

November 8, 2016

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

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

Subject: Request to Extend the Implementation Period for the Proposed License Amendment concerning Emergency Diesel Generator Fuel Oil Transfer Surveillance Requirements for Peach Bottom Atomic Power Station, Units 2 and 3

- References:
- 1) Letter from J. Barstow (Exelon Generation Company, LLC) to the U.S. Nuclear Regulatory Commission, "License Amendment Request to Revise Surveillance Requirement 3.8.1.6 Involving EDG Fuel Oil Transfer (ML15337A413)," dated December 3, 2015.
 - 2) E-mail correspondence from R. Ennis (U.S. Nuclear Regulatory Commission) to S. J. Hanson (Exelon Generation Company, LLC), "Peach Bottom Atomic Power Station – Request for Additional Information Regarding Proposed License Amendment Request to Revise Surveillance Requirement 3.8.1.6 Involving EDG Fuel Oil Transfer (ML16134A474)," dated April 20, 2016.
 - 3) Letter from J. Barstow (Exelon Generation Company, LLC) to the U.S. Nuclear Regulatory Commission, "Peach Bottom Atomic Power Station – Response to Request for Additional Information Regarding the Proposed License Amendment Request to Revise Surveillance Requirement 3.8.1.6 Involving EDG Fuel Oil Transfer (ML16162A101)," dated June 9, 2016.
 - 4) E-mail correspondence from R. Ennis (U.S. Nuclear Regulatory Commission) to S. J. Hanson (Exelon Generation Company, LLC), "Peach Bottom Atomic Power Station – Request for Additional Information Regarding the Proposed License Amendment Request to Revise Surveillance Requirement 3.8.1.6 Involving EDG Fuel Oil Transfer (ML16209A204)," dated July 27, 2016.

- 5) Letter from J. Barstow (Exelon Generation Company, LLC) to the U.S. Nuclear Regulatory Commission, "Peach Bottom Atomic Power Station – Response to Draft Request for Additional Information Regarding the Proposed License Amendment Request concerning Emergency Diesel Generator Fuel Oil Transfer Surveillance Requirements for Peach Bottom Atomic Power Station, Units 2 and 3 (ML16216A076)," dated August 2, 2016.

By application dated December 3, 2015, as supplemented by letters dated June 9, 2016 and August 2, 2016 Exelon Generation Company, LLC (EGC) submitted a license amendment request (LAR) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 (Reference 1). The proposed amendment would revise the technical specification (TS) surveillance requirements (SRs) associated with the emergency diesel generator (EDG) fuel oil transfer system. Specifically, the amendment would allow for the crediting of manual actions, in lieu of automatic actions, without having to declare the EDGs inoperable.

The U.S. NRC requested additional information (References 2 and 4). References 3 and 5 provided EGC's response.

In the Reference 1 letter, EGC requested approval of the proposed amendment by December 3, 2016, and that once approved, the amendment shall be implemented within 60 days. EGC is requesting an extension of the implementation date from 60 days to 120 days for both PBAPS Units 2 and 3. This will provide adequate time, following the current Unit 2 refueling outage, for orderly implementation of the amendments, procedure revisions and the incorporation of engineering analysis into the time sensitive action (TSA) program.

There are no regulatory commitments in this letter.

If you have any questions concerning this request, please contact Stephanie J. Hanson at 610-765-5143.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 8th day of November 2016.

Respectfully,



James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

U.S. Nuclear Regulatory Commission
Request to Extend Implementation Period
PBAPS SR 3.8.1.6 – EDG Fuel Oil Transfer
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cc: USNRC Region I, Regional Administrator
USNRC Senior Resident Inspector, PBAPS
USNRC Project Manager, PBAPS
R. R. Janati, Pennsylvania Bureau of Radiation Protection
S. T. Gray, State of Maryland