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April 14, 2016

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Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Subject: Comments Concerning Draft Regulatory Issue Summary 2016-XX, "License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation" (81FR13849, dated March 15, 2016, Docket ID NRC-2016-0054)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission's (NRC's) request for comments concerning draft Regulatory Issue Summary 201X-XX, "License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation," published in the *Federal Register* (i.e., 81FR13849, dated March 15, 2016).

The NRC is issuing this RIS to inform addresses of the application of guidance documents to support License Amendment Requests (LARs) that would change augmenting Emergency Response Organization (ERO) staffing and arrival times. This RIS is based on a number of recent LAR submittals that did not properly justify proposed ERO changes. Specifically, the NRC has identified the need to clarify the application of the Nuclear Energy Institute (NEI) document NEI 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," dated June 23, 2011 (ML111751698). In addition to the clarification this RIS provides, the RIS will assist licensees by providing examples of the scope and detail of information that should be provided in the LARs to facilitate the NRC review.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this draft RIS. Exelon supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry related to the subject RIS.

If you have any questions or require additional information, please do not hesitate to contact Richard Gropp at (610) 765-5557.

Respectfully,

D. P. Helker

David P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

SUNSI Review Complete

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