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10 CFR 50.54(q)
10 CFR 50, Appendix E

RS-03-061

March 24, 2003

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

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPR-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-234 and 50-265

Subject: Revision to the Exelon Nuclear Standardized Radiological Emergency Plan and Emergency Plan Procedure

In accordance with 10 CFR 50.54(q), "Conditions of licenses," Exelon Generation Company (Exelon), LLC, has revised the Exelon Nuclear Standardized Radiological Emergency Plan. In addition, in accordance with 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," Exelon is submitting the Emergency Plan Procedures pursuant to Section V, "Implementing Procedures." These changes were implemented on February 20, 2003, and are being submitted within 30 days as required by regulation. The main purpose of the revision is to incorporate Three Mile Island Nuclear Station into the Exelon Nuclear Standardized Radiological Emergency Preparedness Program.

Attachment A, "Summary of Changes," contains a summary of the changes to the Exelon Nuclear Standardized Radiological Emergency Preparedness Program. Attachment B, "Revised Emergency Plan," contains the revised Exelon Nuclear Standardized Radiological Emergency Plan. Attachment C, "Change Summary," contains a brief summary of the changes to the Emergency Plan procedures. Attachment D, "Revised Procedures, contains the procedures

Should you have any questions concerning this letter, please contact Ms. Marcia Lesniak at (630) 657-2814.

Respectfully,

Keith R. Jury

Keith R. Jury
Director – Licensing
Exelon Generation Company, LLC
AmerGen Energy Company, LLC

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station
NRC Senior Resident Inspector – Clinton Power Station
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – LaSalle County Station
NRC Senior Resident Inspector – Quad Cities Nuclear Station

Attachment A – Summary of Changes
Attachment B – Revised Emergency Plan
Attachment C – Change Summary
Attachment D – Revised Procedures

ATTACHMENT A

SUMMARY OF CHANGES

SUMMARY OF SIGNIFICANT PROCEDURE CHANGES

EP-AA-110, "Assessment of Emergencies" (Revision 4)

- Administrative changes only to reference addition of attachments made to EP-MA-110-100 for the Mid-Atlantic ROG

EP-AA-110-302, "Core Damage Assessment (PWR)" (Revision 1)

- (Heading) Reference added to the existing TMI Technical Support Center (TSC) Calculational Guide – Section 6.0, "Core Damage Assessment", for use in lieu of methodology listed in procedure.

EP-AA-111, "Emergency Classifications and Protective Action Recommendations" (Revision 5)

- (Section 4.1.1.1) Deleted table listing specific plant modes for BWRs & PWRs, since TMI listing varies from MWROG PWRs. The following phrase inserted, "...abnormal condition ***(Operating Modes are identified in respective EALs)***".
- (Attachment 1, Termination / Recovery Checklist) Under Step 2, revised to state, "...required notifications for entry into the Recovery Phase have been prepared ***per EP-AA-114 (NRC) and EP-MW(MA)-114-100***".
- (Attachment 7, Clinton Plant-Based PAR Flowchart) Revised to reword action to state, "***EVACUATE Subarea 1***" vs. "Evacuate 2 Mile Radius & 5 Miles Downwind".
- (Attachment 9) Inserted PAR flowchart for TMI Station.

EP-AA-112, "Emergency Response Organization (ERO) / Emergency Response Facility (ERF) Activation and Operation" (Revision 7)

- (Section 4.2.5.1) The following changes were incorporated:
  - Minor wording changes: "...complete a ***separate*** EP-AA-112-200, Attachment 2, OSC Team Request Form ***for each task...***"
  - MAROG specific step inserted, "***The upper portion of the OSC Team Briefing Form (EP-AA-112-300, Attachment 5), or equivalent method, may be completed in lieu of the OSC Team Request Form***".
- (Section 4.3.5) Revised to state, "**If** the EOF is, or becomes uninhabitable, the Corporate Emergency Director will transfer ***Command and Control*** responsibility back to the TSC. Available Exelon facilities or a TSC at an unaffected station should be considered as an alternate location ***for EOF personnel***".
- (Section 4.6) Specific section added referencing fitness for duty (FFD) forms contained as Attachments 3 and 4.
- (Attachment 1, Command & Control Turnover Briefing Checklist)
  - (Page 1 of 3) Footnote box at bottom of form revised to state, "Use of Pages 2 ***and 3*** of this form (Key System Status) is optional and intended to be used as a user aid ***primarily*** for Mid-Atlantic ROG stations".
  - (Page 2 of 2) PWR systems / component section revised to create separate rows for "Westinghouse PWRs" and "TMI".
- (Attachment 2, Shift Turnover) Guidelines revised to state:
  - (#5) "OBTAIN a copy of your shift schedule from the TSC Logistics Coordinator / EOF Administrative Coordinator ***/ JPIC Administrative Coordinator***" to address JPIC staffing.
  - (#6) From TSC Security Coordinator to "**VERIFY** arrangements for access when returning on the next shift with the ***TSC Logistics Coordinator / EOF Administrative Coordinator / JPIC Administrative Coordinator***" to address multiple facilities.

- (Attachment 5, Dose Assessment Turnover Sheet) Under Dose Assessment Turnover Sheet, "Coolant" option added for TMI under Source Term (Reactor Core Accident) Type.
- (Attachment 6, Pre-Scripted PA System Announcements for Event Classification) Under Pre-Scripted PA System Announcements for Event Classification":
  - Separate headers created (A or B) for "ERO Notification Only" and "Optional Facility Staffing" announcements at an Unusual Event.
  - Spelled out acronym "ERO"
  - Changes "Non-ERO" to "Other personnel".
- (Attachment 8) Field Monitoring Team Turnover Checklist relocated from EP-AA-112-500 as a multi-facility form, similar to the existing Dose Assessment Turnover Form (Attachment 5).

