

July 01, 2002
5928-02-20138

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

Three Mile Island, Unit 1 (TMI Unit 1)
Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Request for NRC approval of the Proposed Consolidation of Three Mile Island, Unit 1 (TMI Unit 1) Emergency Operations Facility into the common EOF used by Peach Bottom Atomic Power Station (PBAPS) and Limerick Generating Station (LGS)

In accordance with 10 CFR 50.54(q), "Conditions of licenses", AmerGen Energy Company, LLC (AmerGen) requests approval of an exception for the location of the Emergency Operations Facility (EOF) for the Three Mile Island Unit 1, (TMI Unit 1).

This request involves relocation of the existing Emergency Operations Facility (EOF) functions into the common EOF currently used by Peach Bottom Atomic Power Station (PBAPS) and Limerick Generating Station (LGS) in Coatesville, Pennsylvania. This is part of an integrated AmerGen and Exelon Generation Company plan to improve organizational emergency response.

The common EOF in Coatesville has been demonstrated, since its 1992 implementation, to be an effective facility for implementation of the integrated Emergency Plan for multiple stations. Approval of this proposal extends that philosophy to a single emergency response concept at all Exelon Mid-Atlantic Regional Operating Group (MAROG) nuclear stations located within the Commonwealth of Pennsylvania.

Exelon has conducted a public outreach to State Officials, Agencies, County Governments, and Federal Officials by providing tours of the common Coatesville EOF.

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Incorporation of TMI into the common EOF will not adversely affect the ability of the EOF to be staffed within 60 minutes. The proposed EOF in Coatesville will be staffed with personnel primarily from the Exelon Corporate Office in Kennett Square, PA. Personnel with TMI operational knowledge will report to the EOF to support the EOF Operations Advisor position as an augmented support responder. This proposed change will reduce the impact on the TMI station resources and permit a wider selection of resources for the Technical Support Center.

All current TMI Emergency Response functions for communication of information to the public via the news media by designated spokespersons will remain at the Joint Public Information Center (JPIC) currently located in the Harrisburg, PA area upon relocation of the EOF to Coatesville. The Coatesville JPIC would not be relied upon for TMI emergencies.

AmerGen has compared the capabilities of the near-site EOF to the common EOF at Coatesville. This review concluded that the capabilities provided by the common EOF are equivalent to or better than those in the near-site EOF. This proposed consolidation of EOF facilities will improve the overall effectiveness of the TMI Unit 1 emergency response capability by increasing the available station personnel to staff the site Emergency Response Organization. This relocation does not alter the functions of the EOF as described in NUREG-0696 and significantly enhances the coordination activities with the overall emergency response effort.

The NRC approved a similar EOF relocation with the consolidation of the Clinton Power Station Emergency Operations Facility into the Midwest Central Emergency Operations Facility in March of 2002 along with the Midwest Regional Operating Stations of Exelon Generation Company (Exelon). A significant factor in the NRC approval of the central EOF concept is the fact that the state and local emergency responders operate from their own emergency centers and send representatives to the EOF to enhance their overall response. As a result, there is no change in communication arrangements with the state and local governments resulting from relocating EOF. Incorporation of TMI into the common EOF will not adversely impact the capabilities of the EOF staff to work with State, County, and NRC Site Team responders.

AmerGen has evaluated the proposed change against the standards in 10 CFR 50.54(q). Since the proposed location of the common EOF involves an exception to the guidance in NUREG-0696 for location of the EOF to be within the 20 miles of the TSC, we are requesting NRC approval of the proposed change.

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A summary of the proposed change including justification is contained in Attachment A. Verbal agreement from the state and TMI risk counties of the Commonwealth of Pennsylvania has been obtained and letters of concurrence will follow under an additional submittal letter.

This proposed change is a necessary element of and will be implemented concurrently with the Exelon Standard Emergency Plan at TMI. The Exelon Standard Emergency Plan for TMI will be implemented in accordance with 10 CFR 50.54(q). Approval is requested by November 30, 2002 of the common EOF to allow for the timely implementation of the associated Emergency Plan program improvements.

If you have any questions or require further information, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael P. Gallagher". The signature is fluid and cursive, written over a white background.

