



Exelon Generation®

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10 CFR 50.90
10 CFR 50.54(q)

RS-18-021

January 31, 2018

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456, STN 50-457, and 72-73

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. 50-454, 50-455, and 72-68

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461 and 72-1046

Dresden Nuclear Power Station, Units 1, 2 and 3
Facility Operating License No. DPR-2
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-010, 50-237, 50-249, and 72-37

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373, 50-374, and 72-70

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254, 50-265, and 72-53

Subject: License Amendment Request for Approval of Changes to Emergency Plan
Staffing Requirements

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (Exelon) requests amendments to licenses for the facilities listed above.

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10 CFR 50.47(b) and 10 CFR 50, Appendix E establish emergency planning standards that require: 1) adequate staffing, 2) satisfactory performance of key functional areas and critical tasks, and 3) timely augmentation of the response capability.

Exelon is requesting U.S. Nuclear Regulatory Commission (NRC) approval of proposed changes to the Radiological Emergency Preparedness Plans for the facilities listed above. The proposed changes would revise certain Emergency Response Organization (ERO) positions for facilities listed with the minimum staff ERO guidance specified in draft Revision 2 of NUREG-0654/FEMA-REP-1, *"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."*

The proposed changes have been reviewed considering the requirements of 10 CFR 50.47, *"Emergency plans,"* paragraph (b), 10 CFR 50 Appendix E, *"Emergency Planning and Preparedness for Production and Utilization Facilities,"* and other applicable emergency preparedness NRC guidance documents. An evaluation of the proposed changes pursuant to 10 CFR 50.54, *"Conditions of licenses,"* paragraph (q), *"Emergency plans,"* determined that the proposed changes result in a reduction in effectiveness of the Emergency Plans for the affected facilities and, therefore, require prior NRC approval.

Exelon has concluded that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92, *"Issuance of amendments."*

The proposed changes have been reviewed by Plant Operations Review Committees at each site in accordance with the requirements of the Exelon Quality Assurance Program.

The following enclosures, along with supporting attachments, are provided which contain an evaluation of the proposed changes, including a detailed description, technical and regulatory evaluations including a no significant hazards consideration, and environmental consideration for each facility.

- Enclosure 1 – Braidwood Station, Units 1 and 2 – Evaluation of Proposed Changes
 - Attachment 1A - Emergency Plan Marked-up Pages
 - Attachment 1B - Emergency Plan Clean Copy Pages
- Enclosure 2 – Byron Station, Units 1 and 2 – Evaluation of Proposed Changes
 - Attachment 2A - Emergency Plan marked-up pages
 - Attachment 2B - Emergency Plan clean copy pages
- Enclosure 3 – Clinton Power Station – Evaluation of Proposed Changes
 - Attachment 3A - Emergency Plan marked-up pages
 - Attachment 3B - Emergency Plan clean copy pages
- Enclosure 4 – Dresden Nuclear Power Station, Units 1, 2, 3 – Evaluation of Proposed Changes
 - Attachment 4A - Emergency Plan marked-up pages
 - Attachment 4B - Emergency Plan clean copy pages

- Enclosure 5 – LaSalle County Station, Units 1 and 2 – Evaluation of Proposed Changes
 - Attachment 5A - Emergency Plan marked-up pages
 - Attachment 5B - Emergency Plan clean copy pages
- Enclosure 6 – Quad Cities Nuclear Power Station, Units 1 and 2 – Evaluation of Proposed Changes
 - Attachment 6A - Emergency Plan marked-up pages
 - Attachment 6B - Emergency Plan clean copy pages
- Enclosure 7 - Assessment of ERO Minimum Staff and Full Augmented Staff Positions Removed
- Enclosure 8 - Summary of Commitments
- Enclosure 9 - Information Related to Review of Proposed Changes by the State

This amendment request includes a regulatory commitment as described in Enclosure 8 of this submittal. Exelon plans to conduct a confirmation Emergency Preparedness Drill at one of the affected stations under this License Amendment Request to demonstrate that no loss of function will result due to the proposed changes in the ERO.

Exelon is requesting approval of the proposed license amendments by September 1, 2019. Once approved, Exelon is requesting that the amendments for the affected facilities be implemented no later than December 31, 2019.

In accordance with 10 CFR 50.91, "*Notice for public comment; State consultation,*" paragraph (b), Exelon is notifying the State of Illinois of this application for these license amendments by transmitting a copy of this letter and the supporting attachments to the designated State Official.

If you have any questions regarding this submittal, please contact Richard Gropp at (610) 765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31st day of January 2018.

Respectfully,



James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Enclosures (including supporting Attachments) (CD copy):

- 1) Braidwood Station, Units 1 and 2 – Evaluation of Proposed Changes
- 2) Byron Station, Units 1 and 2 – Evaluation of Proposed Changes
- 3) Clinton Nuclear Station – Evaluation of Proposed Changes
- 4) Dresden Nuclear Power Station, Units 1, 2, and 3 – Evaluation of Proposed Changes
- 5) LaSalle County Station, Units 1 and 2 – Evaluation of Proposed Changes
- 6) Quad Cities Nuclear Power Station, Units 1 and 2 – Evaluation of Proposed Changes
- 7) Assessment of ERO Minimum Staff and Full Augmented Staff Positions Removed
- 8) Summary of Regulatory Commitments
- 9) Information Related to Review of Proposed Changes by the States of Illinois and Iowa

cc: w/ Enclosures (including supporting Attachments) (CD copy)

Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Project Manager, NRR - Braidwood Station
NRC Project Manager, NRR - Byron Station
NRC Project Manager, NRR - Clinton Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station
NRC Project Manager, NRR - LaSalle County Station
NRC Project Manager, NRR - Quad Cities Nuclear Power Station
Illinois Emergency Management Agency - Division of Nuclear Safety