



Order No. EA-13-109

RS-18-060

June 29, 2018

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

Peach Bottom Atomic Power Station, Unit 2
Renewed Facility Operating License No. DPR-44
NRC Docket No. 50-277

Subject: Eighth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

References:

1. NRC Order Number EA-13-109, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013
2. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions", Revision 0, dated November 14, 2013
3. NRC Interim Staff Guidance JLD-ISG-2015-01, "Compliance with Phase 2 Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions", Revision 0, dated April 2015
4. NEI 13-02, "Industry Guidance for Compliance With Order EA-13-109, BWR Mark I & II Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions", Revision 1, dated April 2015
5. Exelon Generation Company, LLC's Answer to June 6, 2013, Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 26, 2013
6. Exelon Generation Company, LLC Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2014 (RS-14-062)
7. Exelon Generation Company, LLC First Six-Month Status Report Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 19, 2014 (RS-14-305)
8. Exelon Generation Company, LLC Second Six-Month Status Report Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2015 (RS-15-151)

9. Exelon Generation Company, LLC Phase 1 (Updated) and Phase 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 15, 2015 (RS-15-303)
10. Exelon Generation Company, LLC Fourth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2016 (RS-16-109)
11. Exelon Generation Company, LLC Fifth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 15, 2016 (RS-16-235)
12. Exelon Generation Company, LLC Sixth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2017 (RS-17-068)
13. Exelon Generation Company, LLC Seventh Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 15, 2017 (RS-17-155)
14. NRC letter to Exelon Generation Company, LLC, Peach Bottom Atomic Power Station, Units 2 and 3 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 1 of Order EA-13-109 (Severe Accident Capable Hardened Vents) (TAC Nos. MF4416 and MF4417), dated February 12, 2015
15. NRC letter to Exelon Generation Company, LLC, Peach Bottom Atomic Power Station, Units 2 and 3 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 2 of Order EA-13-109 (Severe Accident Capable Hardened Vents) (TAC Nos. MF4416 and MF4417), dated August 2, 2016
16. NRC letter to Exelon Generation Company, LLC, Peach Bottom Atomic Power Station, Units 2 and 3 – Report for the Audit of Licensee Responses to Interim Staff Evaluation Open Items Related to NRC Order EA-13-109 to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, dated November 30, 2017

On June 6, 2013, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued an Order (Reference 1) to Exelon Generation Company, LLC (EGC). Reference 1 was immediately effective and directs EGC to require their BWRs with Mark I and Mark II containments to take certain actions to ensure that these facilities have a hardened containment vent system (HCVS) to remove decay heat from the containment, and maintain control of containment pressure within acceptable limits following events that result in loss of active containment heat removal capability while maintaining the capability to operate under severe accident (SA) conditions resulting from an Extended Loss of AC Power (ELAP). Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an Overall Integrated Plan (OIP) by June 30, 2014 for Phase 1 of the Order, and an OIP by December 31, 2015 for Phase 2 of the Order. The interim staff guidance (References 2 and 3) provide direction regarding the content of the OIP for Phase 1 and Phase 2. Reference 3 endorses industry guidance document NEI 13-02, Revision 1 (Reference 4) with clarifications and exceptions identified in References 2 and 3. Reference 5 provided the EGC initial response regarding reliable hardened containment vents capable of operation under severe accident conditions. Reference 6 provided the Peach Bottom Atomic Power Station, Units 2 and 3, Phase 1 OIP pursuant to Section IV, Condition D.1 of Reference 1. References 7 and 8 provided the first and second six-month status reports pursuant to Section IV, Condition D.3 of Reference 1 for Peach Bottom Atomic Power Station. Reference 9 provided the Peach Bottom Atomic Power Station, Units 2 and 3, Phase 1 updated and Phase 2 OIP pursuant to Section IV, Conditions D.2 and D.3 of Reference 1. References 10, 11, 12, and 13 provided the fourth, fifth, sixth, and seventh six-month status reports pursuant to Section IV, Condition D.3 of Reference 1 for Peach Bottom Atomic Power Station.