Michael P. Gallagher
Director, Licensing & Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachment A: TMI Unit 1 Emergency Plan Change Summary

cc: H. J. Miller, USNRC Administrator, Region I (2 copies)
J. D. Orr, USNRC Senior Resident Inspector, TMI
T. G. Colburn, USNRC Senior Project Manager, TMI
File No. 02060

ATTACHMENT A

**THREE MILE ISLAND UNIT 1
EOF RELOCATION JUSTIFICATION**

DESCRIPTION AND IMPACT OF THE PROPOSED CHANGE

This proposed change requests the relocation of the Three Mile Island Unit 1 (TMI) Emergency Operations Facility (EOF) located at 2574 Interstate Drive, Harrisburg, PA. to the Exelon Emergency Operations Facility, which is located at 175 North Caln Road, Coatesville, PA. This facility will serve as the common location for coordinating response activities between on-site and off-site groups, for coordinating radiological and environmental assessment and dose projection calculations in order to make protective action recommendations to the Commonwealth of Pennsylvania, and for interface with the State and Federal agencies.

The current EOF in Harrisburg is located approximately 12 (straight line) miles from the TSC. The proposed common EOF in Coatesville is approximately 50 miles from the TSC. The Coatesville EOF will be staffed with an experienced organization, from the Exelon Corporate Office located in Kennett Square, PA, approximately 11 miles from Coatesville, and will be able to respond within the 60 minutes time requirement. This EOF staff will be sufficiently trained to assume Command and Control functions of the EOF for TMI emergencies. The facility will receive the same type of TMI specific data that the present EOF receives. The common EOF staff will be augmented to include TMI operational expertise.

Exelon has conducted a public outreach to State Officials, Agencies, County Government, and Federal Officials and discussed the proposal for relocation of the TMI EOF to a common facility in Coatesville, PA. Various tours of the Coatesville facility have also been offered to state and local governmental officials. Verbal agreement (public acceptance) from the state and counties of the Commonwealth of Pennsylvania has been obtained and letters of concurrence will follow under an additional submittal letter.

The location, size and layout of the new facility will continue to meet the staffing and equipment requirements of the Emergency Plan. Periodic ERO augmentation drills will be used to verify staff response capabilities. The Coatesville facility represents a larger facility and provides enough working space to accommodate the proposed new staffing level including the state and NRC personnel. This relocation of the facility is an enhancement to response capabilities.

The proposed change does not impact or alter arrangements for requesting and effectively using support resources to accommodate State and local staff or other organizations capable of augmenting the planned response.

JUSTIFICATION OF THE PROPOSED CHANGE

Since the proposed change represents a new location for the EOF, the adequacy of the facility was evaluated against the criteria in NUREG-0696, "Functional Criteria for Emergency Response Facilities," Section 4 entitled "Emergency Operations Facility" using the methodology in NUREG-0814, "Methodology for Evaluation of Emergency Response Facilities."

FUNCTIONS

The proposed TMI EOF relocation does not alter the basic functions of the EOF as described in Section 4.1 of NUREG-0696. The facilities, equipment and staffing of the Coatesville facility are adequate to ensure the continued effective and timely performance of the following functions:

- Management of overall licensee emergency response,
- Coordination of radiological and environmental assessment,
- Determination of recommended public protective actions, and
- Coordination of emergency response activities with Federal, State and local agencies.

The common EOF in Coatesville has been demonstrated, since its 1992 implementation, to be an effective facility for implementation of the integrated Emergency Plan for Peach Bottom Atomic Power Station (PBAPS) and Limerick Generating Station (LGS). The common EOF, when activated, will be staffed with emergency personnel designated by the emergency plan as well as liaisons from Federal and State entities.

Senior company officials will manage activities in the common EOF and will be augmented, as needed, with station specific Pressurized Water Reactor (PWR) operating knowledge in a support role for the Operations Advisor position along with an experienced organization of Exelon Corporate Office personnel. TMI plant data acquisition and display will be provided for the evaluation of all radiological, meteorological, and plant system data needed to determine off-site protective action recommendations and off-site dose projections. The common EOF will be used as the post-accident recovery management center for all three nuclear stations. The EOF will evaluate the off-site effects and make protective action recommendations for the public to State response agencies.

All current TMI Emergency Response functions for communication of information to the public via the news media by designated spokespersons will remain at the Joint Public Information Center currently located in the Harrisburg, PA area upon relocation of the EOF to Coatesville.

The Coatesville common EOF meets the provisions for normal industrial security to ensure activation readiness for an emergency by the exclusion of unauthorized persons. After the Coatesville Common EOF is activated, security protection is upgraded to restrict access to those personnel assigned to this facility or authorized for entry.

Therefore, the function of the proposed Consolidated Common EOF provides for the same or improved support to plant operations personnel and communication capability during emergency conditions as the existing TMI EOF and meets the guidance of NUREG-0696.

