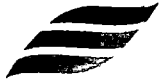


~~Security-Related and Exelon Confidential/Proprietary Information
Withhold Under 10 CFR 2.390~~

~~Attachment 3 contains Security-Related and Exelon Confidential/Proprietary
Information; upon separation this cover letter and Attachments 1 and 2 are decontrolled.~~



Exelon Generation.

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

January 6, 2016

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

Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220, 50-410, and 72-1036

Subject: Exelon Nuclear Radiological Emergency Plan Implementing Procedure
Revisions

In accordance with 10 CFR 50.4(b)(5), "Emergency plan and related submissions," Exelon Generation Company, LLC (Exelon) is submitting an Emergency Plan implementing procedure revision listed in the table below for the Nine Mile Point Nuclear Station (NMP). This submittal also provides notification concerning a superseded procedure as noted in the table.

Procedure No.	Revision	Title
OP-NM-106-104	0	Security Contingency Event
EPIP-EPP-10 (superseded)	02500	Security Contingency Event

The changes involving the implementation of OP-NM-106-104 and replacement of EPIP-EPP-10 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 NMP. This notification is being submitted within 30 days of implementation of the changes as required by 10 CFR 50.4(b)(5). The changes continue to meet the applicable planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E. The procedure included in Attachment 3 contains *SUNSI Security-Related Information* and the pages have been marked "Security-Related Information - Withhold Under 10 CFR 2.390," as appropriate.

~~Security-Related and Exelon Confidential/Proprietary Information
Withhold Under 10 CFR 2.390~~

~~Attachment 3 contains Security-Related and Exelon Confidential/Proprietary
Information; upon separation this cover letter and Attachments 1 and 2 are decontrolled.~~

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Furthermore, Attachment 3 of this letter is proprietary and confidential and contains trade secrets and commercial or financial information. Exelon maintains this information on a confidential basis and protects it from disclosure to the general public or unauthorized individuals. Exelon requests that Attachment 3 also be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4), and has attached an affidavit for this purpose (Attachment 2). However, if the NRC intends to place any of this information in the Public Document Room or on the Agencywide Documents Access and Management System or produce it in response to a Freedom of Information Act ("FOIA") request, Exelon requests the opportunity to redact the materials consistent with established FOIA exemptions and precedent. A copy of the NMP superseded procedure (EPIP-EPP-10) is not included as an attachment.

In addition, as required by 10 CFR 50.54(q)(5), this submittal includes a summary analysis of the changes to the implementing procedure.

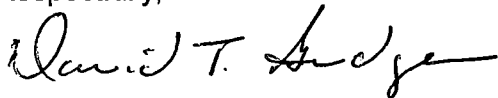
This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the Emergency Plan, the licensee shall submit a report containing a description of the changes to the Director, Division of Spent Fuel Storage and Transportation.

A copy of the revised procedure and supporting change summary analysis 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 Richard Gropp at (610) 765-5557.

Respectfully,



David T. Gudger
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1. 10 CFR 50.54(q)(5) Procedure Change Summary Analysis
 2. Affidavit
 3. OP-NM-106-104, Revision 0, "Security Contingency Event" (SUNSI)

cc: w/ Attachment 1 only
 Regional Administrator – NRC Region I
 Director, NRC Division of Spent Fuel Storage and Transportation, ONMSS
 NRC Senior Resident Inspector – Nine Mile Point
 NRC Project Manager, NRR – Nine Mile Point
 A. L. Peterson, NYSEDA

ATTACHMENT 1

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

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

Procedure/Title

Exelon Generation Company, LLC (EGC) is submitting the following Emergency Plan implementing procedure revision for Nine Mile Point Nuclear Station (NMP):

- OP-NM-106-104, Revision 0, "*Security Contingency Event*"

This procedure contains *Security-Related (SUNSI)* and *Exelon Confidential/Proprietary Information* and is requested to be withheld from public disclosure pursuant to 10 CFR 2.390. This procedure supersedes EPIP-EPP-10, Revision 02500, "*Security Contingency Event*."

Description of Procedure

The purpose of OP-NM-106-104 is to describe actions in response to those security events at NMP that may pose credible threats to the security of the station and may result in the classification and declaration of an emergency.

Description of Changes

As noted above, OP-NM-106-104 supersedes and replaces EPIP-EPP-10, Revision 02500, "*Security Contingency Event*." The content of EPIP-EPP-10 in its entirety has been reformatted and converted into OP-NM-106-104. In addition to assignment of a new number and converting the procedure into a new format, the procedure was updated to reflect current procedure references and titles and align with the EGC writer's guide. These changes do not affect the implementation of steps associated with personnel protective actions, and do not affect actions that implement requirements of the emergency planning regulations.

