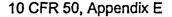
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Exel@n.

Nuclear

RS-03-207

October 30, 2003

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

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

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

Clinton Power Station, Unit 1 Facility Operating License NPF-62 NRC Docket Nos. STN 50-461

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

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

Quad Cities Nuclear Power Station, Units 1 and 2 Facility Operating License DPR-29 and DPR-30 <u>NRC Docket Nos. 50-254 and 50-265</u>

Subject: Revisions to the Exelon Nuclear Standardized Radiological Emergency Plan Implementing Procedure

In accordance with 10 CFR 50, Appendix E, Section V, "Implementing Procedures," Exelon Generation Company, LLC (EGC) and AmerGen Energy Company (AmerGen) are submitting changes to Exelon procedure, EP-AA-112-403, "EOF Logistics Support Group."

The procedure revision incorporates Limerick-specific changes associated with company volunteer bus driver support to designated school districts. Additionally, administrative changes are included to reflect the elimination of the Regional Operating Group organizational

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structure. This procedure change was implemented on September 19, 2003, and was to be submitted within 30 days of implementation. Due to an administrative error, this procedure is being submitted after the required submittal date of October 19, 2003. This condition has been entered into the Corrective Action Program to resolve the issue.

Should you have any questions concerning this letter, please contact Mr. T. W. Simpkin at 630-657-2821.

Respectfully,

Veich R. Jury

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

cc: Regional Administrator – NRC Region III (two copies) 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 Power Station

Attachment A - Exelon Nuclear Procedure, EP-AA-112-403, "EOF Logistics Support Group"

ATTACHMENT A

EP-AA-112-403 EOF LOGISTICS SUPPORT GROUP

Exelon.

Nuclear

EP-AA-112-403 Revision 2 Page 1 of 31 Level 2 - Reference Use

EOF LOGISTICS SUPPORT GROUP

1. <u>PURPOSE</u>

- 1.1. This procedure describes the responsibilities and actions of the EOF Facility Support Group, which consists of the following positions reporting to the Logistics Manager:
 - Regulatory Liaison,
 - Security Coordinator (EOF),
 - State / Local Communicator (EOF),
 - Emergency Operations Center (EOC) Communicator
 - Administrative Coordinator (EOF), and
 - Computer Specialist

1.2. When the Shift Manager decides that a situation warrants activation of the EOF under the Emergency Plan, this procedure becomes applicable.

2. TERMS AND RESPONSIBILITIES

None

3. <u>RESPONSIBILITIES</u>

- 3.1. The *Logistics Manager* provides support functions in organizational logistics and governmental interface. The Logistics Manager directs the activities of the administrative, security and liaison personnel staffing the EOF.
- 3.2. The State / Local Communicator (EOF) is responsible for transmitting, receiving and documenting information relayed to/from the EOF and State and county agencies.
- 3.3. The EOC Communicator is responsible for transmitting, receiving and documenting information relayed to/from the EOF and the Exelon Liaisons dispatched to the State and County Emergency Operations Centers (EOCs).
- 3.4. The Administrative Coordinator (EOF) is responsible for providing administrative, logistics, computer and personnel support for the EOF.
- 3.5. The *Computer Specialist* assists EOF personnel with the utilization of computer resources necessary to support nuclear emergencies. The Computer Specialist will also assist in trouble-shooting and coordinating repairs for problems encountered with communications and computer equipment and/or programs.

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The *Regulatory Liaison* is responsible for maintaining an effective interface with Federal, State and local agencies, and arranging workspace for the Federal and State agencies in the EOF.

The Security Coordinator (EOF) acts as an interface with the TSC Security Coordinator on events relating to the security of a Nuclear Station. The Security Coordinator will assist in communications with Federal, State and local law enforcement agencies, serve as primary contact to Security Contractors, and interpret information for EOF staff on security events, and provide assistance to the TSC Security Coordinator in resolving security events. The Security Coordinator (EOF) also reviews significant security events for the potential of intentional transgression.

Coatesville EOF

The EOF Security Coordinator position will be staffed out of the Mid-West Region / Cantera EOF.

MAIN BODY

3.6.

3.7.

4.

- 4.1. **ASSUME** your designated ERO position upon arrival in the EOF.
- 4.2. **INITIATE** the appropriate Emergency Plan activities using the position specific checklist listed in Attachments 1 thru 7.

5. **DOCUMENTATION**

None

- 6. <u>REFERENCES</u>
- 6.1. <u>Station Commitments</u>

6.1.1. Limerick

CM-1 T04510 (Attachment 1, Sections 2.10 and 3.3)

7. <u>ATTACHMENTS</u>

- 7.1. Attachment 1, Logistics Manager Checklist
- 7.2. Attachment 2, State / Local Communicator (EOF) Checklist
- 7.3. Attachment 3, EOC Communicator Checklist
- 7.4. Attachment 4, Administrative Coordinator (EOF) Checklist
- 7.5. Attachment 5, Computer Specialist Checklist
- 7.6. Attachment 6, Regulatory Liaison Checklist
- 7.7. Attachment 7, Security Coordinator (EOF) Checklist

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ATTACHMENT 1 LOGISTICS MANAGER CHECKLIST Page 1 of 7

Section 1, Initial Actions

Section 2, Ongoing Actions

Section 3, Situational Actions

- 3.1, Exelon Nuclear Fitness for Duty Program
- 3.2, NRC Site Team Response
 - 3.3, Limerick Volunteer Bus Driver Activation

<u>NOTE</u>: Steps in this checklist may be performed in an order other than listed **or** they may be omitted if not applicable.

1. INITIAL ACTIONS

- 1.1. ____ SIGN IN on the EOF Organization Board.
- 1.2. ____ **REPORT** your arrival to the EOF Director.
 - 1. If the EOF Director is not yet present, then **NOTIFY** the Corporate Emergency Director.
- 1.3. ____ INITIATE a position log documenting significant actions performed and communications related to your position.
- 1.4. **VERIFY** the arrival of Logistics Group staffing and completion of designated actions, as applicable:
- 1.4.1. State / Local Communicator: _____
- 1.4.2. Administrative Coordinator: _____

Coatesville EOF Only

1. **VERIFY** with the Administrative Coordinator that the EOF First Responder Checklist has been completed per EP-AA-112-400, Attachment 2.