EP-AA-112-100, "Control Room Operations" (Revision 5)

- (Section 3.4) Revised to state, "The Damage Control Communicator relays tasks and status of NLO activities ***between the TSC, OSC and Control Room and monitors the status and priority of OSC team activities***".
- (Section 3.5) Revised to state, "The Shift Communicator***(s) are*** designated member of the on-shift staffing, who ***are*** responsible for performing notifications to ***the NRC,*** State and local government agencies".
- (Attachment 1, Shift Emergency Director Checklist) Changes include:
  - (Header) Footnote revised to state, "* Precautionary staffing ***is required*** for a credible security threat (HU1)".
  - (Header) Inserted footnote stating, "***Symbol "→" indicates that action is not required if performed during previous lower event classification***".
  - (Step 1.7) Clinton applicability box inserted stating, "***DISPATCH Security to activate ERDS***".
  - (Step 1.8) Step inserted to "***FAX notification forms to State/Locals and NRC to the TSC and EOF when notifications are completed***". Action is identified in TSC and EOF checklists, but was not specified under CR actions.
  - (Step 1.9.1) Step inserted to "***DIRECT the use of designated accountability card readers by Control Room / on-shift personnel, as applicable***". Addition addresses required CR action inferred under EP-MW(MA)-113-100.
  - (Step 3.4) Deleted Nuclear Duty Officer (NDO) action to support notifications for hazardous substance and/or oil discharges at a station.
  - (Step 3.5.1) Revised to state, "...REQUEST via the ***TSC Operations Manager*** that an OSC team be dispatched" versus the Operations Communicator.
  - (Step 3.5.2) Revised to state, "DIRECT NLO actions through the ***OSC Operations Group Lead...***" versus Field/Floor Supervisor.
  - (Step 3.6) Revised to state, "Operational Status Line (between the CR, TSC and EOF) – ***U***sed to ***communicate*** changes in plant/system/equipment status, ***and monitor ...***"
  - (Step 3.6) Revised to state, "Damage Control Line (between the CR, TSC and OSC) – ***U***sed to ***relay the status of NLO activities outside the Control Room to the TSC and OSC,*** and ***to*** monitor status of OSC team activities".
  - (Step 3.9) Inserted action, "***IF recovery of a system is immediately needed to protect the health and safety of the public, and no action consistent with licensee conditions and technical specifications that can provide adequate or equivalent protection is immediately apparent, then INVOKE 10 CFR 50.54(x)***".

- (Attachment 2, ERO Augmentation) Changes include:
  - Revised attachment to create separate tables outlining existing actions for each ROG: Table 2-1 (MWROG) & Table 2-2 (MAROG).
  - Deleted reference to COMM (Communications) Test.
  - (Tables 2-1 & 2-2) Table layout revised under Alternate Pager Notification Method.
  - (Table 2-2) Inserted references to scenario numbers for TMI Station.
- (Attachment 3, Shift Dose Assessor) Changes include:
  - (Step 1.1) Reference added for TMI to shift Dose Assessor location(s).
  - (Step 1.8) Revised to state, "After each dose projection ***run***, ***TRANSMIT (fax)*** a copy of DAPAR Dose Assessment, PAR and ***designated*** STATE Reports to ... (EOC), ***using the numbers listed in the ERF Telephone Directory***".
  - (Step 2.2) Revised to state, "IF the ***potential exists or a radiological release is currently underway, AND*** the TSC is not yet activated, then PERFORM the following ***to mobilize field monitoring teams***".
- (Attachment 4, Operations Communicator Checklist) Changes include:
  - (Step 1) Revised to address stations where TSC outside the Protected Area: "***IF communicator facility assignments are designated based on ERO duty roster, then REPORT directly to your designated facility and NOTIFY the TSC Director of your arrival. PROCEED directly to Section 2***".
- (Attachment 5, Damage Control Communicator Checklist) Changes include:
  - (Step 1) Revised to address stations where TSC outside the Protected Area: "***IF communicator facility assignments are designated based on ERO duty roster, then REPORT directly to your designated facility and NOTIFY the TSC Director of your arrival. PROCEED directly to Section 2***".
  - (Step 3.2) The following changes made under "COMMUNICATE the following information to the TSC and OSC as changes occur:"
    - (2nd bullet) Revised to state, "Dispatch and return of ***NLO's*** dispatched from the Control Room".
    - (NOTE) Revised to state, "Requests for the dispatching of an OSC Team (other than NLO's) should be communicated by the Shift Manager directly to the TSC Operations Manager", which deleted reference to the Operations Communicator.
- (Attachment 6, Shift Communicator Checklist) Changes include:
  - (Step 1.1) Revised to state, "...***designated on-shift communicator(s) shall*** REPORT immediately to the affected Control Room, ***if not already present***".
  - (Step 2.2) Relocated the following action from ON-GOING to INITIAL ACTION: "***If instructed by the Shift Manager, then INITIATE an ERO augmentation (call out) using the guidance listed in EP-AA-112-100, Attachment 2***".
  - (Step 2) Delete action to assist in completion of PA/MD Notification Form.
  - (Step 3.1) Inserted NOTE stating, "***The Shift Communicator is responsible for reviewing form, prior to transmittal, to ensure that all blocks are completed and that the form has been approved by the Station Emergency Director***".
  - (Step 3.1.1) Action inserted stating, "***FAX completed copy of both pages of form to the TSC and EOF when notification is completed***".
  - (Step 3.2) Revised to state, "ASSIST Control Room staff in ***performing event*** notification to the NRC". Also, a separate sub-action created for maintaining ENS line.

EP-AA-112-200, "Technical Support Center (TSC) Activation and Operation" (Revision 4)

- (Attachment 1, OSC Emergency Team Dispatch Guidance) Changes include:
  - (Step 1) Existing guidance, entitled "Forming Emergency Teams Following a Request from the TSC", was reorganized under Steps 1 and 2 to improve order and flow.
  - (Step 1) Description of briefing levels and task priorities deleted to eliminate redundancy with descriptions already on OSC Team Request Form. [Refer to Attachment 2.]
  - (Step 1.3) Revised to state, "The Maintenance Manager, in coordination with the Operations Manager, shall assign ***a task priority*** to the request ***per the guidelines listed on OSC Team Request Form***".
  - (Step 1.4) Inserted action for Maintenance Manager to "***...DETERMINE the appropriate briefing level: URGENT (Minimum) or FULL, per the guidelines listed on OSC Team Request Form, and FORWARD request to the OSC via the Damage Control Communicator***".
- (Attachment 2, OSC Team Request Form) Changes include:
  - Establishes separate actions for determining task priority (reflecting MW & MAROG practices) and task briefing level (using existing guidelines).
  - Revised to address updating status board "***as applicable***".
- (Attachment 3, TSC Evacuation Guidelines) Changes include:
  - TSC Evacuation Guidelines revised to reflect locations for alternate TSC at TMI and Clinton Stations as designated in their respective Station Annexes.