Description of How the Change Still Complies with Regulations

The implementation of OP-NM-106-104 and elimination of EPIP-EPP-10 continue to satisfy the applicable emergency planning requirements established in 50.47(b)(10) and 10 CFR 50 Appendix E, Section IV.I, as well as the guidance established in NUREG-0654, Section II.J.

Description of Why the Change is Not a Reduction in Effectiveness (RIE)

OP-NM-106-104 remains consistent with the emergency planning requirements specified in 10 CFR 50.47(b)(10), and 10 CFR 50 Appendix E, Section IV.I, as well as the guidance established in NUREG-0654, Section II.J.

The changes do not alter the capability of the Emergency Response Organization (ERO) to implement required Emergency Plan functions, and does not affect the timeliness of the performance of these functions. Therefore, the change does not result in a reduction in the effectiveness of the Emergency Plan for NMP.

ATTACHMENT 2

Affidavit

AFFIDAVIT OF DAVID T. GUDGER

DOCKET NOS. 50-220, 50-410, and 72-1036

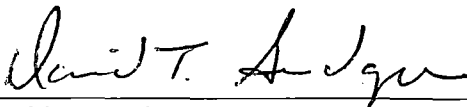
I, David T. Gudger, Manager, Licensing and Regulatory Affairs, Exelon Generation Company, LLC, do hereby affirm and state:

1. I am Manager, Licensing and Regulatory Affairs for Exelon Generation Company, LLC (EGC), and I am authorized to execute this affidavit on behalf of EGC.
2. I am further authorized to review the documents sought to be withheld from public disclosure in connection with submittals to the Nuclear Regulatory Commission ("NRC"):
 - OP-NM-106-104, Revision 0, "Security Contingency Event"
3. I am also authorized to apply to the NRC for the withholding of the aforementioned documents from public disclosure under 10 C.F.R. §§ 2.390(a)(4) and 9.17(a)(4) on the grounds that the documents contain privileged or confidential or proprietary commercial information. The documents EGC seeks to withhold from public disclosure have been marked "Proprietary" and are summarized in the attachment to my Affidavit.
4. On behalf of EGC, I request that the documents marked by EGC as "Proprietary" and described in the attached list (Appendix 1) be withheld, in their entirety, by the NRC from public disclosure.
5. In making this application for withholding of proprietary and confidential information of which EGC is the owner, EGC relies on 10 C.F.R. § 2.390(a)(4) and 10 C.F.R. 9.17(a)(4). The proprietary documents contain privileged or confidential or proprietary commercial information.
6. The proprietary information described in Appendix 1 should be withheld from disclosure by the NRC pursuant to the policy reflected in 10 C.F.R. § 2.390(a)(4), and for the following reasons to be considered pursuant to 10 CFR § 2.390(b)(4):
 - i.. The documents are each either a policy, procedure, process, technical requirements document, or other document that forms part of the Exelon Nuclear Management Model ("ENMM").
 - ii. The ENMM is a set of confidential policies and procedures that enable EGC to consistently achieve excellence in all key dimensions of its business. It documents proven ways of achieving excellence and defines how EGC executes and manages performance and assesses results. EGC expended significant resources, in terms of time and money, to develop, implement, and update the ENMM. EGC derives economic benefit from the ENMM in terms of increased efficiency and improved results as well as revenue generated from EGC's sale or licensing of the ENMM.

- iii. The documents are now, and have been, held in confidence by EGC. EGC does not customarily make these documents available to the public. EGC has not authorized making the documents available through public sources.
- iv. EGC is providing the NRC with the documents and information in confidence.
- v. Economic harm would come to EGC with the publication of the individual documents that form the ENMM, as it would reduce or eliminate the need for any third party to purchase or license the ENMM from EGC, and would reduce the competitive position of EGC based on the benefits that the ENMM provides to EGC in the management of its own nuclear plants. The ENMM is considered by EGC to be a very valuable part of our intellectual property and it would be very difficult, costly and time-consuming for another to duplicate it without access to these documents.

7. EGC requests that each of the documents listed in Appendix 1 be withheld from public disclosure based on the reasons stated above in paragraph 6.i. through 6.v.

I declare under penalty of perjury that the foregoing affidavit and statements therein are true and correct to the best of my knowledge, information, and belief.



David T. Gudger
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Date: January 6, 2016

Appendix 1: Information that Should Be Withheld from Public Disclosure

Date or Revision	Description of Document	Reason(s) to Withhold
Revision 0	OP-NM-106-104	Entire document exempt from disclosure under 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) based on paragraph 6 of the affidavit to which this Appendix 1 is attached.