1.4.3. Regulatory Liaison:

1.4.4. Computer Specialist: _____

1.4.5. Security Coordinator: _____

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ATTACHMENT 1 LOGISTICS MANAGER CHECKLIST Page 2 of 7

Coatesville EOF

- 1. ____ If not yet contacted by the on-call Security Coordinator for the Mid-West Region, then PAGE individual using number listed in the ERF Telephone Directory.
- 2. ____ BRIEF the Mid-West Region EOF Security Coordinator on the event and required support.
- 3. ____ DIRECT the Mid-West Region EOF Security Coordinator to contact his counterpart at the Station TSC and PROVIDE telephone number, if needed.
- 4. ____ **IDENTIFY** a telephone number were individual can be reached at the Cantera EOF and where you can be contacted at the Coatesville EOF.

1.4.6. EOC Communicator:

- ____ CONFIRM that each applicable State Agency listed on Table 3-1, "Key State Agency Listing," (Attachment 3).
 - A. If an Exelon Nuclear presence is requested by any of the State Agencies, then DIRECT the EOC Communicator to CONTACT and DISPATCH State Liaison(s).

1.4.7. Access Control:

1.6.

1.7.

- 1.5. ____ VERIFY that Access Control has been established and access is being restricted to emergency response personnel only.
 - _____ REVIEW adequacy of EOF staffing based on responder present in facility and expected response as indicated on faxed copy of automated callout system status reports.
 - **NOTIFY** the EOF Director when the Logistics Support Group is adequately staffed to support facility activation and **ADVISE** on the status of activities relating to governmental interfaces and readiness to accept responsibility for the notification of State and county authorities.

1. If the EOF Director is not yet present, then PERFORM the initial actions listed in the EOF Director Checklist (EP-AA-112-402, Attachment 2) to facilitate EOF activation.

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ATTACHMENT 1 LOGISTICS MANAGER CHECKLIST Page 3 of 7

1.8. **PERFORM** the following to any vacant positions for required staff:

- 1.8.1. ____ **IDENTIFY** available personnel to fill the vacant emergency response position who possess appropriate skills and background.
 - 1. **OBTAIN** Corporate Emergency Director approval and **RECORD** in Event Log.
- 1.8.2. ____ DIRECT the Administrative Coordinator to CALL additional trained personnel to fill the vacant positions using EP-AA-112, Attachment 3, "FFD Call-Out Record" to ensure FFD compliance for called out personnel.
- 1.9. **PERFORM** the following steps to assume responsibility from the Nuclear Duty Officer (NDO) for notifications to the Institute of Nuclear Power Operations (INPO) and the American Nuclear Insurers (ANI).
 - **NOTE:** ANI and INPO will be contacted initially by the NDO per the Reportability Manual following the declaration of an Alert or higher classification.
- 1.9.1. ____ CONTACT the NDO for the information that has already been provided to these agencies. TIME: _____
- 1.9.2. ____ CONTACT INPO/ANI and INFORM them that you are the Exelon Nuclear point of contact and PROVIDE a telephone number at the EOF. TIME:

2. ONGOING ACTIONS

- 2.1. **DIRECT** the activities of the Logistics Support Group.
- 2.2. **MAINTAIN** records of Logistics Group EOF activities, including contacts with offsite agencies, contractors, and other support organizations

Mid-West Region

- 2.3. **CONTACT** the Siren Maintenance contractor and obtain a siren system status for the affected plant.
 - 1. If there are problems with any sirens, then DIRECT the State/Local Communicator to notify the counties of the problems.

ATTACHMENT 1 LOGISTICS MANAGER CHECKLIST Page 4 of 7

2.4. **ENSURE** facility access control is maintained and access limited to Emergency Responders.

Coatesville EOF

The first of 2 facility security members arriving at the EOF will assume responsibility for controlling access to the EOF. The 2nd facility security member will assume responsibility for controlling access to the Joint Public Information Center (JPIC).

1. **AUTHORIZE** admittance to non-Exelon personnel on an "as needed" basis.

2. **CONSIDER** staffing additional Facility Security for long-term access control if State, local and/or Federal agencies may also be responding to the EOF and JPIC.

- 2.5. **PARTICIPATE** in periodic EOF briefings. Information to be discussed should include but not be limited to the following:
 - State and County emergency response
 - EOC(s) staffed
 - Liaison(s) requested / dispatched
 - Communications established
 - State Radiological Assessment Centers staffed, as applicable
 - Other Exelon facilities potentially affected by the on-going event
 - State / NRC / other agencies present or enroute to the EOF
- 2.6. **PROVIDE** assistance to the State/Local Communicator(s), as needed, to ensure that notifications to offsite agencies are transmitted in a timely manner.

2.7. COORDINATE with the NDO to maintain communications with ANI and INPO and UPDATE periodically on the status of the event and of any changes in event Classification, PARs using the following:

- Approved State/Local Notification forms
- Approved NRC Event Notification Worksheets
- Approved Press Releases
- Significant Events Log (SEL), maintained by the Events Recorder

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ATTACHMENT 1 LOGISTICS MANAGER CHECKLIST Page 5 of 7

- 2.8. **NOTIFY** the NDO of offsite protective actions implemented that affect Exelon facilities and/or activities, and **REQUEST** that the NDO contact affected Exelon, AmerGen and PECO/ComEd commercial divisions.
- 2.9. ENSURE that timely updates and information are provided by the EOC Communicators(s) to Exelon Nuclear Liaisons dispatched to State/County Emergency Operations Centers (EOCs), and to offsite officials present in the EOF.
 - 1. **ADVISE** the EOF Director concerning the status of activities and interface(s) established with governmental agencies.
 - 2. **MAINTAIN** communications via the EOC Liaison with appropriate State and county EOCs whose assistance may be required to terminate the emergency and to expedite the recovery.

