



Michael P. Gallagher  
Exelon Nuclear  
Vice President  
License Renewal and Decommissioning

200 Exelon Way  
Kennett Square, PA 19348

610 765 5958 Office  
610 765 5658 Fax  
www.exeloncorp.com  
michaelp.gallagher@exeloncorp.com

10 CFR 50.12  
10 CFR 50, Appendix B  
10 CFR 50.59(d)(3)  
10 CFR 50.71(c)

TM-19-068

July 12, 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

Subject: Request for Exemption from Record Retention Requirements

Reference: 1) Letter from J. Bradley Fewell (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "*Certification of Permanent Cessation of Power Operations for Three Mile Island Nuclear Station, Unit 1,*" dated June 20, 2017 (ML17171A151)

Pursuant to 10 CFR 50.12, "Specific exemptions," Exelon Generation Company, LLC (Exelon), on behalf of Three Mile Island Nuclear Station, Unit 1 (TMI-1), requests a permanent exemption from:

- (1) 10 CFR 50, Appendix B, Criterion XVII, which requires certain records to be retained consistent with applicable regulatory requirements for a duration established by the licensee;
- (2) 10 CFR 50.59(d)(3), which requires certain records to be maintained until "termination of an operating license issued under this part;" and
- (3) 10 CFR 50.71(c), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

By letter dated June 20, 2017 (Reference 1), Exelon informed the U.S. Nuclear Regulatory Commission (NRC) that TMI-1 will permanently cease power operations on or about September 30, 2019. Once TMI-1 permanently ceases operations and submits the certifications required by 10 CFR 50.82(a)(1)(i) and (ii), pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for TMI-1 will no longer authorize operation of the reactor or placement or retention of fuel in the reactor vessel. Once granted, the requested exemption and application of the exemption will eliminate the requirement to maintain records that are no longer necessary due to the permanently shutdown status of TMI-1.

U.S. Nuclear Regulatory Commission  
TMI-1 Request for Exemption  
Docket Nos. 50-289  
July 12, 2019  
Page 2

Exelon is requesting approval of this exemption request by July 31, 2020. Exelon will use the exemption, if granted, to eliminate the applicable records associated with structures, systems, components, and activities no longer required by the licensing basis due to the permanently shutdown status of TMI-1.

This letter contains no new regulatory commitments.

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

Respectfully,



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

Attachment: Request for Exemption from Record Retention Requirements

cc: w/Attachment

Regional Administrator - NRC Region I  
NRC Senior Resident Inspector - Three Mile Island Nuclear Station – Unit 1  
NRC Project Manager, NRR – Three Mile Island Nuclear Station – Unit 1  
NRC Project Manager, NMSS/DUWP/RDB – Three Mile Island – Unit 2  
Director, Bureau of Radiation Protection - PA Department of Environmental Resources

**ATTACHMENT**  
**REQUEST FOR EXEMPTION FROM RECORD RETENTION REQUIREMENTS**

## 1.0 SPECIFIC EXEMPTION REQUEST

Pursuant to 10 CFR 50.12, "Specific exemptions," Exelon requests a permanent exemption from the following record retention requirements for Three Mile Island Nuclear Station, Unit 1 (TMI-1):

- (1) 10 CFR 50, Appendix B, Criterion XVII, which requires certain records to be retained consistent with applicable regulatory requirements for a duration established by the licensee;
- (2) 10 CFR 50.59(d)(3), which requires certain records to be maintained until "termination of an operating license issued under this part;" and
- (3) 10 CFR 50.71(c), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

The exemption is requested to allow TMI-1 to eliminate the requirement to maintain records that are no longer necessary or applicable due to the permanently defueled condition and decommissioning status of the station. Specifically, the following records would no longer be retained:

- (1) Records associated with structures, systems, and components (SSCs), and activities that were applicable to the nuclear unit, which are no longer required by the Part 50 licensing basis (e.g., removed from the Updated Final Safety Analysis Report and/or Technical Specifications by appropriate change mechanisms); or
- (2) Records associated with safe storage of fuel in the spent fuel pool (SFP) once spent nuclear fuel has been completely transferred from the SFP to dry storage, and the SFP is ready for demolition and the associated licensing bases are no longer effective.

