



RS-16-200

October 13, 2016

Mr. Kenneth O'Brien
Director of Reactor Safety
U. S. Nuclear Regulatory Commission – Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Subject: Final Response to Confirmatory Order EA-13-068

References:

1. Letter from C. D. Pederson (NRC) to M. J. Pacilio (Exelon Generation Company, LLC (EGC)), "Confirmatory Order; NRC Report Nos. 05000237/2013407(DRS); 05000249/2013407(DRS) and Investigation Report No. 3-2012-020; Dresden Nuclear Power Station, Units 2 and 3," dated October 28, 2013
2. Letter from C. D. Pederson (NRC) to B. C. Hanson (Exelon Generation Company, LLC (EGC)), "Dresden Nuclear Power Station – Request for Relaxation of Confirmatory Order," dated May 4, 2015

The purpose of this letter is to provide a written status pursuant to Section V.C of the Confirmatory Order, which requires Exelon to submit a written status of the Confirmatory Order action items to the NRC Region III Director of Reactor Safety on an annual basis until all actions are complete. Accordingly, this status update is due on October 31, 2016. Reference 1 transmitted the Confirmatory Order, EA-13-068, which confirmed commitments made by Exelon Generation Company, LLC (EGC) to the NRC as part of a settlement agreement. EGC and NRC agreed to these commitments in an Alternate Dispute Resolution session conducted on September 18, 2013. Thereafter, EGC revised Procedure, SY-AA-103-513, "Behavioral Observation Program," to provide the clarification required by the Confirmatory Order, and trained its employees on the updated Behavioral Observation Program (BOP). In Reference 2, the NRC relaxed Confirmatory Order EA-13-068, Condition V.A.1 to allow EGC until November 30, 2015, to negotiate with the International Brotherhood of Electrical Workers (IBEW), Local 15, over the changes made to the EGC BOP and to implement revisions to SY-AA-103-513, following the negotiations, in accordance with the requirements of Condition V.A.1.

On November 18, 2015, following bargaining between EGC and the IBEW, Local 15, minor changes to SY-AA-103-513, were approved under Revision 12 and implemented across the EGC fleet. Training on these enhancements and a review of their effectiveness as required by the revised Confirmatory Order, Conditions VA.2 and VA.3, was completed on January 15, 2016, and May 31, 2016, respectively.

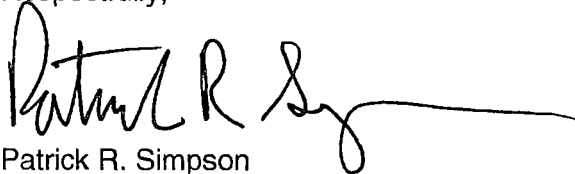
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Consistent with Confirmatory Order EA-13-068, Section V.C, this report documents the completion of all actions associated with the Confirmatory Order.

This letter does not contain any new regulatory commitments. If you have any questions, please contact Tamra Domeyer at (630) 657-3753.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long horizontal flourish extending to the right.

Patrick R. Simpson
Manager - Licensing
Exelon Generation Company, LLC

cc: NRC Document Control Desk
Regional Administrator, NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station