



INDIAN POINT 2

Emergency Planning

YEAR 2001 BUSINESS PLAN

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PLAN MANAGER:

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SUBMITTED

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APPROVED

7 December, 2000

DATE

7 DECEMBER, 2000

DATE

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1. Business Plan Summary:

Emergency Planning

OVERVIEW: The Emergency Planning organization mission is to insure that station and local government personnel are properly prepared to respond to a radiological emergency. The focus of that response is to insure that capabilities are in place to protect the health and safety of the public. Accomplishment of this mission requires extensive cooperation and mutual support between Con Edison, NYPA (who has responsibility for Indian Point 3) and local, state and federal officials.

Key responsibilities include:

- ◆ Maintenance of the Emergency Plan and Implementing Procedures
- ◆ Readiness of Emergency Response Facilities and Equipment
- ◆ Staffing, training and readiness of the Emergency Response organization
- ◆ Maintenance and Testing of the Emergency Notification System.
- ◆ Liaison with State and County government to insure the overall readiness of local governments to respond to an emergency at Indian Point.

Performance and programmatic concerns relating to Indian Point 2 (IP2) Emergency Preparedness (EP) activities have been increasing in significance and frequency for several years. Emergency Plan implementation issues were raised with respect to the IP2 emergency response to the reactor trip incident, on August 31, 1999 and to the steam generator tube rupture event on February 15, 2000, and also during the Nuclear Regulatory Commission (NRC) graded exercise in September 1999. In June of 2000, the station demonstrated, in a NRC graded exercise, that it had made significant improvements in its ability to implement its Emergency Plan. The focus for 2001 is to sustain the improvements accomplished and continue to implement improvements to increase the overall effectiveness of the Station's emergency response.

GOALS:

- ◆ Enhance the overall performance of the Emergency Response Organization as demonstrated in drills and exercises
- ◆ Provide quality and meaningful training to Emergency Response Organization Personnel
- ◆ Insure facilities and equipment are maintained at a maximum state of readiness for emergency response
- ◆ Develop an eagerness to participate in and an overall Station sense of ownership of the Emergency Response Plan
- ◆ Cultivate a working relationship with state, county and federal government that is centered in trust and mutual respect.

EXPECTED 2000 RESULTS:

The Indian Point Station will be able to respond to an emergency rapidly, safely and effectively to mitigate any impact on the health and safety of the public. WE will be able to demonstrate that capability to the Nuclear Regulatory Commission and Federal Emergency Management Agency along with our counterparts in the State and Counties. WE will have an Emergency Preparedness Program that is among the best in the Industry.

2. Action Plans: Emergency Planning

GOAL	ACTIONS	OWNER	COMPLETION DATE	STATUS
Drills and Exercises	Conduct successful NRC graded Exercise	Burns	6/30/01	
	Complete minimum of 2 Exercises per ERO team	Burns	12/31/01	
GOAL	ACTIONS	OWNER	COMPLETION DATE	STATUS
Training	Complete Continuing Training for ERO	Walker	11/01	
	Complete SAMG training for Operations and ERO	Betts	6/01	
	Qualify additional personnel to insure all ERO team positions are at least 4 deep	Lee	6/01	

Emergency Planning

Emergency Planning				
GOAL	ACTIONS	OWNER	COMPLETION DATE	STATUS
Facilities and Equipment	Complete Siren Verification System Upgrade	Inzirillo	9/01	
	Complete MIDAS Upgrade	Burns	2/01	

Emergency Planning				
GOAL	ACTIONS	OWNER	COMPLETION DATE	STATUS
Off-Site Interface	Complete Evacuation Travel Time Estimate Study	Huber	12/01	
	Develop plan for 2002 FEMA exercise.	Ferraro	10/01	
	Improve interface with Counties	Inzirillo	6/01	

Emergency Planning				
GOAL	ACTIONS	OWNER	COMPLETION DATE	STATUS
On-Site Interface	Develop SAO defining responsibilities of on-site organizations in Emergency Response preparedness	Inzirillo	2/01	

3. 2001 Approved Budget (11/8/00): Emergency Planning

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOT
<u>Human Resources</u>													
Management	4												
Weekly	1												
Summer/COOP													
<u>Subtotal</u>	5												
Overtime (Hours)													
<u>O & M (\$000)</u>													
Management													
Comp													
Weekly													
Overtime													
Sub Total Labor													
<u>Vendor Services</u>													
State Disaster Prep Fee													
Communications													
For Allocation													
E Plan Improvements													
Sub Total Vendor Svcs													
<u>All Other</u>													
Communications													
Petty Cash													
Vehicles													
Sub Total All Other													
Total Non Outage													
Outage													
Grand Total, EP													

4. Project Requests: Emergency Planning

The following Projects and Programs are planned in 2001

Item	Project/Program Title	Estimated Con Ed Months	Estimated Outside Support \$'s (000)
4.1	Broad Scope EP Function Improvements		
4.2	Off Site Notification Improvements		
4.3	On Site Technical Assessment & Support Improvements		
4.4	Off Site Rad Protection Program Improvements		
4.5	Evacuation Time Estimate Study		
Total Estimated Con Ed Person Hours			
Total Estimated outside Support \$'s (000)			

* \$500K is Capital for Siren Verification System Upgrade.

Indian Point 2
2001 Project Request

1) Title: Broad Scope EP Function Improvements					2) Project #: 4.1					
3) Description:										
1.) Continue to revise and consolidate Emergency Plan Implementing Procedures to address additional recommendations (1 coned man month + \$xxK), 2.) Drill/Exercise improvement program (Revise all scenarios to new format. Include improvements. Develop table top exercises for each scenario. Total of 8 scenarios, 2 Con Ed months + \$xxK), 3.) Develop a process for assessment of Emergency Response Facility readiness (1 Con Ed month), 4.) Address CRS backlog (\$xxK), 5.) Establish Consolidated description for Emergency Planning Facilities, equipment, and other requirements (3 Con Ed months + \$xxK), 6.) Develop additional Emergency Preparedness Training Program materials, to include: Exam Bank development and Course Materials (1 Con Ed months + \$xxK). 7.) Conduct of Joint News Center Improvements. (\$xxK) 8.) WEB page development (1 ConEd man months + \$xxK)										
4) Justification:										
5) Indian Point 2 Goals and Strategies Supported:										
6) Budget:										
Dept	Account	2000 + Prior		2001		2002 + Future		Project Total		
		Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	
Emerg Png										
	TOTALS:									
7) Lead Department: Emergency Planning					8) O & M: X					Capital:
					XM:					
9) Proposed By: F. Inzirillo					Date:					
10) Lead Dept. Mgr. Approval:					Date:					
11) 2000 Budget Approval By:					Date:					
12) Notes: .Project scope reduced to essential improvements.										

