Donald K. Cobb
Assistant Vice President, Nuclear Generation

Fermi 2
6400 North Dixie Hwy., Newport, MI 48166
Tel: 734.586.5201 Fax: 734.586.4172

DTE Energy

10 CFR 50.54(q)

May 14, 2007
NRC-07-0009

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) Detroit Edison Letter to NRC, "Submittal of Proposed Revision to the Fermi 2 Radiological Emergency Response Preparedness Plan (RERP Plan)," NRC-05-0052, dated September 6, 2005

3) Detroit Edison Letter to NRC, "Withdrawal of Submittal of Proposed Revision to the Fermi 2 Radiological Emergency Response Preparedness Plan (RERP Plan)," NRC-06-0056, dated July 21, 2006

4) NRC letter dated August 31, 2006, "Fermi 2 – Withdrawal of Proposed Changes to the Radiological Emergency Response Plan (TAC No. MC8351)"

Subject: Submittal of Proposed Revision to the Fermi 2 Radiological Emergency Response Preparedness Plan (RERP Plan)

Pursuant to 10 CFR 50.54 (q), Detroit Edison hereby submits proposed changes to the Fermi 2 Radiological Emergency Response Preparedness Plan (RERP Plan) for review and approval.

Approval of the following changes to the Fermi 2 RERP Plan are requested: to eliminate the Station Nuclear Engineer position, the second Chemistry Technician, the EOF Coordinator, the QA Advisor, and one Support Engineer from the Emergency Response Organization (ERO).

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The purpose of this submittal is to provide justification for elimination of these positions based on demonstration of adequate coverage without placing undue burden on the on-shift staff.

The proposed changes have been reviewed considering the requirements of 10 CFR 50.47 (b), 10 CFR 50, Appendix E and other applicable NRC guidance documents. These changes modify the Fermi licensing basis which was relied upon to meet the requirements of 10 CFR 50.47, "Emergency plans," and 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," and other applicable NRC guidance documents.

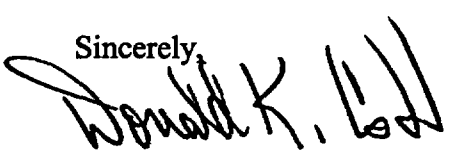
These changes represent a proposed alternate method under Regulatory Guide 1.101 for complying with the regulations, therefore NRC review and approval is requested. These changes, however, have minimal impact on the capability of the emergency response organization to respond to an emergency and do not reduce the ability of Fermi to assure the health and safety of the public. These changes therefore, do not decrease the effectiveness of the Fermi 2 RERP Plan.

Enclosure 1 discusses the proposed changes and the justification for those changes. Enclosure 2 provides electronic markups reflecting the proposed changes.

NRC approval of the proposed changes is requested by December 31, 2007 in order to address an NRC inspection finding. These changes were previously proposed by Detroit Edison in Reference 2, which was withdrawn by Detroit Edison in Reference 3. NRC documented the status of its review in Reference 4 and found that the proposed changes included herein were acceptable. Based on the effort already expended by the NRC staff and Detroit Edison personnel during the previous review, an expedited review of this submittal is requested.

Should you have any questions or require additional information, please contact Mr. Ronald W. Gaston at (734) 586-5197.

Sincerely,



cc: NRC Project Manager
Reactor Projects Chief, Branch 4, Region III
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, DONALD K. COBB, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

DONALD K. COBB
Assistant Vice President, Nuclear Generation

On this 14th day of May, 2007 before me personally appeared Donald K. Cobb, being first duly sworn and says that he executed the foregoing as his free act and deed.

Notary Public

ROSALIE ARMETTA
NOTARY PUBLIC MONROE CO., MI
MY COMMISSION EXPIRES Oct 11, 2007

ENCLOSURE 1
TO
NRC-07-0009

PROPOSED CHANGES
AND
JUSTIFICATION FOR
FERMI 2 RERP PLAN REVISION

Proposed Fermi 2 RERP Plan Revision

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1.0 INTRODUCTION

The following provides the purpose, background, and discussion of the proposed changes to the Fermi 2 Radiological Emergency Response Preparedness (RERP) Plan. These changes are: 1) Eliminate the Station Nuclear Engineer (SNE) position from the ERO; 2) Eliminate a second Chemistry Technician; 3) Delete one Support Engineer from augmented personnel; 4) Delete the Emergency Operations Facility (EOF) Coordinator position; 5) Delete the Quality Assurance Advisor position.

2.0 PURPOSE

The purpose of this submittal is to request changes in the augmented staffing levels and to address positions that are no longer required. Details are as follows:

- It is proposed that the Shift Nuclear Engineer (SNE) be eliminated from the emergency response organization's staffing requirements based on a review of STA training and responsibilities.

- It has been determined that a second Chemistry Technician is no longer needed within 60 minutes to support post accident sampling activities. It is requested to delete this staffing requirement from the Fermi 2 RERP Plan.

- It has been determined that a second Engineering Support person is no longer needed within 60 minutes to support technical support and analysis due to the improved technology and sufficient expertise available on-shift.

- It is proposed to eliminate the EOF Coordinator previously described in the last NRC approved RERP Plan, revision 3A. This position was identified in the Plan as additional staffing but was not specified in Table B-1. This position is no longer needed.

- It is proposed to eliminate the QA Advisor previously described in the last NRC approved RERP Plan, revision 3A. This position was identified in the Plan as additional staffing but was not specified in Table B-1. This position is no longer needed.

3.0 REGULATORY INFORMATION AND REVIEW

The Fermi 2 RERP Plan was originally approved by the NRC in NUREG-0798, "Safety Evaluation Report Related to the Operation of Enrico Fermi Atomic Power Plant Unit 2," Supplement 5, and dated March 1985.

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The following section illustrates the current requirements of the Fermi 2 RERP Plan and the proposed change Fermi 2 is requesting. Each change specified requires prior NRC approval in accordance with 10 CFR 50.54 (q).

3.1 Regulations

- 10 CFR 50.47(b)(1) states, in part: "...and each principal response organization has staff to respond and to augment its initial response on a continuous basis."

- 10 CFR 50.47(b)(2) states, in part: "... adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and ..."

- 10 CFR 50 Appendix E IV A states, in part: "The organization for coping with radiological emergencies shall be described including ...duties of the licensee's emergency organization..."

3.2 Guidance

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 2, states, in part: "The criteria and recommendations contained in Revision 1 of NUREG-0654/FEMA-REP-1 are considered by the NRC staff to be acceptable methods for complying with the standards in 10 CFR 50.47 that must be met in on-site and off-site emergency response plans."

NUREG-0654/FEMA-REP-1, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, states, in part:

- In Section B. Onsite Emergency Organization, "5. Each licensee shall specify...functional areas of emergency activity.... These assignments shall cover the emergency functions in Table B-1 entitled, Minimum Staffing Requirements for Nuclear Power Plant Emergencies. The minimum on-shift staffing shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1....."

NUREG-0696, Revision 1, Functional Criteria for Emergency Response Facilities, states, in part: in subparagraph 2.3. "Upon activation of the TSC, ... achieve full functional operation within 30 minutes" and in subparagraph 4.3. "Upon EOF activation,...achieve full functional operation within 1 hour..
NUREG-0737, Supplement 1, "Clarification of TMI [Three Mile Island Nuclear Station] Action Plan Requirements", states, in part:

- Subparagraph 8.2.1.a. "When activated, the TSC is staffed by predesignated technical, engineering, senior management, and other licensee personnel."
- Subparagraph 8.3.1.a. "When activated, the OSC ...where predesignated operations support personnel will assemble."
- Subparagraph 8.4.1.i. "EOF - Staffed using Table 2 (previous guidance approved by the Commission) as a goal. Reasonable exceptions to goals for the number of additional staff personnel and response times for their arrival should be justified and will be considered by NRC staff."

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4.0 SUMMARY OF CHANGES TO FERMI 2 RERP PLAN

Current	Proposed
1. The Shift Technical Advisor (STA) provides on-shift technical support and a Station Nuclear Engineer responds within 30 minutes (Reactor Engineer in revision 3A).	Delete the requirement for Station Nuclear Engineer (SNE) (RERP Plan Revision 32) or Reactor Engineer (RERP Plan revision 3A) from reporting to the site in 30 minutes.
2. One additional Chemistry Technician is identified to respond within 60 minutes to support the on-shift Chemistry Technician	Eliminate the requirement for a second Chemistry Technician to report within 60 minutes.
3. In revision 3A of the RERP Plan one Nuclear Safety Advisor and two Support Engineers were required to respond within 60 minutes	Revise the list of 60-minute responders in Table B-1 to require the Technical Engineer or the Nuclear Safety Advisor and one Support Engineer. This results in deleting one Support Engineer.
4. In revision 3A of the RERP Plan the EOF Coordinator is identified as directing activities in the EOF	Delete the EOF Coordinator position.
5. In revision 3A of the RERP Plan the Quality Assurance Advisor is required to ensure QA procedures are followed and to assist in developing procedures	Delete the Quality Assurance (QA) Advisor position.

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5.0 PROPOSED CHANGES

The following tables compare the staffing requirements from the guidance of NUREG-0654 Table B-1, the staffing requirements from the last NRC NRR approved Fermi 2 RERP Plan (Revision 3A), the current Fermi 2 RERP Plan (Revision 32), and the proposed revision to the staffing levels.

TABLE 1 - First Level of Augmentation/Additional Staffing (30 minutes)		NUREG-0654	Rev. 3A	Rev. 32	Proposed
Emergency Direction and Control	Emergency Director	0	0	1	1
Notifications/Communications	Communicator	1	1	1	1
Dose Assessment	RPA	1 (Senior RP)	0	1	1
Offsite Surveys	RET Samplers/RP Technicians	2	2	2	2
Onsite and In-Plant Surveys	RET Samplers/RP Technicians	2	2	2	2
Radiochemistry	Chemistry Technicians	0	0	0	0
Technical Support and Analysis	Core Thermal Hydraulic/Reactor Eng./SNE	1	1	1	0
Technical Support and Analysis	Technical Engineer or NSA	0	0	0	0
	Engineer	0	0	0	0
Repair and Corrective Actions	OSC Coordinator	0	1	1	1
	DCRT members	2	2	2	2
Protective Actions/Radiation Protection (in-plant)	RP Technicians	2	2	2	2
Total		11	11	13	12

Note: There are no additional personnel identified to respond for "Plant Operations and Assessment of Operational Aspects."
Note: Local support provides for Rescue Operations and First Aid at this level of augmentation.