EP-AA-112-201, "TSC Command and Control" (Revision 1)

- (Attachment 1, Station Emergency Director Checklist)
  - (Heading) NOTE in Station ED Checklist revised to clarify use of symbol: "***...Symbol "→" indicates that action is not required if performed during previous lower event classification***".
  - (Step 1.5.1) Under 10th bullet, revised to reflect SAMG Evaluator staffing at Clinton: "SAMG Evaluator (MWROG, ***except Clinton w/ 2***)".
  - (Step 1.5.3) Revised to provide the following clarification: "...to perform the following ***TSC Director tasks; otherwise PROCEED to Step 1.6***".
  - (Step 3.4) Inserted definitions for symbols "O" & "→" under header.
  - (Step 3.5.2) Revised to address implementation of evacuation after assembly as a Mid-West ROG specific action, since evacuation is performed concurrent with accountability in MAROG.
  - (Step 4.3) NOTE revised under Severe Accident Management Guidelines to state, "...The 2nd team member will consist of a designated SAMG Evaluator".

EP-AA-112-202, "TSC Facility Support Group" (Revision 1)

- (Attachment 1, TSC Director Checklist) Changes include:
  - (Step 1.3) Revised to reflect activation of ERDS by Security at Clinton Station.
  - (Step 1.7) Inserted the following qualifier for assignment of communicators: "***If the following communicator assignments are predefined, then communicator may RESPOND directly to designated facility and CONTACT the TSC Director upon arrival***".
  - (Step 1.10.1, 11th bullet) Revised to reflect SAMG Evaluator staffing at Clinton: "SAMG Evaluator (MWROG, ***except Clinton w/ 2***)".
  - (Step 2.2.1) Revised to state, "***ASSIST*** the ***Station Emergency Director (or Operations Manager) in the completion of the*** State / Local notification form...", to clarify TSC Director responsibility

- (Step 2.2.2, bullet) Action inserted stating, "***If the arrival of the State/Local Communicator is delayed, then PERFORM notification per EP-MA(MW)-114-100***".
- (Step 2.13) The following action inserted: "***When deactivation of the TSC is directed, COORDINATE the restoration of the TSC to it's pre-event status and inventorying / replacement of facility equipment and supplies as needed***".
- (Step 3.1) Relocated action to assist in determining non-essential personnel from an ON-GOING action to SITUATIONAL (Accountability / Site Evacuation). Additional clarification also provided if onsite assembly has already been performed and for the return of essential personnel into the Protected Area.
- (Step 3.2.1) Revised to state, "When directed ***by station procedure or*** the Radiation Protection Manager, REALIGN ***or verify alignment of*** the TSC ventilation to its "emergency" ***or applicable*** mode". Included TMI specific guidance for operation of TSC ventilation.
- (Step 3.5) Inserted guidance for MAROG stations for interfacing with State (PEMA/BRP) representatives responding from offsite to the station TSC.
- (Table 1-3) Included Byron specific guidance for the operation of TSC HVAC

- (Attachment 2, Logistics Coordinator Checklist) Changes include:
  - (Table 2-2, Shift Assignment Worksheet) Revised to list 2nd SAMG Evaluator for staff relief purposes and OSC Operations Group Lead
- (Attachment 3, Security Coordinator Checklist) Changes include:
  - (Step 1.4) Clinton specific step inserted for Security Coordinator to verify activation of ERDS by shift Security personnel.
  - (Step 1.7) Revised to state, "OBTAIN a listing of personnel within the Protected Area, ***preferably*** by department…"
  - (Step 2.6) The following heading created to group various existing actions: "***CONTROL access to the station, site and Protected Area***".
  - (Step 2.6.8) Additional action created: "***DIRECT the Security Shift Supervisor to coordinate access by Station Security personnel into plant areas through the OSC, as appropriate, based on in-plant and site radiological conditions***".
  - (Step 3.1.1) Revised to state, "***In coordination with*** the TSC Radiation Protection Manager, ***ASSIST the Station Emergency Director*** in determining the ***following prior to initiating accountability*** …"
  - (Step 3.1.1.3) Revised to state, "***DETERMINE*** appropriate ***site*** evacuation route(s) for non-essential personnel per EP-MW(MA)-113-100, ***if applicable,*** based on on-going or potential security threats".
  - (Step 3.1.2) Revised to state, "***INFORM*** the Security Shift Supervisor ***of designated evacuation routes and/or assembly decisions and DIRECT Station Security*** to perform the following …"
  - (Step 3.1.2.5) (3rd bullet) Inserted, "***Traffic control at remote assembly areas (relocation centers)***".
  - (Step 3.1.8) Revised to make Mid-West ROG applicable, since non-essential personnel are evacuated as part of accountability at MAROG stations rather than assembling within the Protected Area in designated areas.
- (Attachment 4, State / Local Communicator Checklist) Changes include:
  - (Step 2.1.1.1) Inserted the following action: "***ENSURE that a copy of both pages of the form is faxed to the EOF when notification is completed***".

- (Step 2.4) Revised to reflect monitoring of NARS Circuit as a MWROG activity, since in MAROG the station does not receive State notifications over NARS.
- (Step 2.5) Since MAROG stations do not monitor traffic from the State over NARS Circuit, action inserted to consider re-assigning the TSC State/Local Communicator when notification responsibility has been transferred to the EOF.

