

June 2, 2003

*Mr. John Skolds
Chairman and CEO
AmerGen Energy Company, LLC
4300 Winfield Road
5th Floor
Warrenville, IL 60555*

SUBJECT: THREE MILE ISLAND STATION, UNIT 1 - NRC EVALUATED EMERGENCY
PREPAREDNESS EXERCISE INSPECTION REPORT 50-289/03-006

Dear Mr. Skolds:

The enclosed report documents an inspection at the Three Mile Island (TMI) Station, Unit 1 which evaluated the performance of your emergency response organization during the April 22, 2003, 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. Bruce Williams and other members of your staff on April 24, 2003.

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 addition, on March 18, 2003 the NRC approved the relocation of the TMI Emergency Operations Facility (EOF) and its integration into the combined EOF serving Peach Bottom Atomic Power Station and Limerick Generating Station. In your request for approval to relocate the TMI EOF, you committed to conduct a drill in the current calendar year that would demonstrate that the Pennsylvania combined EOF staff and equipment could function properly in the case of emergencies occurring simultaneously at two or more facilities. On May 19, 2003, you informed my staff that this drill/exercise will take place on August 27, 2003. The NRC will conduct a team inspection to observe and evaluate the August 27th exercise.

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).

Mr. John Skolds

-2-

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

Sincerely,

/RA/

Wayne D. Lanning, Director
Division of Reactor Safety

Docket No. 50-289
License No. *DPR-50*

Enclosures: Inspection Report No. 50-289/03-006
Attachment 1: Supplemental Information

cc w/encl:

AmerGen Energy Company - Correspondence Control Desk
Chairman and CEO, AmerGen Energy
Vice President, TMI Unit 1
Vice President, Mid-Atlantic Operations Support
Vice President, General Counsel and Secretary, AmerGen Energy Company, LLC
Senior Vice President, Nuclear Services
Senior Vice President, Mid-Atlantic Regional Operating Group
Plant Manager
Director-Licensing
Licensing and Regulatory Affairs- Vice President, AmerGen Energy
E. Epstein, TMI-Alert (TMIA)
R. Janati, Chief, Division of Nuclear Safety
D. Allard, PADER
M. Schoppman, Framatome
Chairman, Board of County Commissioners of Dauphin County
Chairman, Board of Supervisors of Londonderry Township
J. Johnsrud, National Energy Committee

Mr. John Skolds

-3-

Distribution w/encl:

- Region I Docket Room (with concurrences)*
- C. Smith, DRP - Acting Senior Resident Inspector*
- H. Miller, RA*
- J. Wiggins, DRA*
- J. Rogge, DRP*
- R. Barkley, DRP*
- K. Brock, NRR*
- A. Kugler, OEDO*
- R. Laufer, NRR*
- J. Andersen, NRR*
- T. Colburn, PM, NRR*
- P. Tam, Backup PM, NRR*
- DRS File*

DOCUMENT NAME:C:\ORPCheckout\FileNET\ML031530641.wpd

After declaring this document "An Official Agency Record" it **will** be released to the Public.

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

| | | | | | | | | | |
|--------|-----------|--|----------|--|----------|--|------------------|--|--|
| OFFICE | RI/DRS | | RI/DRP | | RI/DRS | | RI/DRS | | |
| NAME | NMcNamara | | NPerry | | RConte | | WLanning/RVC for | | |
| DATE | 05/22/03 | | 05/22/03 | | 05/30/03 | | 06/2/03 | | |

OFFICIAL RECORD COPY

U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No: 50-289

License No: DPR-50

Report No: 50-289/03-006

Licensee: *AmerGen Energy Company, LLC*

Facilities: Three Mile Island Station, Unit 1

Location: P. O. Box 480
Middletown, Pennsylvania

Dates: April 21-24, 2003

Inspectors: N. McNamara, Sr. Emergency Preparedness Inspector (Lead)
C. Smith, Acting Sr. Resident Inspector, DRP
H. Williams, Operator Licensing Examiner, DRS
J. Nick, Enforcement Specialist, OE
K. Williams, Emergency Preparedness Specialist, NRR
D. Screnci, Sr. Public Affairs Officer, PAO
T. O'Hara, Reactor Engineer, DRS

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

Enclosure

SUMMARY OF FINDINGS

IR 05000289/03-006; on 04/21-24/2003; Three Mile Island Station, Unit 1. Emergency Preparedness Exercise Report.

This team inspection was conducted by region based inspectors, NRC Headquarter's personnel and a resident inspector. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609 "Significant Determination Process" (SDP). 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 significant findings 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 the TMI exercise objectives submitted to the NRC on January 21, 2003 and the exercise scenario submitted on February 20, 2003 to determine if the TMI exercise would test major elements of AmerGen's Emergency Plan as required by 10 CFR 50.47(b)(14). On March 4 and 26, 2003 the NRC held telephone conversations with AmerGen to discuss concerns with the scenario not providing sufficient level of play for the TSC, OSC and dose assessment area in order for the NRC to adequately evaluate those areas. On April 11, 2003 AmerGen resubmitted a revised scenario which the NRC noted improvement.