DCRT – Damage Control and Rescue Team
HP – Health Physics
NSA – Nuclear Safety Advisor
SNE – Station Nuclear Engineer
RPA – Radiation Protection Advisor
RET – Radiological Emergency Team
RP – Radiation Protection
I & C – Instrument and Controls

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TABLE 2 – Second Level of Augmentation/Additional Staffing (60 minutes)		NUREG-0654	Rev. 3A	Rev. 32	Proposed
Notifications/Communications	Communicator	2	2	2	2
Emergency Officer		1	1	1	1
Dose Assessment	RPA/Senior HP Personnel/RPC	0	1	1	1
Offsite Surveys	RET Samplers or RP Technicians	2	2	2	2
Onsite and In-Plant Surveys	RP Technicians	2	3	2	2
Radiochemistry	Chemistry Technician	1	0	1	0
Technical Support and Analysis	Technical Eng./NSA	0	1	1	1
	Support Engineer	2	2	1	1
Repair and Corrective Action	DCRT Members	3	3	3	3
Protective Actions/Radiation Protection (in-plant)	RP Technicians	2	0	2	2
Total		15	15	16	15

Note: There are no additional personnel identified to respond for "Plant Operations and Assessment of Operational Aspects."
Note: Local support provides for Rescue Operations and First Aid at this level of augmentation.

DCRT – Damage Control and Rescue Team
HP – Health Physics
NSA – Nuclear Safety Advisor
RPC – Radiation Protection Coordinator
RPA – Radiation Protection Advisor
RET – Radiological Emergency Team
RP – Radiation Protection

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General Information

10 CFR 50.47 (b) and 10 CFR 50 Appendix E establish emergency planning standards that require 1) adequate staffing; 2) satisfactory performance of key functional areas and critical tasks and; 3) timely augmentation of the response capability.

The Fermi 2 RERP Plan defines four emergency classifications. The first is an "Unusual Event." The purpose of this classification is described as bringing "the operating staff to a state of readiness." Augmentation of "on-shift resources" is only required on an "as needed" basis. Normally on-shift personnel described in Table B-1 respond to this level of event.

The second classification is an "Alert." It is at this level that currently the Emergency Operations Facility, the Technical Support Center and Operational Support Center are activated. The response focus is to assure that emergency personnel are readily available to respond if the situation should become more serious.

Fermi 2 RERP Plan, Section H.1, requires the Emergency Response Facilities (ERFs) to be "activated as soon as possible after an emergency is declared." This is accomplished by the Shift Manager/Emergency Director initiating the Emergency Call-Out System (ECOS). The ECOS is an automated computerized notification system used to contact specific Emergency Response Organization personnel depending on the emergency classification. As described in station procedure FBP-18, "On-Call Support Guidelines" it is Fermi 2 senior management's expectation that these "on-call" personnel "report immediately to their assigned facility."

The requirement for timely augmentation is described in 10 CFR 50.47 (b) (2). This regulation states "On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified." Additional staffing guidelines are provided in NUREG-0654, Table B-1.

Proposed Fermi 2 RERP Plan Revision

Proposal 1

Proposal 1- Delete the requirement for Station Nuclear Engineer (SNE) (RERP Plan Revision 32) or Reactor Engineer (RERP Plan revision 3A) from reporting to the site in 30 minutes.

Affected Pages

Revision 32 - Table B-1, pg. B-3 and Table B-2, pg. B-5, Figure B-2, pg. B-16
Revision 3A – Table B-1, pg. B-8, Table B-2, pg. B-11, Figure B-3 (no page number identified)

Discussion and Functional Analysis

STA Training

The STA was originally trained as an advisor to the operating shift per NUREG-0737. In 1990, INPO issued the additional guidance, "Guidelines for the Training and Qualification of Shift Technical Advisors, INPO 90-003, 1990." This guidance is reflected in Fermi 2 Operations Department Expectations (ODE) procedure ODE-5. STAs contribute to operations during normal plant conditions but are primarily intended to provide an independent assessment of plant conditions during abnormal and emergency situations. By routine monitoring of equipment and plant operations the STA can focus on preventative actions in order to mitigate the consequences of an accident.

INPO 90-003 also describes the training content for normal, abnormal, and emergency operations, heat transfer and fluid flow, thermodynamics, reactivity control and fuel behavior, chemistry, radiation and radiological protection fundamentals, materials science fundamentals, electronics and mechanical equipment, instrumentation and control fundamentals, plant system and component, and teamwork and diagnostic skills.

Training for mitigating core damage has been enhanced as a result of the guidance provided in INPO 90-003 and industry operating experiences. The training is both broad based and Fermi specific and describes how to identify conditions that could lead to core damage. The training allows the user to evaluate plant conditions to determine the scope of the accident and describes methods to control reactivity, analyze plant data to determine status of core cooling and ways to ensure core cooling.

A task list was developed for each task of the STA to identify training needs. STAs participate in the licensed operator requalification program. The training program is comprehensive in terms of recognizing and assessing potential emergency plant conditions.

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The STA provides for independent assessments of plant operating concerns, appropriate corrective actions, analysis of events and their effects, effectiveness of responses to emergent conditions, classifications of emergencies, protection of the public and any other actions for assuring critical safety function and plant safety.

Since the original approval of the RERP plan, training has greatly improved the Shift Technical Advisor's knowledge and capabilities. The STA's expertise allows for the Station Nuclear Engineer/Reactor Engineer requirement to be eliminated from the ERO staffing. The STA can adequately respond to any accident to assure reactor safety until relieved by the Engineering Staff in the TSC.

It is important to note that in the nuclear fuels engineering group, one reactor engineer is on-call and would respond for assistance per plant procedure MOP-19, "Reactivity Management" and can assist the operating crew with any questions or concerns as they arise.

Technical Advancements and Support

Several technological advancements have occurred that have increased the capabilities and support provided to the STA. These include the "3D Monicore" program that has been improved and can allow power distribution calculations across the fuel bundles and the individual fuel pins.

Integrated Plant Computer System (IPCS)

The Safety Parameter Display System (SPDS) requirements are described in NUREG-0696 Section 5. The purpose of the SPDS is to aid the user in the rapid detection of abnormal operating conditions. This can provide additional information to analyze and diagnose the cause of the abnormal condition, execute corrective actions, and monitor plant response. The SPDS requirements were incorporated into the Emergency Response Information System/Safety Parameter Display System (ERIS/SPDS).

The Integrated Plant Computer System (IPCS) was installed during refueling outage RF09, in 2003. This system is a significant improvement compared to the previous system, ERIS/SPDS. IPCS has proven to be a robust system with a capacity that exceeds that of the ERIS system. For example the ERIS system monitored approximately 918 points while IPCS has approximately 25,000 monitored points and 75,000 calculated points. The increase in available data beyond that provided by ERIS has allowed for more efficient and accurate accident assessments. Additionally, each individual IPCS workstation can provide up to four screens on each terminal display for displaying plant data. Previously ERIS was limited to one screen per terminal.

IPCS has been in use since the spring of 2003. Since that time the system has been utilized during several radiological emergency drills, multiple simulator scenarios, two exercises and

three actual events. IPCS has proven to be a more reliable and user friendly system. There have been no identified equipment performance deficiencies during these situations. Users have reported that the system provides much more information in a quicker, more efficient manner.

The improvements in technology have increased the abilities of the STA to perform the task of Technical Support.

In Revision 32 of the RERP Plan, the task of dose assessment was transferred to the on-shift Chemistry Technician.

Multiple drills have been performed without response from the SNE. There have been no observed performance issues related to core safety and analysis or the major task of Technical Support.

The proposed change does not negate the task of technical support. It is retained by a qualified person on-shift, the STA, until relieved by another qualified person, in the TSC. The change as written is considered an alternative for meeting the regulations and staffing guidelines as indicated in NUREG-0654, Table B-1.

Proposal 2

Eliminate the requirement for a second Chemistry Technician to report within 60 minutes.

Affected Pages

Revision 32 - Table B-1, pg. B-3
Revision 3A – N/A

Discussion and Functional Analysis

Currently the RERP Plan requires a second Chemistry Technician to arrive within 60 minutes to support the on-shift technician in the area of radiochemistry. Originally this requirement existed to ensure the capability to promptly obtain reactor coolant samples and containment atmosphere samples was maintained. The samples assist in determining the amount of core damage. The combined time allotted for sampling and analysis should be three hours or less from the time a request is made to take a sample. This requirement was identified in NUREG-0737 and was accomplished using the Post Accident Sampling System (PASS). The second Chemistry Technician was used to assist on-shift personnel with the sample. Other methods now exist for determining core damage using containment radiation levels and the dose assessment program or procedural calculations. Revision 3A did not require a second Chemistry Technician to respond.

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On September 5, 2002, the NRC provided Fermi 2 with the approved Amendment 150 to Facility Operating License Number NPF-43. This amendment deleted TS 5.5.3, "Post Accident Sampling System (PASS)" and thereby eliminates the requirements to have and maintain the PASS at Fermi 2. This eliminated the need for a three-hour sample and analysis and supports the elimination of the requirement for a second Chemistry Technician to report within 60 minutes. The following PASS samples were eliminated by the Amendment.

1. Reactor coolant dissolved gases
2. Reactor coolant hydrogen
3. Reactor coolant oxygen
4. Reactor coolant chlorides
5. Reactor coolant pH
6. Reactor coolant boron
7. Reactor coolant conductivity
8. Reactor coolant radio isotopes
9. Containment hydrogen
10. Containment oxygen
11. Containment atmosphere radioisotopes
12. Suppression pool pH
13. Suppression pool chlorides
14. Suppression pool boron
15. Suppression pool radioisotopes

Capabilities still exist for sampling reactor coolant during an emergency to validate core damage estimates. The sample used for this analysis is DEI-131. Sampling for DEI-131 cannot occur for a minimum of two hours after a potential core-damaging event and can be delayed for up to six hours. Therefore, DEI-131 sample results do not provide timely information for use in evaluating classifications or protective action recommendations related to core damage estimates.

Currently the On-Call Chemistry Supervisor responds to the site for off-normal non-emergency events and may request additional chemistry support as needed. For an Alert or higher events the RadChem Advisor (chemistry management personnel) responds to the TSC. The RadChem Advisor evaluates the event and the chemistry needs and requests additional chemistry support as needed. Personnel are expected to report immediately and without delay. Additional chemistry support would arrive within the time allotted for DEI-131 sampling.

A review of declared events from 1995 through 2004 was performed to gauge the actual events that are typically declared in the industry. Approximately 26 Alerts were declared during this time frame. Regarding these actual events none of them indicated actual or potential core damage and therefore, would not require additional chemistry support for the task of radiochemistry.

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An evaluation was done to determine if this change places an undue burden on the on-shift Chemistry Technician. The on-shift Chemistry Technician is assigned the responsibility of dose assessment prior to augmented personnel arriving. TSC personnel would assume responsibility for dose assessment within 30 minutes.

Dose assessment modeling has improved over the years since the first RERP Plan was approved. Originally the program was a user intensive program that required significant time to set up and initiate. The current program is a user-friendly, automated program that requires the user to initially input plant conditions and activate the automatic mode for calculations. Today's dose assessment program reflects significant time savings and minimizes potentials for errors in the results. The back-up mode of dose assessment is no longer manual calculations but it is a computer based program and is quick and easy to use. Printouts are now automatically printed in the Control Room making results quickly available.

Dose assessment is initiated for any potential core damage accidents, specifically events involving clad failure. Dose assessment results can provide additional information to the Shift Manager/Emergency Director for purposes of emergency declaration(s) and/or Protective Action Recommendations (PARs). However, dose assessment results merely reflect the actual event that is occurring. Emergency declarations should focus on all plant indications, such as reactor water level and containment radiation levels, which provide more timely information to accurately declare an event and formulate PARs.