EP-AA-112-203, "TSC Operations Group" (Revision 1)

- (Attachment 1, Operations Manager Checklist) Changes include:
  - (Step 1.10) Action clarified to state, "***if applicable***" to reflect single unit stations were separate SRO as Field / Floor Supervisor is not designated on-shift.
  - (Step 2.6.1) Revised to state, "APPROVE emergency special procedures developed by the TSC Technical Support Group, ***using EP-AA-112-204, Attachment 4 or equivalent station procedure***" to reflect existing station specific requirements of commitments.
- (Attachment 2, ENS Communicator Checklist) -- No significant changes
- (Attachment 3, Operations Communicator Checklist) Changes include:
  - (Step 1) Bullet inserted to clarify response for where TSC is located outside the Protected Area.
  - (Step 3.2, 1st bullet) Provided the additional clarification, "Station priorities ***(established by the Station Emergency Director)***".

EP-AA-112-204, "TSC Technical Support Group" (Revision 1)

- (Attachment 1, Technical Manager Checklist) Changes include:
  - (Step 1.5) Revised to state, "EVALUATE the need for additional technical or engineering support based on the existing emergency ***and potential for escalation…***"
  - (Step 2.11.1) Revised to state, "SUBMIT Emergency Special Procedure ***change*** to the Operations Manager, ***using Attachment 4 or per station-specific procedure*** for review and approval prior to implementation", to reflect station requirements / commitments as applicable.
  - (Step 3.4.1) NOTE revised to state, "The 2nd team member will consist of a designated TSC Evaluator."
- (Attachment 2, Technical Communicator Checklist) -- No significant changes
- (Attachment 3, Core / Thermal Hydraulic Engineer Checklist) -- No significant changes
- (Attachment 4, Emergency Special Procedure Form) -- No significant changes

EP-AA-112-205, "TSC Maintenance Group" (Revision 1)

- (Attachment 1, Maintenance Manager Checklist) Changes include:
  - (Step 1.4.1) Staffing Table revised to:
    - Consolidate Maintenance groups under "Maintenance (Total)" Category.
    - RP block revised to include support for repair and corrective actions, and separate onsite & offsite field monitoring personnel.
    - Column inserted to reflect TMI staffing.
  - (Step 1.6.3) MA ROG statement inserted to address the dispatching of NLOs from the CR.
  - (Step 1.7) Clarifier added to NOTE stating, "***…Requests from the Control Room for an OSC Team will be communicated directly to the TSC Operations Manager and subsequently to the OSC through the Maintenance Manager***".
  - (Step 2.3) Revised to reflect changes to EP-AA-112-300 to state, "***In coordination with the Operations Manager***, DETERMINE the ***task priority and briefing level*** for requested OSC tasks ***using the guidance in EP-AA-112-200, Attachment 1…***"

- (Attachment 2, Damage Control Communicator Checklist) Changes include:
  - (Step 1) Inserted response guidance for stations with TSC located outside the Protected Area.
  - (
  - (Step 3.5) Revised to state, "ENSURE ***that the Maintenance Manager is immediately notified of a change in*** team status ***and that it*** is accurately reflected on designated status board".
  - (Step 3.6) NOTIFY Operations Manager of the following:
    - (1st bullet) Revised to state, "***Status of OSC teams consisting of NLO's dispatched from the OSC***".
    - (2nd bullet) Revised to state, "Changes in status of NLO's dispatched ***directly*** from the Control Room".

EP-AA-112-206, "Radiation Protection / Chemistry Group" (Revision 1)

- (Attachment 1, Radiation Protection Manager Checklist) Changes include:
  - (Step 1.7) Reworded, "If an actual or potential radiological hazard exists, INSTRUCT the TSC Director to shift the TSC HVAC to its "emergency" ***or applicable*** mode".
  - (Step 1.12) Revised to address RP staffing requirements for TMI Station and to clarify use of OSC RP Group Lead, Radiation Controls Coordinator, and HPN Communicator as "on-call" responders.
  - (Step 2.13) Revised to state, "...an OSC Team Request Form, ***or equivalent***...", to reflect changes to other procedures.
  - (Step 2.19) Inserted the following action: "***EVALUATE the benefits of obtaining a vent / stack sample to quantify release***".
  - (Step 3.1.4) Deleted table listing assembly area and evacuation route options for LGS & PBAPS. Table duplicates information and directions provided for the TSC radiation Protection Manager in EP-MA-113-100.
  - (Step 3.5) Revised to state, "If alarms or survey information are received from the TSC's installed ARM and airborne monitoring systems or from habitability concerns ***based on a potential or actual release***, then:"
  - (Step 3.5.1) Revised to address multiple HVAC modes per station: "operating in the "Emergency" ***or appropriate*** Mode".
- (Attachment 2, Radiation Controls Coordinator Checklist) Changes include:
  - Reorganized steps to consolidate existing actions for the turnover of dose assessment and field monitoring activities from the TSC to the EOF.
  - (Step 1.9) Field Monitoring Team composition for TMI added to table.
  - (Step 1.9.5) Revised to direct the dispatching of teams in accordance with EP-AA-122-500 to eliminate potential duplication in multiple procedures.
  - (Step 1.9.5) NOTE inserted recommending that if possible a simultaneous briefing and turnover occur with the EOF Dose Assessment Coordinator and Environmental Coordinator.
  - (Step Inserted statement, "***[OPTIONAL: REFER to the Field Monitoring Team Turnover Checklist (EP-AA-112, Attachment 8)]***", for consistency with EOF checklists and expected TSC actions.
  - (Step 1.13) Revised to state, "REPORT turnover ***of control*** to the TSC Radiation Protection Manager, ***when acknowledged by the EOF***".
  - (Step 2.4) Revised to state, "...COMPLETE the upper portion of EP-AA-112-200, Attachment 2, Team Request Form, ***or equivalent*** ..."
  - (Step 3.3.2.3) Revised to state, "After each projection ***run***, TRANSMIT (fax, etc.) copies of DAPAR Dose Assessment, PAR and ***designated*** STATE Reports to the Pennsylvania

Emergency Operations Center (EOC) ***using the nos. listed in the ERF Telephone Directory***". (Bullet) Statement inserted, "***If a BRP Representative is present in the TSC, then PROVIDE a copy of reports to this individual in lieu of faxing reports***".

