

10 CFR 50.54(q)

October 17, 2007
5928-07-20167

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Three Mile Island, Unit 1
Facility Operating License No. DPR-50
NRC Docket No. 50-289

Three Mile Island, Unit 2
Possession Only License No. DPR-73
NRC Docket No. 50-320

Subject: Request for NRC Approval of the Three Mile Island Joint Information Center (JIC)
Relocation from Harrisburg to Coatesville, PA.

In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (q), AmerGen Energy Company, LLC (AmerGen) requests approval of a proposed change to the Exelon Nuclear Radiological Emergency Plan (EP) Annex for Three Mile Island (TMI) Station. AmerGen is proposing a change to the EP that relocates the JIC from its current location in Harrisburg, to Coatesville, Pennsylvania.

This request involves relocation of the existing JIC functions into the common JIC currently used by Peach Bottom Atomic Power Station (PBAPS) and Limerick Generating Station (LGS). The common JIC is co-located with the Emergency Operations Facility (EOF), located in Coatesville, Pennsylvania. This request is part of an integrated company plan to improve organizational emergency response.

Attachment 1 contains the 10 CFR 50.54(q) evaluation section associated with the proposed change. Attachment 2 contains the proposed changes to the TMI Radiological Plan Annex, EP-AA -1009. Attachment 3 contains applicable sections of the Exelon Standard Radiological Plan, EP-AA-1000. Attachment 4 contains the Pennsylvania Emergency Management Agency (PEMA) concurrence documentation.

The common JIC in Coatesville has been demonstrated to be an effective facility for implementation of the integrated Emergency Plan for multiple stations. Approval of this proposal extends that philosophy to a single emergency response concept at all Exelon/AmerGen Mid-Atlantic nuclear stations located within the Commonwealth of Pennsylvania.

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Incorporation of the TMI JIC into the common Coatesville JIC will not adversely impact current activation time requirements, which will remain the same. The proposed JIC in Coatesville will be staffed with personnel from both TMI and the Amergen/Exelon Corporate Office in Kennett Square, PA. This proposed change will reduce the impact on the TMI station resources and permit a wider selection of resources for the TMI Emergency Response Facilities by allowing the redundant JIC resources to be redeployed onsite.

AmerGen has evaluated the proposed change against the standards in 10 CFR 50.54(q), as clarified in NRC Regulatory Issue Summary (RIS) 2005-02, "Clarifying the Process for Making Emergency Plan Changes." Since the proposed location of the common Coatesville JIC involves an "Alternate Method," we are requesting NRC approval of the proposed change.

AmerGen currently uses the Harrisburg JIC for the TMI Station and the Coatesville Emergency News Center (ENC) to perform the Emergency Plan Public Information activities. AmerGen is proposing to centralize the Harrisburg JIC with the ENC located in Coatesville, PA, which is co-located with the TMI Emergency Operations Facility (EOF). Also, due to the centralization and co-location of the Pennsylvania JIC activities in the same facility as the EOF, some of the existing TMI Emergency Response Organization positions associated with performance of EOF and JIC functions at remote locations are no longer needed and are being eliminated. These include the JIC Public Information Liaison, and the EOF Emergency News Center positions of Technical Advisor and Radiological Advisor.

AmerGen has concluded that the proposed change will not result in a reduction of the ERO capability to respond to an emergency, and will not reduce AmerGen's ability to protect the health and safety of the public. The revised Emergency Plan will continue to meet the performance requirements of 10 CFR 50.47, Emergency Plans," and 10CFR 50 Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities."

The proposed changes to the Emergency Plan have been reviewed by the TMI Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the Exelon/AmerGen Nuclear Procedures.

Approval is requested by October 17, 2008 to allow for timely implementation of the associated Emergency Plan program improvements. Once approved, the changes will be implemented in a timely manner with consideration of station priorities including the 2008 TMI EP drill schedule.

No new regulatory commitments are established by this submittal. If any additional information is needed, please contact Frank Mascitelli at 610-765-5512.

Respectfully,

gBK


Pamela B. Cowan
Director - Licensing & Regulatory Affairs
AmerGen Energy Company, LLC

- Attachment:
- 1) 10CFR 50.54(q) Evaluation Section for TMI JIC Consolidation
 - 2) Proposed Changes to the Exelon Nuclear Radiological Emergency Plan Annex for Three Mile Island (TMI) Station, EP-AA-1009, Rev 9a
 - 3) Applicable Sections of the Exelon Nuclear Standardized Radiological Emergency Plan, EP-AA-1000, Rev 17
 - 4) PEMA Concurrence Documentation

cc: S. J. Collins, Administrator, USNRC Region I
D. M. Kern, USNRC Senior Resident Inspector, TMI Unit 1
P. J. Bamford, USNRC Project Manager, TMI Unit 1
D. Allard, Director, Bureau of Radiation Protection – Pennsylvania Department
of Environmental Protection
Chairman, Board of County Commissioners of Dauphin County, PA
Chairman, Board of Supervisors of Londonderry Township, Dauphin County, PA
TMI Unit 1 File No. 07042

Attachment 1

Three Mile Island Units 1 and 2

10CFR 50.54(q) Evaluation Section for TMI JIC Consolidation

BACKGROUND AND SCOPE

This §50.54(q) Program Evaluation and Effectiveness Review is applicable to the following documents:

- Three Mile Island Station Emergency Plan Annex, EP-AA-1009.

Exelon is proposing a change to the Emergency Plan that consolidates two Exelon facilities that support the Public Information function for the Three Mile Island Station into a single facility. Exelon currently uses the Harrisburg JIC for the TMI Station and the Coatesville Emergency News Center (ENC) to perform the Emergency Plan Public Information activities. Exelon is centralizing the Harrisburg JIC with the ENC located in Coatesville, PA, which is co-located with the TMI Emergency Operations Facility (EOF). Also, due to the centralization and co-location of the Pennsylvania JIC activities in the same facility as the EOF, some of the existing TMI Emergency Response Organization positions associated with performance of EOF and JIC functions at remote locations are no longer needed and are being eliminated. These include the JIC Public Information Liaison, and the EOF Emergency News Center positions of Technical Advisor and Radiological Advisor.

These proposed changes will establish consistency and alignment of ERO positions and functions at the nine (9) stations governed by the Exelon Nuclear Standardized Radiological Emergency Plan.

- The JIC physical location change affects only the TMI station in Pennsylvania.
- The elimination of ERO Positions only affects ERO positions staffed for the TMI station.
- The ERO position eliminations have no effect on the Braidwood, Byron, Clinton, Dresden, LaSalle, Quad Cities, Limerick or Peach Bottom stations as they already have this structure in place as approved through their current Annexes to the Exelon Nuclear Standardized Radiological Emergency Plan.

PROGRAM REQUIREMENTS

(2) [10CFR50.47(b)(2)] 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.

[NUREG-0654 II.B] 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.

6. Each licensee shall specify the interfaces between and among the onsite functional areas of emergency activity, licensee headquarters support, local services support, and State and local government response organization. This shall be illustrated in a block diagram and shall include the onsite technical support center and the operational support (assembly) center and the licensee's near-site Emergency Operations Facility (EOF).
7. Each licensee shall specify the corporate management, administrative, and technical support personnel who will augment the plant staff as specified in the table entitled "Minimum Staffing Requirements for Nuclear Power Plant Emergencies," (Table B-1) and in the following areas:
 - d. Release of information to news media during an emergency (coordinated with governmental authorities).

(7) [10CFR50.47(b)(7)] Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

[NUREG-0654 II.G] Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance,

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and procedures for coordinated dissemination of information to the public are established.

- 3.a. Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.
 - b. *Each licensee shall provide space which may be used for a limited number of the news media at the nearsite Emergency Operations Facility.*^o
- 4.a. Each principal organization shall designate a spokesperson who should have access to all necessary information.
 - b. Each organization shall establish arrangement for timely exchange of information among designated spokespersons.
 - c. Each organization shall establish coordinated arrangements for dealing with rumors.

- ^o *The existing NRC approved Exelon Emergency Plan and FEMA endorsed Off-Site Emergency Plans do not provide for media access to the EOF.*

(8) **[50.47(b)(8)]** Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

[NUREG-0654 II.H] Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

4. Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.

CHANGE COMPARISON

Facility Changes

Chg #	Issue Name	Change Type	Old	New
1.F.	Physical Location of TMI JIC	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>The Harrisburg JIC is located at 2574 Interstate Drive, in the Commerce Park subdivision in Harrisburg, PA.</p> <p>Below are the approximate travel distances from the Harrisburg JIC to the specific noteworthy locations:</p> <p>TMI Station – 12 miles EOF in Coatesville – 62 miles PEMA Offices in Harrisburg – ¼ mile Harrisburg area news media - immediate proximity Philadelphia major news media – 107 miles. NRC Region I Offices in King of Prussia, PA – 89 miles</p>	<p>The Coatesville JIC is co-located with the EOF at 175 North Caln Road, Coatesville, PA.</p> <p>Below are the approximate travel distances from the Coatesville JIC to the specific noteworthy locations:</p> <p>TMI Station – 50 miles EOF in Coatesville – co-located PEMA Offices in Harrisburg – 62 miles Harrisburg area news media – 62 miles Philadelphia major news media – 42 miles. NRC Region I Offices in King of Prussia, PA – 25 miles</p>

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Chg #	Issue Name	Change Type	Old	New
2.F.	Technological capabilities of the TMI JIC	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>There are 16 installed landline telephones for the ERO members and 15 installed landlines for use by the media. There are 3 separate landline phone exchanges with service ((717) 948-, (717) 657- and (717) 540-). Cellular and digital wireless communication service are available in the area from the major US wireless communication companies including Verizon, Sprint, and AT&T. Satellite communications hookup with the PEMA EOC is provided by PEMA with ready video and audio connections within the Harrisburg JIC. There are two phone extensions connected to the dedicated telephone PBX centralized in the TMI TSC that allows communications with other dedicated telephone extensions at the site and the EOF. There are two desktop computers with LAN access including access to the plant process computer data through R-Time. There are 2 fax machines available to send and receive facsimile documents.</p>	<p>There are over 50 installed landline phones for the ERO members and 20 installed landlines for use by the media. There are 2 separate phone exchanges with service ((610) 380- and (215) 405- plus a phone circuit powered remotely in the event of a local power failure. Cellular and digital wireless communication service are available in the area from the major US wireless communication companies including Verizon, Sprint, and AT&T. Satellite communications hookup with the PEMA EOC is provided by PEMA with ready video and audio connections within the Harrisburg JIC. There are two phone extensions connected to the dedicated telephone PBX centralized in the TMI TSC that allows communications with other dedicated telephone extensions at the site and the EOF. The EOF rooms are immediately adjacent to the JIC rooms reducing the need for telephone communications between the JIC and EOF staffs. There are six desktop computers with LAN access including access to the plant process computer data through R-Time. The EOF and JIC have LAN connections in each room providing ready expansion of LAN connected laptop and other computers. There are 11 fax machines and 3 LAN connected copiers capable of scanning, faxing and emailing documents.</p>