Dose assessment results allow for verification of declaration and PARs. PARs are required at a General Emergency declaration and must be communicated concurrently with the General Emergency notification. The initial PAR is normally based on status of the plant. Per EP-545, the Protective Action Recommendations procedure, no change in PARs based on dose assessment would be expected until projected dose exceeded the Protective Action Guidelines beyond 5 miles. As dose assessment results become available the existing PAR can be modified as needed.

The proposed change eliminates the need for a second Chemistry Technician to automatically respond within 60 minutes of any Alert. The change does not restrict additional chemistry support to be requested as needed. Sampling capabilities still exist and are not impacted. Therefore, the tasks are maintained and the change has no impact on regulatory requirements of 10 CFR 50.47 (b) and 10 CFR 50, Appendix E. This change provides an alternative to meeting regulatory guidance.

Proposed Fermi 2 RERP Plan Revision

Proposal 3

Revise the list of 60-minute responders in Table B-1 to require the Technical Engineer or the Nuclear Safety Advisor and one Support Engineer for staffing under the Technical Support task in the TSC.

Affected Pages

Revision 32 – N/A
Revision 3A - Table B-1, pg. B-8

Discussion and Functional Analysis

Previously, the STA transferred technical support responsibility to the SNE/Reactor Engineer. Once the TSC is functional and sufficient engineering support is present, the Technical Support task and other engineering matters can be transferred to the TSC. As previously requested in Proposal 1, the SNE position is to be eliminated from the ERO.

The STA is uniquely qualified to perform this task until such time as they are relieved by qualified Engineering Support personnel in the TSC. Currently Engineering Support personnel in the TSC are comprised of multiple engineers from all disciplines. Support Engineers normally report to the Nuclear Safety Advisor (NSA). In the absence of the NSA, the Technical Engineer provides direction to the Engineering Staff.

As previously discussed in proposal one, the STA is no longer responsible for on-shift dose assessment. That responsibility has been transferred to the on-shift Chemistry Technician. Therefore the STA will retain those duties related to Technical Support without the additional responsibility of dose assessment.

In revision 3A, the Nuclear Safety Advisor (NSA) and two engineers were identified as 60-minute responders. As described earlier, the advances in technology have improved the capabilities of the ERO. Better technical analysis is performed on-shift and by responding members of the ERO. Therefore, one support engineer, in addition to the NSA or Technical Engineer is sufficient to facilitate the task of technical support and analysis. All ERO personnel are expected to proceed immediately to their emergency response facility when contacted as described previously regarding FBP-18, On-Call Support Guidelines.

This change also allows for the Technical Engineer to be part of the 60-minute additional staffing in lieu of the NSA only. The Technical Engineer position attends the same ERO training as the NSA in addition to the Severe Accident Management training courses. The Technical Engineer is the lead position for Severe Accident Management and would provide direction to the Engineering Staff.

Proposed Fermi 2 RERP Plan Revision

Multiple drills and exercises have been performed with staffing that reflects this proposed change and there have been no observed performance issues related to the task of Technical Support or engineering matters.

This change reflects the guidance for additional staffing provided in NUREG-0654, Table B-1. The task of technical support is maintained and not degraded based on the improvements in technology, training, and procedural guidance. Therefore, the change as written reflects an acceptable alternative to meeting regulatory guidance.

Proposal 4

Delete the EOF Coordinator position.

Affected Pages

Revision 32 – N/A
Revision 3A - Table B-2, pg. B-17, 18, 20, and 21, Figures B-5 and B-6 (no page numbers identified)

Discussion and Functional Analysis

In revision 3A, the EOF Coordinator was identified as the person who directed activities in the EOF. This contradicts Table B-1 which states the Emergency Officer is responsible for overall management and control during the event. The Emergency Officer is an augmented position; the EOF Coordinator is not an augmented position. The Emergency Officer actually directs activities in the EOF and provides oversight in all areas of offsite response including activities in the EOF which support these efforts. As reflected in revision 32, the EOF Coordinator position was eliminated in March 1988. Multiple drill and exercises have been evaluated since that time and there has been no decrease in performance in the EOF staff. Direction and control of EOF activities is maintained with no loss of functionality. Therefore, there is no decrease in effectiveness as a result of this change.

Proposal 5

Delete the Quality Assurance (QA) Advisor position.

Affected Pages

Revision 32 – N/A
Revision 3A - Table B-2, pg. B-16, Figures B-4 and B-5 (no page numbers identified)

Proposed Fermi 2 RERP Plan Revision

Discussion and Functional Analysis

In revision 3A the QA Advisor position was assigned to the TSC to "ensure all quality assurance procedures applicable to the emergency are followed" and to "assist in preparation of specific emergency procedures as required." During an emergency, the responding ERO members use many types of procedures. The majority of procedures used are emergency or abnormal operating procedures, alarm response procedures, emergency plan implementing procedures, and other plant technical procedures. Each person is required to follow the procedures as written. General Administration Conduct Manual procedure MGA03, Procedure Use and Adherence, describes how procedures are to be used by all personnel.

QA procedures detail the corrective action process and requirements and are contained in the Quality Assurance Conduct Manual. All personnel are required to follow these procedures in accordance with MGA03. The QA Advisor position served merely as a consultant on quality assurance procedures to the ERO, however, was not required to monitor use of the emergency response procedures.

Currently the Manager- Nuclear Quality Assurance (NQA) is a member of the Recovery Organization and is responsible to assure that all QA requirements are met. Additionally, per EP-402, Responsibilities of the Recovery Organization, "appropriate Nuclear Operations groups" will develop the necessary Recovery Plan Implementing Procedures, which are reviewed by the Onsite Review Organization, of which NQA is a member.

Multiple drills and exercises have been performed without the QA Advisor position and there have been no observed performance issues related to the ERO.

Therefore the QA Advisor position is not needed for the initial response of an emergency. The Manager - NQA as part of the Recovery Organization and as such will ensure the QA requirements are met. The function has been maintained, therefore, there is no decrease in effectiveness as a result of this change.

ENCLOSURE 2
TO
NRC – 07-0009

ELECTRONIC MARK-UPs OF PROPOSED CHANGES TO FERMI 2 RERP PLAN

TABLE B-1
STAFFING FOR FERMI 2
EMERGENCY RESPONSE ORGANIZATION

Major Functional Area	Major Tasks	Locations	Emergency Response Organizational Title	On Shift	Alert (or higher) +30 min	Alert (or higher) +60 min
Plant Operations and Assessment of Operational Aspects	Plant Operations and Assessment, Accident Mitigation, Corrective Actions, Damage Assessment	CR	Control Room Supervisor	1		
		CR	Nuclear Supervising Operator	3		
		CR	Non-Licensed Operator	5		
Emergency Direction and Control		CR	Emergency Director	1		
		TSC	Emergency Director		1	
Notification/ Communication	Notify ERO, State, Local and Federal Authorities, Maintain Communications	CR	Communicator	1*		
		TSC	Communicator		1	
		EOF	Communicator			2
Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Officer	EOF	Emergency Officer			1
	Offsite Dose Assessment	CR/OSC	Chemistry Technician	1*		
		TSC	Radiation Protection Advisor		1	
		EOF	Radiation Protection Coordinator			1
	Offsite Surveys	OSC/EOF	RET Sampler or RP Technician		2	2
	Onsite (out of plant) Surveys	OSC	RET Sampler or RP Technician		1	1
	In plant Surveys	OSC	RP Technicians	2	1	1
	Chemistry/Radiochemistry	OSC	Chemistry Technician	1		~~1~~
Plant System Engineering, Repair and Corrective Actions	Technical Support	CR	Shift Technical Advisor	1		
		~~CR~~	~~Station Nuclear Engineer~~		~~1~~	
		TSC	Technical Engineer or Nuclear Safety Advisor			1
		TSC	Support Engineer			1
	Repair and Corrective Actions	OSC	OSC Coordinator		1	
		OSC	Damage Control and Rescue Team Members	2	2	3
Protective Actions (In Plant)	Radiation Protection: 1. Access Control 2. HP coverage for repair, corrective actions, search and rescue, first-aid and fire-fighting 3. Personnel monitoring 4. Dosimetry	OSC	RP Technicians	2*	2	2
Fire Fighting		OSC	Fire Brigade	UFSAR		
Rescue Operations and First Aid		OSC	Damage Control and Rescue Teams	2*		
Site Access Control and Personnel Accountability	Security and Personnel Accountability	Per Security Plan	Nuclear Security Force	Per Security Plan		
			Total	16	~~13~~12	~~16~~15

* May be provided by shift personnel assigned other functions and not included in the total.

TABLE B-1
STAFFING FOR FERMI 2
EMERGENCY RESPONSE ORGANIZATION

Major Functional Area	Major Tasks	Locations	Emergency Response Organizational Title	On Shift	Alert (or higher) +30 min	Alert (or higher) +60 min
Plant Operations and Assessment of Operational Aspects	Plant Operations and Assessment, Accident Mitigation, Corrective Actions, Damage Assessment	CR	Control Room Supervisor	1		
		CR	Nuclear Supervising Operator	3		
		CR	Non-Licensed Operator	5		
Emergency Direction and Control		CR	Emergency Director	1		
		TSC	Emergency Director		1	
Notification/ Communication	Notify ERO, State, Local and Federal Authorities, Maintain Communications	CR	Communicator	1*		
		TSC	Communicator		1	
		EOF	Communicator			2
Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Officer	EOF	Emergency Officer			1
	Offsite Dose Assessment	CR/OSC	Chemistry Technician	1*		
		TSC	Radiation Protection Advisor		1	
		EOF	Radiation Protection Coordinator			1
	Offsite Surveys	OSC/EOF	RET Sampler or RP Technician		2	2
	Onsite (out of plant) Surveys	OSC	RET Sampler or RP Technician		1	1
	In plant Surveys	OSC	RP Technicians	2	1	1
	Chemistry/Radiochemistry	OSC	Chemistry Technician	1		
Plant System Engineering, Repair and Corrective Actions	Technical Support	CR	Shift Technical Advisor	1		
		TSC	Technical Engineer or Nuclear Safety Advisor			1
		TSC	Support Engineer			1
		OSC	OSC Coordinator		1	
	Repair and Corrective Actions	OSC	Damage Control and Rescue Team Members	2	2	3
Protective Actions (In Plant)	Radiation Protection: 1. Access Control 2. HP coverage for repair, corrective actions, search and rescue, first-aid and fire-fighting 3. Personnel monitoring 4. Dosimetry	OSC	RP Technicians	2*	2	2
Fire Fighting		OSC	Fire Brigade	UFSAR		
Rescue Operations and First Aid		OSC	Damage Control and Rescue Teams	2*		
Site Access Control and Personnel Accountability	Security and Personnel Accountability	Per Security Plan	Nuclear Security Force	Per Security Plan		
			Total	16	12	15

*** May be provided by shift personnel assigned other functions and not included in the total.**

TABLE B-2:
EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES
(Continued)

