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10 CFR 50.12
10 CFR 50.47
10 CFR 50.54(q)
10 CFR 50.90
10 CFR 50, Appendix E

TMI-19-101

October 9, 2019

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

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

Three Mile Island Nuclear Station, Unit 2
Possession Only License No. DPR-73
NRC Docket No. 50-320

Subject: Supplement to Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR Part 50, Appendix E and License Amendment Request for Proposed Changes to the Three Mile Island Emergency Plan for Permanently Defueled Emergency Plan and Emergency Action Level Scheme

Reference:

1. Exelon Letter to NRC, Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR Part 50 Appendix E, dated July 1, 2019 (ADAMS Accession No. ML19182A104)
2. Exelon Letter to NRC, License Amendment Request - Proposed Changes to the Three Mile Island Emergency Plan for Permanently Defueled Emergency Plan and Emergency Action Level Scheme (ADAMS Accession No. ML19182A182)
3. C-1101-900-E000-088, "Fuel Handling Accident Dose Consequence - Post Permanent Shutdown," Revision 0, dated May 11, 2018
4. U.S. Environmental Protection Agency, EPA 400-R-92-001, "Manual of Protective Action Guides and Protective Actions Guidelines for Nuclear Incidents," dated October 1991 (reprinted May 1992)
5. Nuclear Energy Institute (NEI) 99-01, Revision 6 "Methodology for the Development of Emergency Action Levels for Non-Passive Reactors," dated November 2012 (ADAMS Accession No. ML 12326A805).

By letter dated July 1, 2019 (Reference 1), pursuant to 10 CFR 50.12, "Specific exemptions," Exelon Generation Company, LLC (Exelon) requested exemptions submitted from portions of 10 CFR 50.47(b), 10 CFR 50.47(c)(2), and 10 CFR Part 50, Appendix E for Three Mile Island Nuclear Station (TMI). The requested exemptions would allow TMI to reduce emergency planning requirements consistent with the permanently defueled condition of the station.

Additionally, by separate dated letter dated July 1, 2019 (Reference 2), pursuant 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon requested an amendment that would revise the site emergency plan (SEP) and Emergency Action Level (EAL) scheme for the permanently defueled condition.

In these submittals, Exelon indicated that 365 days after TMI-1 permanently shut down the fuel handling accident (FHA), may result in a Thyroid dose at the exclusion area boundary (EAB) of 5.95×10^{-13} rem (with no credit for safety systems) based on analysis (Reference 3). The purpose of this supplement is to inform the NRC that the correct value for the potential Thyroid dose at the EAB for the FHA should have been indicated as 9.95×10^{-13} rem. This value is still less than the Environmental Protection Agency (EPA) Protective Action Guidelines (PAGs) of 5 rem Thyroid (Reference 4) and accepted 10% EPA PAG for declaration of Site Area Emergency per NEI 99-01, Rev.6 (Reference 5).

Also, in the exemption request (Reference 1), Attachment 1, Table 2, "Exemptions Requested from 10 CFR Part 50, Appendix E," Item 40, the "r" in the word "release" and the comma after it was unintentionally struck out. The sentence was intended to be: "The principal functional areas of emergency response include activities such as management and coordination of emergency response, accident assessment, event classification, notification of offsite authorities, and assessment of the onsite ~~and offsite~~ impact of radiological releases, ~~protective action recommendation development, protective action decision making, plant~~ system repair and mitigative action implementation."

Exelon has reviewed the information supporting a finding of No Significant Hazards Consideration and the Environmental Consideration provided to the NRC in References 1 and 2. The additional information provided in this submittal does not affect the previously stated bases in References 1 or 2 for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments contained in this submittal.

If you have any questions concerning this submittal, please contact Leslie Holden at (630) 657-2524.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 9th day of October 2019.

Respectfully,

A handwritten signature in black ink, reading "Michael P. Gallagher", with a horizontal line underneath the signature.

Michael P. Gallagher
Vice President, License Renewal & Decommissioning
Exelon Generation Company, LLC

cc: Regional Administrator – NRC Region I
NRC Senior Resident Inspector – TMI-1
NRC Project Manager, NRR – TMI-1
NRC Project Manager, NMSS/DUWP/RDB – TMI-2
Director, Bureau of Radiation Protection - PA Department of Environmental Resources