



Exelon Generation.

10 CFR 50.54(q)(5)
10 CFR 50.4
10 CFR 72.44(f)

January 29, 2016

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

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

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

Subject: Exelon Nuclear Radiological Emergency Implementing Procedure Revisions

In accordance with 10 CFR 50.4(b)(5), "Emergency plan and related submissions," Exelon Generation Company, LLC (EGC) is submitting the Emergency Plan implementing procedure revisions identified in the table below for Calvert Cliffs Nuclear Power Plants (Calvert Cliffs), Nine Mile Point Nuclear Station (NMP), and R.E. Ginna Nuclear Power Station (Ginna).

Procedure No.	Revision	Title
EP-AA-112-100-F-58	C	CR Operations Communicator Checklist (CNG)
EP-AA-112-200-F-67	B	TSC Operations Communicator Checklist (CNG)
EP-AA-112-300-F-57	C	OSC Operations Communicator Checklist (CNG)

The changes to the Emergency Plan implementing procedures 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 Calvert Cliffs, NMP, and Ginna. This notification is being submitted within 30 days of implementation of the changes as required by 10 CFR 50.4(b)(5). The changes continue to meet the applicable planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

Ax45
NMSS 26
NRR
NMSS

Furthermore, Attachments 3 through 5 of this letter are proprietary and confidential and contain 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 Attachments 3 through 5 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.

In addition, as required by 10 CFR 50.54(q)(5), this submittal includes a summary analysis of the changes to the Emergency Plan implementing procedure (Attachment 1).

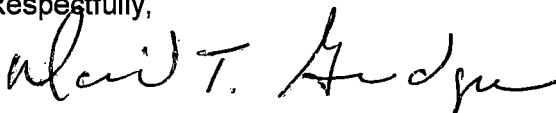
This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the Emergency Plan, the licensee shall submit a report containing a description of the changes to the Director, Division of Spent Fuel Storage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

A copy of the revised procedures and supporting change summary analysis are included in the attachments to this letter.

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,



David T. Gudger
Manager, 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-112-100-F-58, Revision C, "*CR Operations Communicator Checklist (CNG)*"
4. EP-AA-112-200-F-67, Revision B, "*TSC Operations Communicator Checklist (CNG)*"
5. EP-AA-112-300-F-57, Revision C, "*OSC Operations Communicator Checklist (CNG)*"

cc: w/ Attachments 1 and 2 only
Regional Administrator - NRC Region I
Director, NRC Division of Spent Fuel Storage and Transportation, ONMSS
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Station
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station
NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Station
NRC Project Manager, NRR - Calvert Cliffs Nuclear Power Station
NRC Project Manager, NRR - Nine Mile Point Nuclear Station
NRC Project Manager, NRR - R. E. Ginna Nuclear Power Station
S. T. Gray, State of Maryland
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

Procedures/Titles

Exelon Generation Company, LLC (EGC) is submitting the following Emergency Plan implementing procedure/form revisions for Calvert Cliffs Nuclear Power Station (Calvert Cliffs), Nine Mile Point Nuclear Station (NMP), and R.E. Ginna Nuclear Power Station (Ginna):

- EP-AA-112-100-F-58, Revision C, "CR Operations Communicator Checklist (CNG)"
- EP-AA-112-200-F-67, Revision B, "TSC Operations Communicator Checklist (CNG)"
- EP-AA-112-300-F-57, Revision C, "OSC Operations Communicator Checklist (CNG)"

These Emergency Plan implementing procedure/form revisions contain *Exelon Confidential/Proprietary Information* and EGC is requesting that they be withheld from public disclosure pursuant to 10 CFR 2.390.

Description of Procedures

The Emergency Plan implementing procedure/form revisions identified above for Calvert Cliffs, NMP, and Ginna provide the direction to Emergency Response Organization (ERO) personnel that are responsible for communicating plant status information between emergency response facilities as well as displaying, monitoring, and trending plant data and event information on facility display systems. The responsibilities provided in the procedures/forms include gathering, recording, and posting appropriate information as needed or as requested.

