

August 24, 2004

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

SUBJECT: REVISION TO REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 11 -
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.

On July 27, 2004, the NRC staff sent you Request for Additional Information (RAI) Letter No. 11. The topic covered in that RAI letter was emergency planning. Those RAIs were sent to you via electronic mail (e-mail) on July 8 and 22, 2004, and discussed during a teleconference on July 21, 2004. As a result of information exchanged during the teleconference, draft RAI 13.3-18 was deleted because the information requested was beyond the scope of the NRC's ESP review. However, the staff also inadvertently deleted draft RAI 13.3-19. Draft RAI 13.3-19 should not have been deleted and it has been included in the revised set of RAIs contained in the enclosure. Please address this revised set of RAIs in your response.

Receipt of requested information within 75 days of the date of the July 27, 2004 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.

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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ACCESSION NO. ML042230041

OFFICE	RNRP/PM	EPPO/SC	OGC	RNRP/SC
NAME	NGilles	EWeiss	AHodgdon	LDudes
DATE	08/10/04	08/16/04	08/17/04	08/19/04

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

RAI No. 13.3-12

Discuss the extent to which the Clinton ESP application is intended to address Evaluation Criteria V.H.1 and V.H.2 of Supplement 2 to NUREG-0654/FEMA-REP-1 for the Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF); including addressing NUREG-0696. If the application is intended to address these two Evaluation Criteria, provide additional information to address applicable NUREG-0696 criteria. Also, state whether or not Exelon intends to use the existing TSC, OSC, and EOF, which support the existing Clinton unit, for the ESP site. If so, provide information consistent with Evaluation Criteria V.H.1 and V.H.2 regarding the impact of the new reactor on these facilities.

RAI No. 13.3-13

Provide the following information regarding the State and/or local emergency plans:

- a) a description of the legal basis (reference specific acts, codes or statutes) for county or municipal authorities to be part of the overall response organization for the Emergency Planning Zones
- b) a description of the general capabilities of radiological laboratories (besides the two Illinois Department of Nuclear Safety mobile laboratories) to provide radiological monitoring and analyses services
- c) a description of the provisions for prompt communications between state and federal emergency response organizations
- d) a description of the State and local programs for acquainting news media with emergency plans, information concerning radiation, and points of contact for the release of public information in an emergency
- e) references to maps in the local emergency plans that show evacuation routes
- f) a description of the State and local governments' concept for using the traffic capacities of evacuation routes for implementing protective measures
- g) a description of the State and local organizations' concepts for using evacuation time estimates when considering the evacuation of various sectors and distances
- h) a description of the Illinois Department of Nuclear Safety Standard Operating Procedures that relate to the bases for choosing a recommended protective action for the plume exposure pathway

Enclosure

- i) a description of how the State will acquire and distribute dosimeters, both direct-reading and permanent record devices
- j) a description of state and local organization specific action levels for determining the need for decontamination of emergency workers, equipment and vehicles, and the general public and their possessions
- k) a description of state and local organizations' means for radiological decontamination of emergency personnel wounds, supplies, instruments, and equipment
- l) the title of the individual(s) at the state level with the overall authority and responsibility for radiological emergency response planning
- m) the title of the individual(s) at the state level who is designated as the Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordinating of these plans with the other response organizations

RAI No. 13.3-14

Provide the results of the review of the draft Evacuation Time Estimate study by state and local organizations.

RAI No. 13.3-15

Should the information contained in the Phase One Report that was completed in December 2003 and documents the assessment of population changes in the plume exposure pathway emergency planning zone be considered as an update to the 1993 Evacuation Time Estimate (ETE) study for use in evaluation of your ESP application? If not, discuss why it shouldn't be considered. If it should be considered, please provide a copy of the report and discuss the differences in the population data presented in the application and the population data in the 1993 ETE study.

RAI No. 13.3-16

Provide a description of the method(s) used to confirm evacuation and the estimated time required for confirmation of evacuation.

RAI No. 13.3-17

Even though some extrapolated population data has been provided for the addition of two reactors at the Clinton site and refueling outages, additional extrapolated population data is needed for the next 20 years (life of the ESP application) and a discussion of its impact on the ETE.

RAI No. 13.3-18

Provide a copy of the letter of agreement with the DeWitt County Sheriff's Department that is dated 2003 or later.