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Chg #	Issue Name	Change Type	Old	New
3.F.	Logistical aspects of the TMI JIC	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>There are 72 vehicle parking spaces provided for both the ERO and media with the potential for vehicles to park along the sides of Interstate Drive. There is limited parking available for satellite vans and trailers. The building is a single story steel and concrete structure. There are many hotels and food services in the Harrisburg area. The total JIC floor space is approximately 6700 ft² with 3700 ft² floor space for the JIC staff and 3000 ft² for the media including the auditorium. There are 60 media seats in the auditorium.</p>	<p>The Coatesville JIC is located 2 miles from highway US 30 with ready access to Harrisburg, Philadelphia and other areas of Pennsylvania via the interstate and turnpike highways. There are 60 vehicle parking spaces reserved for the ERO and another 60 spaces available for the media including satellite vans and trailers. Additional 250 vehicle and truck parking spaces are available in the adjacent PECO Electric Distribution Service Building parking lot. There are many hotels and food services in the areas surrounding the Coatesville facility. There is a dedicated heliport at the Coatesville location. Amtrak Rail service is available 2 miles from the JIC. The EOF/JIC combined facility total flow space is 22000 ft² with 5000 ft² floor space for the JIC staff and 5000 ft² for the media including the auditorium. There are 160 media seats in the auditorium with additional space available for working tables.</p>

Radiological Emergency Plan Annex for Three Mile Island (TMI) Station, EP-AA-1009, Changes

Chg #	Section	Step #	Change Type	Old Wording	New Wording
1.P.	2	2.2.3	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Emergency Public Information Organization (Figure TMI 2-4)</p> <p>Based on the location of the EOF at the Coatesville facility and local siting of the Joint Information Center (JIC) in the Harrisburg, PA areas, no changes in augmentation positions or staffing levels for the JIC exist from that specified in the Standard Plan.</p> <p>For a TMI event, the Public Information Liaison position is assigned to the Emergency News Center (ENC) function at the Coatesville EOF to support the prompt transfer of information and relaying of communications to and from the Harrisburg JIC.</p> <p>For TMI, the JIC facility is separate from the ENC facility and additional ERO positions exist as a result. Below are the position descriptions for the ERO positions in the JIC and ENC.</p>	<p>Emergency Public Information Organization (Figure TMI 2-4)</p> <p>No changes in augmentation positions or staffing levels for the Joint Information Center from that specified in the Standard Plan except that the Radiological Spokesperson may be staffed by a qualified consultant.</p>

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
2.P.	2	2.2.3.1	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Corporate Spokesperson position description in EP-AA-1009.</p> <p>1) <u>Corporate Spokesperson</u></p> <p>The Corporate Spokesperson reports to the Corporate Emergency Director and is responsible for directing the Exelon Emergency Public Information Organization and providing news information to the media. Responsibilities include:</p> <ul style="list-style-type: none"> • Maintain command and control of the Joint Public Information Center. • Coordinate with Federal, State and Local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public. • Conduct periodic briefings with the news media. • Interface with the Public Information Director. • Coordinate and direct responses to media inquiries. • Ensure that the composition and timeliness of Exelon News Releases are adequate. • Provide for timely exchange of information between other spokespersons. 	<p>Corporate Spokesperson position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.1. Description relocation only and no wording changes.</p>

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
3.P.	2	2.2.3.2	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Technical Spokesperson position description in EP-AA-1009.</p> <p>2) <u>Technical Spokesperson</u></p> <p>The Technical Spokesperson reports to the Corporate Spokesperson. Responsibilities include:</p> <ul style="list-style-type: none"> • In coordination with the Technical Advisor, prepare briefing papers, which contain additional detail and background not found in the news releases. • Provide answers as soon as possible to media questions. • Provide a follow-up explanation that corrects misinformation as soon as practicable. 	<p>Technical Spokesperson position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.2.</p> <p>2) <u>Technical Spokesperson</u></p> <p>The Technical Spokesperson reports to the Corporate Spokesperson. Responsibilities include:</p> <ul style="list-style-type: none"> • Assist in development of technical and plant status information for use in news releases and media briefings. • Assist the Events Recorder in the preparation of a chronological event description log. • Prepare briefing papers which contain additional detail and background not found in the news releases. • Provide answers as soon as possible to media questions. • Provide a follow-up explanation that corrects misinformation as soon as practicable.

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
4.P.	2	2.2.3.10	<input type="checkbox"/> Added <input checked="" type="checkbox"/> Removed <input type="checkbox"/> Modified	Technical Advisor position description in EP-AA-1009. 10) <u>Technical Advisor</u> The Technical Advisor reports to the Public Information Director. Responsibilities include: <ul style="list-style-type: none"> • Assist in obtaining technical and plant status information for use in news releases and media briefings. • Assist the News Writer in the preparation of news releases. • Assist the Events Recorder in the preparation of a chronological event description log. 	The Technical Advisor position does not exist and the responsibilities are combined into the Technical Spokesperson position description in the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.2.

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
5.P.	2	2.2.3.3	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Radiological Spokesperson position description in EP-AA-1009.</p> <p>3) <u>Radiation Protection Spokesperson</u></p> <p>The Radiation Protection Spokesperson reports to the Corporate Spokesperson. Responsibilities include.</p> <ul style="list-style-type: none"> • In coordination with the Radiological Advisor, prepare briefing papers, which contain additional detail and background not found in the news releases. • Provide answers as soon as possible to media questions. • Provide a follow-up explanation that corrects misinformation as soon as practicable. 	<p>Radiological Spokesperson position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.3.</p> <p>3) <u>Radiation Protection Spokesperson</u></p> <p>The Radiation Protection Spokesperson reports to the Corporate Spokesperson. Responsibilities include.</p> <ul style="list-style-type: none"> • Assist in development of environmental and health physics information for use in news releases and media briefings. • Assist the Events Recorder in the preparation of a chronological event description log. • Prepare briefing papers which contain additional detail and background not found in the news releases. • Provide answers as soon as possible to media questions. • Provide a follow-up explanation that corrects misinformation as soon as practicable.

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
6.P.	2	2.2.3.11	<input type="checkbox"/> Added <input checked="" type="checkbox"/> Removed <input type="checkbox"/> Modified	<p>Radiological Advisor position description in EP-AA-1009.</p> <p>11) <u>Radiological Advisor</u></p> <p>The Radiological Advisor reports to the Public Information Director. Responsibilities include:</p> <ul style="list-style-type: none"> • Assist in obtaining environmental and health physics information for use in news releases and media briefings. • Assist the News Writer in the preparation of news releases. • Assist the Events Recorder in the preparation of a chronological event description log. 	<p>The Radiological Advisor position does not exist and the responsibilities are combined into the Radiological Spokesperson position description in the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.3.</p>

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
7.P.	2	2.2.3.4	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>JIC Director position description in EP-AA-1009.</p> <p>4) <u>JIC Director</u></p> <p>The JIC Director reports the Corporate Spokesperson to ensure the operability of and to supervise the activities in the JIC. Responsibilities include:</p> <ul style="list-style-type: none"> • Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel. • Coordinate with Federal, State and Local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public. • Participate, as needed, in rumor control activities. • Ensure that adequate information flow between the EOF and the JIC is coordinated through the Public Information Director. • Authorize admittance of non-Exelon Nuclear officials to the JIC. 	<p>JIC Director position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.4. Description relocation only and no wording changes.</p>

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
8.P.	2	2.2.3.5	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>JIC Coordinator position description in EP-AA-1009.</p> <p>5) <u>JIC Coordinator</u></p> <p>The JIC Coordinator reports to the JIC Director and supervises the facilities support staff. Responsibilities include:</p> <ul style="list-style-type: none"> • Ensure the JIC is activated and operational. This includes the availability of communications and visual aids. • Ensure that access to the JIC areas occupied by Exelon personnel is controlled. • Establish a minimum frequency for addressing news media/public representatives and ensure that some form of communication occurs within that time frame (i.e., an update at least hourly.) • Document unanswered questions and serious public misinformation issues. Follow-up on these questions and issues to ensure that they are being adequately addressed. • Coordinate the interface between Exelon Nuclear and the news media/public, including, as necessary, briefings, news conferences, interviews and responses to information requests. 	<p>JIC Coordinator position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.5. Description relocation only and no wording changes</p>

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
9.P.	2	2.2.3.6	<input type="checkbox"/> Added <input checked="" type="checkbox"/> Removed <input type="checkbox"/> Modified	<p>Pubic Information Liaison position description in EP-AA-1009.</p> <p>6) <u>Public Information Liaison</u></p> <p>The Public Information Liaison reports to the JIC Director. Responsibilities include:</p> <ul style="list-style-type: none"> • Coordinate information flow between the EOF and JIC. • Ensure that approved News Releases and Chronological Event Description Logs are made available in the JIC. 	<p>The Public Information Liaison position does not exist and the responsibilities are redundant to the JIC Director and Public Information Director (PID) positions description in the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.4 and B.5.c.9.</p> <p>This responsibility is redundant to the same responsibility assigned to the JIC Director</p> <p>This responsibility is redundant to the same responsibility assigned to the Public Information Director (PID)</p>
10.P.	2	2.2.3.7	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Administrative Coordinator position description in EP-AA-1009.</p> <p>7) <u>Administrative Coordinator JIC</u></p> <p>The Administrative Coordinator reports to the JIC Director. Responsibilities include:</p> <ul style="list-style-type: none"> • Direct the clerical staff and ensure the clerical requirements for the other JIC staff are met. • Coordinate shift relief and continual staffing for the JIC. • Obtain additional radio and telephone equipment as necessary to meet the needs of the emergency. • Obtain services as appropriate to support operation of the JIC. 	<p>Administrative Coordinator position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.7. Description relocation with minor changes in responsibilities.</p> <ul style="list-style-type: none"> • Coordinate with the EOF Administrative Coordinator to ensure the clerical requirements for the other JIC staff are met.