Exelon is not requesting an exemption from 10 CFR 50, Appendix A, Criterion 1, which requires certain records to be maintained "throughout the life of the unit," because TMI-1 is not a General Design Criteria plant. However, as discussed in UFSAR Section 1.4, TMI-1 was designed and constructed taking into consideration the GDC for nuclear power plant construction permits as listed in the proposed Atomic Energy Commission (AEC) General Design Criteria, dated July 1967. As provided in in the PDTS submittal (Reference 1) Criterion 5, Records Retention, will be modified to reflect the approval of this exemption request.

Exelon is not requesting an exemption associated with any record keeping requirements for storage of spent fuel at the TMI-1 Independent Spent Fuel Storage Installation (ISFSI) under 10 CFR 50, the General License requirements of 10 CFR 72, or for the other requirements of 10 CFR 50 or Renewed Facility Operating License No. DPR-50 applicable to the decommissioning and dismantlement of TMI-1.

## 2.0 BACKGROUND

TMI Station is located in an area of low population density about 12 miles southeast of Harrisburg, Pennsylvania. The area is in Londonderry Township, Dauphin County, about 2.5 miles from the southern tip of Dauphin County, where the county is coterminous with York and Lancaster Counties. The TMI site is part of an 814-acre tract consisting of TMI and several adjacent islands,

which were purchased by a predecessor. The island, which is situated about 900 feet from the east bank and approximately one mile from the west bank of the Susquehanna River, is elongated parallel to the flow of the river with its longest axis oriented approximately due north and south. The north and south ends of the island have access bridges, which connect the island to State Highway Route 441. The north access bridge is used daily. Route 441 is a two-lane highway, which runs parallel to TMI on the east bank of the Susquehanna River and is more than 2,000 feet from the TMI reactors at the closest point.

By letter dated June 20, 2017 (Reference 2), pursuant to 10 CFR 50.82(a)(1)(i), Exelon notified the U.S. Nuclear Regulatory Commission (NRC) of its intention to permanently cease power operations at TMI-1 by September 30, 2019. Once fuel has been permanently removed from the reactor vessel and relocated to the spent fuel pool, Exelon will submit a written certification to the NRC, in accordance with 10 CFR 50.82(a)(1)(ii) that meets the requirements of 10 CFR 50.4(b)(9). Upon docketing of these certifications, the 10 CFR Part 50 license for TMI-1 will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel, as specified in 10 CFR 50.82(a)(2). This marks the start of the Decommissioning of TMI-1.

Exelon's decommissioning plans for TMI-1 are described in the Post Shutdown Decommissioning Activities Report (PSDAR) (Reference 3) and the Spent Fuel Management Plan (Reference 4). Exelon is planning to decommission TMI-1 using the SAFSTOR method. The nuclear reactor and essentially all associated systems, structures, and components (SSCs) in the nuclear steam supply system and balance of plant that supported the generation of power will be retired in place and prepared for SAFSTOR. SSCs that will remain operable or functional are: 1) those required to support safe storage of spent fuel in the SFP; or 2) those that are needed to meet other regulatory requirements or are needed to support other site facilities (e.g., radwaste handling or Heating, Ventilation, and Air Conditioning (HVAC), etc.).

TMI-1 will maintain storage of irradiated fuel in the Spent Fuel Pool until it can safely be stored in a dry cask storage system. TMI is currently designing and constructing an Independent Spent Fuel Storage Installation (ISFSI) facility, expected to be completed by early 2021, that will allow for dry storage of all spent fuel assemblies and Greater than Class C (GTCC) waste generated by the plant. Spent fuel will be maintained at the ISFSI until the Department of Energy takes possession of irradiated fuel, currently scheduled to begin in 2034.

While Exelon intends to retain the records required by the TMI-1 license, as the project transitions from the current plant conditions to fully dismantled with the fuel in dry storage, the regulatory and business needs for maintenance of most of the records will be obviated. As SSCs are retired (as their functions are no longer required) and they are removed from the licensing basis, the need to retain their associated records is, on a practical basis, eliminated. Exelon therefore requests exemptions from the records retention requirements for TMI-1 SSCs and historical activities that are no longer relevant to the licensing basis. Such exemptions would eliminate the associated, unnecessary regulatory and economic burdens of retaining records for SSCs and activities that are no longer part of the TMI-1 licensing basis.