LIMERICK

2.10. For an Alert of higher classification, when school is in session, **CONTACT** the Exelon Berwyn Complex Dispatcher and **REQUEST** that they review their list of volunteer drivers to ascertain availability to respond pending potential requests from Chester and Montgomery Counties. **CM-1**

- 2.11. COORDINATE maintenance of EOF equipment as necessary.
- 2.12. ASSIST EOF Directors/Managers in obtaining and coordinating additional technical expertise, as requested, to support station response activities including Exelon Corporate staff, unaffected stations and vendors / contractors.
- 2.13. If shift relief is considered or additional personnel are required to support continued EOF and/or Station activities, then DIRECT the Administrative Coordinator to arrange for staff rotation and/or call outs.
 - 1. **ENSURE** that the Exelon Nuclear Fitness for Duty Program is implemented for staff reporting to the EOF per Section 3.1.
- 2.14. **OBTAIN** support from Human Resources, Comptroller's Office, Legal, Accounting or other Exelon Departments, as required, to support emergency response activities.
- 2.15. **PERFORM** a shift turnover with on-coming personnel using guidance in EP-AA-112, Attachment 2 (Shift Turnover).

ATTACHMENT 1 LOGISTICS MANAGER CHECKLIST Page 6 of 7

3. SITUATIONAL ACTIONS

3.1. EXELON NUCLEAR FITNESS FOR DUTY (FFD) PROGRAM

- 3.1.1. If this shift is <u>not</u> during normal business hours, then COMPLETE EP-AA-112, Attachment 4, Fitness For Duty Verification for each Exelon Nuclear EOF responder who's FFD status is not recorded as acceptable on the automated call out system report faxed to the EOF.
 - **<u>NOTE</u>**: State, Federal and Local representatives, who may be present in the EOF, which is located outside the protected area and do not have responsibilities directly affecting reactor safety, are not covered by the FFD rule.
 - 1. **SUBMIT** the completed forms to the EOF Director for approval.
- 3.1.2. For State, Federal and Local Representatives, USE the following guidelines:
 - 1. If the odor of alcohol is detected on these individuals, then INSTRUCT the Security Coordinator (Cantera) or Regulatory Liaison (Coatesville) to conduct an immediate behavioral observation to determine FFD.
 - 2. If there is evidence of the person being unfit for duty, then NOTIFY applicable agency and REQUEST that the individual leave the property.

3.2. NRC SITE TEAM RESPONSE

- 3.2.1. When notified that an NRC Site Team has been dispatched to the EOF, **PERFORM** the following:
 - 1. **VERIFY** that the NRC work locations are set up.
 - 2. **DIRECT** the Regulatory Liaison to act as the primary Exelon Nuclear Liaison to NRC Site Team.

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ATTACHMENT 1 LOGISTICS MANAGER CHECKLIST Page 7 of 7

LIMERICK

3.3. LIMERICK VOLUNTEER BUS DRIVER ACTIVATION CM-1

- 3.3.1. Upon receipt of a request from the Director, Chester County Department of Emergency Services and/ or Coordinator, Montgomery County Office of Emergency Preparedness, **PERFORM** the following:
 - 1. **DETERMINE** from the respective County Director / Coordinator the specific number of bus drivers being requested and the staging area location(s) being established.
 - 2. **CONTACT** the Exelon Berwyn Complex Dispatcher (using the telephone number listed in Section 3.1 of the ERF Telephone Directory):
 - A. **REQUEST** that a driver assembly point be established at the Exelon Berwyn Complex and that drivers be held at Berwyn until further instructions are received.
 - B. **REQUEST** that the required number of drivers (with the shortest response times) be contacted to report to the Berwyn assembly point.
 - C. **REQUEST** that arrangements be made for Exelon vehicles to transport bus drivers to the Chester and/or Montgomery County Staging Areas.
 - D. **REQUEST** that he/she monitor the drivers arriving at Berwyn and **PROVIDE** periodic updates to you on the number and estimated time of arrival for drivers contacted.
- 3.3.2. **PROVIDE** periodic updates regarding the status of the mobilization process to the Director, Chester County Department of Emergency Services and/or Coordinator, Montgomery County Office of Emergency Preparedness (using Section 5.0 of the ERF Telephone Directory).

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ATTACHMENT 2 STATE / LOCAL COMMUNICATOR (EOF) CHECKLIST Page 1 of 2

Section 1, Initial Actions

Section 2, Ongoing Actions

<u>NOTE</u>: Steps in this checklist may be performed in an order other than listed **or** they may be omitted if not applicable.

- 1. INITIAL ACTIONS
- 1.1. ____ SIGN IN on the EOF Organizational Board.
 - 1.2. ____ REPORT your arrival to the Logistics Manager and OBTAIN an initial briefing on the event.
 - 1.3. ____ INITIATE a position log documenting significant actions performed and communications related to your position.
 - 1.4. _____ VERIFY dial tone on the Nuclear Accident Reporting System (NARS) Circuit.
 - 1.5. ____ CONTACT the TSC State/Local Communicator to obtain a briefing on State/Local notifications performed and specific requests for updates.
 - 1.6. ____ **INFORM** the Logistics Manager when ready to assume State/Local notifications responsibility from the TSC.

2. ONGOING ACTIONS

2.1. **TRANSMIT** approved notification form to the appropriate agencies when directed per the following, as applicable:

- EP-MW-114-100, Mid-West Region Notifications
- EP-MA-114-100, Mid-Atlantic Region Notifications
- 1. <u>Prior to transmitting</u>, **REVIEW** completed form for accuracy and **VERIFY** the Corporate Emergency Director's approval signature on form.
- 2. **PROVIDE** copies of the completed notification forms to the Administrative Coordinator for distribution and posting.

