

~~Exelon Confidential/Proprietary Information - Withhold Under 10 CFR 2.390~~
Attachment 3 contains ~~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-15-327
RA-15-112
TMI-15-138

December 15, 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, STN 50-457, and 72-73

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

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

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

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AX45
NM5520
NM5526
MLR
NM55

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

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 Radiological Emergency Plan Implementing Procedure Revision

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

- Braidwood Station
- Byron Station
- Clinton Power Station
- Dresden Nuclear Power Station
- LaSalle County Station
- Limerick Generating Station
- Oyster Creek Nuclear Generating Station
- Peach Bottom Atomic Power Station
- Quad Cities Nuclear Power Station
- Three Mile Island Nuclear Station

Procedure No.	Revision	Title
EP-AA-112-F-01	G	<i>Command and Control Turnover Briefing Form</i>

The changes to the Emergency Plan implementing procedure 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 Plans 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 implementing procedure.

Attachment 3 of this letter contains a copy of the revised Emergency Plan implementing procedure, 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-112-F-01, Revision G, *"Command and Control Turnover Briefing Form"*

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 - 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 - 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 - Three Mile Island Nuclear Station, Unit 1
NRC Project Manager, NRR - Braidwood Station

cc: w/ Attachments 1 and 2 only (continued)
NRC Project Manager, NRR - Byron 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 - 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 - 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

ATTACHMENT 1

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

Attachment 1
10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Page 1 of 1

Document Title

The following Exelon Generation Company, LLC (EGC) Emergency Plan implementing procedure/form has been revised for the EGC Midwest and Mid-Atlantic plants listed:

Affected Plants

Braidwood, Byron, Clinton, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Three Mile Island

- EP-AA-112-F-01, Revision G, "*Command and Control Turnover Briefing Form*"

The procedure/form listed above contains *Exelon Confidential/Proprietary Information* and EGC is requesting that the document be withheld from public disclosure pursuant to 10 CFR 2.390.

Description of Procedure

The Emergency Plan implementing procedure/form above provides guidance for conducting Command and Control turnover for the plants cited.

Description of Changes

This procedure/form was revised to remove items that are no longer considered necessary to conduct Command and Control turnover functions.

Description of How the Changes Still Comply with Regulations

The revision to the procedure/form continues to satisfy the applicable Emergency Planning Standard requirements established in 10 CFR 50.47(b)(1) and 50.47(b)(2), and the Program Element guidance specified in NUREG-0654, Sections II.A and B. The changes made to the procedure/form do not alter assigned emergency preparedness responsibilities and functions.

Description of Why the Changes are Not a Reduction in Effectiveness (RIE)

The revised procedure/form remains consistent with the requirements of the Emergency Planning Standard requirements specified in 10 CFR 50.47(b)(1) and 50.47(b)(2), as well as the Program Element guidance included NUREG-0654, Sections II.A and B. This revision to the procedure/form does not alter the capability of the Emergency Response Organization (ERO) to implement required Emergency Plan functions, and does not affect the timeliness of the performance of these functions. Therefore, the changes to the procedure/form do not result in a reduction in the effectiveness of the Emergency Plans for the affected sites.

ATTACHMENT 2

Affidavit

AFFIDAVIT OF JAMES BARSTOW

DOCKET NOS. STN 50-456, STN 50-457, 72-73, STN 50-454, STN 50-455, 72-68, 50-461, 50-010, 50-237, 50-249, 72-37, 50-373, 50-374, 72-70, 50-352, 50-353, 72-65, 50-219, 72-15, 50-171, 50-277, 50-278, 72-79, 50-254, 50-265, 72-53, 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"):
 - EP-AA-112-F-01, Revision G, "Command and Control Turnover Briefing Form"
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.



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

Date: December 15, 2015

Appendix 1: Information that Should Be Withheld from Public Disclosure

Date or Revision	Description of Document	Reason(s) to Withhold
Revision G	EP-AA-112-F-01	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.