### **3.0 Discussion**

In order for an exemption to be granted from the requirements of 10 CFR Part 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3) and 10 CFR 50.71 (c), the licensee must show that the requirements of 10 CFR 50.12(a)(1) are met and that special circumstances, as specified in

10 CFR 50.12(a)(2), exist. As discussed below, TMI-1 satisfies these standards for the requested exemptions.

#### **4.0 TECHNICAL EVALUATION**

##### **A. Nuclear Power Generation SSCs**

The TMI-1 nuclear steam supply system and balance of plant SSCs will no longer be required to be operable or maintained, except as required to support safe storage of spent fuel in the SFP and other support needs described above. TMI-1 will be placed in a condition to support SAFSTOR pending dismantlement. The general justification for eliminating records associated with that portion of the plant that has been retired is straightforward in that these SSCs have been (or will be) removed from service under the NRC license, dismantled or demolished, and will not serve any TMI-1 function regulated by the NRC.

Exelon recognizes that some records related to the nuclear steam supply system and balance of plant will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and the decommissioning activities are and will continue to be appropriately addressed through the license and current plant documents such as the Updated Final Safety Analysis Report/Defueled Safety Analysis Report (UFSAR/DSAR) and Technical Specifications. Except for future changes made through the applicable change process defined in the regulations (e.g., 10 CFR 50.48(f), 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a), 10 CFR 50.54(p), 10 CFR 50.54(q), etc.), these programmatic elements and their associated records will be unaffected by the exemption request.

##### **B. Spent Fuel Pool and Associated SSCs and Activities**

Records necessary for spent fuel storage SSCs and activities will continue to be retained through the SFP's functional life. Similar to the other plant records, once the SFP is emptied of fuel, drained and ready for demolition, there will be no safety-significant function or other regulatory need for retaining SFP related records.

Also, similar to the power generation SSCs, Exelon recognizes that some records related to the SFP SSCs will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and the decommissioning activities are and will continue to be appropriately addressed through the license and current plant documents such as the UFSAR/DSAR and Technical Specifications. Except for future changes made through the applicable change process defined in the regulations (e.g., 10 CFR 50.48(f), 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a), 10 CFR 50.54(p), 10 CFR 50.54(q), etc.), these programmatic elements and their associated records will be unaffected by the exemption request.

The requested exemption is consistent with the retention period for records of changes in the facility or spent fuel storage cask design implemented under 10 CFR 72.48, Changes, Tests, and Experiments. 10 CFR 72.48(d)(3)(i) specifically states that records are to be retained until "... Spent fuel is no longer stored in the facility." This is analogous to the condition when the fuel is no longer stored in the SFP and the SFP is ready for demolition.

C. Spent Fuel

Exelon is not requesting any exemption associated with retention of spent fuel records required by 10 CFR 50 and 10 CFR 72.

D. ISFSI

Exelon is not requesting any exemption associated with the retention of records associated with the storage of spent fuel at the ISFSI required by 10 CFR 72.

## 5.0 JUSTIFICATION FOR EXEMPTIONS AND SPECIAL CIRCUMSTANCES

10 CFR 50.12 states that the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of Part 50 which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the defense and security. 10 CFR 50.12 also states that the Commission will not consider granting an exemption unless special circumstances are present. As discussed below, this exemption request satisfies the provisions of Section 50.12.

### 5.1 Exemptions

#### A. The exemptions are authorized by law

Paragraph 50.71(d)(2) allows for the granting of specific exemptions to the record retention requirements specified in the regulations. Paragraph 50.71(d)(2) states, in part:

*"...the retention period specified in the regulations in this part for such records shall apply unless the Commission, pursuant to §50.12 of this part, has granted a specific exemption from the record retention requirements specified in the regulations in this part."*

If the specific exemption requirements of 10 CFR 50.12 are satisfied, the exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, and 10 CFR 50.59(d)(3) is authorized by law. The request does not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, the exemptions are authorized by law.