Indian Point 2
2001 Project Request

1) Title: On Site Technical Assessment & Support Imprvmts **2) Project #:** 4.3

3) Description:
 1.) Develop and conduct MEANS Program Training (1 Con Ed month + \$xxK).
 2.) Develop improved EAL training materials for onsite and offsite. (1 Con Ed month + \$xxK).

4) Justification:

5) Indian Point 2 Goals Supported:

6) Budget:

Dept	Account	2000 + Prior		2001		2002 + Future		Project Total	
		Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)
Emerg Png									
TOTALS:									

7) Lead Department: Emergency Planning **8) O & M:** X **Capital:**
XM:

9) Proposed By: F. Inzirillo **Date:**

10) Lead Dept. Mgr. Approval: **Date:**

11) 2000 Budget Approval By: **Date:**

12) Notes:

Indian Point 2
2001 Project Request

1) Title: Off Site Rad Protection Program Improvements					2) Project #: 4.4				
3) Description:									
1.) Develop personnel monitoring and decontamination procedures and processes in support of site evacuation. (Carry over from year 2000 business plan, \$xxK)									
2.) Coordinate additional support for county EP program (\$xxK)									
4) Justification:									
5) Indian Point 2 Goals Supported:									
6) Budget:									
Dept	Account	2000 + Prior		2001		2002 + Future		Project Total	
		Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)
Emerg Plng									
TOTALS:									
7) Lead Department: Emergency Planning					8) O & M: X				
					XM:				
9) Proposed By: F. Inzirillo					Date:				
10) Lead Dept. Mgr. Approval:					Date:				
11) 2000 Budget Approval By:					Date:				
12) Notes:									

Indian Point 2
2001 Project Request

1) Title: Evacuation Time Estimate Study					2) Project #: 4.5					
3) Description: The Evacuation Time Estimate Study is periodically performed by utilities to demonstrate the times required for the surrounding counties to evacuate the 10 mile Emergency Planning Zone. This study helps to determine the timing for the counties to initiate protective actions to assure the health and safety of the public.										
4) Justification: Indian Point 2 committed to the NRC to perform an evacuation time estimate study in 2001 to incorporate the results of the 2000 census. The cost of this effort is shared with Unit 3. The budgeted amount indicates only half the cost.										
5) Indian Point 2 Goals Supported:										
6) Budget:										
Dept	Account	2000 + Prior		2001		2002 + Future		Project Total		
		Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	Con Ed Mths.	Outside \$s (000)	
Emerg Plng										
TOTALS:										
7) Lead Department: Emergency Planning					8) O & M: X XM:					Capital:
9) Proposed By: Frank Inzirillo					Date: 17 July 2000					
10) Lead Dept. Mgr. Approval:					Date:					
11) 2000 Budget Approval By:					Date:					
12) Notes:										

5 Performance Measures

5.1 NRC Performance Measures

The NRC cornerstone of Emergency Planning looks at Indian Point 2's capability to implement adequate measures to protect public health and safety during a radiological emergency. Reasonable assurance that our emergency preparedness program is effective is demonstrated through drills and exercises, performance in actual events, and testing of the Alert and Notification System (ANS). This cornerstone does not include the off-site actions, which are covered by FEMA. There are three indicators in this cornerstone: ERO Drill Participation; Drill/Exercise performance; and Alert & Notification System Reliability.

- **ERO Drill Participation**

This indicator monitors the opportunities that Key ERO members have been provided to gain proficiency as an integrated organization. It measures the percentage of those key personnel who have participated in proficiency-enhancing drill/exercise opportunities or in actual events within the past 24 months.

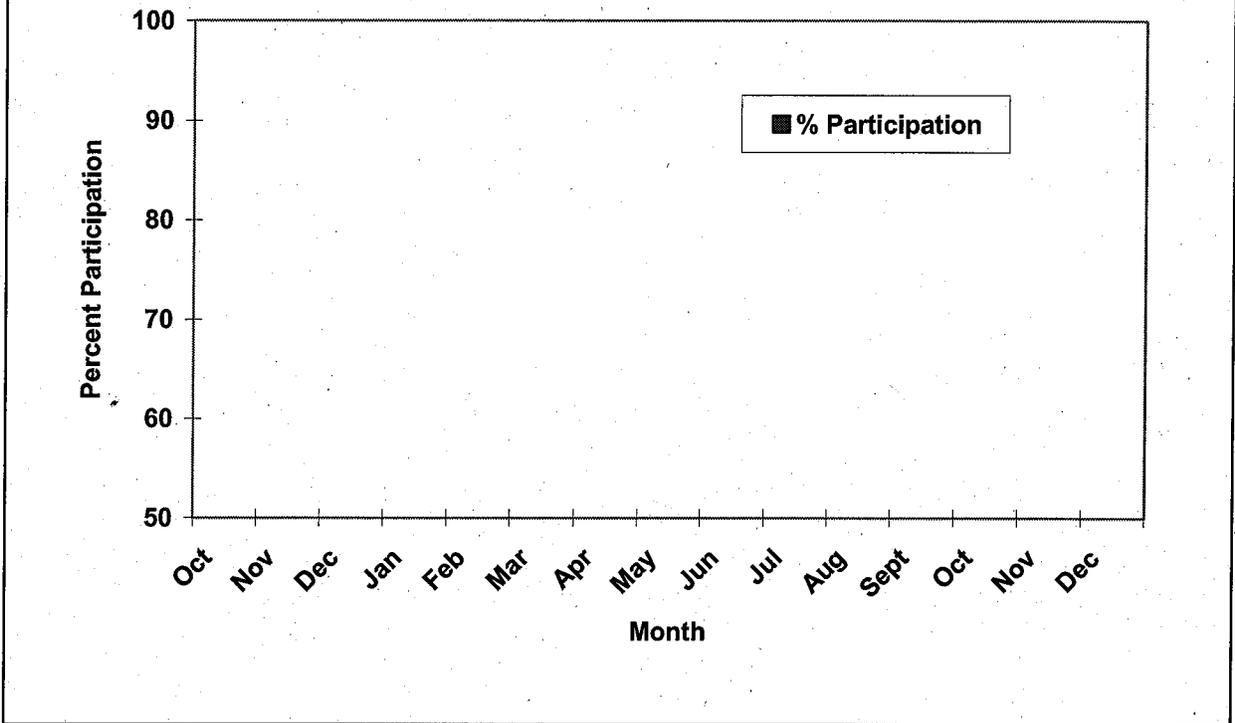
- **Drill/Exercise performance**

This indicator monitors timely and accurate utility performance in drills, exercises and actual events when presented with opportunities for classification of emergencies, notification of offsite authorities and development of protective action recommendations (PARs). The indicator is the ratio, in percent, of timely and accurate performance of those actions to total opportunities.