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ATTACHMENT 2 STATE / LOCAL COMMUNICATOR (EOF) CHECKLIST Page 2 of 2

Mid-West Region

- 2.2. **ANSWER** the NARS phone, when it rings and **RECORD** message on a notification form per EP-MW-114-100.
- 2.3. **COMMUNICATE** updates and information requests to State/County agencies, as directed by the Logistics Manager.
 - 1. LOG relevant data (e.g. name, time, date, source).
 - 2. **ENSURE** that the Logistics Manager is made aware of issues and questions raised by the offsite agencies.
 - 3. **RELAY** replies to issues and questions expeditiously.
- 2.4. **ASSIST** the Logistics Manager to maintain an accurate record of event-related activities.
- 2.5. **PERFORM** a shift turnover with on-coming personnel using guidance in EP-AA-112, Attachment 2 (Shift Turnover).

ATTACHMENT 3 EOC COMMUNICATOR CHECKLIST Page 1 of 5

Section 1, Initial Actions

Section 2, Ongoing Actions

Table 3-1, Key State Agency List

Table 3-2, County Emergency Management Agency Contacts

<u>NOTE</u>: Steps in this checklist may be performed in an order other than listed **or** they may be omitted if not applicable.

1. INITIAL ACTIONS

- 1.1. ____ SIGN IN on the EOF Organizational Board.
- 1.2. ____ REPORT your arrival to the Logistics Manager and OBTAIN an initial briefing on the event.
 - _____ INITIATE a position log documenting significant actions performed and communications related to your position.

Mid-Atlantic Region

1.3.

1.4. **CONTACT** designated Exelon Nuclear Liaisons, using the information listed in the ERO Call Out List, and **DISPATCH** to State EOCs for the affected Station: <u>PA</u>: LGS / PBAPS / TMI events, and <u>MD</u>: PBAPS events only).

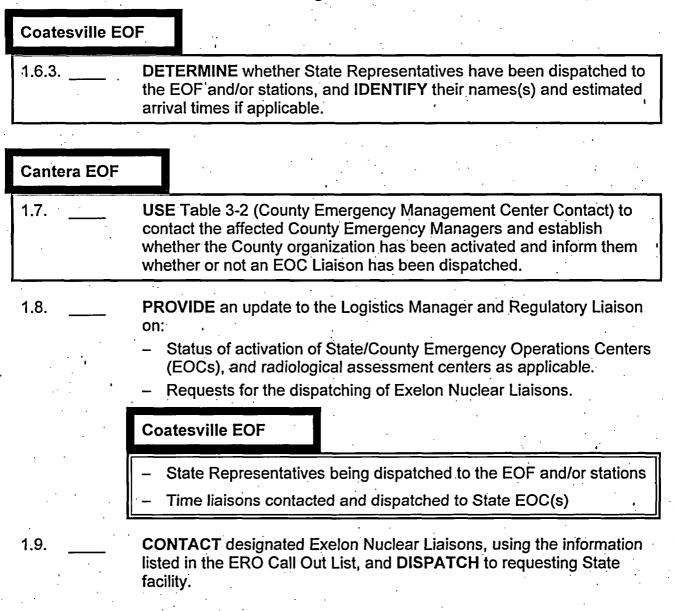
Mid-West Region

- 1.5. **CONTACT** the affected Station Logistics Coordinator to verify that County EOC Liaison(s) have been dispatched if requested, or at a Site Area or General Emergency if <u>not</u> yet dispatched.
- 1.6. **ESTABLISH** contact with applicable Key State Agencies per Table 3-1.
- 1.6.1. _____ COMPLETE Key State Agency List (Table 3-1) and PROVIDE a copy to the Logistics Manager and Regulatory Liaison.

Quad Cities			
1.6.2	Syst	tem (ERDS) is functionin	a that the Emergency Response Data g. If <u>NOT</u> , then CONTACT a 2 nd ENS mmunications with the Iowa EOC.

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ATTACHMENT 3 EOC COMMUNICATOR CHECKLIST Page 2 of 5



2. ONGOING ACTIONS

- 2.1. At a Site Area Emergency or when contacted by Liaison from EOC(s), ESTABLISH a conference call/ bridge between the EOF and Exelon Nuclear Liaisons using the instructions in the ERF Telephone Directory entitled, "Activating and Accessing Conference Bridge."
 - If the conference bridge fails for any reason, then SET UP a conference call with the EOC Liaisons using the conference function on the phone.
 - 1. **INFORM** Liaison(s) of significant changes in plant conditions, station priorities, fission product barrier integrity or release status.

ATTACHMENT 3 EOC COMMUNICATOR CHECKLIST Page 3 of 5

- 2. **OBTAIN** further clarification from the Operations Advisor on plant / system / equipment status in response to inquiries.
- 3. **UPDATE** the EOC Liaisons, at a minimum, whenever a new notification form is issued.

FAXING OF PLANT DATA AND FORMS

Do <u>not</u> fax plant data or notification forms to the County EOC Liaisons, since the recommended PARs on our form may differ from the State recommended protective actions.

- 2.2. **ENSURE** that the following is faxed to the County and State Liaisons:
 - Key State Agency List (Table 3-1)
 - Approved Press Releases
 - Significant Event Log (SEL), obtained from the Events Recorder
- 2.3. **ASSIST** the Logistics Manager to maintain an accurate record of event-related activities.
- 2.4. **ADVISE** the Regulatory Liaison if informed of additional State and/or County personnel being dispatched to the EOF and/or JPIC.
- 2.5. **PERFORM** a shift turnover with on-coming personnel using guidance in EP-AA-112, Attachment 2 (Shift Turnover).

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ATTACHMENT 3 EOC COMMUNICATOR CHECKLIST Page 4 of 5

TABLE 3-1 KEY STATE AGENCY POSITION LIST Page 1 of 1

1. **CONTACT** each agency listed in the table below.

2. **USE** the ERF Telephone Directory to find the telephone number.

3. **RECORD** the name of the person directing the agency's response.