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11.P.	2	2.2.3.8	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Access Controller position description in EP-AA-1009.</p> <p>8) <u>Access Controller</u></p> <p>The Access Controller reports to the JIC Director and is responsible for controlling facility access and obtaining authorization prior to admitting non-Exelon Nuclear officials into the JIC.</p>	<p>Access Controller position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.8. Description relocation only and no wording changes.</p>

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12.P.	2	2.2.3.9	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Public Information Director position description in EP-AA-1009.</p> <p>9) <u>Public Information Director (PID)</u></p> <p>When the Emergency Public Information Organization is activated, the Public Information Director reports to the Corporate Spokesperson and is responsible for all emergency event related information intended to be conveyed from Exelon Nuclear to the news media/public. The Public Information Director supervises the activities of the advisory staff, News Writer, Events Recorder and media monitoring and rumor control personnel. Responsibilities include:</p> <ul style="list-style-type: none"> • Provide the Corporate Emergency Director with an overview of the public and media impacts resulting from the Exelon Nuclear and governmental activities. • Participate with the Corporate Emergency Director regarding information to be released to the public. • Authorize the issuance of news releases. • Interface with the Corporate Spokesperson at the JIC. • Act as a liaison between the ERO and Exelon Nuclear's corporate executives. • Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel. • Interface with the Public Information Liaison located at the JIC and coordinate information flow between the EOF and the JIC. • Coordinate with the Media Monitoring Staff to review and access media coverage of the emergency event. 	<p>Public Information Director position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.9. Description relocation with minor changes in responsibilities. All responsibilities remain the same except for the interface with the Public Information Liaison (PIL) is no longer applicable with the elimination of the PIL position.</p>

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13.P.	2	2.2.3.12	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>News Writer position description in EP-AA-1009.</p> <p>12) <u>News Writer JIC</u></p> <p>The News Writer reports to the Public Information Director. Responsibilities include:</p> <ul style="list-style-type: none"> • Obtain the assistance of the Technical and Radiological Advisors, as needed, to develop news releases. • Compose draft news releases. • Provide the drafted news releases to the Corporate Emergency Director for technical review prior to Public Information Director approval. 	<p>News Writer position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.12. Description relocation with minor changes in responsibilities. Interfaces with the Technical and Radiological Advisors are replaced with interface with the Technical and Radiological Spokesperson positions.</p>
14.P.	2	2.2.3.13	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Events Recorder position description in EP-AA-1009.</p> <p>13) <u>Events Recorder</u></p> <p>The Events Recorder reports to the Public Information Director. Responsibilities include:</p> <ul style="list-style-type: none"> • Develop a chronological event description log. • Obtain the assistance of the Technical and Radiological Advisors, as needed, to develop the event log. 	<p>Events Recorder position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.13. Description relocation with minor changes in responsibilities. Interfaces with the Technical and Radiological Advisors are replaced with interface with the Technical and Radiological Spokesperson positions.</p>

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
15.P.	2	2.2.3.14	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Media Monitoring Staff position description in EP-AA-1009.</p> <p>14) <u>Media Monitoring Staff</u></p> <p>The Media Monitor reports to the Public Information Director. Responsibilities include:</p> <ul style="list-style-type: none"> • Ensure that the media is being monitored and that Exelon Nuclear personnel review the information detailed or contained in media releases. • Inform the Public Information Director of all media reports and of actions taken to correct any misinformation or rumors. • Direct the activities of the Rumor Control Staff with respect to the function of monitoring rumors from sources other than the media. 	<p>Media Monitoring Staff position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.14. Description relocation only and no wording changes.</p>
16.P.	2	2.2.3.15	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	<p>Rumor Control Staff position description in EP-AA-1009.</p> <p>15) <u>Rumor Control Staff</u></p> <p>The Rumor Control Staff reports to the Public Information Director and acts in support of the Media Monitors. Responsibilities include:</p> <ul style="list-style-type: none"> • Ensure that rumors are reviewed, documented and responded to by Exelon Nuclear personnel as deemed appropriate. • Until the JIC is fully activated, document and respond to rumors as quickly as possible, through the Exelon Communications and Public Affairs. 	<p>Rumor Control Staff position description moved to the Standard Emergency Plan, EP-AA-1000, section II. B.5.c.15. Description relocation only and no wording changes.</p>

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
17.P.	2	Table TMI 2-1	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	Functional Area Public Information Emergency Positions as described in Table TMI 2-1 in EP-AA-1009. (See Appendix 1) Corporate Spokesperson (JIC) Rad Protection Spokesperson (JIC) Technical Spokesperson (JIC) Public Information Director Radiological Advisor Technical Advisor News Writer Public Information Liaison (JIC) Media Monitoring Staff Rumor Control Staff JIC Director (JIC) JIC Coordinator (JIC) Administrative Coordinator (JIC) Events Recorder (JIC) Clerical Support (JIC) Access Control (JIC)	Three positions eliminated as discussed in changes 4.P, 6.P and 9.P. The total number of positions for Full Augmentation is reduced from 38+ to 35+. (See Appendix 1) Corporate Spokesperson (JIC) Rad Protection Spokesperson (JIC) Technical Spokesperson (JIC) Public Information Director News Writer Media Monitoring Staff Rumor Control Staff JIC Director (JIC) JIC Coordinator (JIC) Administrative Coordinator (JIC) Events Recorder (JIC) Clerical Support (JIC) Access Control (JIC)
18.P.	2	Figure TMI 2-4	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	Figure TMI 2-4, Emergency Public Information Organization (See Appendix 2)	Figure TMI 2-4, Emergency Public Information Organization (See Appendix 2)
19.P.	4	Figure TMI 4-3 Title	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	Figure TMI 4-3 Remote Assembly Area -- Harrisburg JIC (Commerce Park)	Figure TMI 4-3 Remote Assembly Area -- Former Harrisburg JIC (Commerce Park). This also is reflected in the Table of Contents on page ii.

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Chg #	Section	Step #	Change Type	Old Wording	New Wording
20.P.	5	5.1.5	<input type="checkbox"/> Added <input type="checkbox"/> Removed <input checked="" type="checkbox"/> Modified	Description of the address of the TMI JIC in EP-AA-1009. <u>Joint Information Center (JIC)</u> The Joint Information Center (JIC) is the facility in which media personnel gather to receive information related to the emergency event. The JIC is located at the Commerce Park subdivision in Harrisburg, PA, approximately ¼ mile from the PEMA offices.	New address of the relocated TMI JIC. <u>Joint Information Center (JIC)</u> The Joint Information Center (JIC) is the facility in which media personnel gather to receive information related to the emergency event. The JIC is co-located with the EOF at 175 North Caln Road, Coatesville, Pennsylvania.

CHANGE ASSESSMENT

- Changes impacting the areas listed in Part 1 are evaluated to determine whether they constitute a “decrease in effectiveness” as defined under 10 CFR 50.54(q) or are an “alternate method” as defined under NUREG-0737 Section 3.8 and Regulatory Guide 1.101.
- Changes other than those evaluated below were evaluated as minor and not impacting the above criteria. As such, further assessment of change against the planning standards of 10 CFR 50.47(b), the requirements of Appendix E to 10 CFR 50 or other commitments is not warranted.
- Groups of changes all affected by the same Program Requirements may be summarized in a single listing below.

Facility Changes

Applicable Program Requirements:

Refer to Program Requirements section of this evaluation to review the applicable requirements of the following regulations

10CFR50.47(b)(2)	NUREG-0654 II.B
10CFR50.47(b)(7)	NUREG-0654 II.G
10CFR50.47(b)(8)	NUREG-0654.II.H

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Chg #	Impact	Change impacts on the Program Requirements
1.F 2.F 3.F	<input type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input checked="" type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>The consolidation of the 2 TMI Public Information function facilities (i.e., JIC and ENC) into a single proven centralized JIC does represent a reduction in the number of facilities, and does move the JIC further away from the TMI station and the location of the event. These factors are more than compensated for by the fact that the technology currently utilized by the media is much more independent than was in place at the time of the installation of the current JIC at Harrisburg, Pennsylvania. The common location also enhances the utility, state, and federal response due to location and consolidation such that a single location would be used in the event of multiple station concurrent events within the state (Utility, State, and Federal responders would not need to be diluted at multiple JICs).</p> <p>Changing the location of the TMI JIC from Harrisburg, PA to Coatesville, PA will enhance the performance of the JIC Staff due to the direct interaction with the EOF Staff and the immediate use of Corporate Nuclear Communications and Public Affair staffs. Currently the Harrisburg JIC is staffed only by TMI station personnel. The number and experience level of Exelon employees available to staff and support the Coatesville JIC will be significantly increased when it is co-located in the same building as the Exelon Mid-Atlantic EOF at Coatesville, PA. The Coatesville EOF and JIC are staffed from the Exelon Nuclear Corporate Headquarters located at Kennett Square, Pennsylvania. These offices are located 14 miles or a 30-minute drive from the Coatesville JIC. The Exelon Nuclear Corporate offices include the staffs for the Mid-Atlantic Executive Offices, Corporate Nuclear Communications and Corporate Nuclear Public Affairs. These staffs support the Coatesville JIC for Limerick and Peach Bottom Stations and are highly experienced in the various responsibilities of Public Information. These individuals would be utilized in staffing the Coatesville JIC for the TMI station. The approximate staffing times for the Harrisburg and Coatesville JICs are the same, since the on-call JIC ERO members are required to be within the same travel distance to their assigned JIC facility.</p> <p>The Coatesville facility also offers:</p> <ol style="list-style-type: none"> 1. Larger auditorium, media working spaces and parking facilities to better accommodate the needs of media personnel. 2. Increase in the number of telephone lines available for the media. 3. Improved audio and video display capabilities including large screen satellite linked video of press conferences. 4. A back-up power supply to support continued JIC operations in the event of a power failure. 5. Improved response times to the JIC for the NRC regional office personnel. 6. Availability of a heliport on-site to support federal and state response personnel and officials. <p>This change is considered an "alternative method" as defined under NUREG-0737 Section 3.8 and Regulatory Guide 1.101. Prior NRC approval for alternative methods is required under the requirements of 10 CFR 50.54(q) as clarified by SECY 01-0192¹.</p>

¹ SECY-01-0192, dated 10/18/01, and associated NRC Staff Memorandum EGM 02-001, dated 11/06/01.