- (Attachment 3, Radiation Controls Engineer Checklist) Changes include:
  - (Step 1.7) Revised to state, "***At your discretion,*** OBTAIN concurrence from the TSC Radiation Protection Manager to relocate Chemistry technicians ..."
  - (Step 2.5.2) Revised to state, "...COMPLETE the upper portion of EP-AA-112-200, Attachment 2 (OSC Team Request Form), ***or equivalent ...***"
- (Attachment 4, HPN Communicator Checklist) Changes include:
  - (Step 2.2.2) Reorganized HPN information to sort by that retained by the TSC and that transferred to the EOF.
  - (Step 2.2.2.A) Inserted statement, "***REFER to Page 2 of the NRC Emergency Notification Worksheet (ENW) as a guide when communicating information to the NRC***".

EP-AA-112-300, "Operations Support Center (OSC) Activation and Operation" (Revision 4)

- (Attachment 1, OSC Director Checklist) Changes include:
  - (Step 1.1) NOTE inserted stating, "***Actual log keeping may be delegated to designated or available OSC staff***".
  - (Step 1.2) References added to station-specific guidance in Tables 4-1 through 4-9.
  - (Step 1.4) Staffing Table revised to:
    - Consolidate Maintenance groups under "Maintenance (Total)" Category.
    - RP block revised to include support for repair and corrective actions, and separate onsite & offsite field monitoring personnel.
    - Column inserted to reflect TMI staffing.
  - (Step 1.7) Action revised to state, "REQUEST the Shift Manager to dispatch the Field / Floor Supervisor, ***as applicable,*** and NLO's to the OSC".
  - (Step 1.9) Revised MAROG box to state "***Emergency operating Procedure***" vs. TRIP and "***OSC Operations Group Lead***" vs. Field / Floor Supervisor.
  - (Step 1.15) Step added for OSC Director to, "***VERIFY that the Assistant OSC Director and OSC Group Leads present are ready to support OSC activation***".
  - (Step 2.5) Deleted reference to "T-200", which is applicable only to LGS / PBAPS. Generic reference to EOPs retained.
  - (Step 3.1) Under OSC Accountability Actions:
    - (1) Inserted, "***If not already performed, then DIRECT OSC Staff to key into designated card readers when accountability is called for***".
    - Inserted TMI specific instructions regarding the use of OSC card reader.
    - (2) Revised to state, "***DISCUSS with the TSC Maintenance Manager whether dispatched teams are to be recalled or remain in the field***".
    - (3) Revised to state, "CONTACT dispatched team ***members, OBTAIN their badge/key card nos. if required, ...***"
    - (4) Revised to state, "**PROVIDE** names, **badge/key card nos.**, and locations for dispatched team ***members*** to the Security Coordinator ***per EP-MW(MA)-113-100***".
  - (Step 3.2.2) TMI specific statement added regarding designated backup OSC location.
- (Attachment 2, Assistant OSC Director Checklist) Changes include:
  - (Step 1) Deleted INITIAL ACTION to initiate a separate log.

- (Step 2.1) Inserted the following ON-GOING ACTION: "***ENSURE that significant OSC activities, not documented on designated forms, are recorded in the OSC Director's Log or a position log***".
- (Step 1.3) References added to station-specific guidance in Tables 4-1 through 4-9.
- (Step 1.4) OSC staffing table deleted to eliminate redundancy and potential error with table retained under OSC Director's Checklist in Attachment 1
- (Step 1.8) Inserted action for Assistant OSC Director to, "***INFORM the OSC Director when facility is adequately set-up to support OSC activation***".

- (Attachment 3, OSC Group Lead Checklist) Changes include:
  - (Step 1) Deleted INITIAL ACTION to initiate a separate log.
  - (Step 2.1) Inserted the following ON-GOING ACTION: "***ENSURE that significant OSC activities, not documented on designated forms, are recorded in the OSC Director's Log or a position log***".
  - (Step 1.4) Revised to state, "ASSIST ***with the initial set up of*** the OSC ..." References also added to station-specific guidance in Tables 4-1 through 4-9.
  - (Step 1.5) Inserted action for the OSC Group Leads to, "***INFORM the OSC Director when ready to support OSC activation***".
  - (Step 1.6.2) Field Monitoring Team Composition table revised to reflect TMI staffing.
  - (Step 1.7.1) Revised to state, "***As required,*** OBTAIN ***concurrence*** from the TSC Radiation ***Controls Engineer*** to relocate Chemistry personnel ...". NOTE also inserted stating: "***Dispatching of Chemistry technicians in-plant must still be coordinated through the OSC***".
- (Attachment 4, OSC Configuration) Changes include:
  - (Tables 4-3 & 4-5) Inserted revised layout / flow path diagram for Dresden & Quad Cities.
  - (Table 4-8, Step 1.7) Revised to state, "**DIRECT** Radiation Protection to establish periodic habitability surveys ***per attached Habitability Check-Off List***".
  - (Table 4-9) Inserted, "Three Mile Island OSC Suggested Configuration"
- (Attachment 5, OSC Team Briefing Form) – Refer to Attachment 3. Changes include:
  - By Team No. block, inserted" ***(Assigned by OSC)***".
  - Streamlined to specify "Task Priority" and "Briefing Level". Deleted description of each, which is contained in EP-AA-112-200 and/or posted in facility.
  - Revised to state, "***Phone /*** Pager#".
- (Attachment 6, OSC Team Debriefing Form) – No significant changes
- (Attachment 7, Staffing Guidelines) Changes include:
  - (Step 3) Inserted, "The following should be discussed / identified, as applicable:
    - Procedure / prints (drawings)
    - Special tools / parts requirements
    - Tagging requirements
    - Requirements for system restoration / abnormal line-ups
    - Impact of component manipulations / contingency actions / barriers
    - Error likely situations
    - Heat stress / confined space /hazardous material precautions".
- (Attachment 8, Damage Control Communicator Checklist) Changes include:
  - (Step 1, bullet) inserted guidance for designated communicator assignments for stations with TSC located outside the Protected Area.