Functional Position	Location	Reports To	Responsibilities
Emergency Director (continued)	Technical Support Center	Emergency Officer	Ensure that information to be released to the public is prompt, accurate, and released through proper channels
Manager, Nuclear Operations Operations Engineer			Coordinate and direct the combined activities of Detroit Edison personnel in the Control Room, TSC, OSC, and elsewhere on owner-controlled property
Manager, Nuclear Maintenance			Authorize plant and emergency workers to receive radiation doses in excess of 10 CFR 20 limits
General Supervisor, Operations Training			Authorize the distribution and use of Potassium Iodide (KI) Obtain assistance of offsite support organizations as necessary Provide oversight of Severe Accident Management
Shift Technical Advisor Shift Technical Advisor	Control Room	Emergency Director	Advise the Emergency Director on plant technical matters, including Thermal/Hydraulic issues, Reactor Engineering, analysis related to safe operation of the plant.
~~**Station Nuclear Engineer**~~ ~~Station Nuclear Engineer~~	~~Control Room~~	~~Emergency Director~~	~~Analyze conditions affecting core safety~~ ~~Advise the Emergency Director/Shift Manager on all matters relating to reactor core safety~~

TABLE B-2:
EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES
(Continued)

Functional Position	Location	Reports To	Responsibilities
Emergency Director (continued)	Technical Support Center	Emergency Officer	Ensure that information to be released to the public is prompt, accurate, and released through proper channels
Manager, Nuclear Operations Operations Engineer			Coordinate and direct the combined activities of Detroit Edison personnel in the Control Room, TSC, OSC, and elsewhere on owner-controlled property
Manager, Nuclear Maintenance			Authorize plant and emergency workers to receive radiation doses in excess of 10 CFR 20 limits
General Supervisor, Operations Training			Authorize the distribution and use of Potassium Iodide (KI) Obtain assistance of offsite support organizations as necessary Provide oversight of Severe Accident Management
Shift Technical Advisor Shift Technical Advisor	Control Room	Emergency Director	Advise the Emergency Director on plant technical matters, including Thermal/Hydraulic issues, Reactor Engineering, analysis related to safe operation of the plant.

Figure B-2

CONTROL ROOM

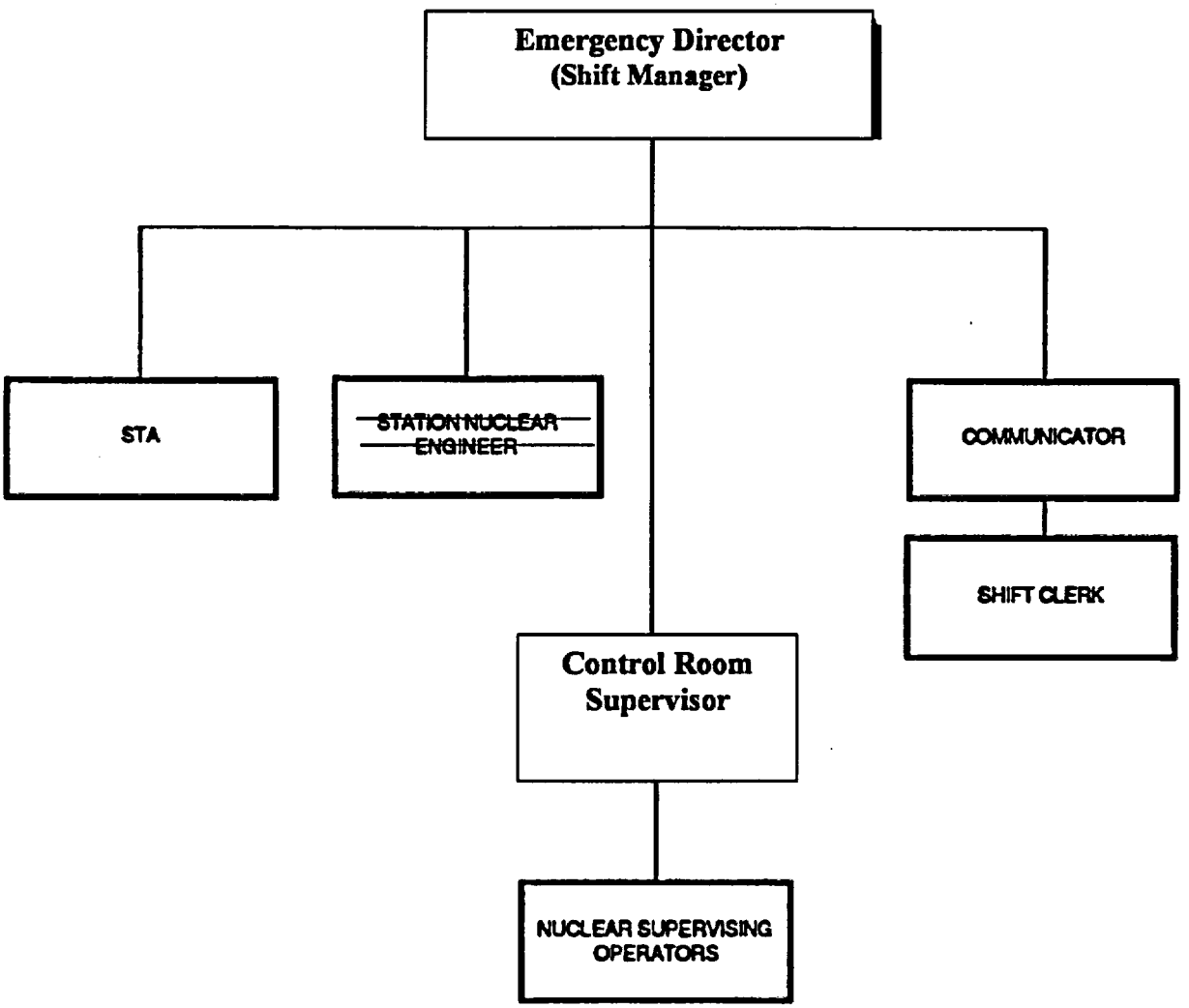


Figure B-2

CONTROL ROOM

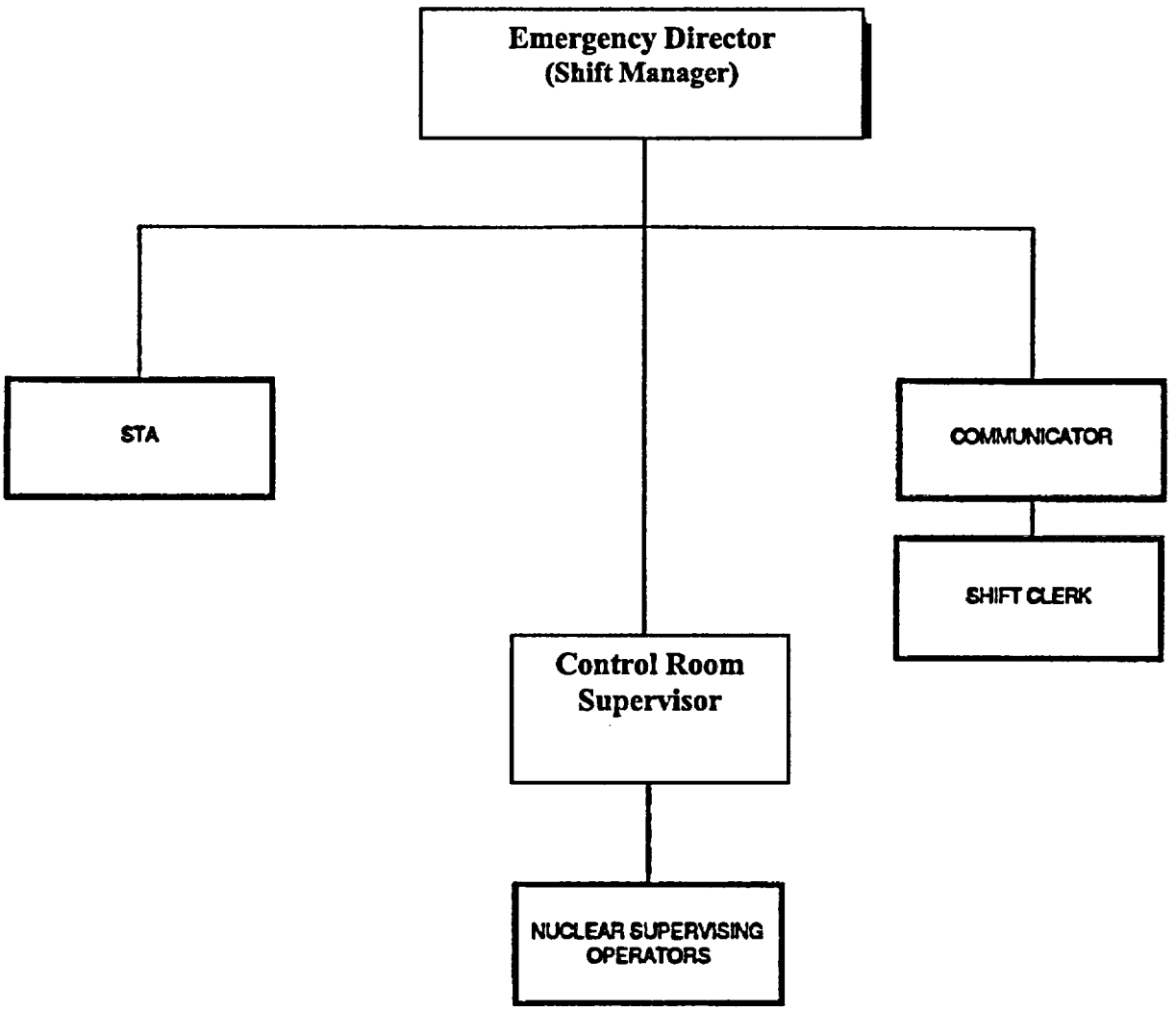


TABLE B-1 STAFFING FOR FERMI-2 EMERGENCY RESPONSE ORGANIZATION (Sheet 1 of 2)

Major Functional Area	Location	Major Tasks	Emergency Response Organization Title	Detroit Edison Position Title	On Shift*	Capability for Additions 30 Min.	Capability for Additions 60 Min.
Plant Operations and Assessment of Operational Aspects	CR		Nuc. Assist. Shift Supt. Nuc. Supervising Operator Nonlicensed Operator	Same Same Same	1[a] 2[a] 4[a]		
Emergency Direction and Control (on-site, in-plant)	CR		Emergency Director Emergency Director	Nuc. Shift Supt. Or, Supt. – Production	1		
Notification and Communication	CR TSC EOF	Notify emer. organization, State, local off-site Organizations, NRC – Maintain communications	Communicator Communicator Communicator	NSO Technicians Technicians	1[a]	1	2
Radiological Accident Assessment and Protective Actions and Support of Operational Accident Assessment	OSC/Plant TSC CR EOF	In-plant, on-site surveys, Radiochemistry Radiation protection Off-site dose projection, PAG, meteorology Off-site dose projection, PAG, meteorology Off-site field surveys	On-Site Radiological Emergency Team Radwaste Operator Radiation Protection Advisor Rad/Chem Advisor Shift Tech. Advisor Radiation Protection Coordinator Radiological Emergency Team (off-site)(2/team)	Health Physics/ Rad/Chem Tech. Nonlicensed Op. General Supt. – Health Physics General Supt. – Chemistry General Supt. – Chemistry Site Health Physicist Technicians	1[a] 1[a] 1[a]	2 1 1 2	3 1 2
Emergency Direction And Control Overall Off-site	EOF	Management responsibility Coordination with off-site response organizations	Emergency Officer	Vice-President – Nuc. Operations			1
Plant System Eng. And Analysis	CR TSC	Technical support and analysis, reactor physics Tech. Support and analysis Electrical, Mechanical, I&C Thermal/Hydraulic	Shift Technical Advisor ~~Reactor Engineer~~ Nuclear Safety Advisor or Technical Engineer Engineering Support	Same Same Director – Nuc. Eng. Engineers	1[a]	1	1 21

a. Can perform several functions depending on the emergency.
b. Onshift personnel trained to handle critical functions.