- **Alert & Notification System Reliability.**

This indicator monitors the reliability of the offsite Alert & Notification System (ANS), a critical link for alerting and notifying the public of the need to take protective actions. It provides the percentage of the sirens that are capable of performing their safety function.

ERO Drill Participation



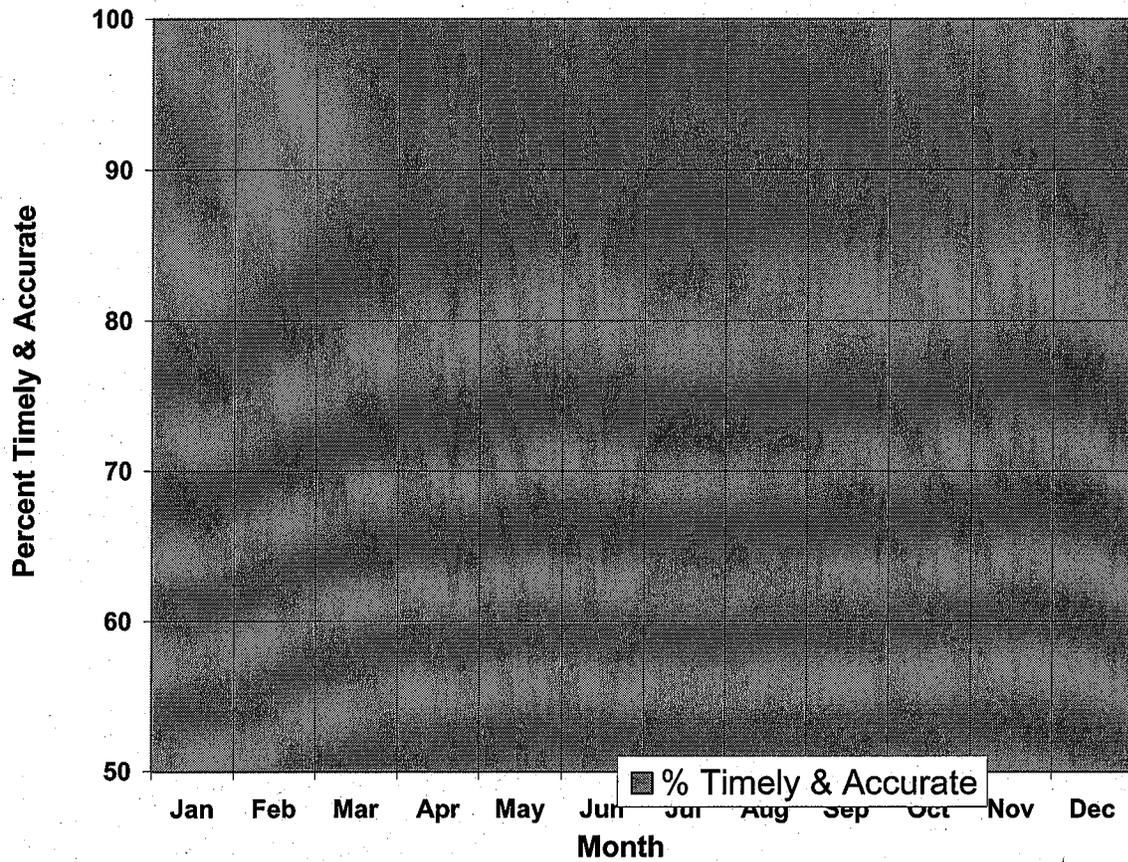
Month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
% Participation															

INDICATOR DESCRIPTION

Emergency Response Organization (ERO) Drill Participation - The percentage of key ERO members that have participated in a drill, exercise, or actual event during the previous eight quarters, as measured on the last calendar day of the quarter.
 White=Increased Regulatory Response Band, <80.0%
 Yellow=Required Regulatory Response Band, <60%
 Red=Unacceptable Performance Band, N/A

