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

RS-20-137

November 10, 2020

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

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

Subject: Exelon Generation Company Emergency Plan Addendum Revisions

In accordance with 10 CFR 50.4(b)(5), "Emergency plan and related submissions," Exelon Generation Company, LLC (Exelon) is submitting the Emergency Plan Addendum revisions for Clinton Station (Clinton) listed in the table below.

Procedure No.	Revision	Title
EP-AA-1003, Addendum 3	3	<i>Emergency Action Levels for Clinton Station</i>
EP-AA-1003, Addendum 3	4	<i>Emergency Action Levels for Clinton Station</i>
EP-AA-1003, Addendum 3	5	<i>Emergency Action Levels for Clinton Station</i>

The changes to the Emergency Plan Addendums 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 Plan for Clinton. 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.

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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 Addendum and Procedure (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 Addendum revisions are included in the attachments to this letter.

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) Change Summary Analysis
2. EP-AA-1003, Addendum 3, Revision 3, "*Emergency Action Levels for Clinton Station*"
3. EP-AA-1003, Addendum 3, Revision 4, "*Emergency Action Levels for Clinton Station*"
4. EP-AA-1003, Addendum 3, Revision 5, "*Emergency Action Levels for Clinton Station*"

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

ATTACHMENT 1

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

ATTACHMENT 1

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

I. Document Titles

Exelon Generation Company, LLC (Exelon) has issued the following Emergency Plan Addendum and Procedure revisions for Clinton Station (Clinton):

- EP-AA-1003, Addendum 3, Revision 3, "*Emergency Action Levels for Clinton Station*"
- EP-AA-1003, Addendum 3, Revision 4, "*Emergency Action Levels for Clinton Station*"
- EP-AA-1003, Addendum 3, Revision 5, "*Emergency Action Levels for Clinton Station*"

II. Description of Procedures

Emergency Plan Addendum (EP-AA-1001, Addendum 3)

The Emergency Plan Addendum listed (i.e., EP-AA-1001, Addendum 3) describes the Emergency Action Levels (EALs) implemented at Clinton for entering Emergency Classification Levels (ECLs).

III. Description of Changes

EP-AA-1003, Addendum 3, Revision 3

The following change was made under this revision to EP-AA-1003, Addendum 3.

The Note in the Hot and Cold Reference Matrices for EAL RA3 was revised as follows to be consistent with the wording in the EAL RA3 Basis section:

Changing from:

"If the equipment in the listed room or area was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted."

To:

"If the equipment in the room or area listed in Table R3 was already inoperable, or out of service, before the event occurred, then no emergency classification is warranted."

EP-AA-1003, Addendum 3, Revision 4

The following change was made under this revision to EP-AA-1003, Addendum 3.

By letter dated February 14, 2020, the NRC issued Amendment No. 228 to Facility Operating License No. NPF-62 Clinton Power Station, Unit 1. The amendment approved changes submitted in a license amendment request dated March 1, 2019, for revising EALs based on adopting certain NRC-accepted Emergency Preparedness Frequently Asked Question (EPFAQ) guidance.

This revision to EP-AA-1003, Addendum 3, implements the changes as approved by the NRC in its letter and supporting Safety Evaluation Report (SER) dated February 14, 2020. The changes associated with this revision are considered "conforming changes" and prior NRC approval is not required to support implementation since the changes have already been approved. NRC Regulatory Guide (RG) 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors," states the following regarding "conforming changes":

The licensee should screen all proposed changes to the emergency plan to determine whether a 10 CFR 50.54(q) evaluation is necessary and to determine whether another formal change process is applicable. The purpose of this screening is not to decide which proposed changes could reduce effectiveness but instead whether a 10 CFR 50.54(q) change evaluation is necessary. The licensee should screen each proposed change separately and reserve the treatment of changes collectively for (1) repetitive identical changes, (2) editorial or typographical changes such as formatting, paragraph numbering, spelling, or punctuation that do not change intent, (3) conforming changes, or (4) two or more elements that are interdependent (e.g., a change to one element compensates for a change to another element). The licensee should document this screening if it concludes that a 10 CFR 50.54(q) evaluation is not necessary.

EP-AA-1003, Addendum 3, Revision 5

The following change was made under this revision to EP-AA-1003, Addendum 3.

By letter dated July 31, 2020, the NRC issued Amendment No. 234 Facility Operating License No. NPF-62 for Clinton Power Station, Unit 1. This amendment approved changes submitted in a license amendment request dated August 23, 2019, for revising EAL RA3.1 to remove specific references to radiation monitoring instrumentation used for monitoring radiation levels in the Main Control Room (MCR) as the only entry condition into the EAL.