TABLE B-1 STAFFING FOR FERMI-2 EMERGENCY RESPONSE ORGANIZATION (Sheet 1 of 2)

Major Functional Area	Location	Major Tasks	Emergency Response Organization Title	Detroit Edison Position Title	On Shift*	Capability for Additions 30 Min.	Capability for Additions 60 Min.
Plant Operations and Assessment of Operational Aspects	CR		Nuc. Assist. Shift Supt.	Same	1[a]		
			Nuc. Supervising Operator	Same	2[a]		
			Nonlicensed Operator	Same	4[a]		
Emergency Direction and Control (on-site, in-plant)	CR		Emergency Director	Nuc. Shift Supt.	1		
			Emergency Director	Or, Supt. – Production			
Notification and Communication	CR	Notify emer. organization,	Communicator	NSO	1[a]		
	TSC	State, local off-site	Communicator	Technicians		1	
	EOF	Organizations, NRC – Maintain communications	Communicator	Technicians			2
Radiological Accident Assessment and Protective Actions and Support of Operational Accident Assessment	OSC/Plant	In-plant, on-site surveys,	On-Site Radiological Emergency Team	Health Physics/ Rad/Chem Tech.	1[a]	2	3
	TSC	Radiochemistry	Radwaste Operator	Nonlicensed Op.	1[a]		
		Radiation protection	Radiation Protection Advisor	General Supt. – Health Physics		1	
	CR		Rad/Chem Advisor	General Supt. – Chemistry	1[a]	1	
	EOF	Off-site dose projection, PAG, meteorology	Shift Tech. Advisor	General Supt. – Chemistry			
		Off-site dose projection, PAG, meteorology	Radiation Protection Coordinator	Site Health Physicist			1
		Off-site field surveys	Radiological Emergency Team (off-site)(2/team)	Technicians		2	2
Emergency Direction And Control Overall Off-site	EOF	Management responsibility Coordination with off-site response organizations	Emergency Officer	Vice-President – Nuc. Operations			1
Plant System Eng. And Analysis	CR	Technical support and analysis, reactor physics	Shift Technical Advisor	Same	1[a]		
			Nuclear Safety Advisor	Same			
	TSC	Tech. Support and analysis	or Technical Engineer	Director – Nuc. Eng.			1
			Engineering Support	Engineers			1
		Electrical, Mechanical, I&C Thermal/Hydraulic					

a. Can perform several functions depending on the emergency.
b. Onshift personnel trained to handle critical functions.

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 2 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities
Emergency Director (Continued)				o Coordinate and direct the combined activities of Detroit Edison personnel in the Control Room, TSC, OSC, and elsewhere on owner-controlled property o Authorize plant and emer-gency workers to receive radiation doses in excess of 10 CFR 20 limits (see Table K-1) o Obtain assistance of support organizations as necessary 3
~~Reactor Engineer~~ ~~Reactor Engineer~~	~~Reactor Engineer~~ ~~Nuclear Safety Engineer~~	~~Nuclear Shift Supervisor~~	~~Control Room~~	~~o Analyze conditions affecting core safety~~ ~~o Advise the Operations Engineer on all matters relating to reactor core safety~~ 3
OSC Coordinator Maintenance Engineer	Assistant Maintenance Engineer General Foreman	Emergency Director	Operational Support Center	o Direct maintenance operations o Dispatch Emergency Teams o Advise the Emergency Director on matters concerning maintenance activities

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 2 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities
Emergency Director (Continued)				o Coordinate and direct the combined activities of Detroit Edison personnel in the Control Room, TSC, OSC, and elsewhere on owner-controlled property o Authorize plant and emer-gency workers to receive radiation doses in excess of 10 CFR 20 limits (see Table K-1) o Obtain assistance of support organizations as necessary
OSC Coordinator Maintenance Engineer	Assistant Maintenance Engineer General Foreman	Emergency Director	Operational Support Center'	o Direct maintenance operations o Dispatch Emergency Teams o Advise the Emergency Director on matters concerning maintenance activities

3

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 7 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities	
Administration and Support Coordinator (Continued)				o Implement communications to off-site emergency response organizations o Provide for documentation support and control o Provide work schedules and shift augmentation for Nuclear Operations emergency response personnel o Maintain records concerning the emergency	3
~~Quality Assurance Adviser~~ ~~Principal Engineer Engineering Quality Assurance~~	~~Supervisor Quality Assurance Staff~~	~~Emergency Director~~	~~Technical Support Center~~	~~o Ensure all quality assurance procedures applicable to the emergency are followed~~ ~~o Assist in preparation of specific emergency procedures as required~~	3
Engineering Support Thermal Hydraulics/ Mechanical/Electrical/Instrument And Control Engineers	Senior Enginner (4)	Nuclear Safety Advisor	Technical Support Center	o Advise Nuclear Safety Advisor on technical matters as required	3

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 7 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities	
Administration and Support Coordinator (Continued)				o Implement communications to off-site emergency response organizations o Provide for documentation support and control o Provide work schedules and shift augmentation for Nuclear Operations emergency response personnel o Maintain records concerning the emergency	3
Engineering Support Thermal Hydraulics/ Mechanical/Electrical/Instrument And Control Engineers	Senior Enginner (4)	Nuclear Safety Advisor	Technical Support Center	o Advise Nuclear Safety Advisor on technical matters as required	3

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 8 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities
Emergency Officer Vice President – Nuclear Operations	Manager – Nuclear Operations Assistant Manager – Nuclear Operations	President – Detroit Edison	Emergency Operations Facility	o Overall Management o Concur on all protective action recommendations o Ensure that the full resources of Detroit Edison Company are made available as required to secure the plant systems and to minimize the effects of the incident on plant personnel and public. This includes availability of other utilities and vendor resources o Ensure information released to the public is accurate and directed through proper channels o Establish long-term emergency and recovery organizations o Communicate with Corporate Headquarters
~~EOF Coordinator~~ ~~Manger – Wayne Monroe Division~~	~~Director – Customer and Marketing Services – Wayne – Monroe Division~~	~~Emergency Officer~~	~~Emergency Operations Facility~~	~~o Direct activities in EOF~~ ~~o Notification of Government Emergency Response Agencies~~

3

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 8 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities
Emergency Officer Vice President – Nuclear Operations	Manager – Nuclear Operations Assistant Manager – Nuclear Operations	President – Detroit Edison	Emergency Operations Facility	o Overall Management o Concur on all protective action recommendations o Ensure that the full resources of Detroit Edison Company are made available as required to secure the plant systems and to minimize the effects of the incident on plant personnel and public. This includes availability of other utilities and vendor resources o Ensure information released to the public is accurate and directed through proper channels o Establish long-term emergency and recovery organizations o Communicate with Corporate Headquarters

3

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 9 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities
~~EOF Coordinator (Continued)~~	~~Director – Nuclear Outage Management~~			~~o Recommend protective measures to Off-Site Emergency Response Organizations based on dose assessment~~ 3
Radiation Protection Coordinator Site Health Physicist	Radiation Emergency Engineer	~~EOF Coordinator~~Emergency Officer	Emergency Operations Facility	o Direct and coordinate off-site assessment activities 3 o Direct Environmental Assessment Team o Determine survey areas for Radiological Emergency Teams o Determine environmental sample media o Advise EOF Coordinator on protective actions to be taken o Evaluate results of environmental surveys Director activities in EOF Emergency laboratory o Ensure proper personnel monitoring and records of the emergency are maintained

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 9 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities
Radiation Protection Coordinator Site Health Physicist	Radiation Emergency Engineer	Emergency Officer	Emergency Operations Facility	o Direct and coordinate off-site assessment activities o Direct Environmental Assessment Team o Determine survey areas for Radiological Emergency Teams o Determine environmental sample media o Advise EOF Coordinator on protective actions to be taken o Evaluate results of environmental surveys Director activities in EOF Emergency laboratory o Ensure proper personnel monitoring and records of the emergency are maintained

3

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 11 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities	
Nuclear Operations Advisor Off-Shift Nuclear Shift Supervisor		~~EOF Coordinator~~Emergency Officer	Emergency Operations Facility	o Advise EOF Coordinator on plant status o Provide updated information on operational status of plant	3
Public Information Coordinator Media Relations Specialist	Public Affairs Personnel (2)	Emergency Officer	Emergency Operations Facility	o Coordinate public information with Joint Public Information Team o Prepare information under the direction of the Emergency Officer for release to the Joint Public Information Center (JPIC) o Liaison between the Emergency Officer and Joint Public Information Team	3
EOF Administrator Director – Nuclear Administration	Director – Planning and Control Assistant Director – Nuclear Administration	~~EOF Coordinator~~Emergency Officer	Emergency Operations Facility	o Supervise the establishment of the EOF o Provide logistical support o Provide documentation control and support	

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 11 of 12)