ANALYSIS

Drill & Exercise Performance



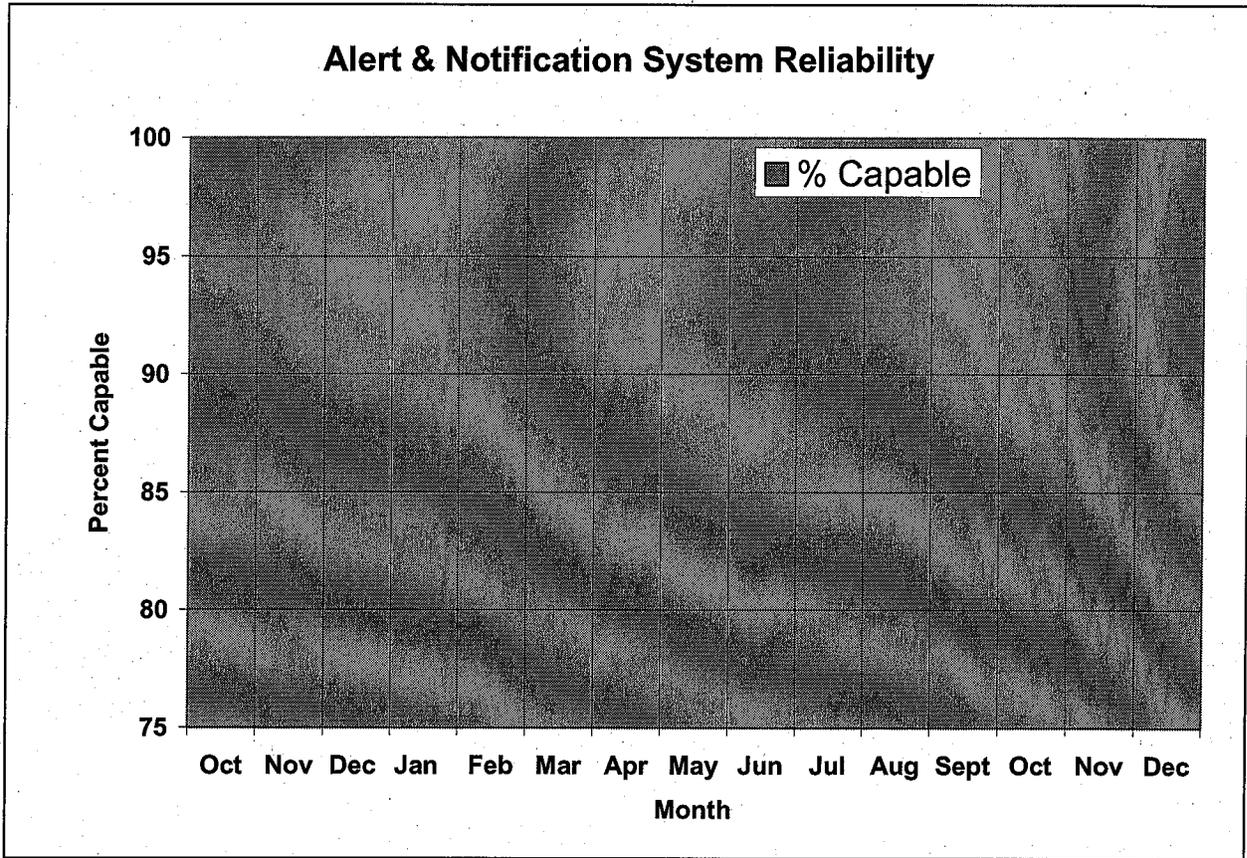
Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
% Timely & Accurate												

INDICATOR DESCRIPTION

The percentage of all classifications of events, notifications to off site authorities and development and communication of protective action recommendations that are timely and accurate. Performance in drills, exercises and actual events during the previous eight quarters is counted.
 White=Increased Regulatory Response Band, <90.0%
 Yellow=Required Regulatory Response Band, <70.0%
 Red=Unacceptable Performance Band, N/A

ANALYSIS

Alert & Notification System Reliability



Month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
% Capable															

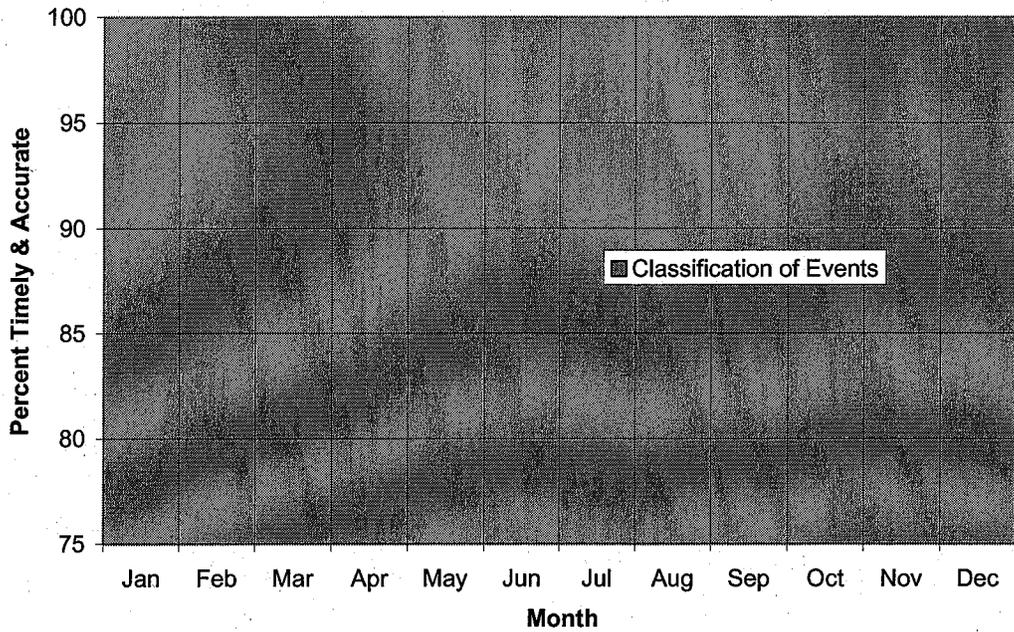
INDICATOR DESCRIPTION

The percentage of ANS sirens that are capable of performing their function as measured by periodic siren testing in the previous 12 months. Periodic tests are the regularly scheduled tests that are conducted to actually test the ability of the sirens to perform their function (e.g., silent, growl, siren sound test)

White=Increased Regulatory Response Band, <94.0%
 Yellow=Required Regulatory Response Band, <90.0%
 Red=Unacceptable Performance Band, N/A