- (Step 2.1) Deleted action for Damage Control Communicator to "OBTAIN an initial briefing on emergency conditions". Communicator will received briefing as part of overall facility briefing(s).
- (Step 2.3) Deleted INITIAL ACTION to initiate a separate log.
- (Step 3.1) Inserted the following ON-GOING ACTION: "***ENSURE that significant OSC activities, not documented on designated forms, are recorded in the OSC Director's Log or a position log***".

EP-AA-112-400, "Emergency Operations Facility (EOF) Activation and Operation" (Revision 4)

- (Attachment 1, Cantera EOF Activation) – No significant changes
- (Attachment 2, Coatesville EOF Activation) Changes include:
  - (Step 1.3) Revised to provide specific INITIAL and ON-GOING ACTIONS for the Coatesville EOF Access Controller.
  - (Step 1.3.2.3) Revised to direct media to Harrisburg JPIC for a TMI event, rather than generic "JPIC entrance" statement.
  - (Table 2-1) Incorporated unnumbered action under Step 4 into existing Step 5 to state, "STAFF the Lobby Desk ***and MAINTAIN security at the door, checking identification per Section 1.3 of Attachment 1, until relieved by facility security or assigned EOF/JPIC member***".
  - (Table 2-3) Revised existing Steps 5, 6 & 7 to state:
    - (Step 6) "***UNLOCK all doors inside the blue double doors leading from the Lobby.***"
    - (Step 7) "***STAFF the Lobby Desk and MAINTAIN security at the door, checking identification per Section 1.3 of Attachment 1, until relieved by facility security or assigned EOF/JPIC member***".

EP-AA-112-401, "Nuclear Duty Officer (NDO)" (Revision 1)

- (Attachment 1, Nuclear Duty Officer Checklist) Changes include:
  - (Step 1.7) Added actions for MAROG stations to "***UPDATE the Employee Emergency Notification Line for the affected station, using the instructions found in EP-MA-110-100***".
  - Deleted actions for NDO to assist Station in offsite notifications for hazardous material emergencies required under the Exelon Nuclear Reportability Manual.

EP-AA-112-402, "EOF Command and Control" (Revision 1)

- (Attachment 1, Corporate Emergency Director Checklist) – No significant changes
- (Attachment 2, EOF Director Checklist) – No significant changes

EP-AA-112-403, "EOF Logistics Support Group" (Revision 1)

- (Attachment 1, Logistics Manager Checklist) Changes include:
  - (Step 1.4.1) Deleted actions to "VERIFY that operation of the Nuclear Accident Reporting System (NARS) phone has been tested from the EOF".
  - (Step 1.8.1 & 1.8.2) Reversed existing steps to improve flow.
  - (Step 1.9) Revised to state, "***PERFORM the following steps to assume*** responsibility from the Nuclear Duty Officer (NDO) for notifications to…"
- (Attachment 2, State/Local Communicator Checklist) Changes include:
  - (Step 1.4) Revised to state, "***VERIFY dial tone on*** the Nuclear Accident Reporting System (NARS) Circuit".
- (Attachment 3, EOC Communicator Checklist) Changes include:
  - (Step 2.1) Revised to state, "At a Site Area Emergency ***or when contacted by Liaison from EOC(s),*** ESTABLISH a conference call / bridge…"

- (Step 2.1.1) Inserted action for communications with EOC Liaison to "***INFORM Liaison(s) of significant changes in plant conditions, station priorities, fission product barrier integrity or release status***".
- (Step 2.1.2) Inserted action for communications with EOC Liaison to "***OBTAIN further clarification from the Operations Advisor on plant / system / equipment status in response to inquiries***".

- (Attachment 4, Administrative Coordinator Checklist) Changes include:
  - (Table 4-1) Revised EOF staffing table to reflect the following:
    - Revised to state, "***Operations Advisor (BWR)***".
    - Inserted, "***Operations Advisor (PWR)***".
    - Footnote revised to state, "POSITION ***(Bold Italics)*** * -- "Minimum Staffing" position".
    - Inserted footnote stating, "# -- ***Applies to Cantera & for TMI event to Coatesville***".
- (Attachment 5, Computer Specialist Checklist) – No significant changes
- (Attachment 6, Regulatory Liaison Checklist) – No significant changes
- (Attachment 7, Security Coordinator Checklist) – No significant changes

EP-AA-112-404, "EOF Technical Support Group" (Revision 1)

- (Attachment 1, Technical Support Manager Checklist) Changes include:
  - (Step 1.3) Inserted the following: "***NOTE: Cantera (MWROG) will staff with both BWR & PWR Operations Advisors. Coatesville (MAROG) will augment staffing with a PWR experience Operations Advisor for an event at TMI Station***".
- (Attachment 2, Operations Advisor Checklist) Changes include:
  - (Step 2.3, NOTE) Revised to insert, "***The ENS Communicator should report to the appropriate Operations Advisor for the affected station (BWR vs. PWR) for responses to NRC inquiries or clarification on plant / event status***".
- (Attachment 3, ENS Communicator Checklist) Changes include:
  - (Heading) Revised to insert, "***Cantera (MWROG) will staff with both BWR & PWR Operations Advisors. Coatesville (MAROG) will augment staffing with a PWR experience Operations Advisor for event at TMI Station. The ENS Communicator should report to the appropriate Operations Advisor for the affected station (BWR vs. PWR) for responses to NRC inquiries or clarification on plant / event status***".
- (Attachment 4, Technical Advisor Checklist) – No significant changes
- (Attachment 5, Events Recorder Checklist) – No significant changes

EP-AA-112-405, "EOF Protective Measures Group" (Revision 1)

- (Attachment 1, Radiation Protection Manager Checklist) Changes include:
  - (Steps 3.1.1 & 3.1.2) Revised to address MW/MA ROG facility titles and to include reference to ROG-specific procedure in action statement: "**PROVIDE** supplementary Health Physics support to the Station and Exelon Nuclear Relocation Center(s) ***/ Remote Assembly Areas,*** as needed, ***per EP-MW(MA)-113-100***".
- (Attachment 2, Dose Assessment Coordinator Checklist) Changes include:
  - (Step 1.3, NOTE) Revised to state, "If possible, a joint call with the EOF Environmental Coordinator should be made to the TSC Radiation Controls Coordinator ***to turnover dose assessment and control of field monitoring teams***".