The purpose of this letter is to provide the eighth six-month update report for Phases 1 and 2, pursuant to Section IV, Condition D.3 of Reference 1, that delineates progress made in implementing the requirements of Reference 1 for Peach Bottom Atomic Power Station, Unit 2. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any. The enclosed report also addresses the NRC Interim Staff Evaluation open items contained in References 14, 15, and 16.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David J. Distel at 610-765-5517.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of June 2018.

Respectfully submitted,



David P. Helker
Manager - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Enclosure:

Peach Bottom Atomic Power Station, Unit 2 Eighth Six-Month Status Report for Phases 1 and 2 Implementation of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions

cc: Director, Office of Nuclear Reactor Regulation
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Enclosure

Peach Bottom Atomic Power Station, Unit 2

**Eighth Six-Month Status Report for Phases 1 and 2 Implementation of Order EA-13-109,
Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable
of Operation Under Severe Accident Conditions**

(9 pages)

Enclosure

Peach Bottom Atomic Power Station, Unit 2 Eighth Six-Month Status Report for Phases 1 and 2 Implementation of Order EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions"

1 Introduction

Peach Bottom Atomic Power Station (PBAPS) developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 2. This is the Eighth six-month status report updating milestone accomplishments based on the combined Phases 1 and 2 Overall Integrated Plan dated December 15, 2015.

PBAPS developed an updated and combined Phases 1 and 2 Overall Integrated Plan (Reference 6 in Section 8), documenting:

1. The installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 2.
2. An alternative venting strategy that makes it unlikely that a drywell vent is needed to protect the containment from overpressure related failure under severe accident conditions, including those that involve a breach of the reactor vessel by molten core debris, in response to Reference 2

This enclosure provides an update of milestone accomplishments since submittal of the Seventh Six-Month Status Report for Phase 1 and Phase 2 Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the development of the combined Phases 1 and 2 Overall Integrated Plan (Reference 6), and are current as of June 1, 2018:

- Eighth Six-Month Update (complete with this submittal)
- Started Phase 2 installation

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the combined Phases 1 and 2 Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

Peach Bottom Atomic Power Station, Unit 2
Eighth Six-Month Status Report for the Implementation of HCVS Phases 1 and 2
June 29, 2018

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Submit Overall Integrated Plan	Jun. 2014	Complete	
Submit 6 Month Updates			
Update 1	Dec. 2014	Complete	
Update 2	Jun. 2015	Complete	
Update 3 [Simultaneous with Phase 2 OIP]	Dec. 2015	Complete	
Update 4	Jun. 2016	Complete	
Update 5	Dec. 2016	Complete	
Update 6	Jun. 2017	Complete	
Update 7	Dec. 2017	Complete	
Update 8	Jun. 2018	Complete with this submittal	
Update 9	Dec. 2018	Not Started	
Phase 1 Specific Milestones			
Phase 1 Unit 2 Modifications			
Begin Conceptual Design	Apr. 2014	Complete	
Complete Conceptual Design	Jun. 2015	Complete	
Begin Detailed Design	Jun. 2015	Complete	
Complete Detailed Design and Issue Modification Package	Jun. 2016	Complete	
Begin Online Portion of the Installation	Jun. 2016	Complete	
Complete Online Installation	Oct. 2016	Complete	
Begin Outage Portion of the Installation	Oct. 2016	Complete	
Complete Outage Installation	Nov. 2016	Complete	
Phase 1 Procedure Changes Active			
Operations Procedure Changes Developed	Nov. 2016	Complete	

Peach Bottom Atomic Power Station, Unit 2
 Eighth Six-Month Status Report for the Implementation of HCVS Phases 1 and 2
 June 29, 2018

