



Exelon Generation®

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

February 11, 2016

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

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

Subject: Exelon Nuclear Radiological Emergency Plan Revision

Reference: Letter from David P. Helker, Exelon Generation Company, LLC to U.S. Nuclear
Regulatory Commission – "*Exelon Nuclear Radiological Emergency Plan
Revision*," dated January 14, 2016

In accordance with 10 CFR 50.4(b)(5), "*Emergency Plan and related submissions*," Exelon
Generation Company, LLC (EGC) is submitting an Emergency Plan Addendum revision for
Peach Bottom Atomic Power Station (PBAPS) as listed in the table below.

Document	Revision	Title
EP-AA-1007, Addendum 3	3	<i>Emergency Action Levels for Peach Bottom Atomic Power Station</i>

By letter dated January 14, 2016 (Reference), EGC submitted Revision 2 of EP-AA-1007,
Addendum 3. Subsequently, an administrative/editorial discrepancy was identified in that
certain information had been inadvertently omitted from the Revision 2 document. The Revision
2 changes to the Emergency Plan Addendum 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 PBAPS. EGC is submitting Revision 3 of EP-AA-1007, Addendum 3 to
address and correct the administrative/editorial discrepancy with the Revision 2 submittal. This
notification is being submitted within 30 days of implementation of the Revision 3 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.

Furthermore, the Emergency Plan Addendum identified in Attachment 3 of this letter is
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 the Emergency Plan Addendum

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NM5526
NRR
NM55

contained in 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.

In addition, as required by 10 CFR 50.54(q)(5), this submittal includes a summary analysis of the changes to the Emergency Plan Addendum (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 Emergency Plan Addendum 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 P. Helker
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-1007, Addendum 3, Revision 3, *"Emergency Action Levels for Peach Bottom Atomic Power Station"*

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 - Peach Bottom Atomic Power Station
NRC Project Manager, NRR - Peach Bottom Atomic Power Station
Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental Resources
R. R. Janati, Commonwealth of Pennsylvania

ATTACHMENT 1

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

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

Procedure/Title

Exelon Generation Company, LLC (EGC) is submitting the following Emergency Plan Addendum revision for Peach Bottom Atomic Power Station (PBAPS):

- EP-AA-1007, Addendum 3, Revision 3, "*Emergency Action Levels for Peach Bottom Atomic Power Station*"

This document contains *Exelon Confidential/Proprietary Information* and is requested to be withheld from public disclosure pursuant to 10 CFR 2.390.

Description of Procedure

EP-AA-1007, Addendum 3, describes the Emergency Action Levels (EALs) implemented at PBAPS for entering Emergency Classification Levels (ECLs).

Description of Change

By letter dated January 14, 2016, EGC submitted a revision (i.e., Revision 2) to EP-AA-1007, Addendum 3, for PBAPS in accordance with 10 CFR 50.4(b)(5). The NRC was notified of these changes by letter dated January 14, 2016. It was subsequently identified that an administrative/editorial discrepancy was inadvertently introduced during the Revision 2 update.

This revision to EP-AA-1007, Addendum 3, corrects the administrative/editorial discrepancy that was identified in Revision 2. Specifically, the Heat Capacity Temperature Limit (HCTL) curve T/T-2 was properly incorporated into the EALs for CT3 (Primary Containment Conditions) and MS3 (Failure to Scram), but certain information was inadvertently omitted related to HCTL curve T/T-2 from the quick reference procedure matrix for EALs CT3 and MS3.

The PBAPS EALs were revised to incorporate HCTL curve T/T-2 following the initial submittal of the License Amendment Request (LAR) related to the adoption of NEI 99-01, Revision 6 EAL scheme guidance for PBAPS. This change was correctly incorporated into EP-AA-1007 Addendum 3, Revision 1, which was implemented in October 2015. The NRC was informed of these changes by letter dated November 11, 2015. These changes to the Emergency Plan Addendum were evaluated under the requirements of 10 CFR 50.54(q) and determined not to result in a reduction in the effectiveness of the Emergency Plan for PBAPS.

The changes pertaining to the HCTL curve T/T-2 were included as part of the PBAPS EAL thresholds during the implementation of EALs based on the NEI 99-01, Revision 6 guidance as implemented in EP-AA-1007 Addendum 3, Revision 2, which occurred in December 2015. The NRC was notified of these changes by letter dated January 14, 2016. These changes were also evaluated under the requirements of 10 CFR 50.54(q) and determined not to result in a reduction in the effectiveness of the Emergency Plan for PBAPS. The EALs in Revision 2 were updated correctly. However, as noted above, an administrative/editorial discrepancy was identified related to the inadvertent omission of HCTL curve T/T-2 information from the quick reference procedure matrix contained in the Addendum.

Description of How the Change Still Complies with Regulations

This revision to EP-AA-1007, Addendum 3, corrects the administrative/editorial discrepancy identified in Revision 2 of the Addendum. This revision continues to satisfy the applicable Emergency Planning requirements established in 10 CFR 50.47(b)(4) and the Program Element guidance specified in NUREG-0654, Section II.D.

Updating the quick reference procedure matrix section for EALs CT3 and MS3 to include the inadvertently omitted information as approved by the NRC does not alter the meaning or intent of the basis of the approved EAL. The revised EALs continue to meet the applicable Emergency Planning requirements and commitments and are consistent with the guidance in NEI 99-01, Revision 6. Therefore, this change does not reduce the effectiveness of the Emergency Plan.

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

This revision to EP-AA-1007, Addendum 3, corrects the administrative/editorial discrepancy identified in Revision 2 of the Addendum. Updating the quick reference procedure matrix section for EALs CT3 and MS3 to correct the administrative/editorial discrepancy does not alter the meaning or intent of the basis of the approved EALs. The revised EALs continue to meet the applicable Emergency Planning requirements and commitments and are consistent with the guidance in NEI 99-01, Revision 6. Therefore, this change does not reduce the effectiveness of the Emergency Plan.

ATTACHMENT 2

Affidavit

Radiological Emergency Plan Addendum Revision

AFFIDAVIT OF DAVID P. HELKER

DOCKET NOS. 50-171, 50-277, 50-278, and 72-79

I, David P. Helker, 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-1007, Addendum 3, Revision 3, "Emergency Action Levels for Peach Bottom Atomic Power Station"
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 the document 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 P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Date: February 11, 2016

Appendix 1: Information that Should Be Withheld from Public Disclosure

Date or Revision	Description of Document	Reason(s) to Withhold
Revision 3	EP-AA-1007, Addendum 3	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.