

10 CFR 50  
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August 13, 2019

U. S. Nuclear Regulatory Commission  
Attention: 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: Response to NRC Request for Clarification of Information,  
dated August 1, 2019 related to the Peach Bottom Atomic Power Station,  
Units 2 and 3, Subsequent License Renewal Application

References: 1. Letter from Michael P. Gallagher, Exelon Generation Company LLC, to  
NRC Document Control Desk, dated July 10, 2018, "Application for  
Subsequent Renewed Operating Licenses"

2. E-mail from Bennett Brady, USNRC, to David J. Distel, Exelon Generation  
Company, LLC, dated August 1, 2019, "026 Fire Protection-Peach Bottom-  
4D" - Request for Clarification of Information related to the Safety Review  
of the Peach Bottom Atomic Power Station, Units 2 and 3 Subsequent  
License Renewal Application

In Reference 1, Exelon Generation Company, LLC (Exelon) submitted the Subsequent License Renewal Application (SLRA) for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. In Reference 2, the NRC requested clarification of information to support staff review of the SLRA.

Enclosure A contains the responses to the request for clarification of information.

This letter contains no new regulatory commitments.

If you have any questions, please contact Mr. David J. Distel, Licensing Lead, Peach Bottom Subsequent License Renewal Project, at 610-765-5517.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13<sup>th</sup> day of August 2019.

Respectfully submitted,



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David P. Helker  
Senior Manager, Licensing  
Exelon Generation Company, LLC

Enclosure: A: Responses to Request for Clarification of Information

cc: Regional Administrator – NRC Region I  
NRC Senior Project Manager (Safety Review), NRR-DMLR  
NRC Project Manager (Environmental Review), NRR-DMLR  
NRC Project Manager, NRR-DORL- Peach Bottom Atomic Power Station  
NRC Senior Resident Inspector, Peach Bottom Atomic Power Station  
R.R. Janati, Pennsylvania Bureau of Radiation Protection  
D.A. Tancabel, State of Maryland

**Enclosure A**

**Responses to Request for Clarification of Information  
Related to TRP 026 - Fire Protection  
Peach Bottom Atomic Power Station, Units 2 and 3  
Subsequent License Renewal Application (SLRA)**

**1. RCI Table 3.3.2-14 - TRP 026 Fire Protection**

**Request:**

Please provide confirmation of the following information obtained by the staff:

- Based on the review of SLRA Table 3.3.2-14, the staff noted that some penetration seals are made of aluminum silicate material. During a call with Exelon on July 10, 2019, Exelon stated the following:
  - Kaowool™ is the aluminum silicate material used for penetration seals.
  - The aluminum silicate fibers are not immersed in water for long periods of time nor bound by a resin material.
  - The aluminum silicate penetration seals are not exposed to hydrofluoric acid, phosphoric acid, or strong alkalis.

**Exelon Response:**

This information is correct. The aluminum silicate ceramic fiber material used at PBAPS has a product name of "KAOWOOL" and is manufactured by Thermal Ceramics.

"Blistering" is not an applicable aging affect for aluminum silicate ceramic fibers because:

1) The aluminum silicate ceramic fiber material consists of individual fibers that are high heat resistant and are unaffected by chemicals except for hydrofluoric and phosphoric acids and strong alkalies. Ceramic fiber fire penetration seals at PBAPS are not subjected to these chemicals. These seals are exposed to indoor air as identified in SLRA Table 3.3.2-14.

2) The aluminum silicate ceramic fibers used for the penetration seals are not immersed in water for long periods of time or bound by a resin material. Both conditions are required for osmotic pressure blistering as seen in fiberglass. These seals are exposed to indoor air as identified in SLRA Table 3.3.2-14.