



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

December 2, 2015

EA-15-087

Mr. Bryan C. Hanson
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: NRC INVESTIGATION REPORT NO. 1-2014-029

Dear Mr. Hanson:

This letter refers to the subject investigation by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) conducted at your Limerick Generating Station (LGS). The investigation, which was completed on April 10, 2015, was conducted to determine whether a Radiation Protection Supervisor (RPS) deliberately failed to follow licensee procedures pertaining to the possession and/or use of illegal drugs at LGS. Additionally, the investigation also evaluated whether the RPS deliberately failed to report the use of prescription medication as required by Exelon procedures.

Based on the evidence gathered during the OI investigation, the NRC concluded that the RPS did not deliberately fail to report the use of prescription medication as required by procedure. Nor was evidence found that he deliberately failed to follow licensee procedures pertaining to the possession and/or use of prescription/illegal drugs at LGS.

In accordance with Exelon procedure, SY-AA-102-206, "Reporting Use of Medication", revision 7, individuals were required, in part, to report the use of prescription medication to their supervisor if they believed the prescription may impair their alertness, judgment, or any other ability to safely perform their job duties. On February 7, 2014, the procedure was revised to revision 8 and required individuals to report the use of prescription medication upon receiving any prescription that indicates taking the medication may affect their ability to perform their job duties. During the 2012 and 2013 timeframe, the RPS was prescribed medication, including an antibiotic and a pain medication, for two major illnesses. The RPS reported the use of the antibiotic because it was taken while at work, but did not report the use of pain medication because it was not taken at work and he did not believe it would have an impact on his ability to perform the job. The RPS was also prescribed antibiotics and pain medication in 2013 following another surgery, but he did not report the use of the medication because the medication was not taken at times that he believed would impact his ability to perform the job. Because the RPS had completed his annual refresher training on January 24, 2014, prior to revision 8 being implemented, the NRC concluded that the RPS' understanding of requirements for reporting of prescription medication taken in 2012 and 2013 was consistent with revision 7 of the procedure, the latest version of the procedure of which he was likely aware.

After reviewing the specific circumstances regarding this issue, the NRC concluded that no violation of regulatory requirements occurred. However, NRC notes that other individuals, in addition to the RPS, lacked a clear understanding of Exelon Procedure, SY-AA-102-206, "Reporting Use of Medication" which may be indicative of a training issue.

You are not required to respond to this letter. However, should you choose to respond, your response should be sent to the U.S. Nuclear Regulatory Commission, ATTN: Regional Administrator, Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406, and marked "Open by Addressee Only," within 30 days of the date of this letter, with a copy to the NRC Senior Resident Inspector at LGS. If Security Related Information is necessary to provide an acceptable response, please mark your entire response Security-Related Information in accordance with 10 CFR 2.390(d)(1) and follow the instructions for withholding in 10 CFR 2.390(b)(1). In accordance with 10 CFR 2.390(b)(1)(ii), the NRC is waiving the affidavit requirements for your response.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room and from the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. However, the material enclosed herewith contains Security-Related Information in accordance with 10 CFR 2.390(d)(1), and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material in the enclosure will not be made available electronically for public inspection in the NRC Public Document Room or from ADAMS.

Should you have any questions regarding this letter, please contact Mr. Daniel L. Schroeder at 610-337-5262.

Sincerely,

/RA/

Michael L. Scott, Director
Division of Reactor Projects

Docket Nos. 50-352, 50-353
License Nos. NPF-39, NPF-85

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X SUNSI Review/ CJC*		X Non-Sensitive <input type="checkbox"/> Sensitive		X Publicly Available <input type="checkbox"/> Non-Publicly Available		
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DATE	11/17/15	11/18/15	11/18/15	11/19/15	11/23/15	11/18/15
OFFICE	RI/ORA	OGC	OE			RI/DRP
NAME	B Bickett	R Carpenter/RC via email*	R Carpenter/RC via email*			M Scott
DATE		11/24/15	11/24/15			12/2/15

*see previous concurrence OFFICIAL RECORD

Letter to B. Hanson from M. Scott dated December 2, 2015

D. Dorman, RA
D. Lew, DRA
M. Scott, DRP
J. Colaccino, DRP
R. Lorson, DRS
G. Suber, DRS
D. Schroeder, DRP
S. Barber, DRP
R. McKinley, DRS
J. Bream, DRS
D. Caron, DRS
D. Screnci / N. Sheehan, PAO
B. Klukan, ORA
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S. Rutenkroger, LGS SRI
M. Fannon, LGS RI
D. Bearde, RI
N. McNamara / D. Tiff, RI
Enforcement Coordinators RII, RIII, RIV
(D. Gamberoni, R. Skokowski, M. Hay)
R. Carpenter, OGC
L. Casey, NRR
C. Parker, NRR
S. Coker, NSIR
J. Teator, OI
M. Holmes, OI
R1DRPMailResource
R1 OE Files (with concurrences)
RidsNrrPMLimerick Resource
RidsNrrDorLp1-2 Resource
RidsNRRPMLimerick Resource
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