



Three Mile Island Nuclear Station, Unit 1
441 S. P.O. Box 480
Middletown, PA 17057

~~Submittal Contains Security-Related Information —
Withhold Under 10 CFR 2.390~~

EA-20-103
72.4

TMI-21-008

February 16, 2021

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 1
Renewed Facility License No. DPR-50
NRC Docket No. 50-289 and 72-077

Subject: Supplemental Response to NRC Order EA-20-103, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access at the Three Mile Island Generating Station Independent Spent Fuel Storage Installation"

- References:
- (1) NRC Order EA-20-103, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access at the Three Mile Island Generating Station Independent Spent Fuel Storage Installation," dated August 27, 2020 (ADAMS ML20224A121)
 - (2) Response to NRC Order EA-20-103, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access at the Three Mile Island Generating Station Independent Spent Fuel Storage Installation," dated September 15, 2020 (ADAMS ML20259A196)
 - (3) Supplemental Response to NRC Order EA-20-103, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access at the Three Mile Island Generating Station Independent Spent Fuel Storage Installation," dated January 28, 2021 (ADAMS ML21036A023)

Pursuant to NRC Order EA-20-103 (Reference 1) (ASM Order) for Three Mile Island Generating Station, Unit 1 (TMI-1), Exelon Generation Company, LLC (Exelon) provided the 20-day response required by Sections III.B and III.C of the Order (Reference 2). In Reference 3, Exelon provided a detailed response to Attachments 1 and 2 of the TMI-1 ASM Order,

~~SECURITY-RELATED INFORMATION — WITHHOLD ATTACHMENT UNDER 10 CFR 2.390~~

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which included the revised TMI Security Plan, Training and Qualification Plan, Safeguards Contingency Plan (Security Plan), associated analysis, and supporting documentation. The revised Security Plan (Revision 24) provided in the January 28, 2021 submittal (Reference 3), has been internally reviewed and approved by Exelon prior to submittal. Exelon has determined in accordance with 10 CFR 50.54(p)(2) that the revision does not decrease the safeguards effectiveness of the Security Plan and as such does not require Nuclear Regulatory Commission (NRC) review and approval.

The purpose of this letter is to clarify the intent of the supplemental information provided in Reference 3, and to request the NRC to review the information provided to support its evaluation that Exelon has met the necessary conditions and requirements in the ASM Order in such a manner that the NRC may make its determination that TMI-1 is in compliance with the ASM Order requirements.

Additionally, Exelon has finalized the TMI Integrated Response Plan ISFSI that was provided as a draft document in Attachment 5 of Reference 3. The Attachment to this letter provides the Exelon approved ISFSI Integrated Response Plan and replaces the draft document in Reference 3 in its entirety.

As required by the ASM Order, Exelon must meet the following conditions prior to placing spent fuel in the Independent Spent Fuel Storage Installation (ISFSI):

- Demonstrate the ability to comply with the required ASMs as outlined in these documents no later than 365 days from the date of this Order or 90 days before the first day that spent fuel is initially placed in the ISFSI, whichever occurs first.
- Implement the ASM requirements.
- Receive written verification from the NRC (specifically from the Office of Nuclear Material Safety and Safeguards) that Exelon has adequately demonstrated compliance with the ASM requirements.

In order to support the planned spent fuel transfer to the ISFSI, Exelon is requesting that the NRC complete its review and provide written verification that TMI is in compliance with the ASM Order by September 17, 2021.

The enclosed Attachment is considered sensitive, unclassified (non-safeguard) information in accordance with 10 CFR 2.390, 'Public inspections, exemptions, requests for withholding,' paragraph (d)(1). As such, Exelon requests that the information contained in the attachment be withheld from public disclosure. Upon separation of the attachment this cover letter contains no Security-Related information.

This letter does not contain any regulatory commitments.

TMI-21-008
February 16, 2021
U.S. Nuclear Regulatory Commission
Supplemental Response to EA-20-103
Page 3

Should you have any questions concerning this letter, please contact Mr. Daniel Kenny at (717) 948-8855.

Respectfully,

A handwritten signature in black ink, appearing to read "Trevor L. Orth". The signature is written in a cursive, flowing style.

Trevor L. Orth
Site Decommissioning Director
Three Mile Island Nuclear Station, Unit 1

Attachment:

Implementing and Supporting Documentation - Withhold per 10 CFR 2.390 - TMI
Integrated Response Plan ISFSI (Official Use Only - Law Enforcement Sensitive)

cc: w/o attachment
Regional Administrator - NRC Region I
Project Manager, NMSS - Three Mile Island, Unit 1
Decommissioning, ISFSI and Reactor Health Physics Branch, NRC Region I
Director, Bureau of Radiation Protection - PA Department of Environmental
Resources

TMI-21-008
February 16, 2021
U.S. Nuclear Regulatory Commission
Supplemental Response to EA-20-103
Page 4

bcc: VP Nuclear Security, Licensing and Regulatory (Cantera)
VP License Renewal and Decommissioning
Sr. Manager, Decommissioning
Director - Licensing and Regulatory Affairs – (East)
Sr. Manager – Licensing and Regulatory Affairs – (East)
Licensing Records
Commitment Tracking Coordinator – KSA 3-E
C. Smith – TMI
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