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Site Specific Maintenance Procedure Developed	Nov. 2016	Complete	
Procedure Changes Active	Nov. 2016	Complete	
Phase 1 Training			
Training Complete	Nov. 2016	Complete	
Phase 1 Completion			
Unit 2 Phase 1 HCVS Implementation	Nov. 2016	Complete	
Phase 2 Unit 2 Modifications			
Begin Conceptual Design	N/A	N/A	
Complete Conceptual Design	N/A	N/A	
Begin Detailed Design	Jun. 2017	Complete	
Complete Detailed Design and Issue Modification Package	Sep. 2017	Complete	
Begin Online Portion of the Installation	Feb. 2018	Complete	
Complete Online Installation	Oct. 2018	Started	
Begin Outage Portion of the Installation	N/A	N/A	Status changed to N/A due to no outage work
Complete Outage Installation	N/A	N/A	Status changed to N/A due to no outage work
Phase 2 Procedure Changes Active			
Operations Procedure Changes Developed	Nov. 2018	Started	
Site Specific Maintenance Procedure Developed	Nov. 2018	Started	
Procedure Changes Active	Nov. 2018	Started	
Phase 2 Training			
Training Complete	Nov. 2018	Started	

Peach Bottom Atomic Power Station, Unit 2
 Eighth Six-Month Status Report for the Implementation of HCVS Phases 1 and 2
 June 29, 2018

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Phase 2 Completion			
Unit 2 Phase 2 HCVS Implementation	Nov. 2018	Started	
Submit Full Compliance Report for Phase 1 & Phase 2 for Unit 2	Jan. 2019	Started	

4 Changes to Compliance Method

It was previously communicated in the combined Phases 1 and 2 Overall Integrated Plan (Reference 6) that the operation, testing and inspection requirements for the HCVS and Severe Accident Water Addition (SAWA) would follow the guidance provided in Section 6.2.4 of NEI 13-02, Rev. 1 (Reference 3). This guidance indicates that the HCVS and installed SAWA valves and the interfacing system boundary valves not used to maintain containment integrity during Modes 1, 2 and 3 be cycled once per every operating cycle and, after two consecutive successful performances, the test frequency may be reduced to a maximum of once per every other operating cycle. This test is to verify functionality of the valves.

Per Exelon Performance Centered Maintenance (PCM) template, manual valves need to be cycled every 6 years if installed in severe environmental conditions or every 8 years if installed in mild environmental conditions for design basis Preventive Maintenance (PM) requirements. Per Exelon's engineering judgment, it is deemed that cycling the manual valves (and motor operated valves, check valves within the HCVS pneumatic supply line, and solenoid/air operated valves) within the frequency of the design basis requirements is sufficient for Beyond Design Basis External Events (BDBEE) systems/programs such as HCVS and SAWA. No new failure modes or degradation is expected for BDBEE systems/programs that is different from design basis. Following this approach, valves outside of the HCVS and SAWA modification scope, that are required to change position to establish HCVS venting or SAWA flow, do not need to be cycled prior to order compliance as long as they are cycled in accordance with the design basis PM requirements. Valves that currently have procedural/programmatic requirements to be cycled on a higher frequency will continue to meet those requirements.

All installed HCVS valves and existing valves that require manipulation for HCVS venting were cycled during implementation. All installed SAWA valves were cycled during implementation and all existing valves in the SAWA flow path that require manipulation have been previously stroked within the PCM template frequency from the date of SAWA implementation and will continue to meet the PCM template frequency. The ability to change state of all existing valves in the SAWA flow path that were not cycled during implementation was not impacted since these valves were outside of the modification boundary.

There are no other changes to the compliance method outlined in Reference 6.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

PBAPS expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Combined Phases 1 and 2 Overall Integrated Plan and Interim Staff Evaluations

The following tables provide a summary of the open items documented in the combined Phases 1 and 2 Overall Integrated Plan or the Interim Staff Evaluation (ISE) for Phase 1 and Phase 2 and the status of each item. Reference 10 provided the results of the audit of ISE Open Item closure information provided in References 8 and 9. All Phase 1 and 2 ISE Open Items are statused as closed in Reference 10.