#### B. The exemptions will not present an undue risk to public health and safety

Removal of the underlying SSCs associated with the records from the TMI-1 licensing basis has been or will be evaluated in accordance with the applicable change process defined in the regulations (e.g., 10 CFR 50.59, or an NRC approved license amendment) to have no adverse public health and safety impact. Elimination of associated records for these SSCs will have no additional impact.

The partial exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, Criterion XVII; and 10 CFR 50.59(d)(3), for the records described above is administrative in nature and will have no impact on any remaining decommissioning activities or on radiological effluents. The exemption will merely advance the schedule for no longer maintaining the specified records. Considering the historical nature of these records, these records contain information about SSCs associated with reactor operation and contain no information needed to maintain the facility in a safe condition when permanently defueled and

SSCs are dismantled. The elimination of these records on an advanced timetable will have no reasonable possibility of presenting any undue risk to the public health and safety.

**C. The exemptions are consistent with the common defense and security**

The elimination of the recordkeeping requirements is administrative in nature and does not involve information or activities that could potentially impact the common defense and security of the United States. Upon removal of the affected SSCs from the TMI-1 licensing basis, the records have no functional purpose relative to maintaining the safe operation of the SSCs nor to maintaining conditions that would affect the ongoing health and safety of workers or the public.

Rather, the exemption requested is administrative in nature and would merely advance the current schedule for destruction of the specified records. Therefore, the partial exemption from the recordkeeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B; and 10 CFR 50.59(d)(3), for the types of records described above is consistent with the common defense and security.

**5.2 Special Circumstances**

Pursuant to 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption to its regulations unless special circumstances are present. Exelon has determined that special circumstances are present as discussed below.

**A. Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. (10 CFR 50.12(a)(2)(ii))**

Appendix B of 10 CFR 50, Criterion XVII, states in part:

*"Sufficient records shall be maintained to furnish evidence of activities affecting quality."*

Paragraph 50.59(d)(3) states in part:

*"The records of changes in the facility must be maintained until the termination of an operating license issued under this part..."*

Paragraph 50.71(c), states in part:

*"Records that are required by the regulations in this part or Part 52 of this chapter, by license condition, or by technical specifications must be retained for the period specified by the appropriate regulation, license condition, or technical specification. If a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license..."*

The common and underlying purpose for the records related regulations cited above is to ensure that the licensing and design basis of the facility is understood, documented, preserved and retrievable relative to establishing and maintaining the SSC's safety functions for the life of the facility. These regulations, however, do not consider the reduction in safety-related SSCs during the decommissioning process. Removal of the SSCs from the licensing basis has been or will be evaluated in accordance with the applicable change process in the regulations (e.g., 10 CFR 50.59, or NRC approved license amendment) to have no adverse



public health and safety impact prior to elimination of any records. Elimination of associated records for these SSCs will have no additional impact. Retention of records associated with SSCs that are or will no longer be part of the facility licensing basis serves no safety or regulatory purpose. Ultimately, the SSCs will be physically removed from the facility. Therefore, application of these record requirements in those circumstances does not serve the underlying purpose of the regulations.

Based on the above, the application of the subject record keeping requirements to the TMI-1 records specified above is not required to achieve the underlying purpose of the rule. Thus, special circumstances are present which the NRC may consider, pursuant to 10 CFR 50.12(a)(2)(ii), to grant the requested exemption.

**B. Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated. (10 CFR 50.12(a)(2)(iii))**

The records retention requirements applied by the NRC to the construction and operation of nuclear power plants are intended to demonstrate, on a broad basis, that SSCs and activities are supportive of the safety analysis and the requirements of the NRC license for an operating reactor and operability of its safety functions. The records program requirements provide assurance that records will be captured, indexed, and stored in an environmentally suitable and retrievable condition resulting in a significant volume of records of many forms and a significant associated cost. The burden associated with the operations phase records requirements was understood and considered appropriate by the NRC and their reactor licensees. However, the effect of the operations phase record retention requirements that survived the life of a facility and no longer served an underlying safety purpose were not fully understood or considered. This is the current situation at the decommissioning facilities. The operating reactor records retention requirements to which TMI-1 is currently regulated are no longer necessary nor appropriate in that the SSCs and activities to which many of the records apply are no longer important to the facility, the public or worker health and safety.

