nine Mile Point Nuclear 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  
NRC Project Manager, NRR - R. E. Ginna Nuclear Power Station  
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  
A. L. Peterson, NYSERDA

## **ATTACHMENT 1**

10 CFR 50.54(q)(5) Procedure Change Summary Analysis

## 10 CFR 50.54(q)(5) Procedure Change Summary Analysis

### **Document Title**

The following Exelon Generation Company, LLC (EGC) Emergency Plan has been revised for the plants listed:

- EP-AA-1000, Revision 27, "*Exelon Nuclear Standardized Radiological Emergency Plan*"

### **Affected plants**

Braidwood, Byron, Calvert Cliffs, Clinton, Dresden, LaSalle, Limerick, Nine Mile Point, Oyster Creek, Peach Bottom, Quad Cities, R.E. Ginna, and Three Mile Island

### **Description of Procedure**

The EGC Emergency Preparedness (EP) program consists of the EGC Nuclear Radiological Standardized Emergency Plan, Station Annexes, Emergency Plan Implementing Procedures, and associated program administrative documents. The EGC Standardized Nuclear Radiological Emergency Plan outlines the basis for response actions that would be implemented in an emergency. Planning efforts common to all EGC nuclear generating stations are encompassed within the EGC Nuclear Standardized Radiological Emergency Plan.

### **Description of Changes**

#### **1. Emergency Response Organization (ERO) Training Frequency**

##### **Description of Change**

EGC is revising its Standardized Nuclear Radiological Emergency Plan (Standard Plan) to facilitate its continuing efforts to establish a common annual ERO requalification training frequency and to align the training frequency across the EGC fleet. This change will support the application of common procedural guidance and administrative tracking tools throughout the EGC fleet.

EP-AA-1000 is being revised to incorporate an ERO training frequency of once per calendar year not to exceed 18 months between training sessions. The revision has been previously implemented at the EGC Mid-Atlantic stations (Limerick, Oyster Creek, Peach Bottom, and Three Mile Island) and has not yet been approved for the EGC Northeast stations (Calvert Cliffs, Ginna, and Nine Mile Point), so this change only impacts the Midwest sites (Braidwood, Byron, Clinton, Dresden, LaSalle, and Quad Cities).

##### **Description of How the Change Still Complies with Regulations**

The revision to the Standard Plan (EP-AA-1000) impacts training frequency commitments as stated in the Plan. The change in training frequency for the EGC Midwest plants was approved by the U.S. Nuclear Regulatory (NRC) as documented in a letter dated April 8, 2015 (ML14323A522). A similar change was also approved by the NRC for the Mid-Atlantic plants by letter dated December 24, 2014 (ML14226A940).

## 10 CFR 50.54(q)(5) Procedure Change Summary Analysis

### Description of Why the Change is Not a Reduction in Effectiveness (RIE)

The proposed requirement restricts the time between training sessions to 18 months. This is considered more restrictive than the current definition found in the Standard Plan for Byron, Braidwood, Clinton, Dresden, LaSalle, and Quad Cities, which requires training to occur within each calendar year. Although the change is considered more restrictive and based on discussions with the NRC, EGC agreed to submit this revision to the NRC pursuant to 10 CFR 50.90 in order to establish a firm licensing basis for the ERO training frequency.

## **2. Administrative Changes Related to the Addition of the Northeast Stations Under the Standardized Radiological Emergency Plan**

### Description of the Change

As part of the implementation of the Northeast stations (i.e., Calvert Cliffs Stations, Ginna, and Nine Mile Point) into the Standard Plan, Ginna is being added to the section which describes the State of New York support. Additionally, the Standard Plan describes the PBX Telephone system as having a 4-digit station code. This description does not apply to all of the Northeast stations and is being deleted. Finally, the ERO notification system is described as a "cloud-based" infrastructure. This description is not applicable to the system used at the Northeast stations and is being removed.

### Description of How the Change Still Complies with Regulations

The three changes are descriptive in nature and do not impact the EGC stations' ability to comply with applicable emergency planning regulations. As such, the addition of Ginna under the description of the State of New York, the deletion of specific references to a 4-digit station extensions, or removing the ERO notification system "cloud-based" reference, do not impact the Standard Plan's commitment to comply with the regulatory requirements.

