

December 24, 2002

Mr. John L. Skolds  
Chief Operating Officer  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION UNITS 2 & 3 NRC-EVALUATED  
EMERGENCY PREPAREDNESS EXERCISE INSPECTION REPORT  
50-277/02-008, 50-278/02-008

Dear Mr. Skolds:

The enclosed report documents an inspection at the Peach Bottom Atomic Power Station, Units 2 & 3, which evaluated the performance of your emergency response organization during the November 19, 2002, full-participation exercise and the post-exercise critique as specified in the reactor oversight program. The inspectors discussed the findings of this inspection with Mr. R. G. West and other members of your staff on November 21, 2002.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/ADAMS.html> (the Public Electronic Reading Room).

Should you have any questions regarding this report, please contact Mr. Richard J. Conte at (610) 337-5183.

Sincerely,

*/RA/*

Richard J. Conte, Chief  
Operational Safety Branch  
Division of Reactor Safety

Docket Nos. 50-277; 50-278  
License Nos.: DPR-44, DPR-56

Enclosures: Inspection Report No. 50-287/02-011, 50-288/02-011  
Attachment 1: Supplemental Information

cc w/encl:

Senior Vice President, Mid-Atlantic Regional Operating Group  
Chief, Operating Officer, Exelon Generation Company, LLC  
Senior Vice President, Operations Support  
Vice President, Mid-Atlantic Operations Support  
Senior Vice President, Nuclear Services  
Site Vice President, Peach Bottom Atomic Power Station  
Plant Manager, Peach Bottom Atomic Power Station  
Vice President - Licensing  
Director, Licensing, Mid-Atlantic Regional Operating Group  
Director, Nuclear Oversight  
Regulatory Assurance Manager - Exelon Generation Company, LLC  
Vice President and General Counsel  
D. Quinlan, Manager, Financial Control, PSEG  
R. McLean, Power Plant Siting, Nuclear Evaluations  
D. Levin, Acting Secretary of Harford County Council  
R. Ochs, Maryland Safe Energy Coalition  
Mr. & Mrs. Dennis Hiebert, Peach Bottom Alliance  
Mr. & Mrs. Kip Adams  
D. Allard, Director, Pennsylvania Bureau of Radiation Protection  
R. Janati, Chief, Division of Nuclear Safety, Pennsylvania Bureau of  
Radiation Protection  
Correspondence Control Desk  
Commonwealth of Pennsylvania  
State of Maryland  
TMI - Alert (TMIA)  
Board of Supervisors, Peach Bottom Township  
R. Fletcher, Department of Environment, Radiological Health Program  
J. Johnsrud, National Energy Committee, Sierra Club  
Public Service Commission of Maryland, Engineering Division  
Manager, Licensing - Limerick and Peach Bottom  
Manager, License Renewal  
P. Cote, Acting Regional Director, FEMA Region III

Mr. John L. Skolds

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U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket Nos: 50-277, 50-278

License Nos: DPR-44, DPR-56

Report Nos: 50-277/02-008, 50-278/02-008

Licensee: Exelon Generation Company, LLC  
Correspondence Control Desk  
200 Exelon Way, KSA 1-N-1  
Kennett Square, PA 19348

Facilities: Peach Bottom Atomic Power Station Units 2 & 3

Location: 1848 Lay Road  
Delta, Pennsylvania

Dates: November 19-21, 2002

Inspectors: N. McNamara, Sr. Emergency Preparedness Inspector  
T. Fish, Sr. Operations Engineer  
M. Buckley, Resident Inspector, Susquehanna  
J. Noggle, Sr. Health Physicist

Approved by: Richard J. Conte, Chief  
Operational Safety Branch  
Division of Reactor Safety

## SUMMARY OF FINDINGS

IR 05000277/02-008, IR 05000278/02-008; on 11/19-21/2002; Peach Bottom Atomic Power Station; Units 2&3; Emergency Preparedness Exercise Report.

This team inspection was conducted by regional based inspectors and a resident inspector. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

### **A. Inspector Identified Findings**

#### **Cornerstone: Emergency Preparedness**

No findings of significance were identified

### **B. Licensee Identified Findings**

None

## Report Details

### 1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

#### 1EP1 Exercise Evaluation

##### A. Inspection Scope

An in-office review was conducted of Exelon's exercise objectives submitted to the NRC on August 20, 2002 and the exercise scenario submitted on September 29, 2002 to determine if the Peach Bottom exercise would test major elements of Exelon's Emergency Plan as required by 10 CFR 50.47(b)(14).