Combined Phases 1 and 2 OIP Open Item	Status
Phase 1 Open Items	
OI-1. Confirm that the Remote Operating Station (ROS) will be in an accessible area following a Severe Accident (SA).	Deleted. Closed to ISE Open Item number 09.
OI-2. Provide procedures for HCVS Operation	Deleted. Closed to ISE Open Item number 01.
OI-3. Identify site specific controlling document for HCVS out of service and compensatory measures	Deleted. Closed to ISE Open Item number 02.
OI-4. Determine the approach for combustible gases.	Deleted. Closed to ISE Open Item number 08.
OI-5. Perform radiological evaluation for Phase 1 vent line impact on ERO response actions.	Closed per References 8 and 10.

Phase 1 Interim Staff Evaluation Open Item	Status
ISE-1. Make available for NRC staff audit guidelines and procedures for HCVS operation. (Section 3.2.3.1)	Closed per References 8 and 10.
ISE-2. Make available for the NRC staff audit the site specific controlling document for HCVS out of service and compensatory measures. (Section 3.4.1)	Closed per References 8 and 10.
ISE-3. Make available for NRC staff audit a technical justification for use of jumpers in the HCVS strategy. (Section 3.1.3)	Closed per References 8 and 10.
ISE-4. Make available for NRC staff audit analyses demonstrating that the HCVS has the, capacity to vent the steam/energy equivalent of one percent of licensed/rated thermal power (unless a lower value is justified), and that the suppression pool and the HCVS together are able to absorb and reject decay heat, such that following a reactor shutdown from full power containment pressure is restored and then maintained below the primary containment design pressure and the primary containment pressure limit. (Sections 3.2.2.1 and 3.2.2.2)	Closed per References 8 and 10.

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Phase 1 Interim Staff Evaluation Open Item	Status
ISE-5. Make available for NRC staff audit descriptions or diagrams of reactor building ventilation including exhaust dampers failure modes to support licensee justification for the HVAC release point being below and 150 feet from the reactor building ventilation release point. (Section 3.2.2.3)	Closed per References 8 and 10.
ISE-6. Make available for NRC staff audit details to justify the deviation from tornado protection standards provided in NEI 13-02 or make available a description of how the HCVS will comply with the tornado protection standards provided in NEI-13-02. (Section 3.2.2.3)	Closed per References 8 and 10.
ISE-7. Make available for NRC staff audit documentation that demonstrates adequate communication between the remote HCVS operation locations and HCVS decision makers during ELAP and severe accident condition. (Section 3.2.2.5)	Closed per References 8 and 10.
ISE-8. Provide a description of the final design of the HCVS to address hydrogen detonation and deflagration. (Section 3.2.2.6)	Closed per References 8 and 10.
ISE-9. Make available for NRC staff audit an evaluation of temperature and radiological conditions to ensure that operating personnel can safely access and operate controls and support equipment. (Sections 3.2.1, 3.2.2.3, 3.2.2.4, 3.2.2.5, 3.2.2.10, 3.2.4.1, 3.2.4.2, 3.2.5.2, and 3.2.6)	Closed per References 8 and 10.
ISE-10. Make available for NRC staff audit descriptions of all instrumentation and controls (existing and planned) necessary to implement this order including qualification methods. (Sections 3.2.2.9 and 3.2.2.10)	Closed per References 8 and 10.
ISE-11. Make available for NRC staff audit the final sizing evaluation for HCVS batteries/battery charger including incorporation into FLEX DG loading calculation. (Sections 3.2.2.4, 3.2.3.1, 3.2.3.2, 3.2.4.1, 3.2.4.2, 3.2.5.1, 3.2.5.2, and 3.2.6)	Closed per References 8 and 10.
ISE-12. Make available for NRC staff audit the descriptions of local conditions (temperature, radiation and humidity) anticipated during ELAP and severe accident for the components (valves, instrumentation, sensors, transmitters, indicators, electronics, control devices, etc.) required for HCVS venting including confirmation that the components are capable of performing their functions during ELAP and severe accident conditions. (Sections 3.2.2.3, 3.2.2.5, 3.2.2.9, and 3.2.2.10)	Closed per References 8 and 10.
ISE-13. Make available for NRC staff audit documentation of an evaluation verifying the existing containment isolation valves, relied upon for the HCVS, will open under the maximum expected differential pressure during BDBEE and severe accident wetwell venting. (Section 3.2.2.9)	Closed per References 8 and 10.