Procedure Changes

Applicable Program Requirements:

Refer to Program Requirements section of this evaluation to review the applicable requirements of the following regulations:

10CFR50.47(b)(7) NUREG-0654 II.G

Chg #	Impact	Change impacts on the Program Requirements
1.P 20.P	<input type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input checked="" type="checkbox"/> AM <input type="checkbox"/> Degradation	Reference to the location of the TMI JIC is being updated to retain alignment with the co-location described under change 1.F.
2.P 7.P 8.P 11.P 15.P 16.P	<input checked="" type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input type="checkbox"/> AM <input type="checkbox"/> Degradation	The ERO position descriptions are being relocated from the TMI Annex to the standard Emergency Plan with no text changes.

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Chg #	Impact	Change impacts on the Program Requirements
<p>3.P 4.P</p>	<p> <input type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input checked="" type="checkbox"/> AM <input type="checkbox"/> Degradation </p>	<p>With the co-located JIC in the same location and building as the EOF, a separate position of Technical Advisor is no longer needed. The majority of responsibilities and duties are being transferred to the Technical Spokesperson. The Technical Spokesperson can accomplish the compiled responsibilities, as the tasks are significantly reduced without the communications burden and challenges associated with remote JIC location. The current approved method of obtaining information regarding an event at a remote JIC is less efficient than when the JIC is co-located with the EOF as demonstrated with the Warrentonville and Coatesville JICs. With the remotely located JIC, the staff receives information that is relayed by the Technical and Radiological Advisors at the EOF via phone and computers. When the JIC Staff is in the EOF, the JIC Staff will have more direct access to the resources of the EOF Staff to develop information in a more timely manner. The ability to effectively perform the compiled list of tasks has been demonstrated repeatedly at the Limerick and Peach Bottom stations which have been using this model, as approved by the NRC, for an extended period of time.</p> <p>NRC guidance on the 50.54(q) evaluation states that a decrease in effectiveness is determined to have occurred if there has been a change or reduction in a commitment without a commensurate change or reduction in the bases for that commitment. A commitment is defined as a statement made in the Emergency Plan that affects the capability or resources for responding to an emergency.</p> <p>Exelon has concluded that the proposed change will not result in a reduction of the capability of the Emergency Response Organization (ERO) to respond to an emergency, and will not reduce Exelon's ability to protect the health and safety of the public. The consolidation of Exelon's Emergency Response Facilities has been approved by the NRC previously when the EOF's were moved to a common EOF in Coatesville, PA. The elimination of the separate JIC for TMI station is proposed as an alternate method.</p>

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Chg #	Impact	Change impacts on the Program Requirements
5.P 6.P	<input type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input checked="" type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>With the co-located JIC in the same location and building as the EOF, a separate position of Radiological Advisor is no longer needed. The majority of responsibilities and duties are being transferred to the Radiation Protection Spokesperson. The Radiation Protection Spokesperson can accomplish the compiled responsibilities, as the tasks are significantly reduced without the communications burden and challenges associated with remote JIC location. The current approved method of obtaining information regarding an event at a remote JIC is less efficient than when the JIC is co-located with the EOF as demonstrated with the Warrentonville and Coatesville JICs. With the remotely located JIC, the staff receives information that is relayed by the Technical and Radiological Advisors at the EOF via phone and computers. When the JIC Staff is in the EOF, the JIC Staff will have more direct access to the resources of the EOF Staff to develop information in a more timely manner. The ability to effectively perform the compiled list of tasks has been demonstrated repeatedly at the Limerick and Peach Bottom stations which have been using this model, as approved by the NRC, for an extended period of time.</p> <p>NRC guidance on the 50.54(q) evaluation states that a decrease in effectiveness is determined to have occurred if there has been a change or reduction in a commitment without a commensurate change or reduction in the bases for that commitment. A commitment is defined as a statement made in the Emergency Plan that affects the capability or resources for responding to an emergency.</p> <p>Exelon has concluded that the proposed change will not result in a reduction of the capability of the Emergency Response Organization (ERO) to respond to an emergency, and will not reduce Exelon's ability to protect the health and safety of the public. The consolidation of Exelon's Emergency Response Facilities has been approved by the NRC previously when the EOF's were moved to a common EOF in Coatesville, PA. The elimination of the separate JIC for TMI station is proposed as an alternate method.</p>

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Chg #	Impact	Change impacts on the Program Requirements
9.P	<input type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input checked="" type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>With the co-located JIC in the same location and building as the EOF, a Public Information Liaison is no longer needed. The JIC Coordinator is assuming the responsibility for ensuring that approved News Releases and Chronological Event Description Logs are made available. The responsibility for coordinating information flow between the EOF and JIC was a shared responsibility of the Public Information Liaison and the Public Information Director. With the co-located facilities, a single position having responsibility for the coordination of information is all that is needed to meet the requirements of the emergency plan. These relocated responsibilities are consistent with the existing responsibilities and tasks of the positions.</p> <p>The ability to effectively perform the compiled list of tasks has been demonstrated repeatedly at the Limerick and Peach Bottom stations which have been using this model, as approved by the NRC, for an extended period of time.</p> <p>NRC guidance on the 50.54(q) evaluation states that a decrease in effectiveness is determined to have occurred if there has been a change or reduction in a commitment without a commensurate change or reduction in the bases for that commitment. A commitment is defined as a statement made in the Emergency Plan that affects the capability or resources for responding to an emergency.</p> <p>Exelon has concluded that the proposed change will not result in a reduction of the capability of the Emergency Response Organization (ERO) to respond to an emergency, and will not reduce Exelon's ability to protect the health and safety of the public. The consolidation of Exelon's Emergency Response Facilities has been approved by the NRC previously when the EOF's were moved to a common EOF in Coatesville, PA. The elimination of the separate JIC for TMI station is proposed as an alternate method.</p>
10.P	<input checked="" type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>With the co-located JIC in the same location and building as the EOF, direction of the clerical staff is a coordinated duty of the JIC and EOF Administrative Coordinator positions. The JIC Coordinator position description is revised to reflect this coordinated responsibility.</p>
12.P	<input checked="" type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>Responsibilities of the Public Information Director have been adjusted to retain alignment and consistency in distribution of responsibilities of the JIC/ENC staff members. Elimination of the reference to directing the advisory staff (Radiological Advisor and Technical Advisor) was removed, and reference to interfacing with the Public Information Liaison was removed for consistency with the position changes as described in items 4.P, 6.P and 9.P.</p>
13.P 14.P	<input checked="" type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>News Writer and JIC Events Recorder responsibilities were updated to reflect the changes in interface with the Radiological/Technical Spokespersons v. the Radiological/Technical Advisors as referenced in items 4.P and 6.P. This provides for consistency with the changes described for these positions.</p>

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Chg #	Impact	Change impacts on the Program Requirements
17.P 18.P	<input type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input checked="" type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>Changes to the Emergency Plan table TMI-2-1 and Figure TMI 2-4 reflect the elimination of the three positions as detailed above, and the consolidation of the EOF and JIC Clerical support (minimum number of clerical is unchanged).</p> <p>The ability to effectively perform the compiled list of tasks has been demonstrated repeatedly at the Limerick and Peach Bottom stations which have been using this model, as approved by the NRC, for an extended period of time.</p> <p>NRC guidance on the 50.54(q) evaluation states that a decrease in effectiveness is determined to have occurred if there has been a change or reduction in a commitment without a commensurate change or reduction in the bases for that commitment. A commitment is defined as a statement made in the Emergency Plan that affects the capability or resources for responding to an emergency.</p> <p>Exelon has concluded that the proposed change will not result in a reduction of the capability of the Emergency Response Organization (ERO) to respond to an emergency, and will not reduce Exelon's ability to protect the health and safety of the public. The consolidation of Exelon's Emergency Response Facilities has been approved by the NRC previously when the EOF's were moved to a common EOF in Coatesville, PA. The elimination of the separate JIC for TMI station is proposed as an alternate method.</p>
19.P	<input checked="" type="checkbox"/> No affect <input type="checkbox"/> Enhancement <input type="checkbox"/> AM <input type="checkbox"/> Degradation	<p>With the relocation of the TMI JIC to Coatesville, the name of the Remote Assembly Area is changed to acknowledge the location is the same but is no longer the TMI JIC facility.</p>

JUSTIFICATION

Each change that is classified as a degradation or an alternate method in the Change Assessment section requires a justification that includes the basis and reasons the change is appropriate and necessary. Sufficient level of detail must be provided to support the basis for complex and significant changes and conclusion regarding effectiveness.