LOCATION, STRUCTURE, AND HABITABILITY

The common EOF at Coatesville has been previously evaluated under the relocation of LGS and PBAPS EOFs against the criteria in NUREG-0696, "Functional Criteria for Emergency Response Facilities," Section 4 entitled "Emergency Operations Facility" and has been approved by the NRC. TMI is approximately the same distance as PBAPS from the common EOF.

The location, size and layout of the common EOF will continue to meet the staffing and equipment requirements of the Emergency Plan to carry out overall strategic direction for on-site and support operations, determination of public protective actions to be recommended to off-site officials, and coordination with Federal, State, and local organizations. Periodic ERO augmentation drills will be used to verify staff response capabilities. The Coatesville facility represents a larger facility that is better able to support the larger staff addressed in the proposed revised plan. It has a better accommodation for off-site agencies, and it has a more sophisticated communication system. This relocation of the facility is an enhancement to response capabilities.

STAFFING AND TRAINING

The EOF staff for the common Exelon emergency plan will be trained in the emergency response for TMI. This training is similar to LGS and PBAPS training. Key decision makers will attend TMI training as required based on their prior experience and training. Therefore, proper response to a TMI emergency will be within the capabilities of the EOF staff. Transferring EOF functions to the common EOF will allow TMI to better focus station resources on site accident management.

The common EOF is staffed to provide the overall management of resources and the continuous evaluation and coordination of activities during and after an accident, which meets the guidance of NUREG-0696. Upon EOF mobilization to achieve minimum staffing, under the Standard Exelon Plan, to perform required assigned major tasks, designated personnel shall report directly to the common EOF to achieve functional operation within 1 hour. Personnel with TMI operational expertise will report to the EOF to support the EOF Operations Advisor position as an augmented support responder. The common EOF staff includes personnel needed to manage the on-site and off-site radiological monitoring, to perform radiological evaluations, and to interface with off-site officials for all emergency classes currently described in the TMI Emergency Plan. Operating procedures, staff training in the use of data systems and instrumentation is part of continuous training and activation drills to maintain proficiency in accordance with the Emergency Plan.

Enhanced performance training will be conducted prior to implementation of the common EOF.

SIZE

The common EOF size has been evaluated against Exelon Standard Emergency Plan EOF staff positions. The designated work areas meet the guidance of NUREG-0696 for 75 ft² per person for the planned TMI common EOF staffing.

Therefore, the current common EOF size provides for the same or improved capability when compared to the existing TMI configuration and meets the guidance of NUREG-0696.

RADIOLOGICAL MONITORING

The common EOF at Coatesville is beyond the 10-mile distance from the station as discussed in Table 2 of NUREG-0696 and therefore, does not require radiological monitoring equipment as previously approved.

COMMUNICATIONS

The Emergency communications systems at the common EOF are designed to ensure the reliable, timely flow of information between all parties having an emergency response role. The use of a dedicated phone switch, backup radio links, and commercial telephone lines results in flexible communications plans capable of responding to local and wide-area service outages. On-site and off-site communication capability is either maintained or improved as a result of the relocation to the common EOF. The single facility results in commonality in communications and interface with off-site officials and representatives. EP PBX lines have been installed in the proposed common EOF via independent T-1 lines. The Nuclear Accident Reporting System (NARS) continues to be the primary means of communicating changes in event classification and PARs to State and risk county authorities. These voice communications circuits meet the following primary functions as outlined in Section 4.6 of NUREG-0696:

- EOF Management communications with the designated senior license manager in charge of the TSC,
- Communications to manage licensee emergency response resources,
- Communications to coordinate radiological monitoring,
- Communications to coordinate off-site emergency response activities, and
- Communications to disseminate information and recommended protective actions to responsible government agencies.

Existing commercial telephone service via trunked lines to the local telephone central office and designated Company tie lines from the Coatesville facility will serve as the designated backup means of communication in the event of a NARS Line or EP PBX loss. Therefore, reliable primary and backup means of voice communications from and to the Coatesville EOF are available.

Dedicated channels on the redundant T-1 lines to the TMI radio bay station in the TSC Radiological Assessment Room will allow access from the existing Coatesville multi-channel, fixed base radio system. At the TSC bay station, the T-1 lines will tie into the Station Radio System, thus allowing the use of the existing Environmental and Radiological Frequency for communications with field survey teams. The fixed base radio repeaters, antenna system and radio consoles for the Coatesville EOF are powered from a variety of emergency AC sources (diesel backup and alternate battery supplies). In the event of a failure of the Coatesville radio system or the T-1 lines to the site, the TMI Radio System can be accessed via a private dial-in number using a commercial phone.

