

**From:** Nanette Gilles  
**To:** Eddie Grant; Tom Mundy  
**Date:** Fri, Jun 11, 2004 10:33 AM  
**Subject:** RE: Emergency Plan draft RAIs - Applicant questions

The staff's responses to your questions below concerning the draft RAIs on the EGC ESP Emergency Plan are attached. Please let me know if you have any additional questions.

>>> "Grant, Eddie R." <eddie.grant@exeloncorp.com> 05/05/04 09:55AM >>>  
RAI No. 13.3-2

Is our statement "incorporated by reference" in the EP section 1.2 the cause for this difficulty/request/concern?  
Would it help (or hinder more) if that statement were removed?

RAI No. 13.3-3

To which planning standard is this request related? I think that will help us understand how to respond.

RAI No. 13.3-5

Figure 3.1-2 is intended to show the requested relationships. This figure is the same as currently used to show this interrelationship for all Exelon plants (in the Exelon Nuclear Standardized Radiological Emergency Plan). We would prefer to have consistent information for all Exelon plants if possible.

a) Does the staff really need the requested additional detail?  
If it is deemed necessary, b) do you have an example of a diagram that provides sufficient detail (perhaps from another station's EP)?

RAI No. 13.3-7

Is the Staff looking for anything specific here, or just general information?

Thanks,  
Exelon Early Site Permit Project  
Eddie R. Grant  
610.765.5001 voice  
610.765.5755 fax  
850.598.9801 cell

-----Original Message-----

From: Nanette Gilles [<mailto:NVG@nrc.gov>]  
Sent: Monday, April 12, 2004 3:06 PM  
To: [eddie.grant@exeloncorp.com](mailto:eddie.grant@exeloncorp.com); [thomas.mundy@exeloncorp.com](mailto:thomas.mundy@exeloncorp.com)  
Cc: Ann Hodgdon; Daniel Barss; Eric Weiss; James Lyons; Laura Dudes; Michael Scott; Robert Moody; Stephen Koenick  
Subject: Emergency Plan draft RAIs

Please find attached a package of preliminary questions, in the form of draft requests for additional information (RAIs) for the Clinton ESP review. These questions pertain the review of the EGC ESP Emergency Plan. Exelon may request a phone call to seek clarification on the questions before they are issued by letter. Please contact me to let me know if you wish to arrange such a call or if you have other questions.

Sincerely,

Nanette Gilles  
Senior Project Manager  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Phone (301) 415-1180

\*\*\*\*\*  
This e-mail and any of its attachments may contain Exelon Corporation proprietary information, which is privileged, confidential, or subject to copyright belonging to the Exelon Corporation family of Companies. This e-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this e-mail is strictly prohibited and may be unlawful. If you have received this e-mail in error, please notify the sender immediately and permanently delete the original and any copy of this e-mail and any printout. Thank You.  
\*\*\*\*\*

**CC:** Robert Moody

**Mail Envelope Properties**  
(40C9C2BE.78C : 14 : 21456)

**Subject:** RE: Emergency Plan draft RAIs - Applicant questions

**Creation Date:** Fri, Jun 11, 2004 10:33 AM

**From:** Nanette Gilles

**Created By:** NVG@nrc.gov

<b>Recipients</b>	<b>Action</b>	<b>Date &amp; Time</b>
exeloncorp.com	Transferred	06/11 10:33 AM
eddie.grant (Eddie Grant)		
thomas.mundy (Tom Mundy)		

nrc.gov

owf4\_po.OWFN\_DO  
REM2 CC (Robert Moody)

Delivered  
Opened

06/11 10:33 AM  
06/11 10:33 AM

**Post Office**

**Delivered**

**Route**

owf4\_po.OWFN\_DO

06/11 10:33 AM

exeloncorp.com  
nrc.gov

**Files**

**Size**

**Date & Time**

EP RAI(1)-Exelonquestions.wpd  
10:08 AM

5071

Tuesday, June 8, 2004

MESSAGE

6449

Friday, June 11, 2004 10:33 AM

**Options**

**Auto Delete:** No  
**Expiration Date:** None  
**Notify Recipients:** No  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**To Be Delivered:** Immediate  
**Status Tracking:** Delivered & Opened

RAI No. 13.3-2

Exelon question: Is our statement "incorporated by reference" in the EP section 1.2 the cause for this difficulty/request/concern? Would it help (or hinder more) if that statement were removed?

Response: It would not help to remove "incorporated by reference." The question simply requests that a copy of the revision of State and local emergency plans referenced in the application be submitted on the applicant's docket.

RAI No. 13.3-3

Exelon question: To which planning standard is this request related? I think that will help us understand how to respond.

Response: This question relates to RS-002 "Processing Applications for Early Site Permits," Part 13.3.1 "Early Site Permits," Section II. Acceptance Criteria," Subsection 1 "Identification of Physical Characteristics."

RAI No. 13.3-5

Exelon question: Figure 3.1-2 is intended to show the requested relationships. This figure is the same as currently used to show this interrelationship for all Exelon plants (in the Exelon Nuclear Standardized Radiological Emergency Plan). We would prefer to have consistent information for all Exelon plants if possible.

a) Does the staff really need the requested additional detail?

If it is deemed necessary, b) do you have an example of a diagram that provides sufficient detail (perhaps from another station's EP)?

Response: Evaluation Criterion B.1 in Supplement 2 to NUREG-0654/FEMA-REP-1, Revision 1, states that the applicant is to identify the interfaces between and among the onsite functional areas and local support services, local law enforcement, and State and local government response organizations. Figure 3.1-2 in the Clinton application does not illustrate the various interfaces identified in Evaluation Criterion B.1 at the onsite functional area level. Table B-1 of NUREG-0654/FEMA-REP-1 provides guidance related to major onsite functional areas. As an alternative to a block diagram, a narrative description of interfaces at the functional area level could be provided. The narrative description could address the various interfaces at the functional area level and be contained separately in the ESP application, or the narrative description may reference letters of agreement for the various support services and organizations associated with the functional areas.

RAI No. 13.3-7

Is the Staff looking for anything specific here, or just general information?

Response: Evaluation Criterion G.1 in Supplement 2 to NUREG-0654/FEMA-REP-1, Revision 1, states that the applicant shall describe the program for disseminating emergency information to the public. Evaluation Criterion G.1 also specifies that respiratory protection information should be included in the program. The RAI question requests confirmation that respiratory protection information will be included in the periodic dissemination of information to the public.