RAI No. 13.3-19

Provide an updated version of Table B-1 "Requirements Matrix" in Appendix B "Requirements Matrix" of the Exelon Generation Company (EGC) ESP Emergency Plan. For example, consider updating the following references:

NUREG-0654/ FEMA-REP-1, Rev.1, Supp. 2, Sec. V Eval. Criteria	EGC ESP Plan	State of Illinois Plan	DeWitt County Plan
C.1	Add section 3.1.1.1.2		
C.2		Remove 3A(3) Add 1E(1)	
C.3		Remove 1E(1) and 3A(8) Add 3A(12) and 3C	Add Appendices D and E Add Map C
E.2	Replace sections 5.3.and 5.4 with 5.2 and 5.3		
E.3		Remove 4A, 4B, 4C, and 4D Add 1G	Remove 1D Add 2A
F.1.a		Remove 1E(2), 4C, and 4D Add 1J	Remove 1C, 1D, 2A, 2B, 2C, and 2D Add 2G and Appendix A
F.1.b		Remove 1J and 4A Add 2B	Remove 2G and Annexes 2A – 2F Add IPRA Volume I
F.1.c		Remove 2B, 3A(3), and 3A(8) Add 3A	Add 1C and 1D
F.2			Add 2G and Annexes 2A – 2F
G.2		Remove 5C Add 5D	
I.1	Add 3.1.1.1.7	Remove 3A(4) Add 1E and 3A(8)	Add 1D, 2F, and 2O
I.3		Add 1E	
J.1		Remove 1E(4) Add "Not Applicable"	Remove "Included in the Illinois Plan at 1E(4)" Add "Clinton Power Station Emergency Plan"
J.2	Add 10.2		
J.4	Add 10.1.3 and Figure 10.2-1		
J.4.a		Remove 1E(4) Add "Site-specific volumes"	Remove 2J, Annexes 2A – 2F Add 1E and Maps B and D
J.4.b	Change figure number to 2.3-2	Remove 1E(4) Add "Site-specific volumes"	Add Maps A – C
J.4.c	Remove 6.1 Add 5.2.1	Add 1G	Remove 2G, 2I, and 2P Add 1C and 2A

NUREG-0654/ FEMA-REP-1, Rev.1, Supp. 2, Sec. V Eval. Criteria	EGC ESP Plan	State of Illinois Plan	DeWitt County Plan
J.4.d		Remove 1E(4) Add 5C	Remove Attachment references Add 2J, 3B, and Annexes 2A – 2F
J.4.e			Remove 2O(3) Add 1D, 2O, and Annexes 2A – 2F
J.4.f			Remove Appendix D and Map C
J.4.g		Remove 1E(4) Add “Site-specific volumes”	Remove Appendix D
J.4.h		Remove 1E(4) Add “Evacuation Time Estimates”	Remove 2J, Map A, and Map C Add “Evacuation Time Estimates”
J.4.i		Add 3A(2), 3A(6), and 3A(7)	Remove 1D(1) and Annex 2A Attachment 8 Add 1D and Annexes 2A – 2F
J.4.j		Remove 1E(4) Add 3A(6), 3A(7), and 3A(11)	Remove 1D(1), 1D(4), Annex 2A Attachment 1, Map A, and Appendix B Add 1D, Annexes 2A – 2F
J.4.k		Remove 1E(4) Add “Evacuation Time Estimates”	Remove “Included in Illinois Plan at 1E(4)” Add “Evacuation Time Estimates”
J.4.l			Remove 3 Add “See IPRA Volume I”
J.5		Remove 1E(4)	Remove Appendix D and Appendix E
K.1.a thru h	Add 11.1		
K.3.a			Remove 2O(1) Add 1D, 2O, and Annexes 2A – 2F
K.3.b		Remove 1E(4) and 3A(8)	Add 1D and Annexes 2A – 2F
K.4	Add 11.1		
K.5.b	Add 11.2.4		Add 2A and Annexes 2A – 2F
L.1	Add 3.4.5	Remove 1E Add 1H	Remove 1E
O.1	Add 15.5		
O.1.h		Add 1H	
P.1			Remove 2N Ass 2L
P.2		Remove 6D	
P.5	Remove 16.4		

NUREG-0654/ FEMA-REP-1, Rev.1, Supp. 2, Sec. V Eval. Criteria	EGC ESP Plan	State of Illinois Plan	DeWitt County Plan
P.5	Add Appendix B Remove 16.7		

Distribution for Revision to Request For Additional Information Letter No. 11 dated August 24, 2004

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