ANALYSIS

Classification of Events



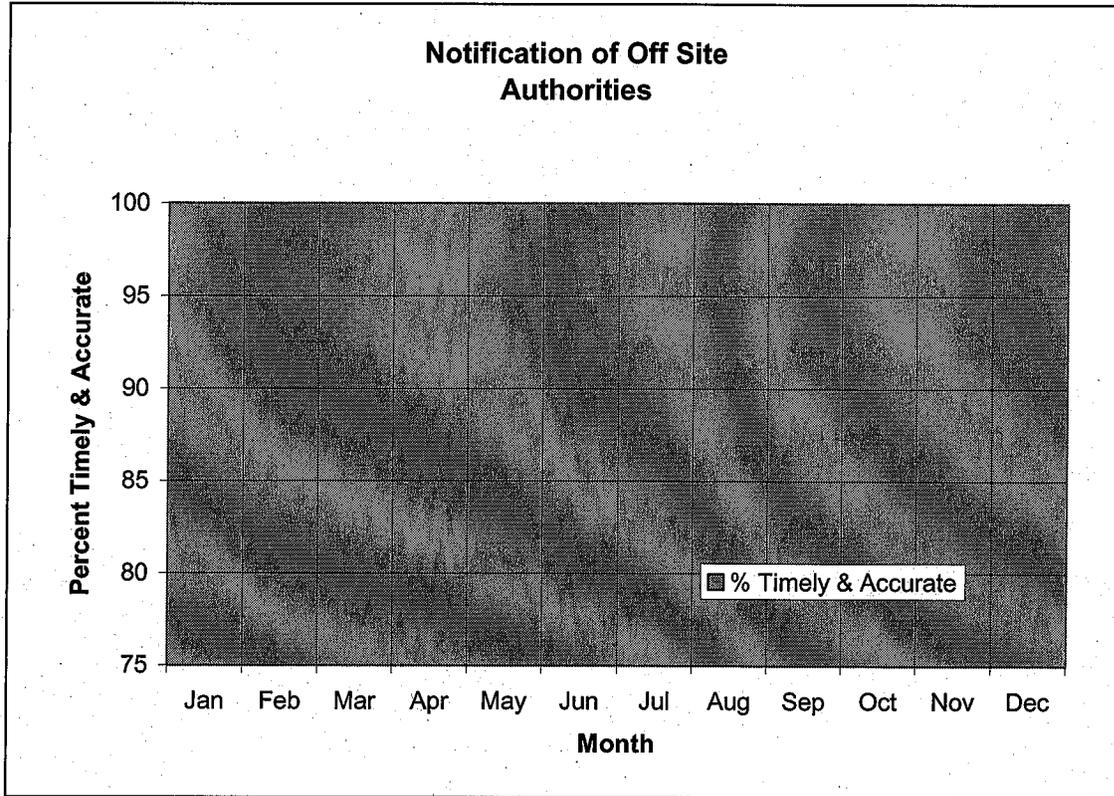
Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
% Timely & Accurate												

INDICATOR DESCRIPTION

This indicator measures the percentage of event classifications that are timely and accurate. Events resulting from actual emergencies, evaluated exercises and drills and exercises that include formal assessment of performance of classification of events are included. For each expected classification; whether the correct EAL was selected is evaluated and whether the EAL was determined within 15 minutes of plant parameters reaching the EAL is evaluated

ANALYSIS

Notification of Off Site Authorities



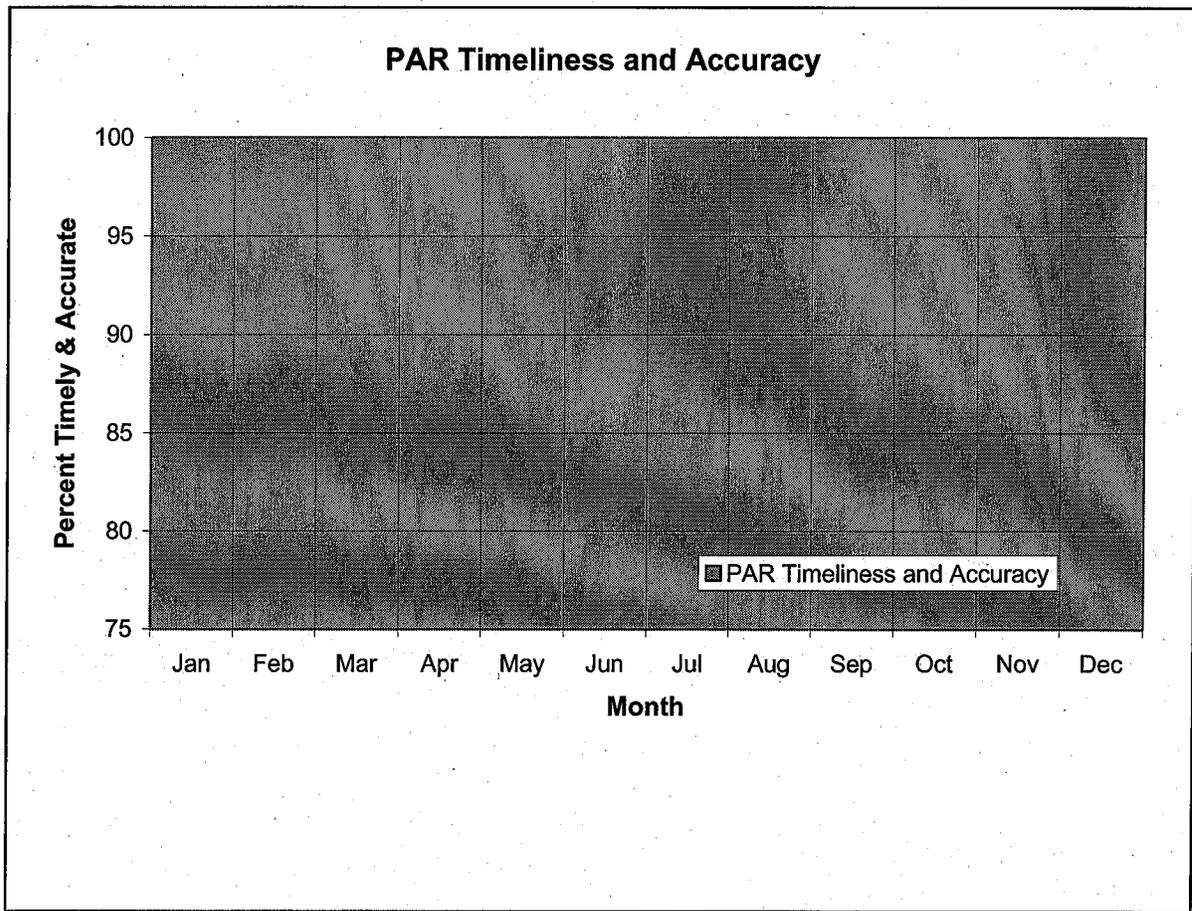
Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
% Timely & Accurate												

Indicator Description:

This indicator includes notifications made to the state and/or local government authorities for initial emergency classification, upgrade of emergency class, initial PARs and changes in PARs (periodic follow up notifications and briefings when the classification or PARs have not changed are not included). All of the required notifications (state, counties, NRC, etc.) for a given initiator (classification or PAR), taken together, are considered a single notification opportunity. Offsite notifications are timely if initiated within 15 minutes of event classification: Notifications are accurate if they are appropriate to the event as specified by the approved plan and implementing procedures.