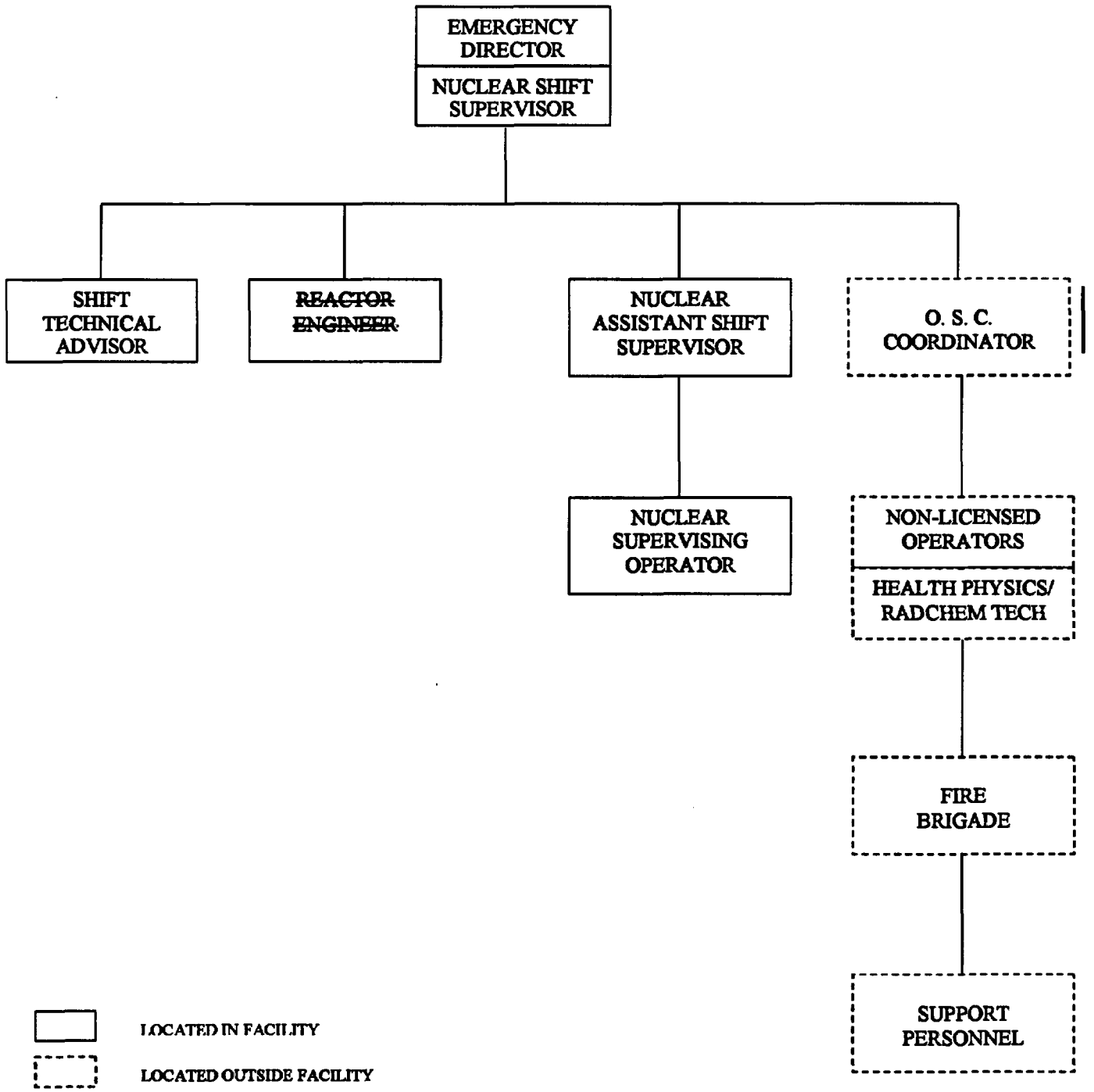
Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities	
Nuclear Operations Advisor Off-Shift Nuclear Shift Supervisor		Emergency Officer	Emergency Operations Facility	o Advise EOF Coordinator on plant status o Provide updated information on operational status of plant	3
Public Information Coordinator Media Relations Specialist	Public Affairs Personnel (2)	Emergency Officer	Emergency Operations Facility	o Coordinate public information with Joint Public Information Team o Prepare information under the direction of the Emergency Officer for release to the Joint Public Information Center (JPIC) o Liaison between the Emergency Officer and Joint Public Information Team	3
EOF Administrator Director – Nuclear Administration	Director – Planning and Control Assistant Director – Nuclear Administration	Emergency Officer	Emergency Operations Facility	o Supervise the establishment of the EOF o Provide logistical support o Provide documentation control and support	

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 12 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities	
EOF Administrator (Continued)				o Establish and maintain a long-term record on file for the emergency o Supervise the communicators, status board clerks and clerical support assigned to the EOF o Implement communications to off-site Emergency Response Organizations o Advise Coordinator Emergency Officer on matters relating to logistical support	3
Security Advisor Director – Nuclear Security	Nuclear Security Coordinator	~~EOF Coordinator~~Emergency Officer	Emergency Operations Facility	o Coordinate access and egress of off-site personnel to owner-controlled areas o Act as security liaison between the EOF, the JPIC and the TSC o Advise the EOF Coordinator on security matters o Maintain security of the EOF	3

TABLE B-2 EMERGENCY RESPONSE ORGANIZATION FUNCTIONAL RESPONSIBILITIES (Sheet 12 of 12)

Functional Position	Alternate(s)	Reporting Function	Location	Responsibilities	
EOF Administrator (Continued)				o Establish and maintain a long-term record on file for the emergency o Supervise the communicators, status board clerks and clerical support assigned to the EOF o Implement communications to off-site Emergency Response Organizations o Advise Coordinator Emergency Officer on matters relating to logistical support	3
Security Advisor Director – Nuclear Security	Nuclear Security Coordinator	Emergency Officer	Emergency Operations Facility	o Coordinate access and egress of off-site personnel to owner-controlled areas o Act as security liaison between the EOF, the JPIC and the TSC o Advise the EOF Coordinator on security matters o Maintain security of the EOF	3

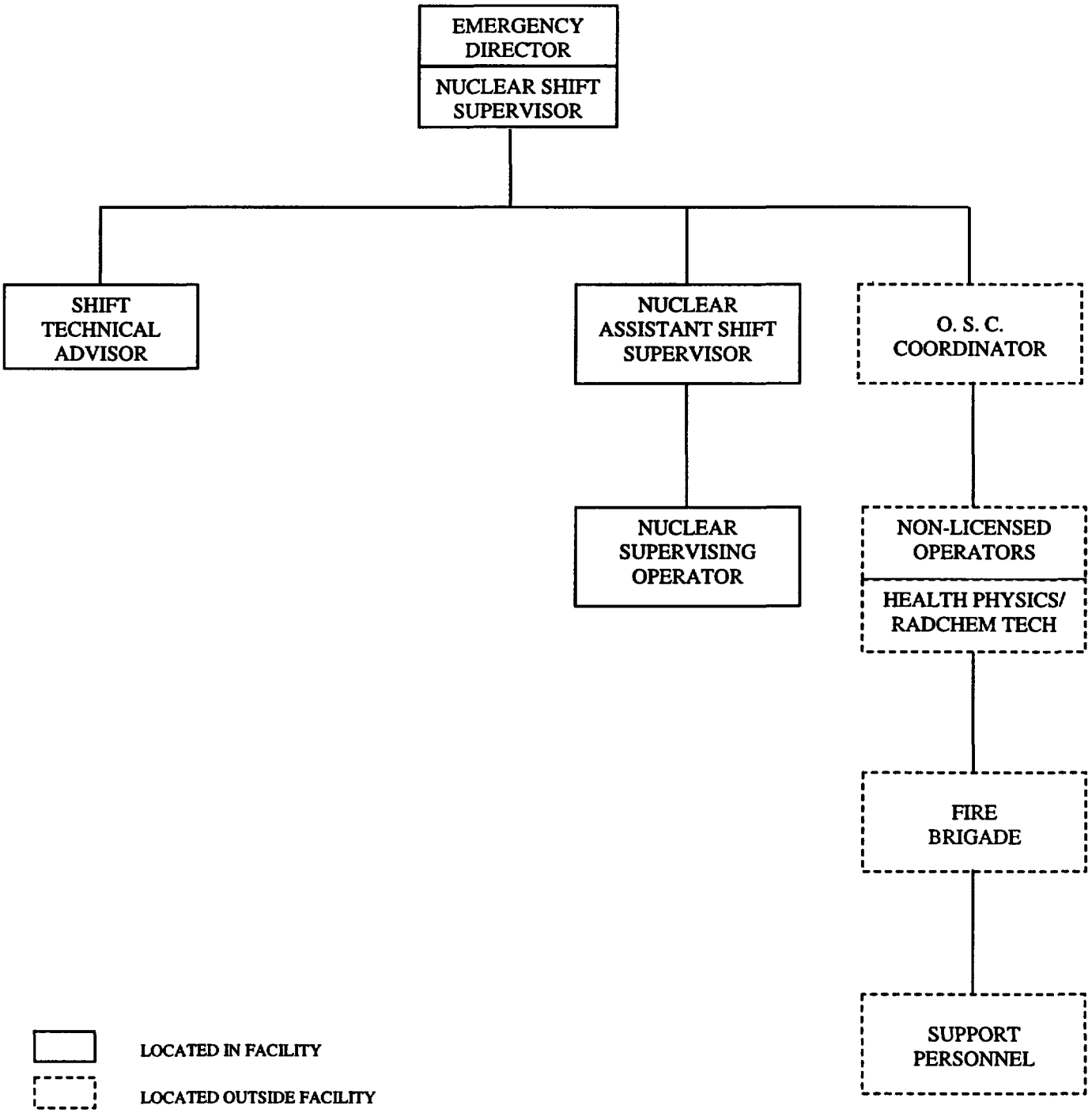


FERMI-2 – RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-3

EMERGENCY RESPONSE ORGANIZATION
CONTROL ROOM
ALERT/SITE AREA/GENERAL EMERGENCY

Revision 3 – February 1984
Revision 3A – August 1984



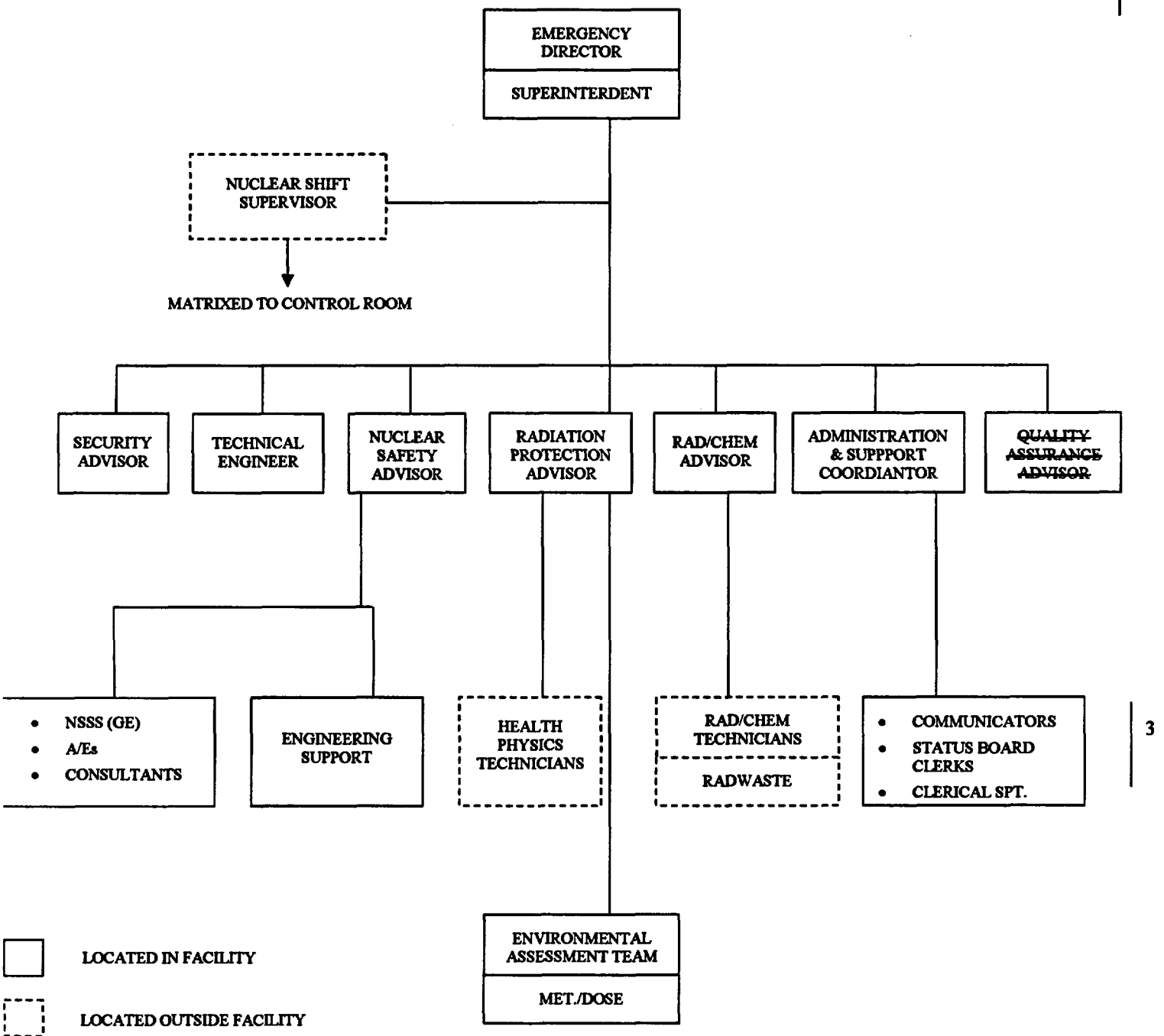
FERMI-2 – RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-3

