

April 3, 2019

VIA EMAIL TO:

U.S. Nuclear Regulatory Commission
ATTN: William Ford <William.Ford@nrc.gov>
Division of License Renewal, Office of Nuclear Reactor Regulation
Washington D.C. 20555-0001

Subject: Comments on Information Collection: Environmental Protection Regulations for
Domestic Licensing and Related Regulatory Functions (NRC-2018-0203)

Dear Mr. Ford:

In an email dated 2/25/2019, you requested comments on the draft supporting statement for the subject information collection. In response, Exelon Generation Company, LLC offers the comments provided in the table below.

#	Section in Supporting Statement	Comments
01	Description of the Information Collection	<p>This section lists “potential respondents to Part 51 information collections.” Power reactors are covered by 3 entries on the list:</p> <ul style="list-style-type: none">• Applicants for power reactor operating licenses.• Applicants for early site permits or design certifications for power reactors.• Power reactor licensees requesting to renew or amend their license or obtain an exemption. <p>The list does not include applicants described in 10 CFR 51.53(d) who are seeking either license termination at a power reactor or a license amendment to store spent fuel at a power reactor after expiration of its operating license. Consider whether these applicants should be included on the list of potential respondents to 10 CFR Part 51 information collections for completeness, or alternatively, explain why they are not included (e.g., no applications of this type expected during the 3-year clearance period?). Also, consider whether other types of applicants, such as applicants for storage of spent fuel in an ISFSI as described in 10 CFR 51.60(b), should be added to the list.</p>

#	Section in Supporting Statement	Comments
02	A.12, Estimated Industry Burden and Burden Hour Cost	Among other things, this section indicates that four license renewal applications for commercial power reactors are anticipated to require environmental reviews during the 3-year clearance period, and that NRC estimates the burden of the reviews to be 15,990 hours/year. Please verify that 15,990 hours/year is the correct burden because, based on information in Table 2, that number appears to be the 3-year total burden for all four reviews rather than the annual burden for 1.3 reviews per year.
03	Table 2	Although it is recognized that NRC's environmental review time among power reactors can vary extensively, for comparison purposes, please note that the total hours billed by the NRC staff for environmental reviews of recent Exelon Generation license renewal applications for power reactors appears to be approximately half of the annual "NRC Review Time Per Submission" assumed in Table 2 of the draft supporting statement.
04	General	Consider whether the draft supporting statement should be supplemented to include an estimated burden for NRC information collection activities related to National Environmental Policy Act (NEPA) compliance in the context of its reviews of Post Shutdown Decommissioning Activities Reports (PSDARs) for power reactors, although such activities are not now clearly delineated in 10 CFR Part 51.
05	General	To minimize burden of information collection, consider developing clarified guidance concerning NEPA compliance during preparation by applicants and review by NRC staff of PSDARs.

The comments in the table above have also been submitted to <http://www.regulations.gov> (Docket No. NRC-2018-0203).

If there are questions, please contact Ms. Nancy Ranek of my staff by phone at 267-533-1506 or by email at Nancy.Ranek@exeloncorp.com.

Respectfully,



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