Mid-West Region

<u>Position</u>		Name/Phone Number
Illinois EMA (State EOC)		
Chief of Operations		
Illinois DNS (REAC)	• •	
REAC Commander		
Illinois DNS (REAC)		
REAC Executive Officer		
Illinois DNS (REAC)		
REAC Reactor Analyst		
Illinois DNS (REAC)		
REAC Environmental Analyst	· ·	· · · · · · · · · · · · · · · · · · ·
Illinois DNS (REAC)		
Public information Officer		
Quad Only - Iowa EMD (State EOC)	•	
EMD Administrator	•	
Quad Only - Iowa DPH (State EOC)	•	
State Radiological Coordinator	• •	

Mid-Atlantic Region

Position	Name/Phone Number			
Pennsylvania EOC (EOC Director)				
Peach Bottom Only: Maryland EOC (EOC Director)				

ATTACHMENT 3 EOC COMMUNICATOR CHECKLIST Page 5 of 5

Table 3-2

COUNTY EMERGENCY MANAGEMENT AGENCY CONTACT [Mid-West Region] Page 1 of 1

Mid-West	Regior
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1. **USE** the chart below to determine the appropriate county(ies) to contact.

Affected Station / Associated EOCs

Local EOC Locations/County Emergency Manager Contact

Braidwood	Byron	Clinton	Dresden	LaSalle	Quad Cities
Will County EOC	Ogle County EOC	DeWitt County EOC	Will County EOC	Grundy County EOC	Clinton County EOC
Grundy County EOC		•	Grundy County EOC	LaSalle County EOC	Scott County EOC
Kankakee County EOC			Kendall County EOC	• •	Rock Island Count EOC
					Whiteside County EOC

- 1) **REFERENCE** the ERF Telephone Directory, State and County Emergency Response Organizations Section, for EOC telephone numbers.
 - 2) **CONTACT** the County Emergency Management Agency Coordinator at the county EOC.
 - 3) **DETERMINE** if their EOC has been activated.
 - 4) **DETERMINE** if an Exelon Nuclear presence is desired.
- 5) LOG all relevant data (e.g. contact name, position, telephone numbers, liaison presence requested, etc).
- 6) If a Exelon Nuclear presence is requested in the county, then CONTACT the affected station Logistics Coordinator to dispatch County EOC Liaisons.
 - **LOG** the name of the county and the liaison dispatched.
- 7) If liaisons are dispatched, then ACTIVATE the conference bridge using the instructions contained in the ERF Telephone Directory.

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ATTACHMENT 4 ADMINISTRATIVE COORDINATOR (EOF) CHECKLIST Page 1 of 5

Section 1, Initial Actions

Section 2, Ongoing Actions

Section 3, Situational Actions

- 3.1, Specialized Training
- 3.2, Relocation Center Transportation [Mid-West Region]
- 3.3, Event Termination

Table 4-1, EOF Staffing

<u>NOTE</u>: Steps in this checklist may be performed in an order other than listed **or** they may be omitted if not applicable.

- 1. INITIAL ACTIONS
- 1.1. ____ SIGN IN on the EOF Organization Board.
- 1.2. ____ **REPORT** your arrival to the Logistics Manager and **OBTAIN** a briefing.
- 1.3. ____ INITIATE a position log documenting significant actions performed and communications related to your position.
- 1.4. ____ REVIEW the automated call out system listing faxed to the EOF, and OBTAIN the names of the expected EOF personnel and their response times from the status report.
- 1.4.1. If the Call Out System Status Report indicates that EOF staffing is not complete OR additional staff is requested by EOF Director / Managers, then PERFORM the following:
 - 1. ____ **IDENTIFY** suitable personnel for the missing staff positions with the assistance of the Logistics Manager and group leads.
 - REFER to the ERO Telephone Directory for a listing of qualified personnel for emergency response positions.
 - **<u>NOTE</u>**: Fitness For Duty (FFD) requirements apply to all EOF emergency responders.
 - 2. ____ CONTACT identified emergency personnel, as necessary to fill EOF positions
 - A. **COMPLETE** EP-AA-112, Attachments 3 and 4, for all personnel contacted to fill EOF response positions.

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ATTACHMENT 4

ADMINISTRATIVE COORDINATOR (EOF) CHECKLIST Page 2 of 5

1.5.

1.7.

- **OBTAIN** additional clerical support for the EOF and JPIC, as required.
 - EOF: at least 2 to 3 clerical personnel suggested.
 - JPIC: at least 2 clerical personnel suggested.
- 1.6. ____ CONFIRM with the Computer Specialist that computer systems and communications are functioning properly.
 - ____ DISTRIBUTE copies of notification forms completed by the TSC/Control Room.

Mid-West Region

INCLUDE copies of the Significant Events Log (SEL), completed by the TSC/Control Room, from the Events Recorder

2. ONGOING ACTIONS

- 2.1. DIRECT the actions of the Administrative Staff positions:
 - Computer Specialist
 - Clerical Support
- 2.2. VERIFY arrival of clerical support personnel and ASSIGN tasks. Tasks include:
 - Administrative support to the Corporate Emergency Director.
 - Copying and distributing information per Clerical Fax and Distribution Guidance located at the Administrative Coordinator's desk.
 - Posting copies of completed forms in a central location.
- 2.3. **OBTAIN** services, as necessary, to support operations of the EOF such as accommodations, office support services, food services, training support, transportation and waste disposal.

ATTACHMENT 4

ADMINISTRATIVE COORDINATOR (EOF) CHECKLIST Page 3 of 5

- 2.4. If ongoing staffing of the EOF is necessary, then **PERFORM** the following:
 - **<u>NOTE</u>**: Arrange for relief staffing in coordination with the JPIC Administrative Coordinator.
 - 1. **DEVELOP** a shift schedule based on continuing needs of EOF Directors/ Managers, using Table 4-1 (EOF Staffing) to document the current and future staffing assignments.
 - Shift lengths should be 12 hours (maximum);

3.