EMERGENCY RESPONSE ORGANIZATION
CONTROL ROOM
ALERT/SITE AREA/GENERAL EMERGENCY

Revision 3 – February 1984
Revision 3A – August 1984

3



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FERMI-2 RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-4

EMERGENCY RESPONSE ORGANIZATION
TECHNICAL SUPPORT CENTER
ALERT

Revision 3 – February 1984
Revision 3A – August 1984

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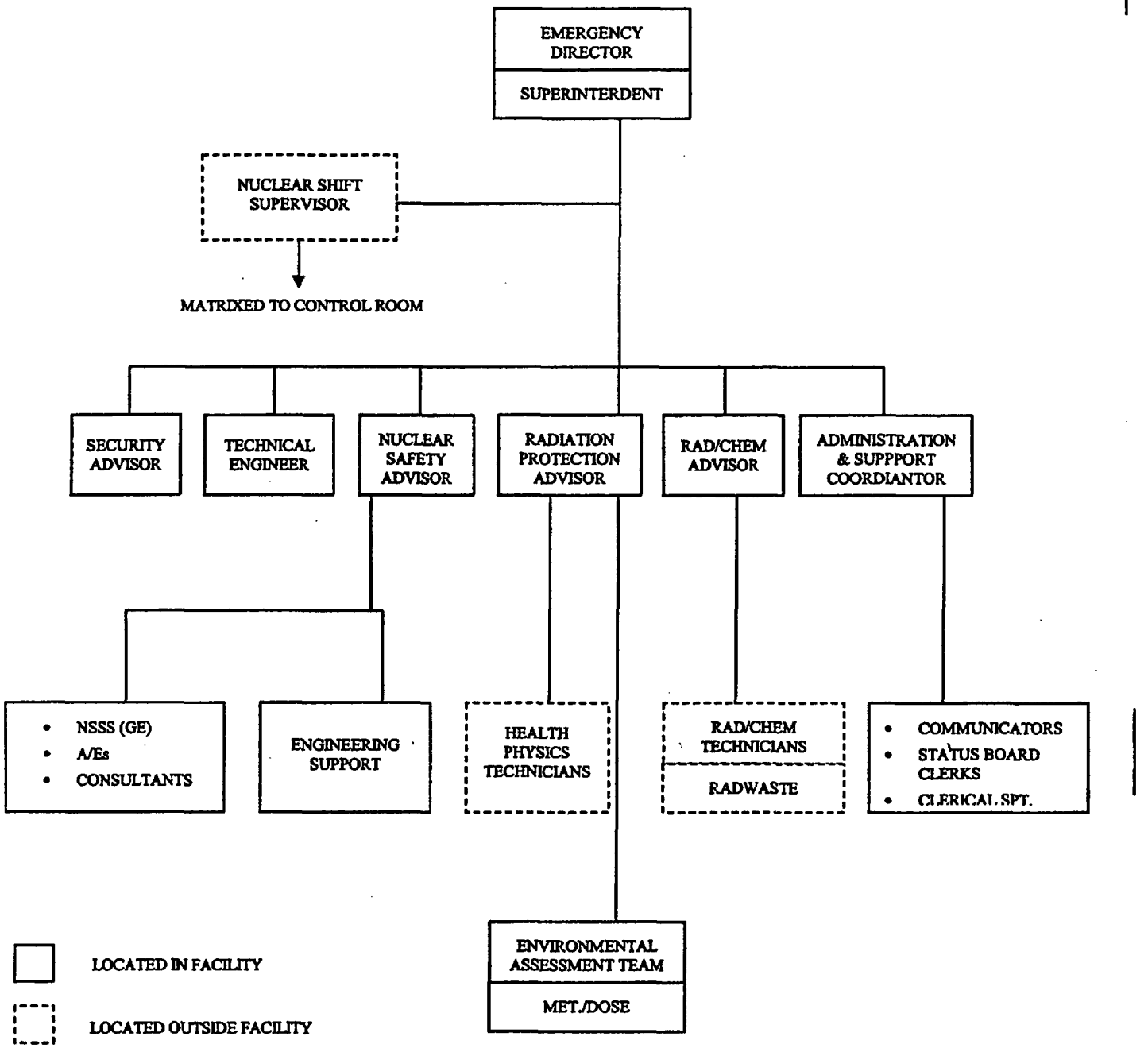

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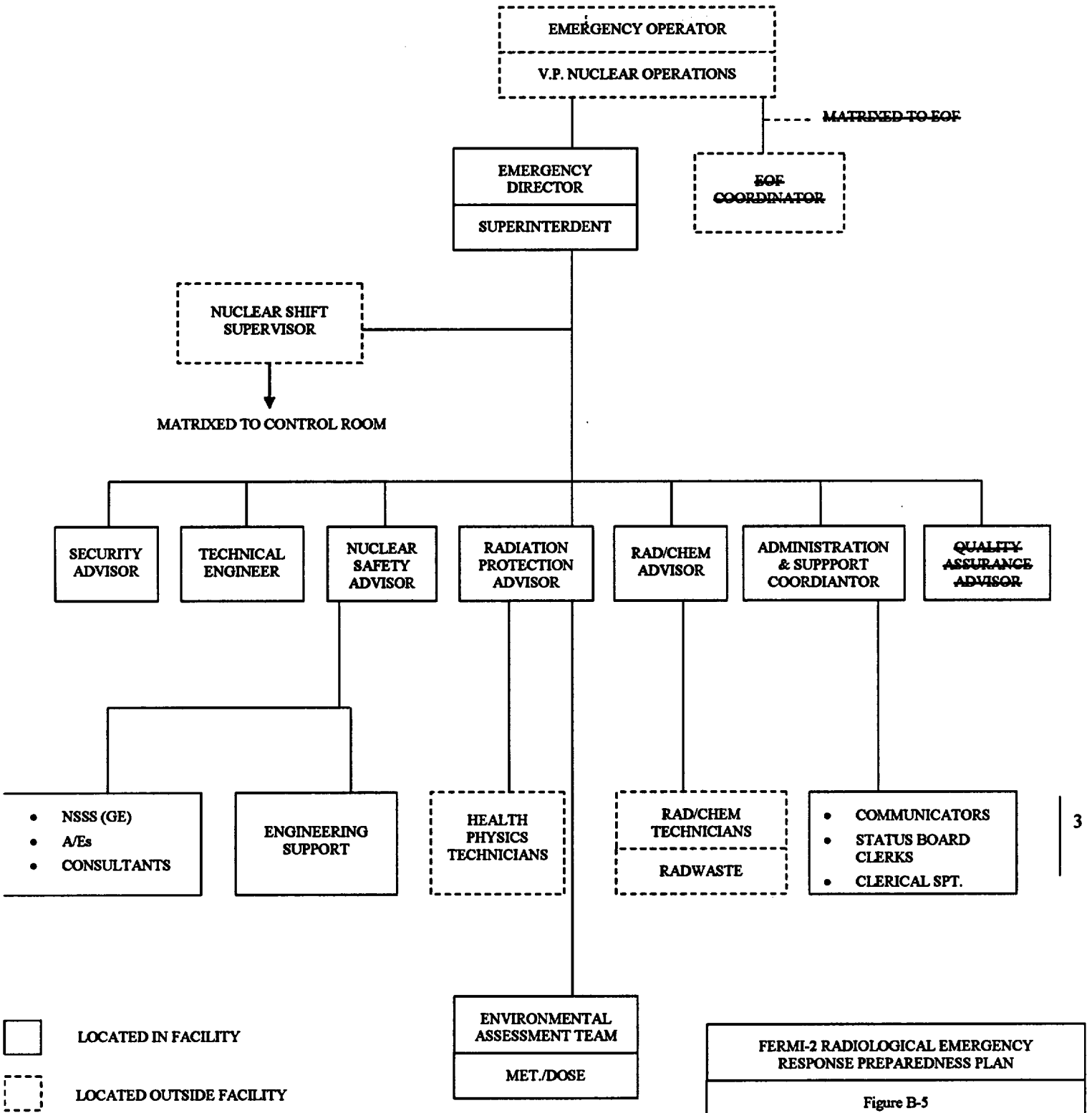
FERMI-2 RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-4