Analysis:

PAR Timeliness and Accuracy

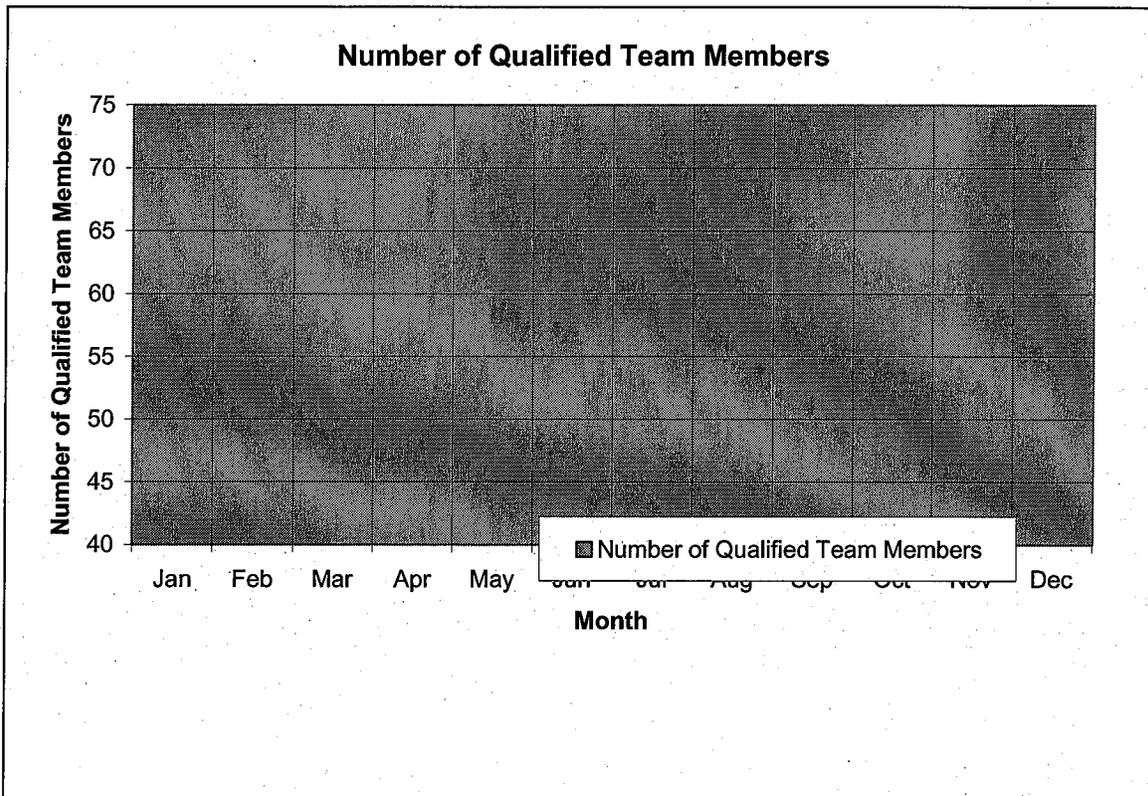


Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
PAR % Timely & Accurate												

Indicator Description:

Measures timeliness and accuracy of PARs. This includes the initial PAR and any PAR change. PARs are timely if developed and notification initiated within 15 minutes of a General Emergency classification, or change in conditions resulting in revised PARs. PARs are accurate when they are appropriate to the event as specified by the approved plan and implementing procedures

Analysis:



Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Number of Qualified Team Members												

Indicator Description:

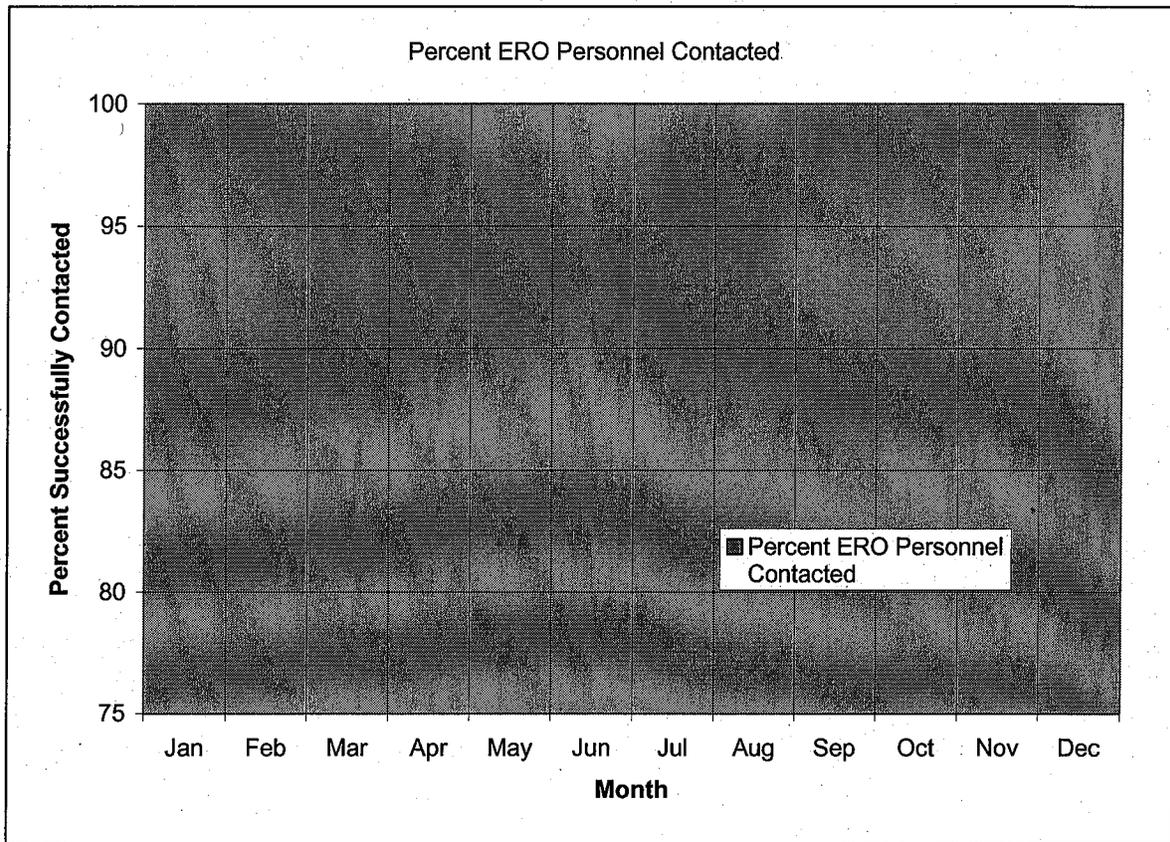
This indicator is the percent of the minimum number of ERO on call team members that are assigned and qualified for their positions as of the end of the month. The current minimum is 3 teams with 21 positions each.

