

Attachments 1 through 13 of this submittal contain ~~security-related information~~;  
upon separation this cover letter is decontrolled.



200 Exelon Way  
Kennett Square, PA 19348  
www.exeloncorp.com

10 CFR 73.5

RS-20-141  
NMP1L3362  
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November 13, 2020

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 and 50-457

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

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-53 and DPR-69  
NRC Docket Nos. 50-317 and 50-318

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

Dresden Nuclear Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

James A. FitzPatrick Nuclear Power Plant  
Renewed Facility Operating License No. DPR-59  
Docket No. 50-333

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

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

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Nine Mile Point Nuclear Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
NRC Docket Nos. 50-220 and 50-410

Peach Bottom Atomic Power Station, Units 2 and 3  
Subsequent Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

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

R.E. Ginna Nuclear Power Plant  
Renewed Facility Operating License No. DPR-18  
NRC Docket Nos. 50-244

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility Operating License No. DPR-50  
NRC Docket No. 50-289

Subject: Request for an Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to COVID- 19 Public Health Emergency

Reference: Letter from Ho K. Nieh, U.S. Nuclear Regulatory Commission, to Jennifer L. Uhle, Nuclear Energy Institute – "Updated Guidance for Licensees that Request Exemptions from the Calendar Year 2020 Annual Licensee-Conducted Force on Force Requirement in Part 73, Appendix B, Section VI During the Coronavirus Disease 2019 Public Health Emergency," dated October 13, 2020 (ML20273A117)

On January 31, 2020, the U.S. Department of Health and Human Services declared a Public Health Emergency (PHE) for the United States to aid the nation's healthcare community in responding to the Coronavirus Disease 2019 (COVID-19). On March 11, 2020, the COVID-19 outbreak was characterized as a pandemic by the World Health Organization and, on March 13, 2020, President Donald Trump declared the COVID-19 pandemic a PHE. In addition, the Governors of the following states in which the cited Exelon Generation Company, LLC (Exelon) plants are located have declared a state of emergency in response to the COVID-19 PHE on the dates noted:

<b>State</b>	<b>State of Emergency Declaration Date</b>
State of Illinois	March 9, 2020
State of Maryland	March 5, 2020
Commonwealth Pennsylvania	March 6, 2020
State of New York	March 7, 2020

In response to these declarations Exelon implemented its pandemic response plan which instituted and supported isolation protocols as recommended by the U.S. Centers for Disease Control and Prevention (CDC) that were necessary to protect public health as well as the health and safety of essential site personnel. As a result of these actions, Exelon submitted temporary exemption requests from certain requirements of 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1), regarding 2020 annual force-on-force (FOF) for which the Exelon facilities cited and received NRC approval for the requested temporary exemptions. The table below provides information regarding the submittal and approval dates for the temporary exemptions for the Exelon facilities. The temporary exemptions were necessary because isolation protocols (e.g., social distancing, group size limitations, self-quarantining, etc.) restrict activities associated with conducting annual FOF exercises and were necessary to maintain a healthy workforce during the PHE. The approved temporary exemptions expire on December 31, 2020.

<b>Facility</b>	<b>Submittal Date</b>	<b>NRC Approval Date</b>
Braidwood Station	June 15, 2020	July 9, 2020
Byron Station	July 30, 2020	August 17, 2020
Calvert Cliffs Nuclear Power Plant	September 8, 2020	October 9, 2020
Clinton Power Station	July 23, 2020	August 13, 2020
Dresden Nuclear Power Station	July 28, 2020	August 27, 2020
James A. FitzPatrick Nuclear Plant	May 29 and June 4, 2020	June 29, 2020
LaSalle County Station	July 16, 2020	August 3, 2020
Limerick Generating Station	July 29, 2020	August 19, 2020
Nine Mile Point Nuclear Station	July 24, 2020	August 25, 2020
Peach Bottom Atomic Power Station	May 8, 2020	May 20, 2020
Quad Cities Nuclear Power Station	July 27, 2020	August 27, 2020
R.E. Ginna Nuclear Power Plant	June 8, 2020	June 24, 2020
Three Mile Island Nuclear Station	June 5, 2020	June 30, 2020