- EOF shift change should not occur closer than one hour either side of TSC shift-change;
- All responders should have
 <u>></u> 7 hours between scheduled work periods.

2. **CONSULT** with the EOF Radiation Protection Manager to identify areas that should be avoided by relief personnel enroute due to radiological or other hazardous conditions.

CONSULT with the EOF Security Coordinator for coordination of relief staff with Local Law Enforcement Agencies (LLEA) through control points that may have been set up to control re-entry into evacuated areas.

- 4. **CONTACT** relief personnel for the next shift, using EP-AA-112, Attachment 3, and **PROVIDE** schedules and any special instructions for reporting to work.
- 2.5. **PERFORM** a shift turnover with on-coming personnel using guidance in EP-AA-112, Attachment 2 (Shift Turnover).

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ATTACHMENT 4 ADMINISTRATIVE COORDINATOR (EOF) CHECKLIST Page 4 of 5

3. SITUATIONAL ACTIONS

3.1. SPECIAL TRAINING

- 3.1.1. COORDINATE with the TSC Logistics Coordinator for training of emergency response personnel obtained to augment the Emergency Response Organization. This may include Nuclear General Employee Training (NGET), special site-specific training, radiological protection training, etc.
- 3.1.2. **CONSIDER** requesting assignment of a Training Specialist to the EOF to coordinate this activity.

Mid-West Region

3.2. RELOCATION CENTER TRANSPORTATION

- 3.2.1. ARRANGE, if requested, for transportation of Station shift relief personnel from the Relocation Center where shift personnel can leave their cars and ride buses to the Station. Provisions should include:
 - Arrangement for buses (these may be obtained from state, city, school authorities or private companies through the Logistics Manager);
 - Bus schedules to support Station shift schedules;
 - Security for employee vehicles;
 - Radiological precautions for persons being bused to and from the Station;
 - Notification to employees of bus pick-up points; and
 - Notification to local Law Enforcement Agency personnel at roadblocks to direct employees to the bus pickup points.

3.3. EVENT TERMINATION

- 3.3.1. COLLECT all documents generated and forms completed in the EOF and provide to Corporate Emergency Preparedness.
- 3.3.2. CONTACT personnel designated for shift relief and INFORM them of the termination of EOF activities.

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ATTACHMENT 4 ADMINISTRATIVE COORDINATOR (EOF) CHECKLIST Page 5 of 5 TABLE 4-1 <u>EOF STAFFING</u> Page 1 of 1

Position	Notes	Date Shift/Time	Date Shift/Time Fill in names below
Corporate Emergency Director*	110100		
EOF Director*		· · · · · · · · · · · · · · · · · · ·	· · · · ·
Technical Support Manager			
Technical Advisor		· · · · · · · · · · · · · · · · · · ·	
Operations Advisor (BWR)	· · ·		
Operations Advisor (PWR)#	· .	· · · · · · · · · · · · · · · · · · ·	
Events Recorder			· · · · · · · · · · · · · · · · · · ·
ENS Communicator	· · ·		· · ·
Radiation Protection Manager*	· .		
Dose Assessment Coordinator*			
State Environs Communicator [MW]		· _	
Dose Assessor			
HPN Communicator*			
Environmental Coordinator*			
Field Team Communicator			
Logistics Manager*		· · ·	
State / Local Communicator*			
EOC Communicator		· .	· .
County EOC Liaison [MW]	As needed	•	· · · · · · · · · · · · · · · · · · ·
State EOC Liaison	As needed		·
Administrative Coordinator	·	· ·	
Computer Specialist			<u> </u>
Security Coordinator (Cantera)		· · ·	· · · · · · · · · · · · · · · · · · ·
Regulatory Liaison	·		
Clerical Staff	· · ·	<u> </u>	
	· · ·	· · · · · · · · · · · · · · · · · · ·	
	L	· · · · · · · · · · · · · · · · · · ·	·····
			<u> </u>

POSITION (Bold Italics) * – "Minimum Staffing" position # -- Applies to Cantera & for TMI event to Coatesville

Mid-West Region			·. ·
Public Information Director			
ENC Events Recorder			
ENC Newswriter		·	
ENC Technical Advisor			
ENC Radiological Advisor			·
ENC Media Monitor	· ·		· · ·
ENC Rumor Control Monitor			

EOF DIRECTOR APPROVAL:

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ATTACHMENT 5 COMPUTER SPECIALIST CHECKLIST Page 1 of 2

Section 1, Initial Actions Section 2, Ongoing Actions

<u>NOTE</u>: Steps in this checklist may be performed in an order other than listed or they may be omitted if not applicable.

- 1. INITIAL ACTIONS
- 1.1. ____ SIGN IN on the EOF Organization Board.

1.2. **REPORT** your arrival to the Administrative Coordinator.

- 1.3. ____ INITIATE a position log documenting significant actions performed and communications related to your position.
- 1.4. ____ ASSIST EOF personnel with logging in to desired programs by walking around the EOF workstation by workstation.

REFER to EP-MW(MA)-110-100, ERO Computer Applications, for guidance on accessing the computer applications.

- 1.4.1. ____ If the Operations Advisor is not yet present, then INITIATE facility data display screens (i.e., flat screens or overhead projection) per EP-MW(MA)-110-100.
- 1.5. VERIFY the proper operation of notification circuits <u>with the following facility</u> <u>communicators</u> upon their arrival:
 - ____ State / Local Communicator (Nuclear Accident Reporting System)
 - ____ ENS Communicator (Emergency Notification System)
 - _____ HPN Communicator (<u>H</u>ealth <u>Physics Network</u>)

1.6.

