



May 10, 2018

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

Limerick Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352, 50-353, and 72-65

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: 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.

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.

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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 the 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 – Limerick Generating 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 – Peach Bottom Atomic Power Station, Units 2 and 3 – Evaluation of Proposed Changes
  - Attachment 2A - Emergency Plan Marked-up pages
  - Attachment 2B - Emergency Plan Clean Copy pages
- Enclosure 3 - Assessment of ERO Minimum Staff and Full-Augmented Staff Positions Removed
- Enclosure 4 - Summary of Commitments
- Enclosure 5 - Information Related to Review of Proposed Changes by the States

This amendment request includes a regulatory commitment as described in Enclosure 4 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 Commonwealth of Pennsylvania of this application for these license amendments by transmitting a copy of this letter and the supporting attachments to the designated State Official.

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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 10<sup>th</sup> day of May 2018.

Respectfully,



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

Enclosures (including supporting attachments) (CD copy):

- 1) Limerick Generating Station, Units 1 and 2 – Evaluation of Proposed Changes
- 2) Peach Bottom Atomic Power Station, Units 2 and 3 – Evaluation of Proposed Changes
- 3) Assessment of ERO Minimum Staff and Full-Augmented Staff Positions Removed
- 4) Summary of Regulatory Commitments
- 5) Information Related to Review of Proposed Changes by the States

cc: w/ Enclosures (including supporting attachments) (CD copy)  
Regional Administrator - NRC Region I  
NRC Senior Resident Inspector - Limerick Generating Station  
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station  
NRC Project Manager, NRR - Limerick Generating Station  
NRC Project Manager, NRR - Peach Bottom Atomic Power Station  
Director, Bureau of Radiation Protection - Pennsylvania Department  
of Environmental Protection  
R.R. Janati, Pennsylvania Bureau of Radiation Protection  
S.T. Gray, State of Maryland