Green=All minimum staffing ERO positions are filled 3 deep for the month

White=Any minimum staffing ERO position is filled at 2 deep for the month

Yello=Any minimum staffing ERO position is filled at < 2 deep for the month

Analysis:



Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
% Successfully Contacted												

Indicator Description:

This performance measure shows the percent of Emergency Response Organization members who were contacted for a notification drill on either their beepers or by phone. The notification system consists of a beeper call out and a automated phone call system known as Community Alert Notification (CAN). The systems are used together to insure sufficient numbers of emergency response personnel are notified to respond to an event at Indian Point..

Analysis:

6. Appendices

6.1 Functional Responsibility The Emergency Planning organization mission is to insure that station and local government personnel are properly prepared to respond to a radiological emergency. The focus of that response is to insure that capabilities are in place to protect the health and safety of the public. Accomplishment of this mission requires extensive cooperation and mutual support between Con Edison, Entergy (who has responsibility for Indian Point 3) and local, state and federal officials.

Key responsibilities include:

- ◆ Maintenance of the Emergency Plan and Implementing Procedures
- ◆ Readiness of Emergency Response Facilities and Equipment
- ◆ Staffing, training and readiness of the Emergency Response organization
- ◆ Maintenance and Testing of the Emergency Notification System.
- ◆ Liaison with State and County government to insure the overall readiness of local governments to respond to an emergency at Indian Point.

6.2 Personnel Information

<u>Name</u>	<u>Title</u>	<u>Highest Degree</u>	<u>Professional License</u>	<u>Professional Experience</u>	<u>Con Ed Experience</u>
MANAGEMENT					
BURNS	SR. PLNG ANAL/ENGR	HS	SRO	28	28
BYSTER	SR. PLNG ANAL/ENGR	BS		38	28
FERRARO	SR. ENGINEER	MBA		33	33
INZIRILLO	SECTION MANAGER	MBA	SRO	25	18
WEEKLY					
WASSMAN	ADMINISTRATIVE ASSISTANT	HS			
CONTRACTORS/TEMPORARY					
WALKER	ON-SITE PLANNER				
LEE (50%)	ON-SITE PLANNER				
VAN BETTS	SAMG TRAINER				
HUBER	OFF-SITE PLANNER				
PERGERSON	ON-SITE PLANNER				
HALE	CORRECTIVE ACTION COORD.				
OPEN OR REQUESTED					
1 EP STAFF					

Authorized Positions

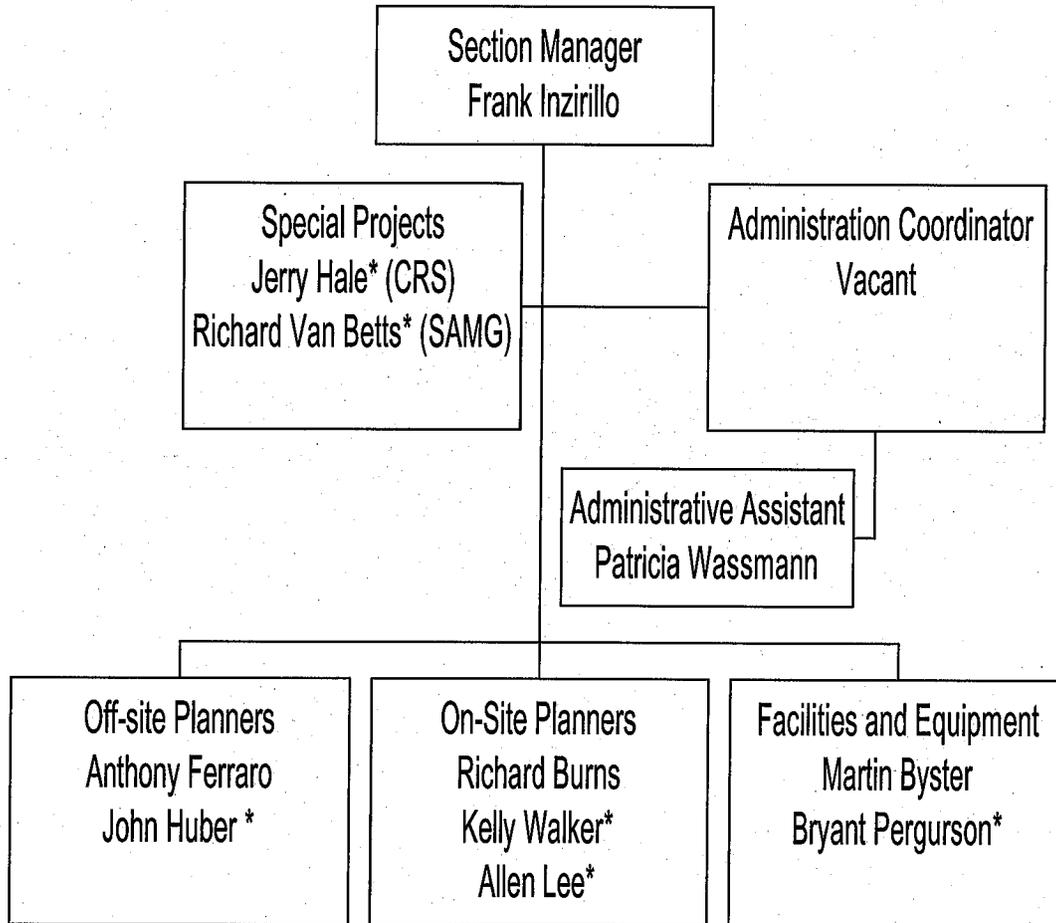
	Management	Weekly	Totals
2000 Budget	4	4	8
Additional Positions	1	0	1
2001 Approved Budget	5	1	6
Change	1	(3)	(2)

Overall reduction in staffing was due to the transfer of three Environmental Technician positions to Radiation Protection. The transfer of personnel to the Radiological Protection organization was part of the Emergency Planning 2000 Business Plan. The activities transferred with the Nuclear Environmental Monitoring technicians are:

- Implementing the technical Specification required Radiological environmental monitoring program
- Maintenance of Offsite sirens
- Maintenance of Reuter Stokes Off-site radiological monitoring instrumentation
- Inventory and maintenance of Emergency Response Facility equipment
- Interface with County Emergency Operations centers for equipment calibration.
- Maintenance of on-site Self-Contained Breathing Apparatus (SCBA's)

6.3 Organization Chart

EMERGENCY PLANNING ORGANIZATION



6.4 Operational Overview

This section covers routine, ongoing functions and activities of the organization.

