

RS-17-167

December 20, 2017

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

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

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

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

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

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

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

Oyster Creek Nuclear Generating Station
Renewed Facility Operating License No. DPR-16
NRC Docket Nos. 50-219

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

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

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244

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

Subject: Regulatory Commitment Change Summary Report

The purpose of this report is to provide the Exelon Generation Company, LLC (EGC) "Regulatory Commitment Change Summary Report" for the listed stations for certain commitment changes processed during the period from January 1, 2017, through December 31, 2017. Summaries of the commitment changes requiring NRC notification are contained in the attachment.

There are no new regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Mitchel Mathews at (630) 657-2819.

Respectfully,



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

Attachment: Regulatory Commitment Change Summary Report

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Regulatory Commitment Change Summary Report
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- **Commitment Change Tracking Number: 2017-01**

Source Documents:

1. Letter from D. L. Taylor (Commonwealth Edison (CECo)) to NRC, "Dresden Station, Units 2 and 3, Quad Cities, Units 1 and 2, Zion Station, Units 1 and 2, LaSalle County Station, Units 1 and 2, Byron Station, Units 1 and 2, Braidwood Station, Units 1 and 2, Alternative Schedule for Generic Letter 90-03," dated September 26, 1990
2. Letter from D. J. Chrzanowski (CECo) to NRC, "Clarification of Commitment to Generic Letter 90-03, 'Vendor Equipment Technical Information Program (VETIP),'", dated December 5, 1991
3. Letter from M. A. Jackson (CECo) to T. E. Murley (NRC), "Generic Letter 90-03, 'Vendor Interface for Safety Related components,' dated March 20, 1990 and Supplement 1 dated May 14, 1990," dated November 4, 1992
4. Letter from G. C. Creel (Baltimore Gas and Electric) to NRC, "Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Response to Generic Letter 90-03, 'Relaxation of Staff Position in Generic Letter 83-28, Item 2.2, Part 2, 'Vendor Interface for Safety-Related Components,'" dated September 24, 1990
5. Letter from J. S. Perry (Illinois Power Company) to NRC, "Clinton Power Station, Unit 1 Response to Generic Letter 90-03," dated September 25, 1990
6. Letter from R. C. Mecredy (Rochester Gas and Electric Corporation) to NRC, "R. E. Ginna Nuclear Power Plant Response to NRC Generic Letter 90-03 (Relaxation of Position in Generic Letter 83-28, Item 2.2 Part 2, 'Vendor Interface for Safety Related Components,'" dated September 18, 1990
7. Letter from D. R. Helwig (Philadelphia Electric Company (PECO) to NRC, "Peach Bottom Atomic Power Station, Units 2 and 3, Limerick Generating Station, Units 1 and 2, Response to Generic Letter No. 90-03, 'Relaxation of Staff Position in Generic Letter No. 83-28, Item 2.2 Part 2 'Vendor Interface for Safety-Related Components,'" dated October 2, 1990
8. Letter from E. E. Fitzpatrick (GPU Nuclear Corporation) to NRC, "Oyster Creek Nuclear Generating Station Response to Generic Letter 90-03," dated September 18, 1990
9. Letter from H. D. Hukill (GPU Nuclear Corporation), "Three Mile Island, Unit 1 Response to Generic Letter 90-03 Relaxation of Staff Position in Generic Letter 83-28, Item 2.2 Part 2 Vendor Interface for Safety Related Components," dated October 1, 1990

Subject of Change:

Revision to the Exelon Generation Company, LLC (EGC) Commitments in Response to NRC Generic Letter (GL) 90-03, "Relaxation of Staff Position in Generic Letter 83-28, Item 2.2 Part 2, 'Vendor Interface for Safety-Related Components.'"

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Original Commitment:

In response to the NRC GL 90-03 recommendations for interface with equipment vendors, EGC established, implemented, and maintains a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of its operating plants, and is appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment were contacted and an interface was established. Where vendors could not be identified, have gone out of business, or would not supply information, EGC ensured that sufficient attention was paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). EGC's vendor interface program includes:

- a) A program with the [Nuclear Steam Supply System] NSSS vendor as described in the Vendor Equipment Technical Information Program (VETIP), which covers all the safety-related components within the NSSS scope of supply. This program includes provisions for assuring receipt by EGC of all technical information provided by the NSSS vendor; and
- b) A program of periodic contact with the vendors of other key safety-related components not included in (a) above.

The program includes periodic communication with vendors to assure that all applicable information has been received. The program uses a system of positive feedback with vendors for mailings containing technical information. It also defined the interface and division of responsibilities between EGC and the nuclear and non-nuclear divisions of their vendors that provide service on safety-related equipment to assure that requisite control of and applicable instructions for maintenance work on safety-related equipment are provided.

Revised Commitment:

EGC will discontinue the program of periodic contact with the vendors of other (non-NSSS) key safety-related components (i.e., Item b above).

The program related to the NSSS vendors which covers all the safety-related components within the NSSS in of supply (i.e., Item a above) is not affected.

Basis:

The periodic re-contact of vendors is redundant. The reliability of safety-related components for EGC's operating units is assured by preventive maintenance and performance monitoring actions implemented after the commitments made in response to NRC GL 83-28, "Required Actions Based on Implications of Salem ATWS Events," and GL 90-03. The preventive maintenance tasks, frequencies, and detailed actions are subject to continuous improvement and monitoring for effectiveness.

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- **Commitment Change Tracking Number: 2017-02** (Limerick Generating Station / Peach Bottom Atomic Power Station)

Source Documents:

Letter from Hubert J. Miller (U.S. Nuclear Regulatory Commission) to Oliver D. Kingsley (Exelon Generation Company, LLC) – "NRC Office of Investigations Report 1-2000-033 - Peach Bottom Atomic Power Station / Limerick Generating Station," dated October 23, 2001

Subject of Change:

Revision to the EGC Commitments Related to NRC Office of Investigations Report 1-2000-033 for Limerick Generating Station and Peach Bottom Atomic Power Station.

Original Commitment:

"...You are not required to respond to this letter because the NRC has sufficient information on the docket concerning this issue, including details in a combined NRC inspection report dated August 30, 2001 (50-277/01-012; 50-278/01-012 and 50-352/01-013; 50-353/01-013), and your slides from the conference. These slides, as well as your presentation, provided your immediate and long term corrective actions to prevent recurrence of the violation. Your immediate corrective actions were described above, while your long term corrective actions included, but were not limited to: (1) the development of a training program and procedure for contract owners; (2) the strengthening of licensee procedures and terms for contracts; (3) the development of guidelines for monitoring contracts; (4) the development of a Siren Program Manual; and (5) the correction of performance indicator data submitted to the NRC...."

Revised Commitment:

EGC will discontinue the implementation of the commitments related to independent siren inspections as discussed above in the commitment statement.

Basis:

There have been several improvements made in the EGC siren program since September 2000, including strengthening vendor oversight and strengthening the preventive maintenance and testing process as part of the EGC Management Model.

EGC has robust vendor oversight programs, which are implemented under the EGC Management Model. These programs were not in place prior to the events that occurred in 2000. Additionally, new siren system installations were completed for Peach Bottom and Limerick by 2012. These new siren systems include upgraded equipment and are managed by a new vendor. These siren systems provide improved reliability, and jumpers are not needed or used as part of the new system.

There is no adverse regulatory impact anticipated from deleting the commitment since there is improved vendor oversight, a strong preventive maintenance program, and new siren systems installed for Limerick and Peach Bottom that are highly reliable and comply with applicable regulatory requirements and guidance.