The onsite inspection consisted of the following review and assessment:

- The adequacy of Exelon's performance on the biennial full-participation exercise performance by primarily focusing on the implementation of the risk-significant planning standards (RSPS) in 10 CFR 50.47 (b) (4), (5), (9) & (10) which are emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of Exelon's emergency response facilities and its implementation of NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the simulator, technical support center (TSC), the operations support center (OSC) and the emergency operations facility (EOF).
- Other performance areas besides the RSPS, such as, the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the Emergency Plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Exelon drill reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10CFR50.47(b)(14).
- The post-exercise critique to evaluate the Exelon's self-assessment of its ERO performance during the exercise and to ensure compliance with 10CFR50 Appendix E.IV.F.2.g.

The inspectors reviewed various documentation which are listed in Attachment 1 to this report.

b. Findings

No findings of significance were identified in this area.

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

The inspectors conducted an in-office review of Exelon submitted changes for the Emergency Plan-related documents received from March 2002 to September 2002 to determine if the changes decreased the effectiveness of the Plan. A thorough review was conducted of documents related to the RSPS whereas a cursory review was conducted for non-RSPS documents. In October, 2002 Exelon submitted to the NRC a Standardized Emergency Plan and an annex to the Plan specific to Peach Bottom. A review of these documents are ongoing and the NRC's assessment of the changes will be documented in a subsequent inspection report.

b. Findings

No findings of significance were identified in this area.

**4. OTHER ACTIVITIES**

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors reviewed Exelon's procedure for developing the data for the EP PIs which are: (1) Drill and Exercise Performance (DEP), (2) ERO Drill Participation and (3) ANS Reliability. The inspectors also reviewed the Exelon's drill/exercise reports, training records and ANS testing data for 2002 to verify the accuracy of the reported data. The review was conducted in accordance with NRC Inspection Procedure 71151. The acceptance criteria are 10 CFR 50.9 and NEI 99-02, Revision 2, "Regulation Assessment Performance Indicator Guideline".

b. Findings

No findings of significance were identified in this area.

4OA2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed Exelon's critique findings documented in 2001 and 2002 drill and exercise reports to determine if significant performance trends exist and to determine the effectiveness of licensee corrective actions based upon ERO performance during the exercise. The inspectors verified that issues identified during this exercise were entered into Exelon's corrective action program and reviewed

condition reports related to significant findings from past drill/exercise reports to assess the adequacy of the corrective actions.

b. Findings

No findings of significance were identified.

40A6 Meetings, including Exit

The inspectors presented the inspection results to Mr. R. G. West and other members of the Exelon's staff at the conclusion of the inspection on November 21, 2002.



ATTACHMENT 1  
SUPPLEMENTAL INFORMATION  
KEY POINTS OF CONTACT

Peach Bottom Atomic Power Station, Units 2 & 3

G. Johnston, Plant Manager  
D. Tailleart, MAROG Emergency Preparedness Manager  
A. Coppa, PB EP Manager  
S. Mannix, MAROG Emergency Preparedness

NRC

M. Shanbaky, Branch Chief, Region I  
S. Iyer, Reactor Engineer, Region I

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Discussed

None

LIST OF ACRONYMS

ANS	Alert and Notification System
DEP	Drill and Exercise Performance
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
OSC	Operations Support Center
PI	Performance Indicator
RSPS	Risk Significant Planning Standard
SDP	Significant Determination Process
TSC	Technical Support Center

## LIST OF DOCUMENTS REVIEWED

Exelon Nuclear Standardized Radiological Emergency Plan  
Exelon Radiological Emergency Plan Annex for Peach Bottom Atomic Power Station  
Emergency Procedure No. EP-AA-111, Emergency Classification and PARs  
Emergency Procedure No. EP-AA-112, ERO/ERF Activation and Operation  
Emergency Procedure No. EP-AA-114, Notifications  
Emergency Procedure No. EP-AA-113, Personnel Protective Actions  
Emergency Procedure No. EP-AA-112-200, TSC Activation and Operation  
Emergency Procedure No. EP-AA-112-100, Control Room Operations  
Emergency Procedure No. EP-AA-112, ERO/Emergency Response Facility Activation  
Emergency Procedure No. EP-MA-110-200, Dose Assessment  
Emergency Procedure No. EP-AA-112-402, EOF Command and Control  
Training Drill Findings and Observation Report, Dated January 2, 2002  
PB October 18, 2002 Pre-Exercise Preliminary Evaluation Report, dated October 23, 2002  
PB August 22, 2002 Standard Plan Drill Report, September 20, 2002  
PB August 29, 2002 DEP Drill Evaluation Report  
PB August 16, 2002 DEP Drill Evaluation Report  
Training Drill Findings and Observation Report, dated March 18, 2002  
PB Emergency Preparedness Training Drill, dated July 26, 2001  
PB Emergency Preparedness Training Drill, dated June 25, 2001  
PB Emergency Preparedness Training Drill, dated April 26, 2001  
PB Emergency Preparedness Training Drill, dated January 24, 2001