## **6.0 PRECEDENT**

This exemption request is consistent with similar exemption requests that have been approved recently by the NRC for other nuclear power reactor facilities beginning decommissioning. Specifically, the NRC granted similar exemptions to Oyster Creek Nuclear Generating Station (Reference 5), Millstone Power Station, Unit 1, (Reference 6); Zion Nuclear Power Station, Units 1 and 2 (Reference 7); Vermont Yankee Nuclear Power Plant (Reference 8); San Onofre Nuclear Generating Station, Units 1, 2, and 3 (Reference 9); Kewaunee Power Station (Reference 10); and Fort Calhoun Station (Reference 10).

## **7.0 ENVIRONMENTAL ASSESSMENT**

The proposed exemption meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(25), because the proposed exemption involves: (i) no significant hazards consideration; (ii) no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (iii) no significant increase in individual or cumulative public or occupational radiation exposure; (iv) no significant construction impact; (v) no significant increase

in the potential for or consequences from radiological accidents; and (vi) the requirements from which the exemption is sought involve: (A) record keeping requirements. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed exemption.

**(i) No Significant Hazards Consideration Determination**

Exelon has evaluated the proposed exemption to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92 as discussed below:

1. Does the proposed exemption involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed exemptions are administrative in nature. They have no effect on structures, systems, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed exemptions would not increase the likelihood of the malfunction of any plant SSC.

The probability of occurrence of previously evaluated accidents is not increased, since most previously analyzed accidents will no longer be able to occur and the probability and consequences of the remaining Fuel Handling Accident are unaffected by the proposed exemption.

Therefore, the proposed exemption does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed exemptions create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed exemption does not involve a physical alteration of the plant. No new or different type of equipment will be installed and there are no physical modifications to existing equipment associated with the proposed exemption. Similarly, the proposed exemption will not physically change any SSCs involved in the mitigation of any accidents. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed exemption does not create the possibility of a new accident as a result of new failure modes associated with any equipment or personnel failures. No changes are being made to parameters within which the plant is normally operated, or in the setpoints which initiate protective or mitigative actions, and no new failure modes are being introduced.

Therefore, the proposed exemption does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed exemptions involve a significant reduction in a margin of safety?

The proposed exemption does not alter the design basis or any safety limits for the plant. The proposed exemption does not impact station operation or any plant SSC that is relied upon for accident mitigation.

Therefore, the proposed exemption does not involve a significant reduction in a margin of safety.

Based on the above, Exelon concludes that the proposed exemption presents no significant hazards consideration, and, accordingly, a finding of "no significant hazards consideration" is justified.

**(ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.**

There are no expected changes in the types, characteristics, or quantities of effluents discharged to the environment associated with the proposed exemption. There are no materials or chemicals introduced into the plant that could affect the characteristics or types of effluents released offsite. In addition, the method of operation of waste processing systems will not be affected by the exemption. The proposed exemption will not result in changes to the design basis requirements of SSCs that function to limit or monitor the release of effluents. All the SSCs associated with limiting the release of effluents will continue to be able to perform their functions. Therefore, the proposed exemption will result in no significant change to the types or significant increase in the amounts of any effluents that may be released offsite.

**(iii) There is no significant increase in individual or cumulative public or occupational radiation exposure.**

The proposed exemption does not involve any physical alterations to the plant configuration or any changes to the operation of the facility that could lead to a significant increase in individual or cumulative occupational radiation exposure.

**(iv) There is no significant construction impact.**

No construction activities are associated with the proposed exemption.

**(v) There is no significant increase in the potential for or consequences from radiological accidents.**

See the no significant hazards considerations discussion in Item (i)(1) above.

**(vi) The requirements from which exemption is sought involve: (A) recordkeeping requirements.**

The requirements from which the exemption is sought involve recordkeeping requirements as defined in 10 CFR 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c).