Description of Changes

The changes to the procedures/forms relate to the program that the Communicators use to display plant data for monitoring and trending information. The Communicators use ERO SharePoint which provides Plant Parameter Data Display System information. The changes to the procedures/forms support upgrading the Plant Parameter Data Display System to the R*Time Plant Parameter Data Display System. The parameters displayed are the same in both systems. The R*Time Data Viewer is the Human Machine Interface (HMI), allowing the user to interact and view R*Time System data and information. The Data Viewer can be configured to run on any user workstation that has network communication with the R*Time Server. The change is transparent to the end user. The end users are Communicators that are responsible for communicating plant status information between emergency response facilities as well as displaying, monitoring, and trending plant data and event information on facility display systems.

Description of How the Changes Still Comply with Regulations

The revised procedures/forms continue to comply with the applicable Emergency Planning requirements related to Emergency Communications and Emergency Assessment Capability as required by 10 CFR 50.47(b)(6) and (9), respectively. The planning functions include: 1) systems are established for prompt communication among principal emergency response organizations; 2) systems are established for prompt communication to emergency response personnel and; 3) methods, systems, and equipment for assessment of radioactive releases are in use. These requirements continue to be met.

Previously, the Communicators had to activate SharePoint to access the Plant Parameter Data Display System. Accessing SharePoint is no longer required. As previously discussed, this change involves upgrading the Plant Parameter Data Display System to the R*Time Plant Parameter Data Display System. The parameters displayed are the same in both systems.

The changes to procedures/forms do not alter ERO assigned responsibilities and functions.

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

The revised documents remain consistent with the requirements of the Emergency Planning requirements specified in 10 CFR 50.47(b)(6) and (9) and the requirements are not impacted by the changes to the procedures/forms. Therefore, the ERO Communicators continue to have a system that displays plant parameters such that plant conditions can be shared between principal onsite facilities for assessment and trending of accident conditions. The revised documents do not alter the capability of the ERO to implement required Emergency Plan functions, and do not affect the timeliness of the performance of these functions. Therefore, the changes do not result in a reduction in the effectiveness of the Emergency Plans for CCNPP, NMP, and Ginna.

ATTACHMENT 2

Radiological Emergency Plan Implementing Procedure Revisions

Affidavit

AFFIDAVIT OF DAVID T. GUDGER

DOCKET NOS. 50-317, 50-318, 72-8, 50-220, 50-410, 72-1036, 50-244, and 72-67

I, David T. Gudger, Manager, Licensing and Regulatory Affairs, Exelon Generation Company, LLC, do hereby affirm and state:

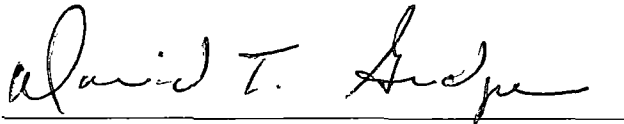
1. I am Manager, Licensing and Regulatory Affairs for Exelon Generation Company, LLC (EGC), and I am authorized to execute this affidavit on behalf of EGC.
2. I am further authorized to review the documents sought to be withheld from public disclosure in connection with submittals to the Nuclear Regulatory Commission ("NRC"):
 - EP-AA-112-100-F-58, Revision C, "CR Operations Communicator Checklist (CNG)"
 - EP-AA-112-200-F-67, Revision B, "TSC Operations Communicator Checklist (CNG)"
 - EP-AA-112-300-F-57, Revision C, "OSC Operations Communicator Checklist (CNG)"
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.



David T. Gudger
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Date: January 29, 2015

Appendix 1: Information that Should Be Withheld from Public Disclosure

Date or Revision	Description of Document	Reason(s) to Withhold
Revision C	EP-AA-112-100-F-58	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.
Revision B	EP-AA-112-200-F-67	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.
Revision C	EP-AA-112-300-F-57	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.