Access to telephone lines is provided to the respective Federal and State Representatives in the respective office areas. This includes access to the NRC Emergency Notification System (ENS) and Health Physics Network (HPN) circuits from the designated NRC Office and respective EOF ENS and HPN Communicator workstations.

Fax machines are available in the EOF to support the hard copy transmission of information between facilities and with the NRC and local authorities. The existing fax machines have repeatedly been tested during drills/exercises under the common Emergency plan for LGS & PBAPS.

Therefore, the current common EOF communications capability provides for the same or improved communications capability when compared to the existing TMI configuration and meets the guidance of NUREG-0696.

INSTRUMENTATION, DATA SYSTEM EQUIPMENT, AND POWER SUPPLIES / TECHNICAL DATA AND DATA SYSTEM

Primary and alternate routes have been developed for the transmission of Plant Process Computer (PPC) data from the TMI station to the Coatesville facility. The primary method is provided to the Coatesville facility via a PPC-LAN Ethernet connection. A redundant link involves the transmission of PPC data via the Company LAN to a Token Ring LAN at the PECO Main Office Building in Philadelphia, PA. PPC data is then accessed by the Coatesville facility via LAN connection to this token ring. Meteorological data is available on the PPC for use in dose assessment models.

A subset of designated EP data from the PPC can be displayed on projection screens in the Main Room and allows for the trending of designated parameters.

In addition to the PPC subset of designated backup EP data screens, Static Displays, (Facility Status Boards) are provided in the event the computer data display is unavailable.

One or more PCs in the Dose Assessment Area are capable of running the dose projection computer program and accessing the PPC subset of designated EP data screens required to perform a dose projection.

Although the power supplies do not and need not meet safety grade or Class 1E criteria, they include commercial electrical power, a battery backup, and a backup diesel generator.

The common EOF in Coatesville has the equipment and data capability to monitor three sites at one time for simultaneous emergencies.

Therefore, the instrumentation, data system equipment, technical data, data system, and power sources provide a highly reliable and diverse capability and meet the guidance of NUREG-0696.

RECORDS AVAILABILITY AND MANAGEMENT

The proposed common EOF will have an up-to-date repository of plant selected records and procedures at the disposal of EOF personnel to aid in their technical analysis and evaluation of emergency conditions. The records will be controlled to ensure they are current and complete. Hardcopies of key reference materials will be maintained for use within the common EOF.

In addition, station design documentation, plant drawings, UFSAR, procedures, etc. are available via Local Area Network connections from the Electronic Document Management System (EDMS).

Therefore, the records availability and management meets the guidance of NUREG-0696.

CONCLUSION

The proposed common EOF in Coatesville has been demonstrated, since its 1992 implementation, to be an effective facility for implementation of the integrated Emergency Plan for multiple stations and meets the guidance specified in NUREG-0696 for an acceptable EOF except for the location criteria. Approval of this proposed relocation of the TMI EOF extends the philosophy of a single emergency response concept at all Exelon MAROG nuclear stations located within the Commonwealth of Pennsylvania. This single philosophy will allow the State, regulatory and utility emergency responders to function in consistent roles when responding to a Limerick, Peach Bottom or TMI station emergency, which is advantageous to the overall response effort.

The Commonwealth of Pennsylvania have provided verbal concurrence of this proposed change. The TMI risk counties have indicated concurrence or no objection to our desire to move the TMI EOF to Coatesville assuming NRC approval. The current schedule anticipates relocating the TMI EOF in December 2002.

The incorporation of the TMI EOF into the proposed common EOF is a prerequisite to implementation of the Exelon Standard Emergency Plan and will result in an overall improvement to organizational emergency response.

The NRC approved a similar EOF relocation with the consolidation of the Clinton Power Station Emergency Operations Facility into the Midwest Central Emergency Operations Facility in March of 2002 along with the Midwest Regional Operating Stations of Exelon Generation Company (Exelon) and is referenced here to provide precedence.

SUMMARY OF EXELON COMMITMENTS

The following table identifies commitments made in this document by Exelon. (Any other actions discussed in the submittal represent intended or planned actions by Exelon. They are described to the NRC for the NRC's information and are not regulatory commitments.)

| COMMITMENT | COMMITTED DATE OR "OUTAGE" |
|---|--|
| A person knowledgeable of TMI operations will report to the EOF to support the EOF Operations Advisor position as an augmented support responder. | Upon Implementation of relocation of the EOF |