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Nuclear

Exelon Generation
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10CFR20.1703

10CFR20.1705

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

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

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

Dresden Nuclear Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237, 50-249 and 72-37

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

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

Oyster Creek Generating Station
Facility Operating License No. DPR-16
NRC Docket Nos. 50-219 and 72-15

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277, 50-278 and 72-1027

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

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

Subject: Request for Authorization for Use of Delta Protection Mururoa Model BLU Single-Use Self-Fed Respiratory Protection Equipment

- Reference:
1. Delta Protection Topical Report MURUBLU05NP "Topical Report for Delta Protection Mururoa BLU Suit Systems," dated October 27, 2005 (ADAMS Accession No. ML053060280)
 2. Final NRC Safety Evaluation For Delta Protection/Bacou Dalloz Topical Report (TR) MURUBLU05NP, "Topical Report For Delta Protection Mururoa BLU Suit Systems" (TAC No. MC8994) dated April 10, 2006 (ADAMS Accession No. ML060950499)
 3. NRC Memorandum from C. Haney to M. Case, "Guidance for Review of Licensee Requests to Use Delta Protection BLU Suit Systems Based on the NRC Approved Topical Report," dated August 18, 2006 (ADAMS Accession No. ML062340554)

In accordance with 10CFR20.1703, "*Use of individual respiratory protection equipment*," and 10CFR20.1705, "*Application for use of higher assigned protection factors*," Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) hereby request authorization to use the French-designed Delta Protection Mururoa BLU single-use, self-fed respiratory protection suits described in Delta Protection/Bacou Dalloz Topical Report (TR) MURUBLU05NP (Reference 1).

10CFR20.1703 paragraph (b) permits licensees to apply to the NRC for authorization to use respiratory equipment that has not been tested or certified by the National Institute for Occupational Safety and Health (NIOSH), provided licensees demonstrate by appropriate testing that a respirator is capable of safely providing the necessary level of user protection under anticipated conditions of use. 10CFR20.1703 paragraph (f) requires standby rescue persons whenever one-piece atmosphere-supplying suits, or any combination of supplied air respiratory protection device and personnel protective equipment are used, from which an unaided individual would have difficulty extricating himself or herself from the suit.

10CFR20.1705 allows licensees to request authorization from the NRC before using assigned protection factors in excess of those specified in 10 CFR 20, Appendix A, "Assigned Protection Factors for Respirators." Appendix A does not currently assign a protection factor for these style suits.

In Reference 2, the NRC issued its final Safety Evaluation (SE) related to the TR MURUBLU05NP. The NRC determined that TR MURUBLU05NP is acceptable for referencing in licensing applications for respiratory protection equipment designed for reactors to the extent specified and under the limitations delineated in the TR and in the NRC's final Safety Evaluation (SE). The NRC indicated that due to the design features of the suit, coupled with required training of all suit users on escape methods, and limiting the use of the suits to areas that are not immediately dangerous to life or health (IDLH), the requirement for standby rescue persons is not required. In addition, the NRC has indicated that the single-use self-fed suit is acceptable for use with an assigned protection factor (APF) of 2000, against airborne particulate contamination, when used in accordance with the criteria established in Section 4.0 of the final SE.

EGC and AmerGen commit to use the Delta Protection Mururoa BLU single-use self-fed suits consistent with TR MURUBLU05NP and within the "Approved Device Configuration and Conditions of Use," specified in Section 4.0 of the referenced SE for TR MURUBLU05NP. This submittal is consistent with the guidance for requesting approval to use Delta Protection BLU Suit systems (Reference 3).

Approval of the request would improve worker safety in areas of airborne radioactivity and high potential for facial or skin contamination from hot particles. In addition, the full body cooling effect will eliminate heat stress-related concerns that can occur during plant outages. This will result in reduced personnel contamination events, as well as the reduction of outage duration.

Authorization to use these suits will allow EGC and AmerGen to proceed with procedure changes and complete training necessary for the use of the Mururoa BLU suits in our upcoming refueling outages. Therefore, EGC and AmerGen are requesting NRC approval by August 31, 2007, in order to support use during refueling outages scheduled for the Fall 2007 and Spring 2008.

The enclosure provides a list of the EGC and AmerGen regulatory commitments supporting this request.

If any additional information is needed, please contact Mr. Richard Gropp at (610) 765-5557.

