

10 CFR 50.54(q)(5)
 10 CFR 50.4
 10 CFR 72.44(f)

RS-20-138

October 30, 2020

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

 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

 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

Subject: Exelon Generation Company Radiological Emergency Plan Document Revisions

In accordance with 10 CFR 50.4(b)(5), "Emergency Plan and related submissions," Exelon Generation Company, LLC (EGC) is submitting the Emergency Plan document revisions for Byron Station (Byron) and Dresden Nuclear Power Station (Dresden) as listed in the table below.

Procedure No.	Revision	Title
EP-AA-1002	37	<i>Radiological Emergency Plan Annex for Byron Station</i>
EP-BY-1000	0	<i>Byron Station Radiological Emergency Plan</i>
EP-AA-1004	39	<i>Radiological Emergency Plan Annex for Dresden Station</i>
EP-DR-1000	0	<i>Dresden Station Radiological Emergency Plan</i>
EP-AA-1000 (superseded)	33	<i>Exelon Nuclear Standardized Radiological Emergency Plan (*)</i>

(*) - EP-AA-1000 for Byron and Dresden has been superseded by EP-BY-1000 and EP-DR-1000.

The changes to the Emergency Plan documents cited in the table were evaluated under the requirements of 10 CFR 50.54(q) and were determined not to result in a reduction in the effectiveness of the Emergency Plans for Byron or Dresden. This notification is being submitted within 30 days of implementation of the changes as required by 10 CFR 50.54(q)(5). The changes continue to meet the applicable planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

U.S. Nuclear Regulatory Commission
Emergency Plan Document Revisions
Docket Nos. 50-454, 50-455, 72-68,
50-010, 50-237, 50-249, and 72-37
October 30, 2020
Page 2

In addition, as required by 10 CFR 50.54(q)(5), this submittal includes a summary analysis of the changes to the noted Emergency Plan documents (Attachment 1). This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the Emergency Plan, the licensee shall submit a report containing a description of the changes to the Director, Division of Fuel Management, Office of Nuclear Material Safety and Safeguards.

Copies of the Emergency Plan document revisions are included in the attachments to this letter. A copy of the superseded procedure (i.e., EP-AA-1000) for Byron and Dresden is not included as an attachment.

There are no regulatory commitments in this submittal.

If you have any questions or require additional information, please contact Amy Hambly at 630-657-2808.

Respectfully,

David M. Gullott
Director, Licensing
Exelon Generation Company, LLC

Attachments:

1. 10 CFR 50.54(q)(5) Procedure Change Summary Analysis
2. EP-AA-1002, Revision 37, "*Radiological Emergency Plan Annex for Byron Station*"
3. EP-BY-1000, Revision 0, "*Byron Station Radiological Emergency Plan*"
4. EP-AA-1004, Revision 39, "*Radiological Emergency Plan Annex for Dresden Station*"
5. EP-DR-1000, Revision 0, "*Dresden Station Radiological Emergency Plan*"

cc: w/ Attachment 1 only
Regional Administrator - NRC Region III
Director, NRC Division of Spent Fuel Management, ONMSS
NRC Senior Resident Inspector - Byron Station
NRC Project Manager, NRR - Byron Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station
Illinois Emergency Management Agency - Division of Nuclear Safety

ATTACHMENT 1

10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Attachment 1
10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Page 1 of 5

Document Title

The following Exelon Generation Company, LLC (Exelon) Emergency Plan documents have been revised or implemented for Byron Station (Byron) and Dresden Nuclear Power Station (Dresden):

- EP-AA-1002, Revision 37, "*Radiological Emergency Plan Annex for Byron Station*"
- EP-BY-1000, Revision 0, "*Byron Station Radiological Emergency Plan*"
- EP-AA-1004, Revision 39, "*Radiological Emergency Plan Annex for Dresden Station*"
- EP-DR-1000, Revision 0, "*Dresden Station Radiological Emergency Plan*"

In addition, in support of revising the Byron and Dresden Emergency Plan documentation, EP-AA-1000, Revision 33, "*Exelon Nuclear Standardized Radiological Emergency Plan*," has been superseded since it is no longer applicable to the Byron and Dresden facilities. A copy of the superseded document is not included as an attachment in this submittal.

Description of Procedures

The revised documents listed above together form the Emergency Plans for Byron (EP-AA-1002 and EP-BY-1000) and Dresden (EP-AA-1004 and EP-DR-1000).

Description of Changes

Exelon has announced its intent to permanently shut down the reactors at the Byron and Dresden sites in the fall of 2021. In conjunction with the shutdown, Byron and Dresden intend to submit changes to the stations' Emergency Plans under 10 CFR 50.90 to seek relief from commitments and regulatory requirements no longer applicable to a permanently shut down reactor.

These revisions to the Emergency Plan documents establish the Station Emergency Plan as an independent Emergency Plan separate and de-linked from the Fleet Standard Plan (i.e., EP-AA-1000). These revisions are necessary such that future changes to the Emergency Plans in support of decommissioning are implemented without impacting the Standard Plan by inserting multiple Byron and Dresden specific exceptions.

