

July 22, 2004

Ms. Marilyn Kray  
Vice President, Project Development  
Exelon Generation  
200 Exelon Way, KSA3-N  
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 3 - EXELON  
EARLY SITE PERMIT APPLICATION FOR THE CLINTON ESP SITE (TAC NO.  
MC1122)

Dear Ms. Kray:

By letter dated September 25, 2003, Exelon Generation Company, LLC (Exelon) submitted its application for an early site permit (ESP) for the Clinton ESP site.

The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of the Site Safety Analysis Report in your ESP application to ensure that the information is sufficiently complete to enable the NRC staff to reach a final conclusion on all safety questions associated with the site before the ESP is issued. The NRC staff has determined that additional information is necessary to continue the review. The topic covered in the request for additional information (RAI) contained in Enclosure 1 is emergency preparedness. These RAIs were sent to you via electronic mail (e-mail) on April 12, 2004, and were clarified further in a follow-up e-mail on June 11, 2004.

Receipt of requested information within 75 days of the date of this letter will support the NRC's efficient and timely review of Exelon's ESP application. Please note that failure to provide a response in a timely fashion may result in a delay of completion of the staff's safety evaluation report. If you have any questions or comments concerning this matter, you may contact me at (301) 415-1180 or [nvg@nrc.gov](mailto:nvg@nrc.gov).

Sincerely,

*/RA/*

Nanette V. Gilles, Exelon ESP Project Manager  
New Reactors Section  
New, Research and Test Reactors Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Docket No. 52-007

Enclosure: As stated

cc: See next page

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Docket No. 52-007

Enclosure: As stated

cc: See next page

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML041890497.wpd

ACCESSION NO. ML041890497 \*See previous concurrence

OFFICE	RNRP/PM*	EPPO/SC*	OGC	RNRP/SC*
NAME	NGilles	EWeiss	AHodgdon	LDudes
DATE	07/13/04	07/13/04	07/19/04	07/14/04

**OFFICIAL RECORD COPY**

**Exelon Early Site Permit Application**  
**Emergency Plan**  
**Requests for Additional Information (RAI)**

RAI No. 13.3-1

Section 1.1 of the Emergency Plan for the Exelon Generating Company, LLC (EGC) Early Site Permit (EGC ESP Emergency Plan)

Section 1.1 of the EGC ESP Emergency Plan of the Exelon ESP application states, in part, "This plan is also aligned with the *Exelon Nuclear Standardized Radiological Emergency Plan*, Revision 14, so that the emergency response organization (ERO) operations, detailed herein, will parallel the other Applicant plants and corporate response operations within the State of Illinois."

Is it your intent that applicable sections of the existing *Exelon Nuclear Standardized Radiological Emergency Plan*, Revision 14 (including the Clinton Annex), be considered as part of the ESP application, to the extent that they support the emergency planning description in the ESP application, or should the NRC staff only consider the content of the EGC ESP Emergency Plan submitted with the ESP application?

RAI No. 13.3-2

Section 1.2 of the Exelon Generation Company (EGC) ESP Emergency Plan

Section 1.2, "Planning Standards and Evaluation Criteria," of the Exelon Generation Company (EGC) ESP Emergency Plan states that the current versions of the state and local plans are incorporated by reference in the ESP application. Appendix C, "References," identifies two plans. They are: State of Illinois, "Concepts of Operations," *The Illinois Plan for Radiological Accidents (IRPA)*, Volume I, May 2001, and State of Illinois, "Clinton Power Station," *The Illinois Plan for Radiological Accidents (IRPA)*, Volume III, July 2001a. Please provide a copy of the versions of the state and local plans that are referred to in the application.

RAI No. 13.3-3

Section 2.1 of the EGC ESP Emergency Plan

Section 2.1, "Site Description," of the EGC ESP Emergency Plan states that Weldon Springs State Recreation Area has camping, fishing, and picnicking facilities. Section 2.1 also states that Lake Clinton State Recreation Area has facilities to accommodate boating, camping, fishing, picnicking, and hiking. Discuss the availability of adequate shelter facilities provided for the public in the Weldon Springs State Recreation Area and Lake Clinton State Recreation Area.

Enclosure

RAI 13.3-4

Section 3.1.1.3 and Appendix A of the EGC ESP Emergency Plan

Section 4.5 of RS-002, "Processing Applications for Early Site Permits," states that letters of agreement, reflecting contacts and arrangements with local governmental agencies with emergency planning responsibilities, might need to be revised to reflect the anticipated presence of an additional reactor (or reactors) at the site. Such letters of agreement should reflect any impact the additional reactor(s) would have on the government agency emergency planning responsibilities, and should include acknowledgment by the agencies of the proposed expanded responsibilities. This acknowledgment may be in either a letter of agreement or in separate correspondence. A separate correspondence might be sufficient in a case where an existing letter of agreement is written in a way that is broad enough to cover an expanded site use, and does not need to be revised. The correspondence should identify this fact. Finally, as indicated in evaluation criterion A.3 of Supplement 2 to NUREG-0654/FEMA-REP-1, a signature page in the ESP application may be appropriate for some organizations to signify their agreement with the concept of operations associated with the ESP application.

