



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
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MEMORANDUM TO: File

FROM: Samson S. Lee, Project Manager **/RA/**  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT – SENSITIVE  
UNCLASSIFIED NON-SAFEGUARDS INFORMATION REVIEW OF  
2019 FINAL SAFETY ANALYSIS REPORT CHANGE PAGES  
(EPID L-2019-LRO-0049)

**BACKGROUND**

After the events of September 11, 2001, the U.S. Nuclear Regulatory Commission (NRC or the Commission) assessed and revised its sensitive information control policies to provide greater assurance against publicly disclosing information that could reasonably be expected to be useful to potential adversaries. On November 9, 2004, the Commission issued SRM-SECY-04-0191 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML043140175), which approved (among other things) proposed guidance to prohibit proactive release to the public of sensitive unclassified information concerning nuclear power reactors. Consistent with this direction, updated final safety analysis reports (UFSARs) were presumptively withheld from public release.

In June 2015, the Commission issued SRM-SECY-15-0032 (ADAMS Accession No. ML15167A090), which approved the NRC staff's recommendation to discontinue the presumptive withholding from public release of final safety analysis report (FSAR) updates, emergency preparedness documents, and fire protection-related documents, and to withdraw the direction provided in SRM-SECY-04-0191 to the extent that SRM-SECY-04-0191 approved presumptive withholding of these documents. Given the issuance of SRM-SECY-15-0032, UFSAR updates are to be reviewed per the NRC Sensitive Unclassified Non-Safeguards Information (SUNSI) policy and proactively released, as appropriate (as of December 15, 2015).

By letter dated April 10, 2019 (ADAMS Accession No. ML19164A151), Exelon Generation Company, LLC (the licensee) submitted the 2019 FSAR change pages for the James A. FitzPatrick Nuclear Power Plant (FitzPatrick) in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.71, "Maintenance of records, making of reports," paragraph (e). The purpose of this memorandum is to document the staff review of the FitzPatrick changes in accordance with the guidance provided in NRC Regulatory Issue Summary (RIS) 2015-17, "Review and Submission of Updates to Final Safety Analysis Reports, Emergency Preparedness Documents, and Fire Protection Documents" (ADAMS Accession No. ML15321A400).

## EVALUATION

The SUNSI review of the 2019 FitzPatrick FSAR change pages was conducted using guidelines in Attachment 1 to SECY-04-0191 (ADAMS Accession No. ML042310663), which was identified as an aid in RIS 2015-17. SECY-04-0191 provides a general framework and discussion of SUNSI, as well as a table detailing specific examples of sensitive information that should be withheld from public disclosure. This table is organized by categories of information (e.g., plant drawings, hydrological information, risk information, fire protection), loosely aligning with a large number of standard sections of UFSARs, and provides specific examples of information that should be withheld from public disclosure under 10 CFR 2.390(d)(1). In addition to the table, the project manager guidance for SUNSI reviews that is available on the Division of Operating Reactor Licensing SharePoint site was considered.

The SUNSI review excluded FSAR sections, chapters, and appendices that contain subjects identified as “uncontrolled” in the “Control of Information by Subject Matter” table in Attachment 1 to SECY-04-0191. The following table shows the FitzPatrick FSAR chapters that are “uncontrolled” according to Attachment 1 to SECY-04-0191.

FitzPatrick FSAR Chapter	Title	Attachment 1 to SECY-04-0191, Discussion of Typical Controls
1	Introduction and Summary	
2	Site	
3	Reactor	Uncontrolled
4	Reactor Coolant System	Uncontrolled
5	Containment	
6	Emergency Core Cooling System	
7	Instrumentation and Controls	Uncontrolled
8	Electrical Systems	Uncontrolled
9	Auxiliary Systems	
10	Steam and Power Conversion System	Uncontrolled
11	Radioactive Waste and Radiation Protection	
12	Structures	
13	Conduct of Operations	Uncontrolled
14	Safety Analyses	Uncontrolled
15	Technical Specifications	Uncontrolled
16	Appendices	

The 2019 change pages for FitzPatrick FSAR Chapters 1, 2, 5, 6, 9, 11, 12, and 16 were reviewed for SUNSI.

## CONCLUSION

The SUNSI review of the 2019 FitzPatrick FSAR change pages did not identify any information to be withheld from public disclosure. The 2019 FitzPatrick FSAR change pages will be made publicly available in ADAMS.

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NAME	SLee	LRonewicz	JDanna	SLee
DATE	02/10/2020	02/10/2020	02/11/2020	02/11/2020

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