## **8.0 CONCLUSION**

The information provided above gives the NRC sufficient basis for granting an exemption from the recordkeeping requirements of 10 CFR 50 Appendix B Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c) for: 1) records pertaining to SSCs or activities associated with the nuclear power unit and associated support systems that are no longer required to support the licensing basis at the TMI-1 site; and 2) records pertaining to the SFP and associated support systems for the safe storage of fuel in the SFP after all the spent nuclear fuel has been transferred from the SFP to the ISFSI and the SFP is ready for demolition. This exemption does not apply to any

record keeping requirements for spent fuel or storage of the spent fuel at the TMI-1 ISFSI under 10 CFR 50 or the general requirements of 10 CFR 72.

Based on the considerations discussed above, the requested exemption is authorized by law, otherwise in the public interest, and consistent with the common defense and security.

Exelon requests that the NRC approve this exemption request by July 31, 2020. Exelon will use the exemption, if granted, to eliminate the applicable records associated with SSCs and activities no longer required by the TMI-1 licensing basis.

## 9.0 REFERENCES:

1. Letter from Michael P. Gallagher, (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – *"License Amendment Request – Proposed Defueled Technical Specifications and Revised License Conditions for Permanently Defueled Condition,"* dated July 25, 2018 (ADAMS Accession No. ML18206A545)
2. Letter from J. Bradley Fewell (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, *"Certification of Permanent Cessation of Power Operations for Three Mile Island Nuclear Station, Unit 1,"* dated June 20, 2017 (ADAMS Accession No. ML17171A151)
3. Letter from Michael P. Gallagher, (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – *"Three Mile Island Nuclear Station, Unit 1 – Post-Shutdown Decommissioning Activities Report,"* dated April 5, 2019 (ADAMS Accession No. ML19095A041)
4. Letter from Michael P. Gallagher, (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – *"Spent Fuel Management Plan for Three Mile Island Nuclear Station – Unit 1,"* dated April 5, 2019 (ADAMS Accession No. ML19095A009)
5. Letter from J. G. Lamb (NRC) to B. C. Hanson (Exelon Generation Company, LLC), *"Oyster Creek Nuclear Generation Station – Exemption from Certain Record Retention Requirements (EPID L-2018-LLE-0006),* dated June 26, 2018 (ADAMS Accession No. ML18122A306)
6. Letter from J. B. Hickman (NRC) to D. A. Christian (Dominion Nuclear Connecticut, Inc.), *"Millstone Power Station, Unit No. 1 - Partial Exemption from Record Keeping Requirements (TAC No. J00287),"* dated January 30, 2007 (ADAMS Accession No. ML070110567)
7. Letter from J. B. Hickman (NRC) to J. A. Christian (ZionSolutions, LLC), *"Zion Nuclear Power Station, Units 1 and 2 - Exemption from Record Keeping Requirements (TAC Nos. J00400 and J00401),"* dated June 23, 2011 (ADAMS Accession No. ML111260277)
8. Letter from J. Kim (NRC) to Vice President, Operations (Entergy Nuclear Operations, Inc.), *"Vermont Yankee Nuclear Power Station - Partial Exemptions from the Requirements of 10 CFR Part 50, Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); 10 CFR 50.71(c) (CAC No. MF5846),"* dated December 22, 2015 (ADAMS Accession No. ML15344A243)
9. Letter from M. Vaaler (NRC) to T. J. Palmisano (Southern California Edison Company), *"San Onofre Nuclear Generating Station, Units 1, 2, and 3 - Exemption from Record*

Attachment

Request for Exemption from Record Retention Requirements

Docket Nos. 50-289

Page A-10 of A-9

*Keeping Requirements (CAC Nos. L53076 and L53077)," dated July 18, 2016 (ADAMS Accession No. ML15355A055)*

10. Letter from T. H. Carter (NRC) to D. A. Heacock (Dominion Energy Kewaunee, Inc.), *"Kewaunee Power Station – Exemption from Record Retention Requirements (CAC NO. L53174)," dated May 10, 2017 (ADAMS Accession No. ML17069A394)*
11. Letter from J. Kim (NRC) to M. J. Fisher (Omaha Public Power District), *"Fort Calhoun Station, Unit No. 1 - Partial Exemptions from the Requirements of 10 CFR Part 50, Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c) (CAC NO. MF9693)," dated October 4, 2017 (ADAMS Accession No. ML 17172A730)*