

## NRR-PMDAPEm Resource

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**From:** Purnell, Blake  
**Sent:** Tuesday, May 19, 2015 11:42 AM  
**To:** richard.gropp@exeloncorp.com  
**Subject:** Exelon Fleet EAL Amendment (TAC Nos. MF4232-MF4251)

Richard,

On May 30, 2014, as supplemented by letter dated March 2, 2015, Exelon Generation Company, LLC submitted a request to revise the emergency action levels (EALs) for its facilities (ADAMS Accession Nos. ML14164A053 and ML15071A122). The NRC staff has reviewed the application and the supplement and has some potential questions with regard to the supplement. The staff would like to have a teleconference to discuss these questions. The staff also wants to know if Exelon can provide a supplement to its application within the next few days to address these questions.

**Quad Cities:** <1> Their response to RAI #16 states that their SBO DG will be "...available within one hour of the onset of an SBO event," and as such should not be used for EALs MG1, MS1, MA1, MG2, CA1, and CU1 as it is not timely enough to credit as a source. Please justify further, or revise accordingly. <2> For threshold CT6, using surveys to determine Max Safe radiation levels is inconsistent with our expectations for timely EAL criteria. Please develop criteria that would be indicative of CT6 rather than using surveys.

**Dresden:** <1> Their response to RAI #16 states that the SBO DGs are "...not normally connected to any bus," and as such should not be used for EALs MG1, MS1, MA1, MG2, CA1, and CU1 as it is not timely enough to credit as a source unless justification is provided that documents that these can be operable within a timely period. <2> For threshold CT6, using surveys to determine Max Safe radiation levels is inconsistent with our expectations for timely EAL criteria. Please develop criteria that would be indicative of CT6 rather than using surveys.

**Clinton:** <1> For threshold CT6 (RC4), using surveys to determine Max Safe (Max Normal) radiation levels is inconsistent with our expectations for timely EAL criteria. Please develop criteria that would be indicative of CT6 (RC4) rather than using surveys.

Thanks,

Blake Purnell, Project Manager  
Plant Licensing Branch III-2 and  
Planning and Analysis Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
ph: 301-415-1380

Docket Nos. STN 50-456, STN 50-457, and 72-73; STN 50-454, STN 50-455, and 72-68; 50-461; 50-010, 50-237, 50-249 and 72-37; 50-373, 50-374, and 72-70; 50-352, 50-353, and 72-65; 50-219 and 72-15; 50-171, 50-277, 50-278, and 72-79; 50-254, 50-265, and 72-53; 50-289 and 50-320;

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