



# Exelon Generation®

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Washington, DC 20555-0001

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Subject: Comments Concerning Draft Interim Staff Guidance JLD-ISG-2016-01, "Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment" (81FR23759, dated April 22, 2016, Docket ID NRC-2016-0084)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning draft Japan Lessons-Learned Division Interim Staff Guidance (JLD-ISG) JLD-ISG-2016-01, "Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment," published in the *Federal Register* on April 22, 2016 (i.e., 81FR23759).

This draft ISG provides guidance and clarification to assist operating power reactor respondents and holders of construction permits under the NRC's regulations with the performance of the focused evaluations and revised integrated assessments for external flooding. The Nuclear Energy Institute (NEI) submitted guidance document NEI 16-05, "External Flooding Assessment Guidelines," Revision 0, on April 12, 2016. The guidance document provides industry-developed methodology that describes the flooding impact assessment process, which is intended to meet the requested information of an integrated assessment in response to Fukushima Dai-ichi Accident Near-Term Task Force (NTTF) Recommendations 2.1, 2.3, and 9.3 and to incorporate the changes described in COMSECY-15-0019, "Integration of Mitigating Strategies for Beyond-Design Basis External Events and the Reevaluation of Flooding Hazards." The draft ISG is being issued to describe to stakeholders methods acceptable to the NRC for performance of the focused evaluations and revised integrated assessments and describe some exceptions and clarifications to NEI 16-05, Revision 0.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this draft ISG. Exelon fully supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry regarding this subject.

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

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