Chg. #	Basis and reasons the change causing the degradation is appropriate and necessary
1.F	Currently, the method of obtaining information regarding an event at a remote JIC is less efficient than when the JIC is co-located with the EOF as demonstrated with the Warrentonville and Coatesville JICs. With the remotely located JIC, the staff receives information that is relayed by the Technical and Radiological Advisors at the EOF via phone and computers. When the JIC Staff is in the EOF, the JIC Staff will have more direct access to the resources of the EOF Staff to develop information in a more timely manner.
2.F	
3.F	
1.P	Another benefit is that the Corporate Spokesperson is able to review news releases that are prepared in the EOF as they are being written. The Spokespersons will have better knowledge of the information that has been released to the public prior to a press conference.
3.P	
4.P	Since the Coatesville JIC is located close to Exelon Nuclear corporate office, additional Exelon corporate personnel are available to provide support if needed, including Exelon Corporate Communications and Nuclear Public Affairs. Likewise, the State PIO personnel have ready access to state EOF personnel with a JIC co-located with the EOF.
5.P	
6.P	
9.P	This change to the Exelon Mid-Atlantic Joint Information Centers does not negatively affect the ability of the Exelon ERO to provide information to the Public. The Coatesville JIC for the TMI Station will replace the JIC at Harrisburg, PA. The Coatesville JIC has the benefits of improved communication with the EOF, improved facilities and experienced staff, and improved response times for the NRC regional office personnel. The maintenance of the Coatesville JIC (Facilities and Equipment) is essentially the same as the maintenance in the existing Harrisburg JIC. NRC guidance on the 50.54(q) evaluation states that a decrease in effectiveness is determined to have occurred if there has been a change or reduction in a commitment without a commensurate change or reduction in the bases for that commitment. A commitment is defined as a statement made in the Emergency Plan that affects the capability or resources for responding to an emergency. Exelon has concluded that the proposed change will not result in a reduction of the capability of the Emergency Response Organization (ERO) to respond to an emergency, and will not reduce Exelon's ability to protect the health and safety of the public. The consolidation of Exelon's Emergency Response Facilities has been approved by the NRC previously when the Limerick and Peach Bottom EOF's were moved to a common EOF in Coatesville, PA. The elimination of the separate JIC for TMI station is proposed as an alternate method. This change is considered an "alternative method" as defined under NUREG-0737 Section 3.8 and Regulatory Guide 1.101. Prior NRC approval for alternative methods is required under the requirements of 10 CFR 50.54(q) as clarified by SECY 01-0192 ² .
17.P	
18.P	
20.P and 20.P	

2 SECY-01-0192, dated 10/18/01, and associated NRC Staff Memorandum EGM 02-001, dated 11/06/01.

REFERENCES

NUREG-0654

NUREG 0737

Regulatory Guide 1.101

SECY 01-0192

10CFR50.47

Appendix E to 10CFR50

APPENDIX 1

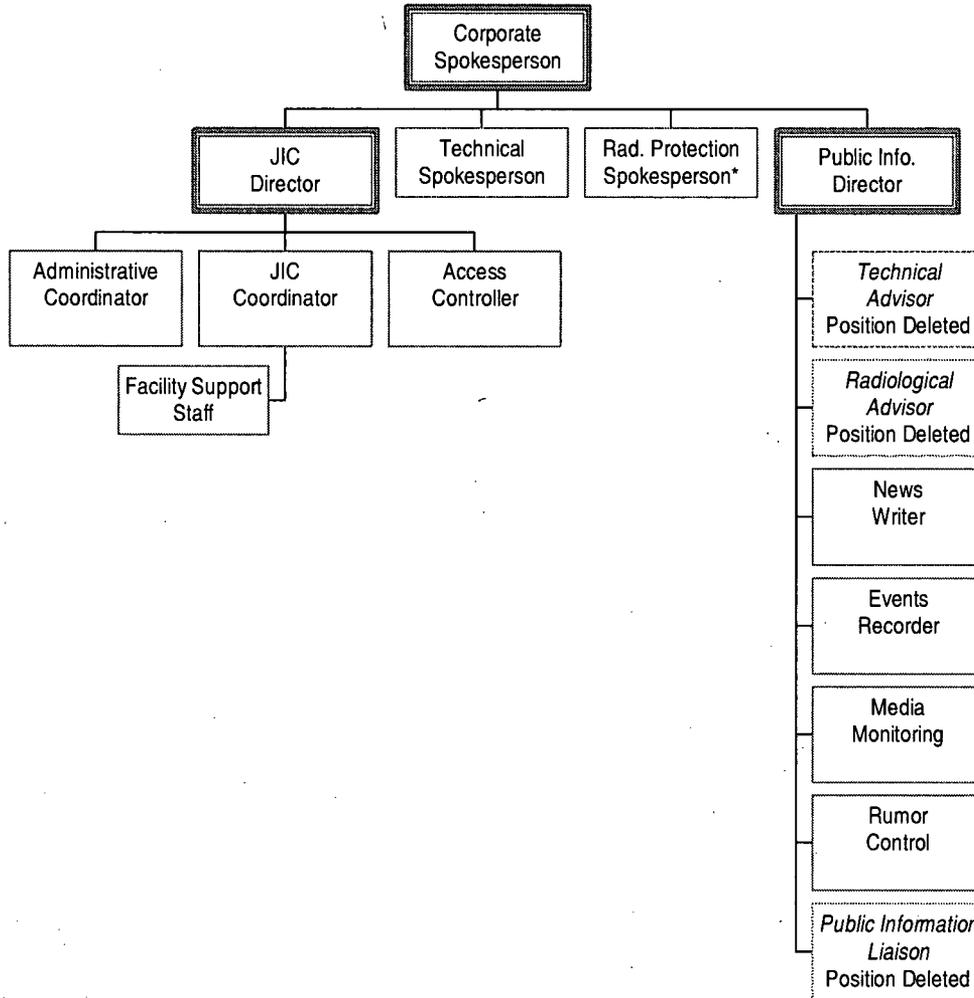
Emergency Plan Annex Table TMI 2-1

Functional Area	Major Tasks	Emergency Positions	Minimum Staffing			Full Augmentation
			(b) Shift Size	(a) 60 Minute Augmentation	(l) Other On-Call	
11. Public Information	Media Interface	Corporate Spokesperson (JIC)			1	1
		Rad Protection Spokesperson (JIC)				1
		Technical Spokesperson (JIC)				1
	Information Development	Public Information Director			1	
		Radiological Advisor				1
		Technical Advisor				1
		News Writer				1
		Public Information Liaison (JIC)				1
	Media Monitoring and Rumor Control	Media Monitoring Staff				(g)
		Rumor Control Staff				(g)
	Facility Operation and Control	JIC Director (JIC)			1	
		JIC Coordinator (JIC)				1
		Administrative Coordinator (JIC)				1
		Events Recorder (JIC)				1
		Clerical Support (JIC)				(g)
Access Control (JIC)					1	
TOTAL (Non-Collateral):			20	29	3	3835+

APPENDIX 2

Emergency Plan Figure TMI 2-4

Figure TMI 2-4: Emergency Public Information Organization



Bolded Boxes indicate minimum staffing positions.

* Radiation Protection Spokesperson / Advisor may be staffed by a qualified consultant

APPENDIX 3

Existing / Proposed JIC Locations



Map showing travel route from TMI Station to Coatesville JIC
Scale 1:8 miles

Attachment 2

Three Mile Island Units 1 and 2

**Proposed Changes to the
Exelon Nuclear Radiological Emergency Plan Annex for Three Mile Island (TMI) Station,
EP-AA-1009, Rev 9a**

EXELON NUCLEAR

RADIOLOGICAL EMERGENCY PLAN ANNEX FOR THREE MILE ISLAND (TMI) STATION

Submitted: J. W. Karkoska Date:
05xx/xx04/xxxx2007
Mid-Atlantic Region Emergency Preparedness Manager

Authorized: J. Meister Date:
05xx/04xx/2007xxxx
Vice President – Operations Support

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2.2 Emergency Response Organization (ERO) Staffing

Refer to Table TMI 2-1 of the TMI Annex, "Minimum Staffing Requirements", for a comparison against the Exelon Nuclear Radiological Emergency Plan of 60-minute and full augmentation commitments. An illustration of the overall Exelon ERO command structure is provided in Figure TMI 2-1.

2.2.1 Emergency Onsite Organization (Figure TMI 2-2)

No changes in augmentation positions or staffing levels for the Technical Support Center (TSC) and Operations Support Center (OSC) from that specified in the Standard Plan.

2.2.2 Emergency Offsite Organization (Figure TMI 2-3)

Based on existing interface and staffing agreements, representatives from the Commonwealth of Pennsylvania will respond to the Emergency Operations Facility (EOF), allowing direct face-to-face communications. As such, the State Environs Communicator position, listed under the Standard Plan, is not staffed at the Coatesville EOF. Rather the EOF Environmental Coordinator will interface directly with State representatives present in the EOF.

An Operations Assistant has been added to augment EOF staffing and provide TMI specific Operations knowledge in support of the existing Technical Support Manager and Operations Advisor positions.

An EOF Access Controller has been added to the Full Augmentation complement to support existing facility access control measures.

2.2.3 Emergency Public Information Organization (Figure TMI 2-4)

No changes in augmentation positions or staffing levels for the Joint Information Center from that specified in the Standard Plan except that the Radiological Spokesperson may be staffed by a qualified consultant. ~~Based on the location of the EOF at the Coatesville facility and local siting of the Joint Information Center (JIC) in the Harrisburg, PA areas, no changes in augmentation positions or staffing levels for the JIC exist from that specified in the Standard Plan.~~

~~For a TMI event, the Public Information Liaison position is assigned to the Emergency News Center (ENC) function at the Coatesville EOF to support the prompt transfer of information and relaying of communications to and from the Harrisburg JIC.~~

~~For TMI, the JIC facility is separate from the ENC facility and additional ERO positions exist as a result. Below are the position descriptions for the ERO positions in the JIC and ENC.~~

Public Information Emergency Response Organization

~~1) Corporate Spokesperson _____ JIC~~

~~The Corporate Spokesperson reports to the Corporate Emergency Director and is responsible for directing the Exelon Emergency Public Information Organization and providing news information to the media. Responsibilities include:~~

- ~~Maintain command and control of the Joint Public Information Center.~~
- ~~Coordinate with Federal, State and Local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.~~
- ~~Conduct periodic briefings with the news media.~~
- ~~Interface with the Public Information Director.~~
- ~~Coordinate and direct responses to media inquiries.~~
- ~~Ensure that the composition and timeliness of Exelon News Releases are adequate.~~
- ~~Provide for timely exchange of information between other spokespersons.~~

~~2) Technical Spokesperson _____ JIC~~

~~The Technical Spokesperson reports to the Corporate Spokesperson. Responsibilities include:~~

- ~~In coordination with the Technical Advisor, prepare briefing papers, which contain additional detail and background not found in the news releases.~~
- ~~Provide answers as soon as possible to media questions.~~
- ~~Provide a follow up explanation that corrects misinformation as soon as practicable.~~

~~3) Radiation Protection Spokesperson _____ JIC~~

~~The Radiation Protection Spokesperson reports to the Corporate Spokesperson. Responsibilities include:~~

- ~~In coordination with the Radiological Advisor, prepare briefing papers, which contain additional detail and background not found in the news releases.~~
- ~~Provide answers as soon as possible to media questions.~~
- ~~Provide a follow up explanation that corrects misinformation as soon~~

as practicable.