This revision to EP-AA-1003, Addendum 3, implements the changes as approved by the NRC in its letter and supporting SER dated July 31, 2020. The changes associated with this revision are considered "conforming changes" and prior NRC approval is not required to support implementation since the NRC has already approved the changes. NRC RG 1.129 states the following regarding "conforming changes":

The licensee should screen all proposed changes to the emergency plan to determine whether a 10 CFR 50.54(q) evaluation is necessary and to determine whether another formal change process is applicable. The purpose of this screening is not to decide which proposed changes could reduce effectiveness but instead whether a 10 CFR 50.54(q) change evaluation is necessary. The licensee should screen each proposed change separately and reserve the treatment of changes collectively for (1) repetitive identical changes, (2) editorial or typographical changes such as formatting, paragraph numbering, spelling, or punctuation that do not change intent, (3) conforming changes, or (4) two or more elements that are interdependent (e.g., a change to one element compensates for a change to another element). The licensee should document this screening if it concludes that a 10 CFR 50.54(q) evaluation is not necessary.

IV. **Description of How the Changes Still Comply with Regulations**

EP-AA-1003, Addendum 3, Revision 3

Revising the Note in the Hot and Cold Matrices for EAL RA3 as noted above in Section III does not alter the meaning or intent of the approved EAL. This change is considered administrative in nature and is consistent with changes previously approved by the NRC for adopting the EAL guidance in NEI 99-01, Revision 6. Additionally, the changes continue to meet applicable regulations requirements and commitments to the NRC.

EP-AA-1003, Addendum 3, Revision 4

Planning Standard 10 CFR 50.47(b)(4) states in part: "*A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee.*" In addition, Program Element guidance in NUREG-0654, Section II.D.1, states in part: "*An emergency classification and emergency action level scheme as set forth in Appendix 1 must be established by the licensee. The specific instruments, parameters or equipment status shall be shown for establishing each emergency class, in the in-plant emergency procedures. The plan shall identify the parameter values and equipment status for each emergency class.*"

The changes made to the EALs in this revision of EP-AA-1004, Addendum 3, as described in Section III above reflect the implementation of Amendment No. 228 for Clinton, Unit 1, as approved by the NRC in its letter and supporting SER dated February 14, 2020. This change is consistent and supported by the guidance related to a "conforming change" as described RG 1.219. The applicable emergency preparedness regulations and commitments to the NRC continue to be met.

EP-AA-1003, Addendum 3, Revision 5

Planning Standard 10 CFR 50.47(b)(4) states in part: "*A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee.*" In addition, the Program Element guidance in NUREG-0654, Section II.D.1, states in part: "*An emergency classification and emergency action level scheme as set forth in Appendix 1 must be established by the licensee. The specific instruments, parameters or equipment status shall be shown for establishing each emergency class, in the in-plant emergency procedures. The plan shall identify the parameter values and equipment status for each emergency class.*"

The changes made to EAL RA3 in this revision of EP-AA-1003, Addendum 3, as described in Section III above implement Amendment No. 234 for Clinton, Unit 1, and reflect the changes as approved by the NRC in its letter and supporting SER dated July 31, 2020. This change is consistent and supported by the guidance related to a "conforming change" as described RG 1.219. The applicable emergency preparedness regulations and commitments to the NRC continue to be met.

Summary

Applicable regulatory commitments made to the NRC continue to be met. Existing requirements and capabilities under the Emergency Plans were not deleted or reduced and applicable regulatory requirements established in 10 CFR 50.47, 10 CFR 50, Appendix E, and the Program Element guidance of NUREG-0654 continue to be met.

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

Based on the changes described in Sections III and IV above, the emergency response capabilities are maintained and are not adversely impacted. The changes made under these revisions are consistent with changes previously approved by the NRC and were determined not to require prior NRC approval since some involved "conforming changes." Some of the changes were also consistent with the guidance specified described in RG 1.219. Applicable emergency preparedness regulatory commitments made to the NRC and applicable regulatory requirements established in 10 CFR 50.47, 10 CFR 50, Appendix E, and the Program Element guidance of NUREG-0654 continue to be met. Therefore, the changes described do not constitute a reduction in effectiveness of the Emergency Plan for Clinton.

ATTACHMENT 2

Radiological Emergency Plan Addendum Revision

EP-AA-1003, Addendum 3, Revision 3, *"Emergency Action Levels for Clinton Station"*

ATTACHMENT 3

Radiological Emergency Plan Addendum Revision

EP-AA-1001, Addendum 3, Revision 4, *"Emergency Action Levels for Clinton Station"*

ATTACHMENT 4

Radiological Emergency Plan Addendum Revision

EP-AA-1001, Addendum 3, Revision 5, *"Emergency Action Levels for Clinton Station"*