Section 3.1.1.3 of the EGC ESP Emergency Plan states that the surrounding communities that comprise the plume exposure pathway Emergency Planning Zone (EPZ) have developed integrated emergency response programs that call upon the resources of the community. Section 3.1.1.3 also states that the community organizations are responsible for implementing and coordinating the community response to an emergency. Section 3.1.1.3 also states that the surrounding communities include DeWitt, Macon, McLean, and Piatt Counties; the municipalities of Clinton, Wapella, Weldon; and the Village of DeWitt.

Consistent with the discussion above, please provide documentation of contacts and arrangements with local governmental agencies with emergency planning responsibilities within the plume exposure EPZ that specifically addresses the expanded responsibilities associated with an additional reactor (or reactors) at the Clinton site.

RAI No. 13.3-5

Section 3.3 of the EGC ESP Emergency Plan

Section 3.3, "The Applicant Emergency Organization," of the EGC ESP Emergency Plan addresses the key positions and associated responsibilities of the EGC ESP Facility Nuclear emergency response organization. Also, Section 3.1.2.4, "Interrelationships," states that the major applicant organizations and sub-organizations as well as governmental interrelationships in the total response effort are illustrated in block diagrams in Figure 3.1-1, "Applicant Emergency Response Organizational Interrelationships," and Figure 3.1-2, "Applicant Response Organization Interrelationships." In addition to this information related to emergency response organization interrelationships, identify the interfaces between and among the on-shift emergency response functional areas (e.g., emergency direction and control, notification and communication, firefighting, medical and rescue support services, and security/law enforcement) and local support services (e.g., the local fire department, local rescue and ambulance services, and local law enforcement agencies) and state and local government response organizations (e.g., Illinois Emergency Management Agency, DeWitt County, the

Village of DeWitt, and the municipality of Weldon). This information may be provided in a block diagram.

RAI No. 13.3-6

Section 5.2.1 of the EGC ESP Emergency Plan

Section 5.2.1, "On-site," in the EGC ESP Emergency Plan states that when an emergency is declared, reclassified, or terminated, an announcement will be made over the plant public address system or by other means. Discuss the means that will be used to notify the transient and resident population in the owner controlled area.

RAI No. 13.3-7

Sections 7.1 and 7.2 of the EGC ESP Emergency Plan

Sections 7.1, "Public Information Publication," and 7.2, "Public Education Materials," of the EGC ESP Emergency Plan state that the public information publication will include the following information: educational information on radiation; a description of the events which require public notification and what to do if a take shelter or evacuate recommendation is given; a map of major evacuation routes; a list of communities likely to serve as host shelter areas, and instructions on how to obtain additional information, especially for the disabled or their caretakers and those without transportation; and an address, telephone number, and email address to contact for additional information. Provide any information from your public information program that addresses respiratory protection.

RAI No. 13.3-8

Section 10.1.1 of the EGC ESP Emergency Plan

Section 10.1.1, "Evacuation Locations," of the EGC ESP Emergency Plan addresses the evacuation of visitors and non-essential personnel from the site. Section 10.1.1 also states that personal transportation, if available, will normally be used. Personnel without transportation will be identified and provided transportation, as necessary. Discuss the means that will be used to transport visitors and non-essential personnel without transportation from the site in the event of an evacuation.

RAI No. 13.3-9

Sections 11.2.3.1 and 11.2.4 of the EGC ESP Emergency Plan

Sections 11.2.3.1, "Contamination Control Means," and 11.2.4, "Contamination Control Measures," of the EGC ESP Emergency Plan discuss the means for decontaminating personnel, vehicles, supplies, instruments and equipment. Describe the means for decontaminating personnel wounds.

RAI No. 13.3-10

Section 16.2 of the EGC ESP Emergency Plan

Section 16.2, "Authority for the Emergency Preparedness Effort," of the EGC ESP Emergency Plan states that the Applicant's officers will be responsible for the safe and reliable operation of the EGC ESP Facility. The issuance and control of this plan and the activities associated with emergency preparedness at EGC shall be the overall responsibility of the Vice President of Licensing and Regulatory Affairs. The Vice President of Licensing and Regulatory Affairs will be assigned the responsibility for overall implementation of the EGC Emergency Plans. Clarify whether the Vice President of Licensing will have overall authority and responsibility for radiological emergency response planning, and if he will be designated the Emergency Planning Coordinator. If the Vice President of Licensing will not have the overall authority and responsibility for radiological emergency response planning, identify by title the individual who will. In addition, if the Vice President of Licensing will not be designated the Emergency Planning Coordinator, identify an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans, and for coordination of these plans with other response organizations.

RAI No. 13.3-11

Section 16.4 of the EGC ESP Emergency Plan

Section 16.4, "Emergency Plan and Agreement Revisions," of the EGC ESP Emergency Plan states, in part, that the *Exelon Nuclear Standardized Radiological Emergency Plan* and supporting agreements will be reviewed on an annual basis. The annual plan review/update will include required changes identified during audits, assessments, training, drills, and exercises. Section 16.4 of the EGC ESP Emergency Plan addresses the annual updating of the *Exelon Nuclear Standardized Radiological Emergency Plan*, but does not address the updating of agreements. Describe the process used to update the agreements that support the *Exelon Nuclear Standardized Radiological Emergency Plan*. The description should address each agreement and the frequency of its update.

Distribution for Request For Additional Information Letter No. 3 dated July 22, 2004

Hard Copy

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