4) ~~JIC Director~~ _____ ~~JIC~~

~~The JIC Director reports the Corporate Spokesperson to ensure the operability of and to supervise the activities in the JIC. Responsibilities include:~~

- ~~Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.~~
- ~~Coordinate with Federal, State and Local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.~~
- ~~Participate, as needed, in rumor control activities.~~
- ~~Ensure that adequate information flow between the EOF and the JIC is coordinated through the Public Information Director.~~
- ~~Authorize admittance of non Exelon Nuclear officials to the JIC.~~

5) ~~JIC Coordinator~~ _____ ~~JIC~~

~~The JIC Coordinator reports to the JIC Director and supervises the facilities support staff. Responsibilities include:~~

- ~~Ensure the JIC is activated and operational. This includes the availability of communications and visual aids.~~
- ~~Ensure that access to the JIC areas occupied by Exelon personnel is controlled.~~
- ~~Establish a minimum frequency for addressing news media/public representatives and ensure that some form of communication occurs within that time frame (i.e., an update at least hourly.)~~
- ~~Document unanswered questions and serious public misinformation issues. Follow up on these questions and issues to ensure that they are being adequately addressed.~~
- ~~Coordinate the interface between Exelon Nuclear and the news media/public, including, as necessary, briefings, news conferences, interviews and responses to information requests.~~

6) ~~Public Information Liaison~~ _____ ~~JIC~~

~~The Public Information Liaison reports to the JIC Director. Responsibilities include:~~

- ~~Coordinate information flow between the EOF and JIC.~~

~~□ Ensure that approved News Releases and Chronological Event Description Logs are made available in the JIC.~~

~~7) Administrative Coordinator JIC~~

~~The Administrative Coordinator reports to the JIC Director. Responsibilities include:~~

~~□ Direct the clerical staff and ensure the clerical requirements for the other JIC staff are met.~~

~~□ Coordinate shift relief and continual staffing for the JIC.~~

~~□ Obtain additional radio and telephone equipment as necessary to meet the needs of the emergency.~~

~~□ Obtain services as appropriate to support operation of the JIC.~~

~~8) Access Controller JIC~~

~~The Access Controller reports to the JIC Director and is responsible for controlling facility access and obtaining authorization prior to admitting non-Exelon Nuclear officials into the JIC.~~

~~9) Public Information Director (PID)~~

~~When the Emergency Public Information Organization is activated, the Public Information Director reports to the Corporate Spokesperson and is responsible for all emergency event related information intended to be conveyed from Exelon Nuclear to the news media/public. The Public Information Director supervises the activities of the advisory staff, News Writer, Events Recorder and media monitoring and rumor control personnel. Responsibilities include:~~

~~□ Provide the Corporate Emergency Director with an overview of the public and media impacts resulting from the Exelon Nuclear and governmental activities.~~

~~□ Participate with the Corporate Emergency Director regarding information to be released to the public.~~

~~□ Authorize the issuance of news releases.~~

~~□ Interface with the Corporate Spokesperson at the JIC.~~

~~□ Act as a liaison between the ERO and Exelon Nuclear's corporate executives.~~

~~□ Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.~~

~~□ Interface with the Public Information Liaison located at the JIC and~~

~~coordinate information flow between the EOF and the JIC.~~

- ~~Coordinate with the Media Monitoring Staff to review and access media coverage of the emergency event.~~

~~10) Technical Advisor~~

~~The Technical Advisor reports to the Public Information Director. Responsibilities include:~~

- ~~Assist in obtaining technical and plant status information for use in news releases and media briefings.~~
- ~~Assist the News Writer in the preparation of news releases.~~
- ~~Assist the Events Recorder in the preparation of a chronological event description log.~~

~~11) Radiological Advisor~~

~~The Radiological Advisor reports to the Public Information Director. Responsibilities include:~~

- ~~Assist in obtaining environmental and health physics information for use in news releases and media briefings.~~
- ~~Assist the News Writer in the preparation of news releases.~~
- ~~Assist the Events Recorder in the preparation of a chronological event description log.~~

~~12) News Writer _____ JIC~~

~~The News Writer reports to the Public Information Director. Responsibilities include:~~

- ~~Obtain the assistance of the Technical and Radiological Advisors, as needed, to develop news releases.~~
- ~~Compose draft news releases.~~
- ~~Provide the drafted news releases to the Corporate Emergency Director for technical review prior to Public Information Director approval.~~

~~13) Events Recorder~~

~~The Events Recorder reports to the Public Information Director. Responsibilities include:~~

- ~~Develop a chronological event description log.~~

- Obtain the assistance of the Technical and Radiological Advisors, as needed, to develop the event log.

14) Media Monitoring Staff

The Media Monitor reports to the Public Information Director. Responsibilities include:

- Ensure that the media is being monitored and that Exelon Nuclear personnel review the information detailed or contained in media releases.
- Inform the Public Information Director of all media reports and of actions taken to correct any misinformation or rumors.
- Direct the activities of the Rumor Control Staff with respect to the function of monitoring rumors from sources other than the media.

15) Rumor Control Staff

The Rumor Control Staff reports to the Public Information Director and acts in support of the Media Monitors. Responsibilities include:

- Ensure that rumors are reviewed, documented and responded to by Exelon Nuclear personnel as deemed appropriate.
- Until the JIC is fully activated, document and respond to rumors as quickly as possible, through the Exelon Communications and Public Affairs.

2.3 Emergency Response Organization (ERO) Training

Training is conducted in accordance with Section O.5 of the Exelon Nuclear Radiological Emergency Plan per TQ-AA-113, "ERO Training and Qualification." Retraining is performed on an annual basis, which is defined as at least once every 12 months + 3 months (25% grace period).

TMI will offer training for hospital personnel, and ambulance and rescue, police and fire departments required to support implementation of the TMI Emergency Plan. This training shall include the procedures for notification, basic radiation protection and their expected roles. For those support organizations that must enter the site, training shall also include site access procedures and the identity (by title) of the individual in the site emergency organization who will control the organization's support activities.

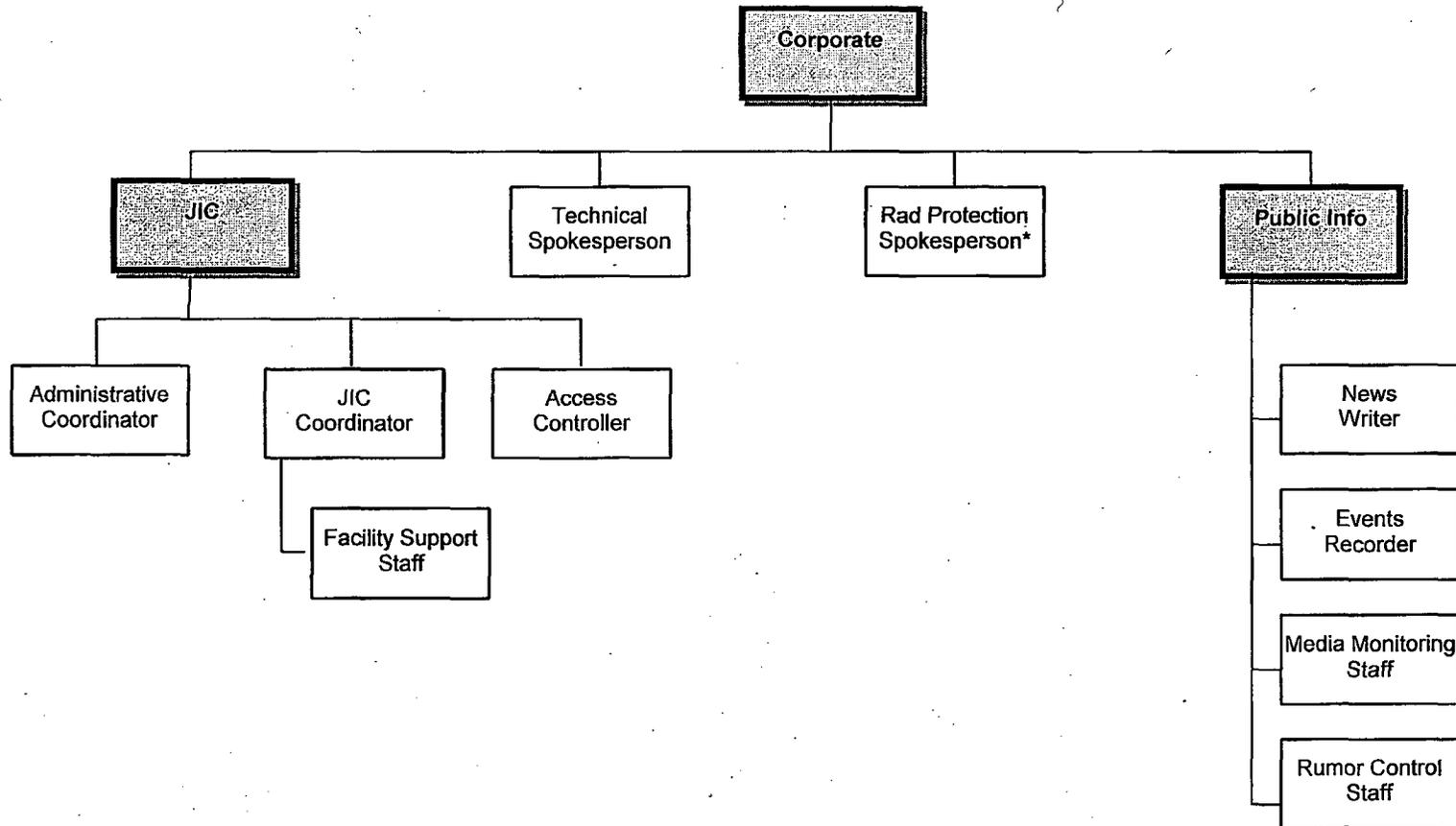
2.4 Non-Exelon Nuclear Support Groups

The nature of an emergency may require augmenting the emergency organizations with assistance from additional personnel and organizations. In order to ensure that support from local law enforcement, fire departments, hospitals, ambulance services and other organizations will be available on relatively short notice, agreements have been established with personnel and organizations. Agreements from offsite individuals, groups and agencies that

TABLE TMI 2-1: Minimum Staffing Requirements for TMI Station (Cont'd)