New Emergency Plan documents were created for Byron and Dresden (EP-BY-1000, "*Byron Station Radiological Emergency Plan*" and EP-DR-1000, "*Dresden Station Radiological Emergency Plan*"). These documents contain regulatory commitments applicable to the stations which are currently in the Fleet Standard Plan.

A change was made to EP-AA-1002, "*Radiological Emergency Plan Annex for Byron Station*," to reflect the new EP-BY-1000 document and a change was made to EP-AA-1004, "*Radiological Emergency Plan Annex for Dresden Station*," to reflect the new EP-DR-1000 document. References to the Standard Plan were replaced with references to EP-BY-1000 and EP-DR-1000. Specific exceptions to the Standard Plan contained in the Annexes for Byron (EP-AA-1002) and Dresden (EP-AA-1004) were removed and incorporated into the respective EP-BY-1000 and EP-DR-1000 documents. The staffing tables located in EP-AA-1000 were moved to EP-BY-1000 and EP-DR-1000. The changes to the Annexes do not introduce or remove regulatory requirements or commitments applicable to Byron or Dresden.

List of Specific Changes

Attachment 1
10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Page 2 of 5

1. **Editorial Changes** - Editorial changes are made which do not impact commitments or compliance with regulatory requirements. These include:
 - Changed step numbers because of information relocated or deleted.
 - The fleet Standardized Emergency Plan was changed to the Byron Emergency Plan and Dresden Emergency Plan. The word "Annexes" was changed to "Annex."
 - Exelon station or stations was changed to Byron or Dresden.
 - Exelon Mid-Atlantic or Northeast sites mentioned were deleted and are not applicable.
2. **Station References** - References to other Exelon Nuclear Stations, and Procedures, Definitions within the Standardized Emergency Plan are deleted which no longer apply to Byron or Dresden
3. **State References** - References to States/Agencies unrelated to Byron or Dresden are removed.

An editorial revision to the Byron and Dresden Emergency Plans removed references and discussions regarding agencies and organizations in the Standard Emergency Plan that do not apply to the stations.
4. **Letters of Agreement** - Letters of Agreements which do not apply to Byron or Dresden are removed.
5. **ERO Notification Systems** - Reference to Northeast Emergency Response Organization (ERO) Notification System was removed
6. **JIC Locations** - Fleet Joint Information Center (JIC) Locations which do not apply to Byron or Dresden were removed.
7. **EOF Locations** - Fleet Emergency Operations Facility (EOF) locations which do not apply to Byron or Dresden were removed.
8. **Hospital Name Change** - Presence St. Joseph Hospital of Joliet IL has changed its name to Amita Health St. Joseph Hospital. There is no change in services and there is a letter of agreement between the station and the hospital that reflects the name change.

Description of How the Changes Still Comply with Regulations

The changes to the Emergency Plan documents for Byron and Dresden delete requirements not applicable to the stand-alone Byron and Dresden Emergency Plans (e.g., remove references to the Exelon Nuclear Fleet, remove descriptions relating to states and agencies applicable to other Exelon stations). The changes do not introduce new or remove existing regulatory requirements or commitments applicable to Byron or Dresden.

1. Editorial Changes

Step 2.6 of Regulatory Guide (RG) 1.219 provides the following guidance regarding editorial changes:

"Editorial Change: Editorial changes do not require a 10 CFR 50.54(q) review. The following are examples of Editorial Changes:

Attachment 1
10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Page 3 of 5

- *Procedure title change*
- *Reference or annotation change*
- *Correction of location description*
- *Correction of typographical errors and punctuation*
- *Reformatting changes that do not change intent, purpose, or order of procedural steps*
- *Changes on plant drawing grid coordinates*
- *Change to position titles when no responsibilities for that position have changed*
- *Correction in page or step numbering.”*

2. Station References

In the conversion of Standard Emergency Plan (EP-AA-1000) into the stand-alone EP-BY-1000 and EP-DR-1000 procedures, it is appropriate to delete general references to other Exelon nuclear sites since they are no longer covered by the Byron or Dresden specific procedures. This separation of the Byron and Dresden Emergency Plans will allow future changes related to Decommissioning to be made without affecting the other Exelon stations' Emergency Plans. In addition, references to Emergency Preparedness (EP) Implementing Procedures, other stations, acronyms, and definitions which do not apply to Byron and Dresden were removed. There was no intent to revise commitments currently maintained under the Emergency Plans as part of the revisions.

