

Pre-Submittal Meeting with the NRC

Exelon Decommissioning Licensing Action Submittal Plan for Byron and Dresden Stations Early Shutdowns

September 22, 2020

Milestones

- Exelon announced closure
 - Byron Station on or before September 30, 2021
 - Dresden Station on or before November 30, 2021
- Cessation letters submitted September 2, 2020
- ➢ Key Milestones

	Permanent	Permanent	End of
	Shutdown	Defuel	Zirc-Fire Period*
Byron	On or before	September-October	January 2023
Units 1 and 2	September 30, 2021	2021	
Dresden	On or before	November-	September 2022
Units 2 and 3	November 30, 2021	December 2021	

* Zirc-Fire period will be determined by analysis, estimated for submittal purposes to be 10-months for Dresden (BWR) and 16-months for Byron (PWR)



1 NRC Decommissioning Submittals - Byron & Dresden

Submittal Background

- Overall goal is to provide for a safe and efficient transition from an operating site to a permanently shutdown site
- Licensing submittals based on:
 - Review of regulations and guidance documents
 - Review of Industry guidance documents (NEI Guidance)
 - Benchmarking and lessons learned
 - Industry peers
 - o Exelon decommissioning transition experience at Oyster Creek and Three Mile Island
 - o RAI review
 - Licensing submittals will align with licensing actions previously submitted and approved by NRC
 - Improved by incorporation of RAI lessons learned
 - Consistent with proposed NRC Decommissioning Rule
- Updates of submittal schedule will be discussed during periodic Byron and Dresden NRR Project Managers calls



2 NRC Decommissioning Submittals - Byron & Dresden

Permanent Shutdown Licensing Actions

		Submittel	Requested Approval	
Licensing Document		Submittal	Byron	Dresden
Certified Fuel Handler Program Com		Oct 2020	Aug 2021 (<i>~10 months*</i>)	
Security Exemption	Combined	Oct 2020	Aug 2021 (~10 months*)	
Administrative License Amendment Request	By Site	Early-Oct 2020	Aug 2021 (<i>~10 months*</i>)	Oct 2021 (~12 months)
Post-Defueled Technical Specifications	By Site	Late-Oct 2020	Aug 2021 (~9 <i>months*</i>)	Oct 2021 (~12 months)
Post-Shutdown Emergency Plan	By Site	Nov 2020	Sep 2021 (<i>~10 months*</i>)	Oct 2021 (<i>~11 months*</i>)
Records Exemption	Combined	Oct 2020	ct 2020 Oct 2021 (~12 months)	
Post-Shutdown Decommissioning Activities Report	By Site	Apr 2021	N/A	N/A
Decommissioning Cost Estimate	By Site	Apr 2021	N/A	N/A
Spent Fuel Management Plan	By Site	Apr 2021	N/A	N/A
Exemption to Use Decommissioning Trust Fund for Spent Fuel Management	By Site	Apr 2021	Under Consideration	Oct 2021 (~6 months*)



3 NRC Decommissioning Submittals - Byron & Dresden

Zirc-Fire Window Licensing Actions

Site	Licensing Document	Submittal	Requested Approval
Dresden	EP Exemption	Mar 2021	May 2022 (~14 months)
Dresden	PDEP	Mar 2021	May 2022 (~14 months)
Byron	EP Exemption	Apr 2021	Oct 2022 (~18 months)
Byron	PDEP Exemption	Apr 2021	Oct 2022 (~18 months)
Dresden	Offsite Insurance Exemption	Jul 2021	Jul 2022 (~12 months)
Dresden	On-Site Insurance Exemption	Jul 2021	Jul 2022 (~12 months)
Byron	Offsite Insurance Exemption	Nov 2021	Nov 2022 (~12 months)
Byron	On-Site Insurance Exemption	Nov 2021	Nov 2022 (~12 months)



Alternate Means Changes

- Defueled Quality Assurance Program (DQAP)
 - Incorporate Byron and Dresden to existing NRC approved DQAP through 50.54(q)
- Security Plans Changes
 - ✤ As allowed through 50.54(p)



Other Considerations

- Dresden Unit 1 will be included, as appropriate, in decommissioning licensing actions for Units 2 and 3
- Exelon evaluating currently docketed and planned non-decommissioning related licensing submittals for Byron and Dresden
 - Communicate results to appropriate NRR Project Manager
- Engagement with NRC Region III regarding scheduled inspections



Summary

- Site Permanent Shutdowns
 - Byron Station on or before September 30, 2021
 - Dresden Station on or before November 30, 2021
- Licensing Submittals
 - Align with licensing actions previously submitted and approved by NRC
 - Consistent with proposed NRC Decommissioning Rule
 - Requesting timely NRC review of licensing submittals
- > Alternate Means Changes
 - Incorporate Byron and Dresden under 50.54(q) into Exelon's previously NRC approved DQAP
 - Security Plans Changes as allowed through 50.54(p)





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QUESTIONS?