

E-44108

Attachment 3

E-mail from Kevin Donovan (Exelon Generation Company, LLC) to Don Shaw (AREVA) for R.E. Ginna Nuclear Power Plant, Limerick Generating Station, Nine Mile Point Nuclear Station, and Oyster Creek Nuclear Generating Station

WILLIFORD Dennis (RS/IB)

From: Donovan, Kevin P:(GenCo-Nuc) <kevin.donovan@exeloncorp.com>
Sent: Tuesday, October 06, 2015 5:33 PM
To: SHAW JR Donis (BE/LO)
Cc: Schrage, John L:(GenCo-Nuc); Dougherty, Joseph James:(GenCo-Nuc); Cazzolli, Michael J:(GenCo-Nuc); Hunter, Kenn A.:(GenCo-Nuc)
Subject: Voluntary Agreement to Implement CoC 1004 Amendment Revisions Which Remove the Requirement for a Spent Fuel Pool

To: Don Shaw, AREVA TN Licensing Manager

From: **Kevin Donovan**
Manager, Dry Cask Storage
Exelon Generation Company, LLC

Reference: AREVA Inc. letter E-42575, from Paul Triska (AREVA) to NRC Document Control Desk, "Application for Revision to the Standardized NUHOMS® System – CoC 1004, Amendments 0 through 11 and Amendment 13, Docket 72-1004," dated August 24, 2015

The purpose of this communication is to confirm the following:

- **Exelon Generation Company, LLC** is aware of and understands the proposed AREVA Inc. changes to the CoC 1004 Standardized NUHOMS® System Technical Specifications and the associated UFSAR changes, which are detailed in the letter referenced above for all approved amendments.
- We understand that these changes will result in Revision 1 to each currently approved CoC 1004 amendment.
- We understand that the previous version of the associated amendments will be superseded in their entirety by Revision 1.
- We agree to voluntarily implement these changes for our general licensee independent spent fuel storage installations (ISFSIs) at the following sites, which operate CoC 1004 Standardized NUHOMS® Systems under one or more amendments:
 - **R.E. Ginna Nuclear Power Plant**
 - **Limerick Generating Station**
 - **Nine Mile Point Nuclear Station**
 - **Oyster Creek Nuclear Generating Station**
- In order to allow sufficient time to incorporate these changes in a quality manner, we request that AREVA work with the NRC to provide its general licensees a 180-day period after the effective date of the revised amendments during which we can complete incorporation and begin storage operations under the revised amendments.

Regards,

Kevin P. Donovan

Manager, Dry Cask Storage
Exelon Nuclear



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