CALL Information Technology (IT) Solution Center / Help Desk, or equivalent, and ENSURE an analyst is assigned in case immediate assistance is needed with the LAN/WAN access

ATTACHMENT 5 COMPUTER SPECIALIST CHECKLIST Page 2 of 2

2. ONGOING ACTIONS

2.1. **PERFORM** first response troubleshooting when computer problems are reported by EOF personnel:

- 1. **REQUEST** IT assistance for software problems that cannot be corrected at the EOF
 - During off-hours, IT may be contacted via the Solution Center / Help Desk.
- 2. **REQUEST** offsite assistance from the IT Solution Center / Help Desk for LAN/WAN and server problems that cannot be corrected at the EOF
- 3. **CONSULT** with IT personnel from the affected station to establish corrective actions for problems that occur on the station LAN that affect the programs.

Mid-West Region

- 4. **ADVISE** the Administrative Coordinator to request assistance from the Operational Analysis Department (OAD) for equipment problems that cannot be corrected at the EOF.
- 2.2. **PERFORM** first response troubleshooting when communications (telephone) problems are reported by EOF personnel:
 - 1. **CONTACT** the appropriate local telephone company(ies), using the numbers listed in the ERF Telephone Directory, to ensure their availability of telephone lines and to arrange for a service representative to be available.
 - 2. If problems arise, then PERFORM visual inspections; MAKE minor repairs if possible; or CONTACT appropriate telephone service representative to perform repairs.
 - 3. **ARRANGE** for expanded facility communications capabilities, as needed.

2.3. **PERFORM** a shift turnover with on-coming personnel using guidance in EP-AA-112, Attachment 2 (Shift Turnover).

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ATTACHMENT 6 REGULATORY LIAISON CHECKLIST Page 1 of 3

Section 1, Initial Actions

Section 2, Ongoing Actions

<u>NOTE</u>: Steps in this checklist may be performed in an order other than listed **or** they may be omitted if not applicable.

- 1. INITIAL ACTIONS
- 1.1. ____ SIGN IN on the EOF organization board.
- 1.2. ____ REPORT your arrival to the Logistics Manager and OBTAIN a briefing on event.
- 1.3. ____ INITIATE a position log documenting significant actions performed and communications related to your position.
- 1.4. <u>Upon arrival of the EOC Communicator</u>, **OBTAIN** copies of the completed Key State Agency List (Table 2-1, Attachment 3) and **DETERMINE** status of the following:
 - Activation of State and County Emergency Operations Centers (EOC)
 - Dispatching of Exelon Nuclear Liaisons to State / [Mid-West Region: County] EOCs
 - **[Coatesville EOF]** State Representatives being dispatched to EOF and estimated time of arrival.
- 1.5. ____ OBTAIN copies of notification forms and Significant Events Log (SEL), completed by the TSC/Control Room, from the Administrative Coordinator.

Coatesville EOF

1.6 _____ ENSURE that designated rooms and equipment for State Representatives are unlocked and accessible and NOTIFY Facility Security (Access Controller) of their pending arrival.

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ATTACHMENT 6 REGULATORY LIAISON CHECKLIST Page 2 of 3

2. ONGOING ACTIONS

- 2.1. **FUNCTION** as the primary interface between Exelon Nuclear and the arriving governmental agencies (NRC, State, Federal) within the EOF.
 - 1. When informed of the dispatching of an NRC Site Team, **OBTAIN** a list of NRC personnel expected at the EOF and JPIC from the ENS Communicator.
 - 2. **MEET** the NRC, State or Federal representatives in the entrance area of the building.
 - A. **OBTAIN** Visitor badges.
 - B. **ESCORT** the agency representatives to the EOF area.
 - 3. **INTRODUCE** agency personnel to their counterparts in the EOF.
 - 4. **ARRANGE** an initial briefing on current conditions.
 - A. **COORDINATE** with the EOF Director for obtaining an initial briefing.
 - B. **CONSULT** with the Administrative Coordinator to obtain copies of documents and forms that would be of interest to the agency representatives.
 - 5. **ALLOCATE** necessary work space, equipment, and supplies.
 - Designated rooms as well as counterpart seating in each of the EOF work areas have been identified.
 - State and Federal agency representatives should be shown their work space in the designated State room.
 - 6. **ACT** as the Exelon Nuclear Liaison to the NRC Site Team members, and State representatives if applicable.
 - 7. **OBTAIN** necessary equipment and supplies from the Administrative Coordinator and the clerical staff to support activities of governmental agencies located in the EOF.
- 2.2. **IDENTIFY** additional resources needed to support Licensing activities to the Logistics Manager.

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ATTACHMENT 6 REGULATORY LIAISON CHECKLIST Page 3 of 3

- 2.3. **RESOLVE** questions regarding Licensing requirements based on existing or proposed abnormal operating modes or plant modifications.
- 2.4. **COORDINATE** with Owners Group representative on relevant licensing matters (using numbers listed in the ERF Telephone Director).
- 2.5. **PERFORM** a shift turnover with on-coming personnel using guidance in EP-AA-112, Attachment 2 (Shift Turnover).

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ATTACHMENT 7 SECURITY COORDINATOR (EOF) CHECKLIST Page 1 of 5

Section 1, Initial Actions

Section 2, Ongoing Actions'

Table 7-1, Security Data Sheet

Table 7-2, Supplemental Support Worksheet

<u>NOTE</u>: Steps in this checklist may be performed in an order other than listed **or** they may be omitted if not applicable.

Coatesville EOF

For an event at Limerick, Peach Bottom Station or TMI, the on-call (Mid-West) EOF Security Coordinator will report to the Cantera EOF when notified and contact the Logistics Manager at the Coatesville EOF via telephone upon arrival.

- 1. INITIAL ACTIONS
- 1.1. ____ SIGN IN on the EOF Organization Board.
- 1.2. **REPORT** your arrival to the Logistics Manager.
- 1.3. ____ INITIATE a position log documenting significant actions performed and communications related to your position.
- 1.4. ____ CONTACT the Security Coordinator in the TSC and obtain information to complete Table 7-1, Security Data Sheet.
- 1.5. ____ BRIEF the Logistics Manager of the security-related information obtained.
- 1.6. ____ **REPORT** information related to the security-based EAL classifications directly to the Corporate Emergency Director.
- 1.7. ____ INFORM Corporate Nuclear Security of the status of the event.