### Description of Why the Change is Not a Reduction in Effectiveness (RIE)

Existing requirements and capabilities under the Standard Plan have not been deleted or reduced as part of this revision; therefore, the Plan continues to meet regulatory requirements. A review of existing regulatory commitments was made to ensure all existing commitments continue to be met. This revision does not constitute a reduction in effectiveness of the Emergency Plans for the Northeast stations.

**ATTACHMENT 2**

Standardized Radiological Emergency Plan Revision

Affidavit



AFFIDAVIT OF JAMES BARSTOW

DOCKET NOS.        STN 50-456, 50-457, 72-73, 50-454, 50-455, 72-68, 50-317, 50-318, 72-8, 50-461, 50-010, 50-237, 50-249, 72-37, 50-373, 50-374, 72-70, 50-352, 50-353, 72-65, 50-220, 50-410, 72-1036, 50-219, 72-15, 50-171, 50-277, 50-278, 72-79, 50-254, 50-265, 72-53, 50-244, 72-67, 50-289, and 50-320

I, James Barstow, Director, Licensing and Regulatory Affairs, Exelon Generation Company, LLC, do hereby affirm and state:

1. I am Director, Licensing and Regulatory Affairs for Exelon Generation Company, LLC (EGC), and I am authorized to execute this affidavit on behalf of EGC.
2. I am further authorized to review the documents sought to be withheld from public disclosure in connection with submittals to the Nuclear Regulatory Commission (“NRC”) for the following purpose:
  - EP-AA-1000, Revision 27, "Exelon Nuclear Standardized Radiological Emergency Plan"
3. I am also authorized to apply to the NRC for the withholding of the aforementioned documents from public disclosure under 10 C.F.R. §§ 2.390(a)(4) and 9.17(a)(4) on the grounds that the documents contain privileged or confidential or proprietary commercial information. The documents EGC seeks to withhold from public disclosure have been marked “Proprietary” and are summarized in the attachment to my Affidavit.
4. On behalf of EGC, I request that the documents marked by EGC as “Proprietary” and described in the attached list (Appendix 1) be withheld, in their entirety, by the NRC from public disclosure.
5. In making this application for withholding of proprietary and confidential information of which EGC is the owner, EGC relies on 10 C.F.R. § 2.390(a)(4) and 10 C.F.R. 9.17(a)(4). The proprietary documents contain privileged or confidential or proprietary commercial information.
6. The proprietary information described in Appendix 1 should be withheld from disclosure by the NRC pursuant to the policy reflected in 10 C.F.R. § 2.390(a)(4), and for the following reasons to be considered pursuant to 10 CFR § 2.390(b)(4):
  - i.. The documents are each either a policy, procedure, process, technical requirements document, or other document that forms part of the Exelon Nuclear Management Model (“ENMM”).

- ii. The ENMM is a set of confidential policies and procedures that enable EGC to consistently achieve excellence in all key dimensions of its business. It documents proven ways of achieving excellence and defines how EGC executes and manages performance and assesses results. EGC expended significant resources, in terms of time and money, to develop, implement, and update the ENMM. EGC derives economic benefit from the ENMM in terms of increased efficiency and improved results as well as revenue generated from EGC's sale or licensing of the ENMM.
- iii. The documents are now, and have been, held in confidence by EGC. EGC does not customarily make these documents available to the public. EGC has not authorized making the documents available through public sources.
- iv. EGC is providing the NRC with the documents and information in confidence.
- v. Economic harm would come to EGC with the publication of the individual documents that form the ENMM, as it would reduce or eliminate the need for any third party to purchase or license the ENMM from EGC, and would reduce the competitive position of EGC based on the benefits that the ENMM provides to EGC in the management of its own nuclear plants. The ENMM is considered by EGC to be a very valuable part of our intellectual property and it would be very difficult, costly and time-consuming for another to duplicate it without access to these documents.

7. EGC requests that each of the documents listed in Appendix 1 be withheld from public disclosure based on the reasons stated above in paragraph 6.i. through 6.v.

I declare under penalty of perjury that the foregoing affidavit and statements therein are true and correct to the best of my knowledge, information, and belief.



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James Barstow  
Director, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

Date: July 24, 2015

## Appendix 1: Information that Should Be Withheld from Public Disclosure

Date or Revision	Description of Document	Reason(s) to Withhold
Revision 27	EP-AA-1000	Entire document exempt from disclosure under 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) based on paragraph 6 of the affidavit to which this Appendix 1 is attached.