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Eighth Six-Month Status Report for the Implementation of HCVS Phases 1 and 2
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Phase 1 Interim Staff Evaluation Open Item	Status
ISE-14. Provide a description of the strategies for hydrogen control that minimizes the potential for hydrogen gas migration and ingress into the reactor building or other buildings. (Section 3.2.2.6 and 3.2.2.7)	Closed per References 8 and 10.
ISE-15. Make available for NRC audit documentation confirming that HCVS will remain isolated from standby gas treatment system during ELAP and severe accident conditions. (Section 3.2.2.7)	Closed per References 8 and 10.

Phase 2 Interim Staff Evaluation Open Item	Status
ISE-1. Licensee to demonstrate the SAWA equipment and controls, as well as ingress and egress paths for the expected severe accident conditions (temperature, humidity, radiation) remain operational throughout the sustained operating period. (Section 3.3.2.3)	Closed per References 9 and 10.
ISE-2. Licensee to demonstrate that instrumentation and equipment being used for SAWA and supporting equipment is capable to perform for the sustained operating period under the expected temperature and radiological conditions. (Section 3.3.2.3)	Closed per References 9 and 10.
ISE-3 Licensee to demonstrate that containment failure as a result of overpressure can be prevented without a drywell vent during severe accident conditions. (Section 3.3.3)	Closed per References 9 and 10.
ISE-4 Licensee shall demonstrate whether a site specific MAAP evaluation will be used to determine an initial SAWA flow rate. If the evaluations performed in BWROG TP-15-011 is considered, provide a description of how the plant is bounded by the reference plant analysis that shows the SAWM strategy is successful in making it unlikely that a drywell vent is needed. (Section 3.3.3.1)	Closed per References 9 and 10.
ISE-5 Licensee to demonstrate that there is adequate communication between the MCR and the Intake Structure operator at the FLEX manual valve during severe accident conditions. (Section 3.3.3.4)	Closed per References 9 and 10.
ISE-6 Licensee to demonstrate the SAWM flow instrumentation qualification for the expected environmental conditions. (Section 3.3.3.4)	Closed per References 9 and 10.

7 Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation(s) identified at this time.

8 References

The following references support the updates to the combined Phases 1 and 2 Overall Integrated Plan described in this enclosure.

1. Peach Bottom Atomic Power Station, Units 2 and 3, Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," dated June 30, 2014.
2. NRC Order Number EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions" dated June 6, 2013.
3. NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, 'To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions,' Revision 1, dated April 2015.
4. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013 (Accession No. ML13304B836).
5. NRC Endorsement of Industry "Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0" (Accession No. ML14128A219).
6. Peach Bottom Atomic Power Station, Units 2 and 3, Combined Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," dated December 15, 2015.
7. NRC Interim Staff Guidance JLD-ISG-2015-01, "Compliance with Phase 2 of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated April 2015 (Accession No. ML15104A118).
8. Peach Bottom Atomic Power Station, Units 2 and 3, Fifth Six-Month Status Report for Phase 1 and Phase 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 15, 2016 (RS-16-235).
9. Peach Bottom Atomic Power Station, Units 2 and 3, Sixth Six-Month Status Report for Phase 1 and Phase 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2017 (RS-17-068).

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10. NRC letter to Exelon Generation Company, LLC, Peach Bottom Atomic Power Station, Units 2 and 3 - Report for the Audit of Licensee Responses to Interim Staff Evaluations Open Items Related to NRC Order EA-13-109 to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, dated November 30, 2017.