Item	Project/Program Description	Estimated Con Ed Months	Estimated Outside Support \$'s (000)
	Off Site EP Activities		
6.4.1	Attendance at Industry meetings, benchmarking trips, other site assessments: NEI: FEMA: NRC : Regional meetings: Benchmarking: Drill Participation at other sites:		
6.4.2	FEMA Fees (Covered in Responsibility Code 262, Nuclear Fees, Licenses, etc., Account 01938. \$ in Feb 98, in Jan 99, \$ in Mar 00)		
6.4.3	FEMA Exercise Scenario Preparations: Coordination Meetings: Exercise scenario planning & development: Assessments:		
6.4.4	Four County Coordinator salary. (50% shared with NYPA)		
6.4.5	Fee to State Disaster Preparedness (NYS DPC Chapter 708 Fees, Payment to NYS Division of Military & Naval Affairs), Sept		
6.4.6	Interface and training of State Emergency Management Office Personnel. Preparation and attendance at quarterly New York State Power Pool meetings.		
6.4.7	Westchester County Emergency Preparedness. Includes twice monthly meetings with county personnel, (1 man month) as well as the following: Bus driver training: (50% shared with Unit 3); EOC personnel training: 0.5 man months; Coordination:-		
6.4.8	Westchester county Hospital related training: Hudson Valley Hospital: \$15,000, Phelps Memorial Hospital:, RMC Hospital Training: \$40,000		
6.4.9	Rockland County Emergency Preparedness. Includes twice monthly meetings with county personnel, (1 man month) as well as the following: Bus driver training: (50% shared with Unit 3), EOC personnel training: 0.5 man months, Alternate EOC Communications:, Coordination:.		

Item	Project/Program Description	Estimated Con Ed Months	Estimated Outside Support \$'s (000)
6.4.10	Orange County Emergency Preparedness. Includes twice weekly meetings with county personnel, (1 man month) as well as the following: Bus driver training: (50% shared with Unit 3), EOC personnel training: 0.5 man months, Coordination:.		
6.4.11	Putnam County Emergency Preparedness. Includes twice monthly meetings with county personnel, (1 man month) as well as the following: Bus driver training: (50% shared with Unit 3), EOC personnel training: 0.5 man months, Partial payment for Putnam emergency Director Position (50% shared with Unit 3) (Pd in March), Putnam Pager system., Coordination:.		
6.4.12	4 County costs: Backup notification system: (paid to NYPA), TLD's + Misc NYPA equipment:: (paid to NYPA), Public Notification Mailings		
6.4.13	City of Peekskill emergency Preparedness. Includes monthly meetings with Peekskill personnel (1 man month) as well as the following: City Official Training:, City Worker Training:, Coordination;.		
6.4.14	Joint News Center Procedures, Training & Facility Maintenance (Previous responsibility of Media relations). To include; JNC Facility Rental:, (paid to NYPA), JNC/County Communications: (paid to NYPA), Assessments:, Radiological Advisor:, Training:, Visual Aids.		
6.4.15	Siren, Midas, and Reuter Stokes Met Tower System Costs: Communications:, Semi annual Testing Personnel Costs:, Public Notification Costs:, Midas Maintenance costs:, Met Tower / Met Program:, Maintenance of Mt Beacon repeater:, Reuter Stokes Sensor, Calibrations & Maintenance:, Offsite Field Monitoring Kit Calibrations:, Accu-Weather Service:, Local Government Radio costs (Orange & Putnam):, Allied Map Service:		
6.4.17	Coordination of Off-site projects.		
6.4.18	NYPA AGREEMENTS		
	Grand Total Off Site EP Activities		

Item	Project/Program Description	Estimated Con Ed Months	Estimated Outside Supprt \$'s (000)
	On Site EP Activities		
6.4.19	NYS coordinated Emergency Action Level upgrade project. Reg. Guide 1.101 Shut Down EAL Project, Started in year 2000. Total cost remaining in 2001		
6.4.20	Communications: RECS and other dedicated Phone lines \$30K, Back Charges from NYPA for various county communication systems, Recurring Network Costs:		
6.4.21	Pagers:, Cell Phones:, Community Alert Network:		
6.4.22	Building costs: Electricity, UPS maintenance:, Signage:, Fire Suppression system maintenance:, Other Maint (Bldg costs),		
6.4.23	Conduct of Drills and Exercises: Material and Supplies:, Food:, Printing:		
6.4.24	EDDS / ERDS maintenance costs		
6.4.25	Maintenance of procedures: Materials:, Printing:		
6.4.26	Conduct of Training for ERO staff both initial and continuing qualifications		
6.4.27	Support for NRC licensing and inspection activities, QA audits and to conduct department planned self-assessments.		
6.4.28	Training of Emergency Plan Staff: Harvard Course: (2 individuals), NEI Training Course (2 individuals), Other courses		
6.4.29	Conduct of Training by EP Staff for operations personnel in EP responsibilities and SAMG		
6.4.30	Time spent in management and supervisory functions including planning, delegation and oversight of work. Assume 50% of the Section Managers time.		
6.4.31	Clerical Support		
6.4.32	Vacation: 6 People X 18 D ea X 8 hrs = 864 Hrs 1632 Hrs/ 173.3 hrs/mth = 9.4 Months Holiday: 6 People X 11 D ea X 8 hrs = 528 Hrs Sick and Authorized Leave: 6 People X 5 D ea X 8 hrs = 240 Hrs		
6.4.33	CRS Work		
6.4.34	Emergent Work: Time allocated for work that emerges over the course of the year that must be done to support safe and reliable operation.		
	Grand Total On Site Activities		
		Total Estimated Con Ed Person-Hours	
		Total Estimated Outside Support \$'s (000)	

6.5 2001 Resource Plan

Section	Item	Estimated Con Ed Person- Months	Con Ed Labor Dollars (000)	Estimated Outside Support \$'s (000)	Total Estimated Dollars (000)
6.4	Operational Overview				
4	Project Requests				
6.4 + 4	Total Resources Needed				
	Approved 2001 Budget				

* Difference between needed and budgeted resources will be addressed with overtime hours as required.