3. State References

State references were removed. Discussions regarding agencies and organizations in the Standard Emergency Plan that do not apply include:

- The State of Iowa
- Iowa Emergency Management Division (IEMD)
- The Iowa Commissioner of Public Health, or his/her designee, from the Iowa Department of Public Health
- University Hygienic Lab (UHL)
- The State of Indiana
- The Commonwealth of Pennsylvania
- Pennsylvania Emergency Management Agency
- Department of Environmental Protection, Bureau of Radiation Protection
- Pennsylvania State Police
- The State of Maryland
- Maryland Emergency Management Agency (MEMA)
- Maryland Department of the Environment, Emergency Operations and Technical Support Program
- Maryland State Police: Responsibilities of the State Police are set forth in Annex Q, "Radiological Emergency Plan."
- State of Delaware
- State of New Jersey
- The New Jersey State Police, Office of Emergency Management
- New Jersey Office of Emergency Management
- New Jersey Department of Environmental Protection, Bureau of Nuclear Engineering
- The State of New York
- New York State Office of Emergency Management (NYSOEM)

Attachment 1
10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Page 4 of 5

- The NYS Department of Department of Health
- The Commonwealth of Virginia
- District of Columbia

These organizations do not have any relation to Byron or Dresden and are deleted with the development of a stand-alone Emergency Plan for Byron and Dresden.

4. Letters of Agreements

Section II.A.3 of the Standard Emergency Plan (EP-AA-1000) discusses letters of agreement obtained by the respective nuclear stations. Upon separation of the Byron and Dresden Emergency Plans from the fleet, it is not correct or appropriate to list actions for all stations in the Byron and Dresden Emergency Plans. As such, this discussion is removed.

In Appendix 3 of the Standard Emergency Plan (EP-AA-1000) letters of agreement that are listed as applicable to non-Midwest (MW) stations are not applicable to Byron and Dresden and, therefore, were removed.

5. ERO Notification Systems

Under the Exelon Standard Emergency Plan (EP-AA-1000), Step II.F.1.d discussed the Exelon Northeast sites' ERO notification system. The discussion stated the description of the system is contained in the station Annexes. With the separation of the Byron and Dresden Emergency Plans from the fleet, specific statements in this section, which are not applicable were removed. For Step II.F.1.e, the reference to the Northeast stations' ERO notification systems was removed. For Step II.F.1.f, the actual configuration of these systems vary from station to station and was removed because the Emergency Plan is station specific.

6. JIC Locations

Under the Exelon Standard Emergency Plan (EP-AA-1000), Step II.G.4 listed all of the JICs in the Exelon fleet and their addresses. With the separation of the Byron and Dresden Emergency Plans from the fleet, the only JIC applicable is in Warrenville IL. The JICs in Pennsylvania, Maryland, New Jersey, and New York are not applicable to Byron and Dresden were removed.

7. Emergency Operations Facility Locations

Under the Exelon Standard Radiological Plan, Step II.H.4 provided a listing all the EOFs in the Exelon fleet and their addresses. With the separation of the Byron and Dresden Emergency Plans from the fleet, the only EOF applicable is the one in Warrenville IL. The EOFs in Pennsylvania, Maryland, New Jersey, and New York are not applicable to Byron and were removed.

8. Hospital Name Change

Presence St. Joseph Hospital of Joliet IL has changed its name to Amita Health St. Joseph Hospital. There is no change in services and there is a letter of agreement between the stations and the hospital that reflects the name change.

Attachment 1
10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Page 5 of 5

Existing requirements and capabilities under the Byron and Dresden Emergency Plans have not been deleted or reduced as part of these revisions and as such, the station Emergency Plans continue to meet regulatory requirements. A review of existing regulatory Commitments was made to ensure all existing commitments continue to be met.

Following the implementation of the changes, the revised Emergency Plans for Byron and Dresden will be independent of the Exelon fleet Standard Plan. The new Emergency Plans for these facilities will form the regulatory basis for developing and submitting future licensing actions to the NRC in support of decommissioning efforts.

Description of Why the Changes are Not a Reduction in Effectiveness (RIE)

The Byron and Dresden Emergency Plans continue to meet applicable regulatory requirements as defined in Planning Standards of 10 CFR 50.46 and 10 CFR 50, Appendix E as well as the Program Element guidance described in NUREG-0654. The changes discussed do not reduce or modify existing emergency preparedness regulatory commitments. The changes do not alter the capability of the ERO to implement required Emergency Plan roles and responsibilities and do not affect the timeliness of the performance of emergency preparedness functions. No emergency planning requirements have been deleted or reduced as a result of the changes. Therefore, the changes do not constitute a reduction in effectiveness of the Emergency Plans for Byron or Dresden.

ATTACHMENT 2

Standardized Radiological Emergency Plan Revision

EP-AA-1002, Revision 37, "*Radiological Emergency Plan Annex for Byron Station*"

ATTACHMENT 3

Standardized Radiological Emergency Plan Revision

EP-BY-1000, Revision 0, *"Byron Station Radiological Emergency Plan"*

ATTACHMENT 4

Standardized Radiological Emergency Plan Revision

EP-AA-1004, Revision 39, "*Radiological Emergency Plan Annex for Dresden Station*"

ATTACHMENT 5

Standardized Radiological Emergency Plan Revision

EP-DR-1000, Revision 0, "*Dresden Station Radiological Emergency Plan*"