Respectfully,

Pamela B. Cowan

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Pamela B. Cowan
Director – Licensing & Regulatory Affairs
EGC Generation Company, LLC and
AmerGen Energy Company, LLC

Enclosure: List of Regulatory Commitments

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Project Manager, NRR - Braidwood Station
NRC Project Manager, NRR - Byron Station
NRC Project Manager, NRR - Clinton Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station
NRC Project Manager, NRR - LaSalle County Station
NRC Project Manager, NRR - Limerick Generating Station
NRC Project Manager, NRR - Oyster Creek Generating Station
NRC Project Manager, NRR - Peach Bottom Atomic Power Station
NRC Project Manager, NRR - Quad Cities Nuclear Power Station
NRC Project Manager, NRR - TMI Unit 1
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Oyster Creek Generating Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - TMI Unit 1
Illinois Emergency Management Agency - Division of Nuclear Safety
Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental
Resources
Director, Bureau of Nuclear Engineering, New Jersey Department of Environmental
Protection
Chairman, Board of County Commissioners of Dauphin County, PA
Chairman, Board of Supervisors of Londonderry Township, PA
Mayor of Lacey Township, Forked River, NJ
R. I. McLean, State of Maryland
R. R. Janati, Commonwealth of Pennsylvania
C. Gratton, NRC Project Manager, NRR - (EGC/AmerGen Fleet)

ENCLOSURE

EGC AND AMERGEN

List of Regulatory Commitments

USE OF DELTA PROTECTION MURUROA MODEL BLU SINGLE-USE SELF-FED
RESPIRATORY PROTECTION EQUIPMENT

The following table identifies those actions committed to by Exelon Generation Company (EGC), LLC and AmerGen Energy Company, LLC (AmerGen) in order to use the Delta Protection Mururoa BLU single-use, self-fed suits consistent with Topical Report MURUBLU05NP (ADAMS Accession No. ML053060280) and within the "Approved Device Configuration and Conditions of Use," specified in NRC's Safety Evaluation dated April 10, 2006 for TR MURUBLU05NP (ADAMS Accession No. ML ML060950499), and the guidance provided in NRC Memorandum, "Guidance for Review of Licensee Requests to Use Delta Protection BLU Suit Systems Based on the NRC Approved Topical Report," dated August 18, 2006 (ADAMS Accession No. ML062340554). Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	PROGRAMMATIC (Yes/No)
1) The BLU suits will be used in a configuration consisting of: Mururoa BLU one-piece encapsulating suit (of either PVC or Ethyfuse construction), fitted with 1) a Micronel C500X-012EK-AB60 blower with a C501A-012AK-A battery (consistent with the parts list in Section 7 of Attachment 6.6.6 to the Topical Report TR MURUBLU05NP), and 2) four Scott PF 10 P3, or four Delta Protection P3, high efficiency particulate filter cartridges. All four filter cartridges must be matching and replaced as a set.	Prior to use.	No	Yes
2) Procedures for use of the suit systems are integrated into the respiratory programs required by 10CFR20, Subpart H. Fit testing of user is not applicable to fully encapsulating suits. Prior to use, wearers are trained on these conditions of use as well as the emergency escape features of the suits.	Prior to use.	No	Yes

3) Suits are used in accordance with recommendations in Attachments 6.6.4, 6.6.5, and 6.6.6 of the Topical Report TR MURUBLU05NP (ADAMS Accession No. ML053060280)	Prior to use.	No	Yes
4) Suit enclosures are single use only, (other than those segregated for training purposes only) and are discarded after use. Unused suit enclosures are stored in their original manufacturer's packing (in an environment not colder than 32 deg. F, nor hotter than 140 deg. F), with a maximum storage shelf-life of 3 years. Suits are not to come in contact with anything colder than 41 deg. F, nor hotter than 140 deg. F, during use.	Prior to use.	No	Yes
5) Suits are donned with a fully charged battery pack installed on the blower. The maximum period of use (timed from a fully charged battery), is 4 hours with the blower set at 600 l/min; and 7 hours with the blower at the 400 l/min setting.	Prior to use.	No	Yes
6) Suits are used only in atmospheres containing specific contaminants in concentrations that are not immediately dangerous to life or health (IDLH), as given in NIOSH "Concept for Industrial Power, Air-purifying Respiratory Standard," Draft for Comment, May 30, 2005, and have an oxygen content of at least 19.5 percent by volume.	Prior to use.	No	Yes

<p>7) Communication channels will be established with Delta Protection to report any defects experienced with the device, and to ensure that any manufacturer's notifications concerning the suit systems are received in a timely manner.</p>	<p>Prior to use.</p>	<p>No</p>	<p>Yes</p>
<p>8) The following elements and controls found in Section 6.4 of Topical Report TR MURUBLU05NP will be incorporated into EGC and AmerGen respiratory protection program:</p> <ul style="list-style-type: none"> a. Prior to use, the Mururoa BLU self-fed suits will be integrated into the respiratory protection program, using the information provided by the manufacturer. b. Prior to use, the lesson plans will be developed to train workers on Mururoa BLU's features, donning, use and removal, cautions and use of mouth strips and tear off strips for routine and emergency egress. c. Prior to use, Radiation Protection personnel will be provided additional training for selection, approval, issue, equipment set-up, operation and maintenance instructions for Mururoa BLU suits. 	<p>Prior to use.</p>	<p>No</p>	<p>Yes</p>