ATTACHMENT 7 SECURITY COORDINATOR (EOF) CHECKLIST Page 2 of 5

2. ONGOING ACTIONS

- 2.1. **ASSIST** in coordinating access control activities at the EOF and JPIC with the EOF Logistics Manager and JPIC Coordinator.
- 2.2. If a Security Event is in progress or is determined to be credible, then REPORT directly to the Corporate Emergency Director and PERFORM the following:
 - 1. MAINTAIN an open line with the TSC Security Coordinator.
 - 2. **PROVIDE** appropriate security related information to the Public Information Manager.
 - 3. **CONSIDER** calling in another Security Coordinator to address the remainder of the responsibilities in this checklist.
 - 4. **PROVIDE** and **INTERPRET** information on Station Nuclear Security Plan response, contingency measures implemented, and security-related emergency action levels (EALs).
 - 5. **CONFIRM** with the TSC Security Coordinator that the "Two-Person, Line of Sight" Rule has been implemented during a specific, credible insider threat (reference SY-AA-101-132 and SY-AA-101-111-1002).

Mid-West Region

- 2.3. **OBTAIN** the traffic control access map, if available, and **IDENTIFY** roadblocks, relocation routes, relocation centers, etc. (IPRA Map A)
- 2.4. **PROVIDE** assistance to the TSC Security Coordinator:
 - **COORDINATE** additional security support at the station, or Relocation Center [Mid-West Region], as required from unaffected stations or security contractor.
 - COORDINATE access to the site with the EOF Administrative Coordinator, Radiation Protection Manager and LLEA, as necessary.
 - **PROVIDE** other assistance as requested by the TSC Security Coordinator.

2.5. In coordination with the TSC Security Coordinator, **ESTABLISH** contact with Local Law Enforcement Agencies (LLEA), State, and FBI if appropriate.

- 1. **INFORM** them of your role as primary contact point for the event from a security/access control point. (Notify TSC that you are doing this)
- 2. **COMPLETE** Table 7-2, Supplemental Support Worksheet with names and phone numbers for the agencies and personnel contacted.

ATTACHMENT 7

SECURITY COORDINATOR (EOF) CHECKLIST

Page 3 of 5

3. SERVE as the primary liaison for local, State and Federal Law Enforcement Agencies during security related events.

2.6. **ASSIST** the EOF Administrative Coordinator with EOF access and FFD requirements.

Cantera EOF

1. **ARRANGE** for building access to provide checkpoints at the EOF entrance.

NOTE: State, Federal and Local representatives, who may be present in the EOF, which is located outside the protected area and do not have responsibilities directly affecting reactor safety, are not covered by the FFD rule.

Mid-West Region

- 2.7. **DIRECT** the activities of the Access Control Coordinator at the JPIC.
- 2.8. **COORDINATE** security-related activities within the EOF.
- 2.9. When EOF/JPIC next-shift staffing is being developed, ADVISE the Administrative Coordinator of travel routes that should be avoided by relief personnel due to traffic control points established by LLEAs.
- 2.10. **COORDINATE** with the Environmental Coordinator travel by the Field Monitoring Team within the EPZ.
 - 1. **ENSURE** LLEAs (staffing roadblocks) are informed of the Field Monitoring Team locations.
- 2.11. SERVE as the primary contact to the Security Contractors for additional support, if necessary.
- 2.12. **ASSESS** all significant emergency events and system/component failures for the potential of intentional transgression.
- 2.13. **OBTAIN** additional resources to support access control measures needed at the EOF and JPIC, with the EOF Logistics Manager and JPIC Coordinator respectively.
- 2.14. **PERFORM** a shift turnover with on-coming personnel using guidance in EP-AA-112, Attachment 2 (Shift Turnover).

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ATTACHMENT 7 SECURITY COORDINATOR (EOF) CHECKLIST Page 4 of 5 TABLE 7-1 <u>SECURITY DATA SHEET</u> Page 1 of 1

EAL's	Have any of the EAL Threshold values for the H1 series classifications been reached?	Y/N
	Which, if any:	
Security Force Impact	Has the current event lead to any impacts on the implementation of the Site Security Plan?	Y/N
Force	Equipment:	
rity 1	Procedures:	
Secu	Personnel:	
lity	Has Personnel Accountability been initiated?	Y/N
Itabi	Siren sounded / PA: (Time / Date)	1 / 18
Personnel Accountability	Completed: (Time / Date)	
Acc	Total initially unaccounted for:	
Inel	Were all personnel accounted for? Y / N	
rson	Persons missing	
Pel	Search and Rescue in use Y / N	
	Has a Site Evacuation been initiated?	Y/N
	Evacuation Route in use:	
tion	Has a Relocation Center been established? Y / N	
Icua	What is the location of the Relocation Center?	
Site Evacuation	Are Security personnel present / needed at the Relocation Center?	
Site	Total personnel on-site prior to evacuation:	
	Total personnel deemed essential remaining on-site:	
	Total non-essentials evacuated from the site:	

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ATTACHMENT 7 SECURITY COORDINATOR (EOF) CHECKLIST Page 5 of 5 TABLE 7-2 <u>SUPPLEMENTAL SUPPORT WORKSHEET</u> Page 1 of 1

<u>NOTE</u>: This worksheet is for the convenience of the Security Coordinator and need not be adhered to item-by-item. Consult the ERF Telephone Directory for telephone numbers.

I. LAW ENFORCEMENT AGENCIES

<u>LOCAL</u>

AGENCY

CONTACT NAME

PHONE NUMBER

•	

<u>STATE</u>

AGENCY CONTACT NAME PHONE NUMBER

	•

FEDERAL

AGENCY CONTACT NAME PHONE NUMBER

•	• •	 · .	• •	
	• •	 		

II. CONTRACTED SECURITY

COMPANY CONTACT NAME PHONE NUMBER