In the submitted requests for the temporary exemptions, Exelon stated that actions would be taken at its sites that included completing any missed 2020 FOF exercises. Specifically, at the time of submittals for the temporary exemption requests the duration of the PHE was discussed as "not currently known" and, therefore, Exelon stated that it would complete the exercises 90 days after the PHE ended, or by December 31, 2020, whichever occurred first. However, the PHE has not ended and continues to impact Exelon's ability to conduct the 2020 annual FOF exercises at the noted facilities. Because the temporary exemption expires December 31, 2020, Exelon requests an exemption from conducting 2020 annual FOF exercises as required by 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) for the Exelon facilities cited. Attachments 1 through 13 are included in this submittal and provide additional information supporting the justification for the requested exemptions for each affected Exelon facility. These exemptions would supersede actions previously described in the temporary exemptions approved by the NRC as further discussed in the supporting attachments for the individual facilities.

Approval of these exemptions will continue to support the isolation protocols necessary to protect essential site personnel. These restrictions are needed to ensure personnel are isolated from the COVID-19 disease and remain capable of maintaining plant security.

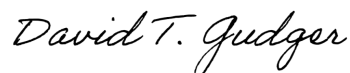
The proposed exemptions will apply specifically to those security personnel in which the approved temporary exemptions applied.

There are no commitments contained in this submittal.

Should you have any questions concerning this submittal, please contact Ron Reynolds at (610) 765-5247.

Exelon requests written approval of the exemptions for the affected Exelon facilities by December 15, 2020.

Respectfully,



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David T. Gudger  
Senior Manager, Licensing  
Exelon Generation Company, LLC

Attachments:

1. Braidwood Station, Units 1 and 2 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
2. Byron Station, Units 1 and 2 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
3. Calvert Cliffs Nuclear Power Plant, Units 1 and 2- Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
4. Clinton Power Station, Unit 1 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
5. Dresden Nuclear Power Station, Units 2 and 3 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
6. James A. FitzPatrick Nuclear Power Plant - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
7. LaSalle County Station, Units 1 and 2 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency

8. Limerick Generating Station, Units 1 and 2 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
9. Nine Mile Point Nuclear Station, Units 1 and 2 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
10. Peach Bottom Atomic Power Station, Units 2 and 3 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
11. Quad Cities Nuclear Power Station, Units 1 and 2 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
12. R.E. Ginna Nuclear Power Plant - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency
13. Three Mile Island Nuclear Station, Unit 1 - Request for Exemption from Certain 10 CFR 73 Appendix B, Section VI, Subsection C.3.(I)(1), Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to the Continued COVID-19 Public Health Emergency

cc: w/ Attachments  
Regional Administrator - NRC Region III  
Regional Administrator - NRC Region I  
NRC Senior Resident Inspector - Braidwood Station  
NRC Senior Resident Inspector - Byron Station  
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant  
NRC Senior Resident Inspector - Clinton Power Station  
NRC Senior Resident Inspector - Dresden Nuclear Power Station  
NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant  
NRC Senior Resident Inspector - LaSalle County Station  
NRC Senior Resident Inspector - Limerick Generating Station  
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station  
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station  
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station  
NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Plant  
NRC Project Manager, NRR - Braidwood Station  
NRC Project Manager, NRR - Byron Station  
NRC Project Manager, NRR - Calvert Cliffs Nuclear Power Plant  
NRC Project Manager, NRR - Clinton Power Station  
NRC Project Manager, NRR - Dresden Nuclear Power Station  
NRC Project Manager, NRR - James A. FitzPatrick Nuclear Power Plant  
NRC Project Manager, NRR - LaSalle County Station  
NRC Project Manager, NRR - Limerick Generating Station  
NRC Project Manager, NRR - Nine Mile Point Nuclear Station  
NRC Project Manager, NRR - Peach Bottom Atomic Power Station  
NRC Project Manager, NRR - Quad Cities Nuclear Power Station  
NRC Project Manager, NRR - R.E. Ginna Nuclear Power Plant  
NRC Project Manager, NRR – Three Mile Island, Unit 1  
NRC Project Manager, NMSS/DUWP/RDB - Three Mile Island, Unit 1  
Illinois Emergency Management Agency - Division of Nuclear Safety  
Director, Bureau of Radiation Protection - Pennsylvania Department of  
Environmental Resources  
W. DeHass - Commonwealth of Pennsylvania Bureau of Radiation Protection  
S. Seaman - State of Maryland  
A. L. Peterson - NYSERDA  
B. Frymire - NYSPSC