Functional Area	Major Tasks	Emergency Positions	Minimum Staffing			Full Augmentation
			^(b) Shift Size	^(a) 60 Minute Augmentation	^(c) Other On-Call	
11. Public Information	Media Interface	Corporate Spokesperson (JIC)			1	1
		Rad Protection Spokesperson (JIC)				1
		Technical Spokesperson (JIC)				1
	Information Development	Public Information Director			1	4
		Radiological Adviser				4
		Technical Adviser				1
		News Writer				4
		Public Information Liaison (JIC)				(g)
	Media Monitoring and Rumor Control	Media Monitoring Staff				(g)
		Rumor Control Staff				(g)
	Facility Operation and Control	JIC Director (JIC)			1	1
		JIC Coordinator (JIC)				1
		Administrative Coordinator (JIC)				1
		Events Recorder (JIC)				(g)
		Clerical Support (JIC)				1
Access Control (JIC)						
TOTAL (Non-Collateral):			20	29	3	3538+

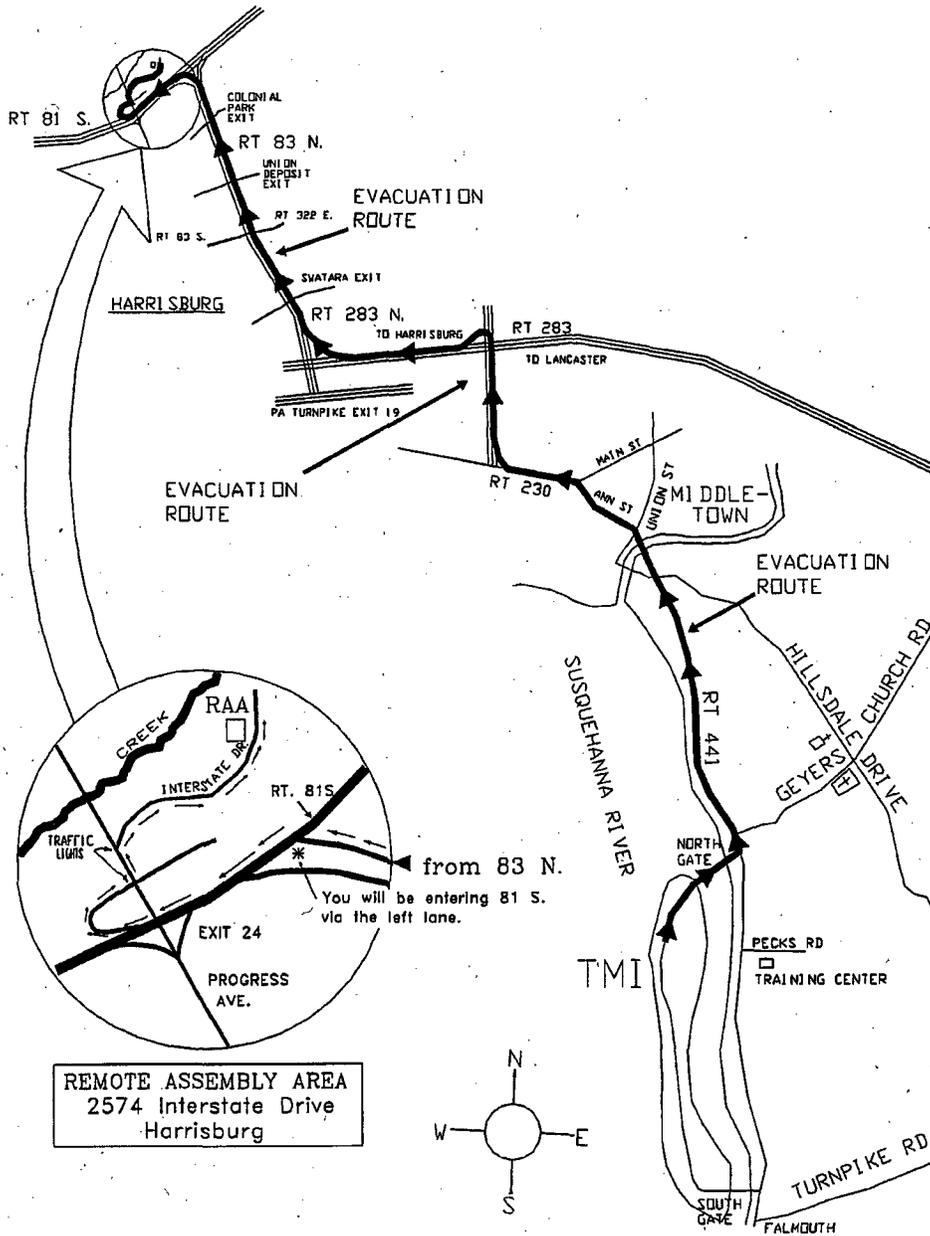
FIGURE TMI 2-4: Emergency Public Information Organization



Bolded Boxes indicate minimum staffing positions.

* Radiation Protection Spokesperson / Advisor may be staffed by a qualified consultant

FIGURE TMI 4-3: Remote Assembly Area – Former Harrisburg JIC (Commerce Park)



Separate offices are provided for Exelon Nuclear, NRC, State representatives and other emergency personnel.

5.1.5 Joint Information Center (JIC)

The Joint Information Center (JIC) is the facility in which media personnel gather to receive information related to the emergency event. The JIC is co-located with the EOF at 175 North Caln Road, Coatesville, Pennsylvania at the Commerce Park subdivision in Harrisburg, PA, approximately ¼ mile from the PEMA offices.

5.1.6 Processing Center

The Processing Center will be continuously manned by Site Security personnel, unless otherwise directed based on the Nuclear Station Security Plan. Emergency equipment and supplies will be maintained in this facility to support such tasks as reentry efforts, performing onsite and offsite radiation surveys or collecting airborne samples. The exact location and the type and quantity of emergency equipment and supplies are specified under the applicable Emergency Plan Administrative Procedures.

5.2 **Assessment Resources**

5.2.1 Radiation Monitoring System

The onsite Radiation Monitoring System contributes to personnel protection, equipment monitoring, data gathering, and accident assessment by measuring and recording radiation levels and concentrations of radioactive material at selected locations within the plant. The Radiation Monitoring System alarms and initiates required emergency actions when radiation levels or radionuclide concentrations exceed predetermined levels. Area, liquid, and atmospheric monitoring subsystems are required to perform these functions. Specific details regarding radiation monitoring and effluent monitoring systems can be found in system design descriptions (SDDs) and site Final Safety Analysis Reports, the TMI Emergency Dose Calculation Manual and the TMI Radiation Monitoring Setpoint Procedures.

The data from these subsystems are displayed by readout in the Control Room. Selected channels are recorded by recorders and/or the plant process computer, which are also located in the Control Room.

In general the radiation monitoring equipment is designed in accordance with the following:

- Each monitoring station has adjustable alarm, alert, and power supply failure alarms.
- Solid-state circuitry is used except for primary detectors.
- Most AC operated radiation monitoring equipment, except for the pump assemblies, is provided with power from the battery-backed,

Attachment 3

Three Mile Island Units 1 and 2

**Applicable Sections of the
Exelon Nuclear Standardized Radiological Emergency Plan, EP-AA-1000, Rev 17**

EXELON NUCLEAR

STANDARDIZED

RADIOLOGICAL EMERGENCY PLAN

Submitted: Keith Kemper Date: 05/25/06
Emergency Preparedness Director

Authorized: Jim Meister Date: 05/25/06
Vice President – Operations Support

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LIST OF STATION ANNEXES

The Station Annexes subject to the requirements of this plan, are as follows:

- EP-AA-1001: Braidwood Station Emergency Plan Annex
- EP-AA-1002: Byron Station Emergency Plan Annex
- EP-AA-1003: Clinton Station Emergency Plan Annex
- EP-AA-1004: Dresden Station Emergency Plan Annex
- EP-AA-1005: LaSalle Station Emergency Plan Annex
- EP-AA-1006: Quad Cities Station Emergency Plan Annex
- EP-AA-1007: Peach Bottom Station Emergency Plan Annex
- EP-AA-1008: Limerick Station Emergency Plan Annex
- EP-AA-1009: Three Mile Island Emergency Plan Annex