The onsite inspection consisted of the following review and assessment:

- The adequacy of AmerGen'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 AmerGen'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), Operations Support Center (OSC), Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC)
- 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 AmerGen drill reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10CFR50.47(b)(14).

Enclosure

- The post-exercise critique to evaluate the AmerGen'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.

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

The inspectors conducted an in-office review of licensee submitted changes for the Emergency Plan-related documents received from December 2002 to March 2003 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. However, in January 2003 the licensee submitted a consolidated Emergency Plan for all Exelon sites and an Annex Plan related specifically to TMI. A review of those documents was not completed during this inspection and is currently ongoing.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed AmerGen's critique findings documented in 2001, 2002 and 2003 drill/exercise reports to determine if significant performance trends existed and to assess the adequacy of the corrective actions based upon ERO performance during those drills and exercises. The inspectors also observed AmerGen's critique of the 2003 exercise to ensure problems identified by the NRC were also independently identified by AmerGen and entered into their corrective action system. Some of the problems identified by AmerGen during their critique were related to command and control issues in the emergency facilities and performance problems in the dose assessment area with regards to the protective action recommendation and manipulation of the dose assessment model. The following condition reports were generated by AmerGen as a result of the 2003 biennial exercise:

AR 0015562 Incorrect PAR and failure of three exercise objectives in the dose

Enclosure

assessment area.

- AR 00157229 Simulator crew problems identified during annual exercise
- AR 00155856 Command and Control issues in the TSC
- AR 00155789 OSC continual staffing assignments for graded exercises
- AR 00155371 Inappropriate Controller Interjection
- AR 00155482 Exercise controller lacked data on personnel contamination
- AR 00158364 Controller inject required to stop player actions

b. Findings

No findings of significance were identified.

40A5 Other Activities

a. Inspection Scope

On March 18, 2003, the NRC approved the relocation of the TMI EOF and its integration into the combined EOF serving Peach Bottom Atomic Power Station and Limerick Generating Station. In Staff Requirements Memorandum (SRM) SECY 03-0033, the Commission directed that the staff closely monitor the licensee's consolidation effort and ensure through the NRC Inspection Program that communication and coordination between the licensee, the public, and County, State and Federal Agencies are not adversely impacted by the consolidation. In response to the SRM and for this exercise, the NRC observed the overall operation of the EOF and the communication and coordination between AmerGen, the public, County, State and Federal agencies to ensure the consolidation effort had no adverse impact. Further, after the exercise, the inspector learned that another exercise for the EOF is scheduled for August 27, 2003, for emergencies occurring simultaneously at two or more facilities.

b. Findings

No findings of significance were identified.

40A6 Meetings, including Exit

The inspectors presented the inspection results to Mr. Bruce Williams and other members of the AmerGen's staff at the conclusion of the inspection on April 24, 2003.

ATTACHMENT 1

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Three Mile Island Station, Unit 1

G. Gellrich, Plant Manager
D. Tailleart, EP Manager, MAROG
B. Brady, TMI EP Manager
H. Langley, TMI EP Coordinator
A. Miller, Regulatory Assurance
B. Canfield, Regulatory Assurance, MAROG

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened/Closed

None

Discussed

None

LIST OF ACRONYMS

| | |
|------|------------------------------------|
| EOF | Emergency Operations Facility |
| EP | Emergency Preparedness |
| ERO | Emergency Response Organization |
| OSC | Operations Support Center |
| RSPS | Risk Significant Planning Standard |
| SDP | Significant Determination Process |
| TSC | Technical Support Center |

LIST OF DOCUMENTS REVIEWED

Exelon Standardized Emergency Plan
TMI Radiological Emergency Plan Annex
EP-AA-112-300, OSC Activation and Operation
EP-AA-112-400, Emergency Operations Facility Activation and Operation
EP-AA-112-402, EOF Command and Control
EP-AA-112-405, EOF Protective Measures Group
EP-AA-112-601, Emergency News Center Operations
EP-AA-112-602, JPIC Activation and Operation
EP-AA-110-302, Core Damage Assessment (PWR)
EP-AA-1102, ERO Fundamentals
EP-MA-110-200, Dose Assessment
EP-AA-111, Emergency Classification & Protective Action Recommendations

EP-AA-112-100, Control Room Operations
EP-AA-112-200, TSC Activation and Operation
EP-AA-112-201, TSC Command and Control
EP-AA-112-405, EOF Protective Measures Group
EP-AA-114, Notifications
EP-MA-122-1002, Exercise Development, Conduct and Evaluation
EP-MA-122-1001, Drill Development, Conduct and Evaluation