- (Step 1.7.3) Revised to state, "DIRECT the Dose Assessor to contact the TSC Radiation Controls Coordinator to ***acknowledge the*** transfer ***of*** responsibility for performing offsite dose projections ***to the EOF***".

- (Attachment 3, Dose Assessor Checklist) Changes include:
  - (Step 1.7.1) Action inserted to: "***OBTAIN a briefing from the Dose Assessment Coordinator on TSC dose assessment and release status. [OPTIONAL: REFER to Dose Assessment Turnover Form (EP-AA-112, Attachment 5)]***".
  - (Step 1.7.2) Revised to state, "CONTACT the TSC Radiation Controls Coordinator when directed and ***ACKNOWLEDGE*** the transfer of dose assessment duties ***to the EOF***".
  - (Step 2.1.3) Revised MAROG statement to state, "After each dose ***projection*** run, **TRANSMIT** (fax, etc.) copies of DAPAR Dose Assessment, PAR and ***designated*** STATE ***r***eports to the Pennsylvania Emergency Operations Center (EOC) ***using the nos. listed in the ERF Telephone Directory*** ". NOTE also inserted stating, "***If a BRP Representative is present in the EOF, a copy of reports can be provided to this individual in lieu of forming reports***".

- (Attachment 4, HPN Communicator Checklist) Changes include:
  - (Step 1.4) Revised to state, "***ESTABLISH contact with*** the TSC HPN Communicator ***and*** DETERMINE if the NRC has requested continuous communication on the HPN Circuit".
  - (Step 2.3) Types of information communicated over HPN were sorted to reflect those retained in the TSC and those transferred to the EOF.

- (Attachment 5, State Environs Communicator Checklist) No significant changes

- (Attachment 6, Environmental Coordinator Checklist) Changes include:
  - (Step 1.7, NOTE) Revised to state, "If possible, a joint call with the EOF Dose Assessment Coordinator should be made to the TSC Radiation Controls Coordinator ***to turnover dose assessment and control of field monitoring teams***".
  - (Step 1.8.1) Revised to state, "**COMPLETE** Field Team Turnover Checklist ***(EP-AA-112, Attachment 8) in*** anticipation of ..."
  - (Former Table 6-1) Field Team Turnover Checklist was relocated to EP-AA-112-200, Attachment 8 since it is a form that may be used by both the TSC and EOF.

- (Attachment 7, Field Team Communicator Checklist) Changes include:
  - (Steps 1.2 & 1.8) Relocated action to obtain briefing. Step 1.8 revised to state, "***OBTAIN a briefing from the Environmental Coordinator on field monitoring team*** status, release conditions and protective actions implemented on-site and offsite".
  - (Step 1.5, bullet) Revised to state, "REFER to ***EP-AA-112-500*** for instructions on use of Field Monitoring Team Radio ***(TMI)*** and Satellite Telephone System ***(MWROG), as applicable***".
  - (Step 1.9.1) Revised to state, "CONTACT the TSC Radiation Controls Coordinator to ***acknowledge the*** transfer ***of*** responsibility for Field Monitoring Teams ***to the EOF***".

EP-AA-112-500, "Emergency Environmental Monitoring" (Revision 5)

- (Attachment 1, Field Monitoring Team Checklist) Changes include:
  - (Step 1.3) Revised to state, "REPORT to the TSC or CONTACT the Radiological Controls Coordinator (RCC) from a pre-designated location (i.e., ***OSC,*** vehicles, equipment area, etc.)..."
  - (Step 1.4.1) Inserted action stating, "***If respiratory protection is recommended, but is not part of equipment inventory, then OBTAIN from RP***".

- (Step 2, CAUTION) Added, "***Use roof top strobe light or vehicle flashers whenever you are stopped along roadside or traveling significantly slower than the speed limit***".
- (Step 2.3.1.b, 2nd bullet) Revised to state, "***REVIEW the*** KI Package Insert in EP-AA-113, Attachment 6 if the use of potassium iodide (KI) is ***authorized***".
- (Step 2.3.2, 2nd bullet) Deleted "from starting point"
- (Step 2.3.3.B, NOTE) Revised to state, "If obtaining an air sample in a high dose area, a air sampler ***run time may be reduced*** with authorization from the controlling facility".
- (Step 2.3.3.D) Revised to state, "...less than 200 cpm ***or per RP guidance***". (was 300 cpm)
- (Table 1-2) Add footnote to Field Monitoring Team Dispatch Log under CURENT DOSE Column for quarterly dose stating, "***Applicable only to MWROG Stations***".
- (Table 1-3, Phonetic Alphabet) Added NOTE stating, "***Alternate listing identified in approved station procedures / guidelines may also be used***".

