

**RIC 2005**  
**Session TH-A5**  
**Region I Breakout**

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# Communications with External Stakeholders

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- Constellation core value
  - Open and honest communications with all stakeholders
- Regional Utility Group, Region I (RUG I)
  - Objectives
    - Exchange and discuss Region I regulatory issues
      - Including communication lessons learned
    - Establish communications with NRC Region I regarding inspection, enforcement, and licensing issues
      - Sam Collins attends periodically to exchange this information
  - Formed in December 2004
    - Similar to RUG IV
  - Members include all 16 sites within Region I
    - Site Licensing Directors/Managers
    - Corporate Licensing

# Emergency Preparedness Initiatives

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- Constellation views
  - Emergency Planning is important
    - Corporate EP Manager is a direct report to CNO
  - EP organizations attempt to establish and maintain strong contacts with local and state governments and populations
    - Includes support of local activities and functions
    - Attempt to bring local officials to site
  - Actively participate in NEI and state EP related organizations
  - Attempt to standardize EP organizations while maintaining local contacts
    - Standard team structures
    - Sharing of training, siren maintenance equipment, and exercise techniques (lessons learned)

# Engineering Pilot Inspection Program

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- Constellation utilizes standard regulatory inspection preparation process
- Elements for significant inspections include:
  - Response Team formed 3+ months in advance
    - Use industry OE, site QA, and corrective action program (CAP) input to perform self assessment of inspection scope
    - Fleet resources and outside experts also used
    - All items identified entered into CAP
      - Attempt to resolve all issues prior to inspection start date
  - Corporate Challenge Board conducted to ensure site readiness 1 month before inspection
  - All items identified during inspection entered into CAP and lessons learned exchanged with rest of fleet

# Engineering Pilot Inspection Program

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- Seeing impact of loss of engineering experience (aging workforce)
- Constellation countermeasures include:
  - Hiring new graduates
  - Co-op pipeline re-established
  - Knowledge retention pilots
  - Site-specific action plans for near-term retirees
  - Similar approach being used for non-engineering population

# Promoting Regional Consistency

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- As noted, will utilize RUG I to identify inconsistencies
  - Sam Collins has specifically asked for this feedback from RUG I
- Recent changes to NOED Process
  - Prefers use of “emergency amendment request” if > 72 hours of Completion Time remain since this is an established process per 10CFR50.91
    - License must “explain why this emergency situation occurred and why it could not avoid this situation”
    - The NRC may decline to use this process if it determines that “the licensee has abused the emergency provision by failing to make timely application for the amendment and thus itself creating the emergency.”
    - Therefore, it is important to:
      - Have early communication with NRC
      - Pre-identify vulnerabilities to submit TS before emergency occurs