EMERGENCY RESPONSE ORGANIZATION
TECHNICAL SUPPORT CENTER
ALERT

Revision 3 – February 1984
Revision 3A – August 1984

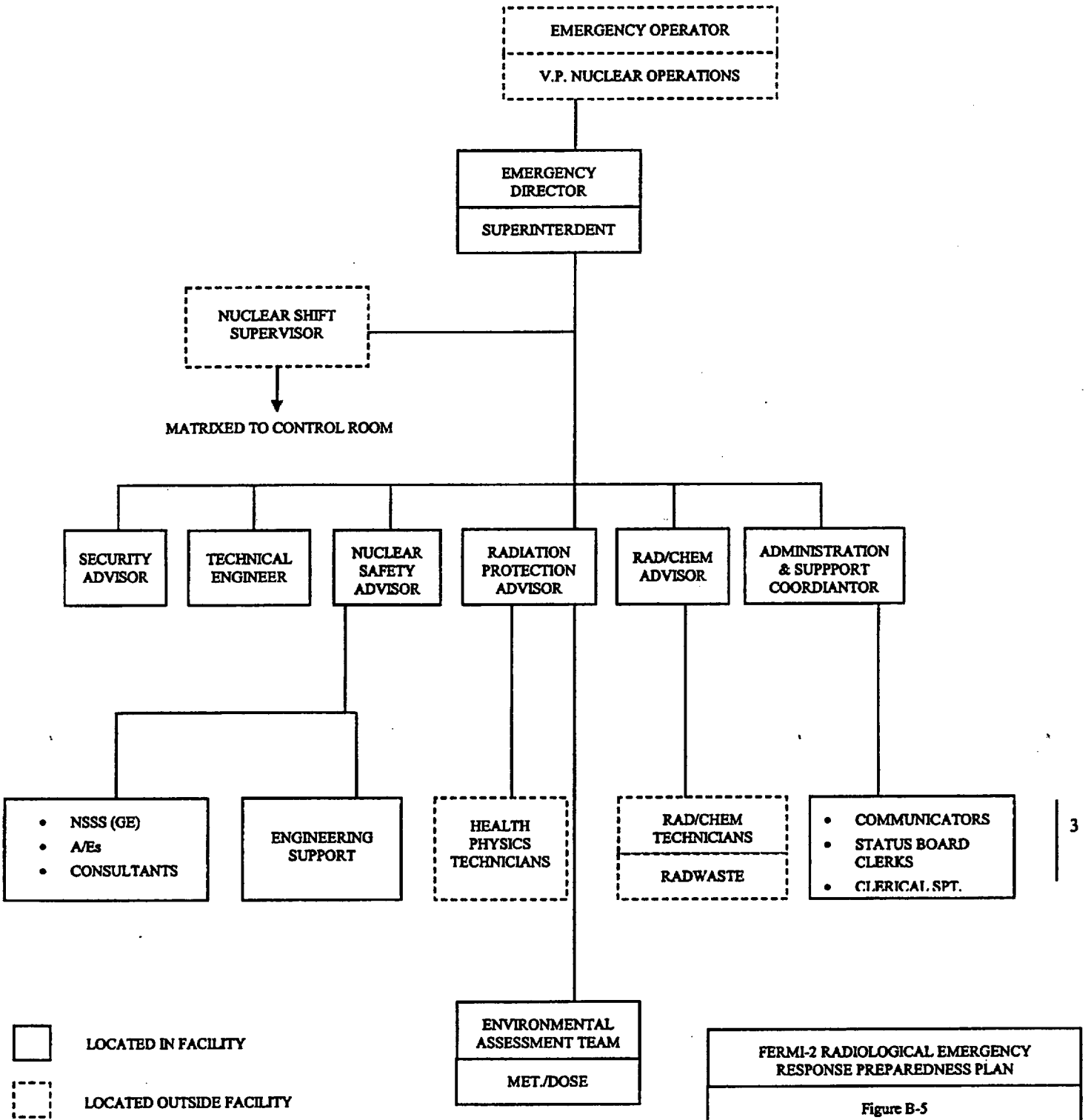


FERMI-2 RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-5

EMERGENCY RESPONSE ORGANIZATION
TECHNICAL SUPPORT CENTER SITE AREA
EMERGENCY AND/OR GENERAL EMERGENCY

Revision 3 – February 1984
Revision 3A – August 1984

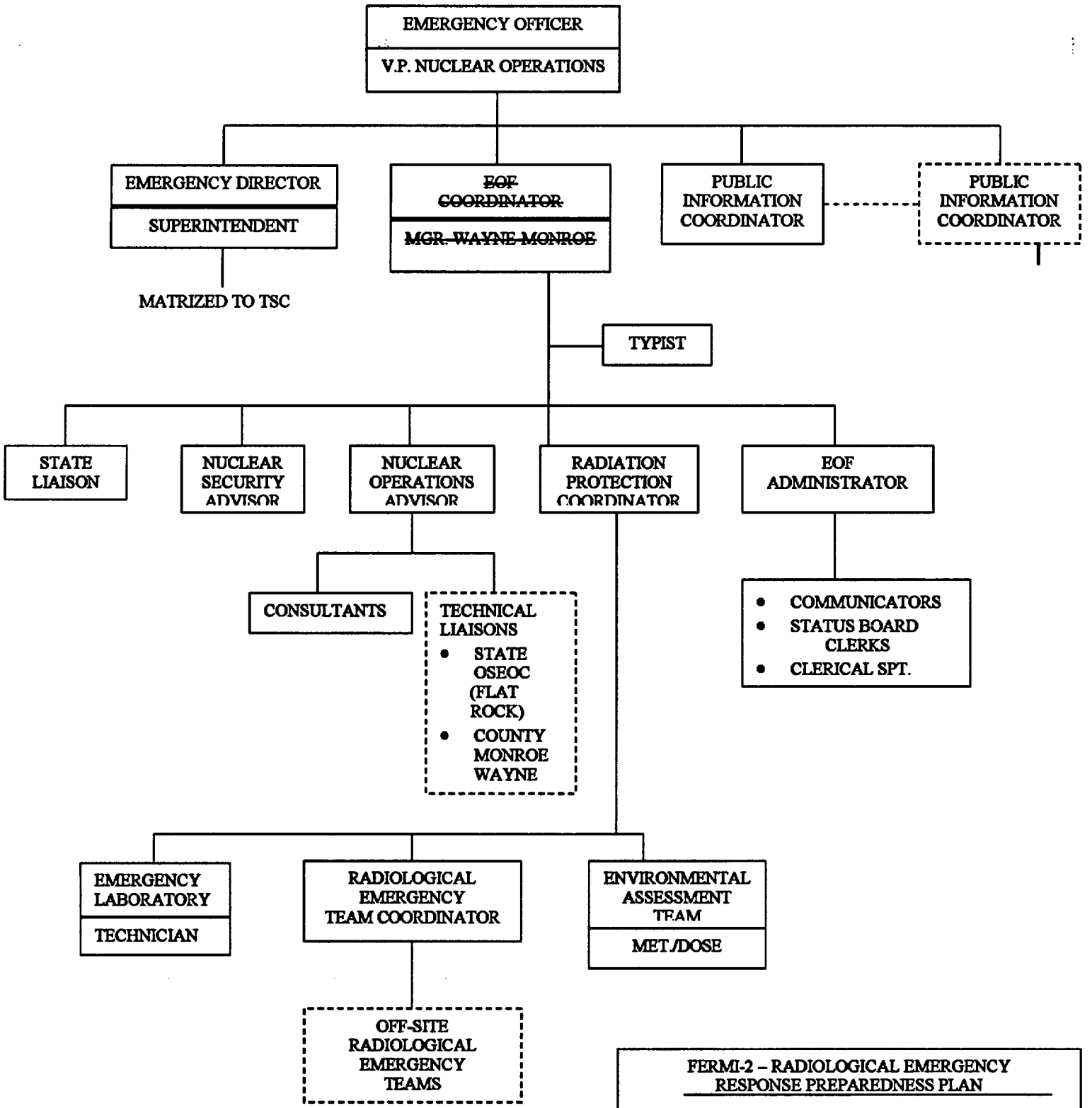


FERMI-2 RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-5

EMERGENCY RESPONSE ORGANIZATION
TECHNICAL SUPPORT CENTER SITE AREA
EMERGENCY AND/OR GENERAL EMERGENCY

Revision 3 – February 1984
Revision 3A – August 1984

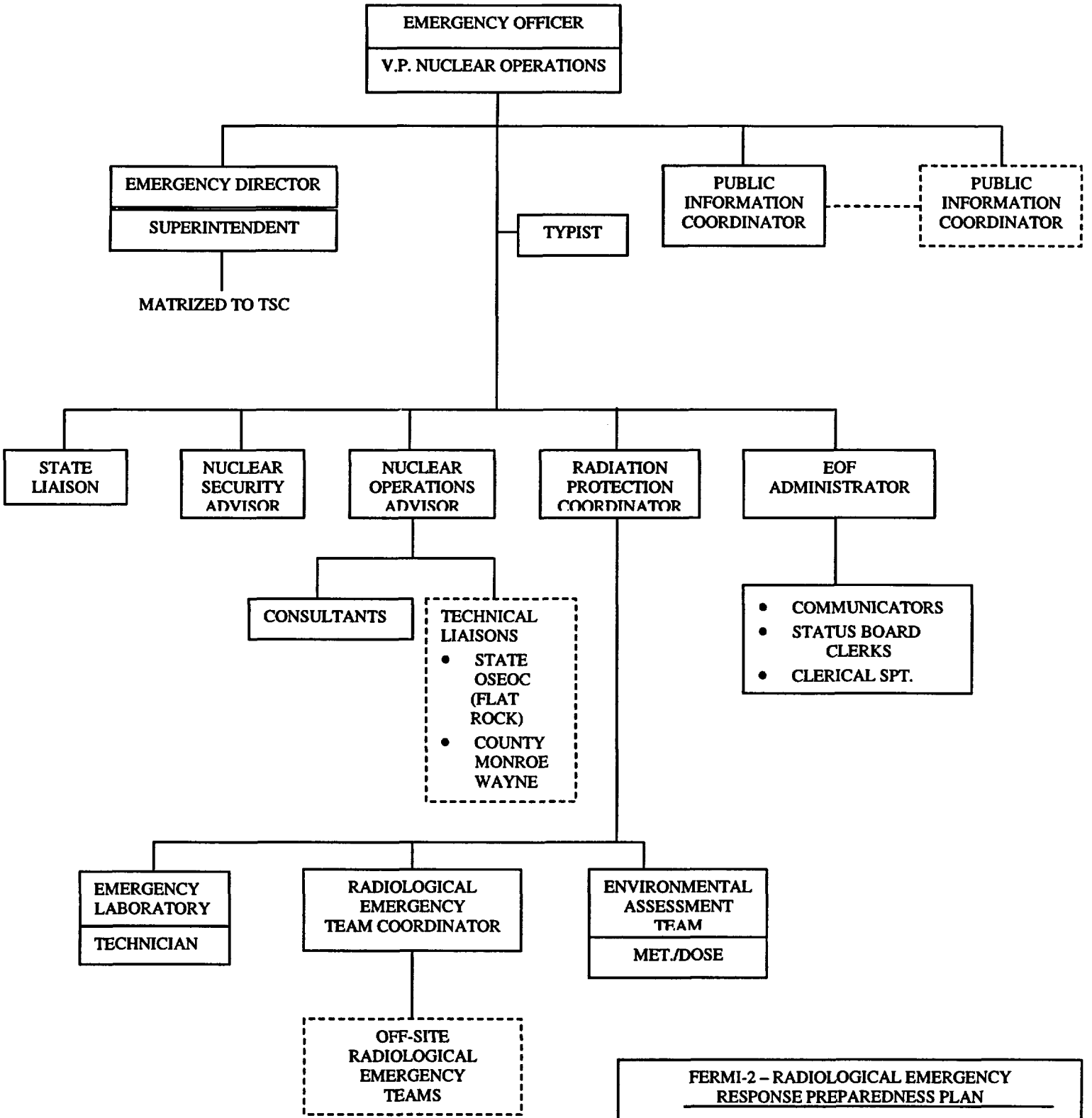


FERMI-2 – RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-6

EMERGENCY RESPONSE ORGANIZATION
EMERGENCY OPERATIONS FACILITY
SITE AREA EMERGENCY AND GENERAL EMERGENCY

Revision 3 – February 1984
Revision 3A – August 1984



FERMI-2 – RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN

Figure B-6

EMERGENCY RESPONSE ORGANIZATION
EMERGENCY OPERATIONS FACILITY
SITE AREA EMERGENCY AND GENERAL EMERGENCY

Revision 3 – February 1984
Revision 3A – August 1984