- (Attachment 2, Protective Equipment & Personnel Dosimetry) Changes include:
  - (Heading) Inserted the following:
    - (1st paragraph) Revised to state, "The purpose of this Attachment is to provide guidance ***to the TSC Radiation Controls Coordinator or EOF Environmental Coordinator*** with respect to..."
    - (2nd paragraph) Revised to state, "...inspected for proper function before use in the field ***and may need to be obtained from RP if not part of field team equipment inventory***".
    - (3rd paragraph) Revised to state, "Radiological protective clothing should only be worn at the direction of the ***TSC Radiation Controls Coordinator or EOF*** Environmental Coordinator".
  - (Step 1.1.2) Revised to state, "...within the following ranges", rather than require specific dosimeter types.
  - (Step 1.1.2, NOTE) Revised to state, "***D***osimetry, ***other than TLDs,*** can be expected to under-report
- (Attachment 3, Field Monitoring Team Data Sheet) Changes include:
  - Label for team "LEAD" & "DRIVER" was deleted, since form can be used to record survey results from multiple teams.
  - "TEAM" No. block relocated under each "TRAVERSE #" block.
  - Deleted "Starting Point Reference: (i.e., intersection)" space.
- (Attachment 4, Environmental Assessment Log) – No significant changes
  - Revised to reflect air sampler flow rate units in either "cfm" or "lpm" (TMI).
- (Attachment 5, Environmental Sample Collection Procedure – MWROG) – No significant changes
- (Attachment 6, Environs Group Transfer or Shipment of Environmental Radiological Samples to Radiological Laboratories -- MWROG) – No significant changes
- (Attachment 7, Mobilization and Direction of the Environmental Sampling Vendor -- MAROG) Changes include:
  - (Part I, Heading) under MOBILIZATION inserted stating, "***This attachment describes the process for contacting and coordinating the collection environmental samples through the contracted REMP Environmental Sampling Vendor (ESV)***".
  - (Part I, Step 4) Revised to state, "... provided to the State Police ***and Security Coordinator***".
- (Attachment 8, Satellite Telephone Operation – MWROG) – No significant changes

EP-AA-112-600, "Emergency Public Information Organization Activation and Operation" (Rev. 5)

- No significant changes other than Attachment 3, Coatesville JPIC Activation / Deactivation clarifications and addition of Attachment 4, Harrisburg JPIC Activation / Deactivation

EP-AA-112-601, "Emergency News Center (ENC) Activation and Operation" (Revision 1)

- (Attachment 1, Public Information Director Checklist) Changes include:
  - (Step 1.6) Inserted action: "***Once the ENC is activated, CONTACT Exelon Nuclear Communications to formally transition press release development responsibilities to the ENC***".
  - (Step 1.10) Revised to state, "...and ***ENSURE*** that a Press Release be issued for JPIC activation".
  - (Step 1.12) Inserted action: "***CONTACT the Exelon Public Affairs Department and PROVIDE current status of the event***".
  - (Step 1.12.1) Inserted action: "***REQUEST*** *the Exelon Public Affairs Department to initiate Key Stakeholder call outs*".
  - (Step 2.7) Revised to state, "APPROVE press releases ***and Chronological Events Description Logs*** prior to dissemination to the media".
  - (Step 2.7.1) Revised to indicate approval of press (news) releases performed by PID.
  - (Step 2.7.2) Inserted new action for PID approval of the Chronological Events Description Log.
  - (Step 2.9) Added new action to "***UPDATE the Exelon Public Affairs Department, as required, with current information concerning the event to ensure accurate information is provided to the Key Stakeholders***".
- (Attachment 2, Technical Advisor Checklist) – No significant changes
- (Attachment 3, Radiological Advisor Checklist) – No significant changes
- (Attachment 4, Events Recorder Checklist) – No significant changes
- (Attachment 5, Media Monitor Checklist) – No significant changes
- (Attachment 6, Rumor Control Checklist) Changes include:
  - (Step 2.1) Revised to state, "ENSURE that rumors are reviewed, documented ***(OPTIONAL: using Table 6-1, Rumor Control Documentation)*** ..."
  - (Table 6-1) Inserted new form for Rumor Control Documentation – Refer to Attachment 4
- (Attachment 7, News Writer Checklist) Changes include:
  - (Step 2.4) Revised to indicate approval of press (news) releases performed by PID.

EP-AA-112-602, "Joint Public Information Center (JPIC) Activation and Operation" (Revision 1)

- Revised "Mid-West ROG" qualifier after the PI Liaison, Technical Spokesperson and Radiation Protection Spokesperson positions to state, "(except LGS / PBAPS)", to reflect applicability to TMI Station.
- (Attachment 1, JPIC Access Controller Checklist) No significant MWROG changes
- (Attachment 2, Corporate Spokesperson Checklist) Changes include:
  - (Step 1.8, #1) Revised to state, "***REVIEW*** the press release ***prior to approval by the Public Information Director***".
  - (Step 1.8 #2) Revised to state, "ENSURE that the approved press release is properly distributed to the ***JPIC***".
  - (Step 2.2) Revised to state, "SUPERVISE the activities of the JPIC Director and, in Mid-West ROG ***and TMI***, the Technical and Radiation Protection Spokespersons".

- (Step 2.5) Revised to state, "DIRECT the ***Public Information Director to have press releases*** prepared as required".
- Deleted previous Mid-West ROG only action to forward press releases to the PID through the Corporate Spokesperson.
- Deleted action to provide press release to the Corporate Spokesperson for review. This is redundant to actions already contained in Corporate Spokesperson Checklist.

- (Attachment 3, JPIC Director Checklist) No significant MWROG changes
- (Attachment 4, Public Information Liaison Checklist) Changes include:
  - (Step 1.5.4) Revised to state, "PROVIDE ***the Chronological Event Description Log to the Corporate Spokesperson for review prior to approval by the Public Information Director***".
  - (Step 1.5.5) Revised to state, "PROVIDE ***approved copies of the Chronological Event Description Log to the JPIC Director ...***"
  - (Step 2.2) Revised to state, "OBTAIN draft copies of press releases ***and Chronological Events Description Log ...***"
- (Attachment 5, JPIC Administrative Coordinator Checklist) Changes include:
  - (Step 1.7) Inserted action to: "***PROVIDE press release to Corporate Spokesperson for review***".
- (Attachment 6, JPIC Coordinator Checklist) Changes include:
  - (Step 1.7) Revised to state, "ENSURE that ***the A***ccess ***C***ontrol***ler*** has established ***control*** at the media entrance".
- (Attachment 7, Technical Spokesperson Checklist) – No significant changes
- (Attachment 8, Radiation Protection Spokesperson Checklist) – No significant changes

EP-AA-114, "Notifications" (Revision 4)

- (Section 4.2.2.1, 5th bullet) Under required information, revised to state, "Power Mode before and after the event ***classification***".
- (Section 4.2.2.6) Under action to approve EMW, inserted "***...using available space on form***".