REVISION HISTORY

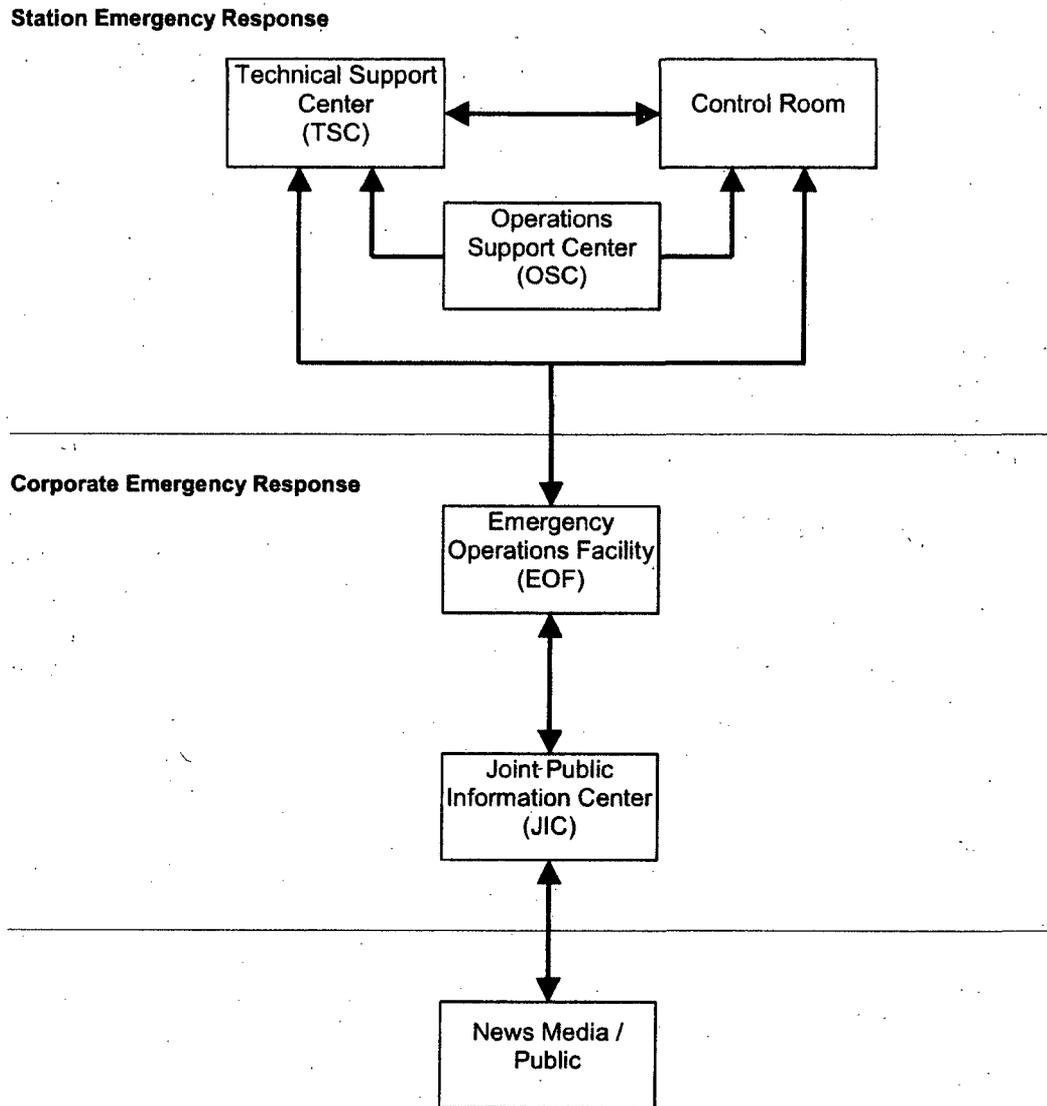
<u>REVISION</u>	<u>EFFECTIVE DATE</u>	<u>REVISION</u>	<u>EFFECTIVE DATE</u>
7	March 1991	7K	January 5, 1998
7A	July 15 1992	7L	October 16, 1998
7B	September 15 1993	8	May 13, 1999
7C	January 1 1994	9	March 31, 2000
7D	June 24 1994	10	January 8, 2001
7E	September 22 1994	11	October 8, 2001
7F	January 25 1995	12	March 22, 2002
7G	March 17 1995	13	August 30, 2002
7H	September 15 1995	14	February 20, 2003
7I	February 16 1996	15	February 13, 2004
7J	March 3 1997	16	December 22, 2004

- Emergency support for operations, engineering, maintenance, fire fighting, material acquisition, security, and first aid.
- 2) The Corporate Organization, directed by the Corporate Emergency Director, provides for:
- Emergency notifications to Federal, State and local agencies.
 - Offsite radiological accident assessment and Protective Action Recommendations to offsite authorities.
 - It serves as the primary interface between Exelon Nuclear and outside organizations responsible for the protection of the public.
- 3) The Public Information Organization, directed by the Corporate Spokesperson, coordinates with public information officers from other organizations to provide information to the public through the news media.
- c. Interrelationships between major Exelon Nuclear organizations and sub-organizations in the total response effort are illustrated in a block diagram in Figures A-1 and A-2. For a more detailed diagram of the Exelon Nuclear ERO, see Figures B-1a to B-1d.
- d. The Corporate Emergency Director is a senior Exelon employee with overall responsibility for coordinating emergency response actions in support of the affected Exelon Nuclear station, Emergency Public Information Organization, and affected State(s) and local agencies.
- e. Procedures for training and maintenance of the emergency organization are in place to ensure 24-hour per day staffing for emergency response, including established communication links.

2. State and County Functions and Responsibilities

The state and counties have emergency response plans that specify the responsibilities and functions for the major agencies, departments, and key individuals of their emergency response organizations. This information is located in their respective plans.

Figure A-1: Exelon Emergency Response Organization Interrelationships



23) State EOC Liaison(s) State EOCs

At the request of State officials and/or at the discretion of the Corporate Emergency Director, Exelon Nuclear will provide Liaison personnel to State Emergency Operation Centers (EOCs). The State EOC Liaisons use the EOC Communicator as their contact at the EOF. Responsibilities include:

- Monitor and report State EOC activities to the EOF.
- Conduct briefings and answer questions as requested.
- Assist Emergency Public Information personnel in rumor control and media monitoring.

24) Regulatory Liaison EOF

The Regulatory Liaison reports to the Logistics Manager. Responsibilities include:

- Coordinate interfaces between Exelon Nuclear personnel and governmental agencies within the EOF.
- Obtain necessary equipment and supplies to support activities of governmental agencies located in the EOF.
- Act as the Exelon Nuclear Liaison to the NRC Site Team representatives.

c. Public Information Emergency Response Organization**1) Corporate Spokesperson JIC**

The Corporate Spokesperson reports to the Corporate Emergency Director and is responsible for directing the Exelon Emergency Public Information Organization and providing news information to the media. Responsibilities include:

- Maintain command and control of the Joint Information Center.
- Coordinate with Federal, State and Local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.
- Conduct periodic briefings with the news media.
- Interface with the Public Information Director.
- Coordinate and direct responses to media inquiries.
- Ensure that the composition and timeliness of Exelon News Releases are adequate.
- Provide for timely exchange of information between other spokespersons.

2) Technical Spokesperson JIC

The Technical Spokesperson reports to the Corporate Spokesperson. Responsibilities include:

- Assist in development of technical and plant status information for use in news releases and media briefings.
- Assist the Events Recorder in the preparation of a chronological event description log.
- Prepare briefing papers which contain additional detail and background not found in the news releases.
- Provide answers as soon as possible to media questions.
- Provide a follow-up explanation that corrects misinformation as soon as practicable.

3) Radiation Protection Spokesperson JIC

The Radiation Protection Spokesperson reports to the Corporate Spokesperson. Responsibilities include:

- Assist in development of environmental and health physics information for use in news releases and media briefings.
- Assist the Events Recorder in the preparation of a chronological event description log.
- Prepare briefing papers which contain additional detail and background not found in the news releases.
- Provide answers as soon as possible to media questions.
- Provide a follow-up explanation that corrects misinformation as soon as practicable.

4) JIC Director JIC

The JIC Director reports the Corporate Spokesperson to ensure the operability of and to supervise the activities in the JIC. Responsibilities include:

- Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.
- Coordinate with Federal, State and Local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.
- Participate, as needed, in rumor control activities.

- Ensure that adequate information flow between the EOF and the JIC is coordinated through the Public Information Director.
- Authorize admittance of non-Exelon Nuclear officials to the JIC.

5) JIC Coordinator

JIC

The JIC Coordinator reports to the JIC Director and supervises the facilities support staff. Responsibilities include:

- Ensure the JIC is activated and operational. This includes the availability of communications and visual aids.
- Ensure that access to the JIC areas occupied by Exelon personnel is controlled.
- Establish a minimum frequency for addressing news media/public representatives and ensure that some form of communication occurs within that time frame (i.e., an update at least hourly.)
- Ensure that approved News Releases and Chronological Event Description Logs are made available in the JIC.
- Document unanswered questions and serious public misinformation issues. Follow-up on these questions and issues to ensure that they are being adequately addressed.
- Coordinate the interface between Exelon Nuclear and the news media/public, including, as necessary, briefings, news conferences, interviews and responses to information requests.

7) Administrative Coordinator

JIC

The Administrative Coordinator reports to the JIC Director. Responsibilities include:

- Coordinate with the EOF Administrative Coordinator to ensure the clerical requirements for the other JIC staff are met.
- Coordinate shift relief and continual staffing for the JIC.
- Obtain services as appropriate to support operation of the JIC.

8) Access Controller JIC

The Access Controller reports to the JIC Director and is responsible for controlling facility access and obtaining authorization prior to admitting non-Exelon Nuclear officials into the JIC.

9) Public Information Director (PID) JIC

When the Emergency Public Information Organization is activated, the Public Information Director reports to the Corporate Spokesperson and is responsible for all emergency event related information intended to be conveyed from Exelon Nuclear to the news media/public. The Public Information Director supervises the activities of the, News Writer, Events Recorder and media monitoring and rumor control personnel. Responsibilities include:

- Provide the Corporate Emergency Director with an overview of the public and media impacts resulting from the Exelon Nuclear and governmental activities.
- Participate with the Corporate Emergency Director regarding information to be released to the public.
- Authorize the issuance of news releases.
- Interface with the Corporate Spokesperson at the JIC.
- Act as a liaison between the ERO and Exelon Nuclear's corporate executives.
- Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.
- Coordinate information flow between the EOF and the JIC.
- Coordinate with the Media Monitoring Staff to review and access media coverage of the emergency event.

12) News Writer JIC

The News Writer reports to the Public Information Director. Responsibilities include:

- Compose draft news releases with assistance from the Technical Spokesperson and the Radiation Protection Spokesperson.
- Provide the drafted news releases to the Corporate Emergency Director for technical review prior to Public Information Director approval.

13) Events Recorder JIC

The Events Recorder reports to the Public Information Director. Responsibilities include:

- Develop a chronological event description log.

14) Media Monitoring Staff JIC

The Media Monitor reports to the Public Information Director. Responsibilities include:

- Ensure that the media is being monitored and that Exelon Nuclear personnel review the information detailed or contained in media releases.
- Inform the Public Information Director of all media reports and of actions taken to correct any misinformation or rumors.
- Direct the activities of the Rumor Control Staff with respect to the function of monitoring rumors from sources other than the media.

15) Rumor Control Staff JIC

The Rumor Control Staff reports to the Public Information Director and acts in support of the Media Monitors. Responsibilities include:

- Ensure that rumors are reviewed, documented and responded to by Exelon Nuclear personnel as deemed appropriate.
- Until the JIC is fully activated, document and respond to rumors as quickly as possible, through the Exelon Communications and Public Affairs.
- Inform the Media Monitors when rumors representing serious misinformation are encountered.

6. Exelon Emergency Response Organization Block Diagram

Table B-1 lists the key positions of the ERO and the supporting positions assigned to interface with federal, state, and county authorities. Figures B-1a through B-1d illustrates the overall emergency response organization. Section B.5 discusses specific responsibilities and the interrelationships for key positions.

7. Exelon Corporate Emergency Response Organization

The Corporate ERO consists of the EOF Organization and the Emergency Public Information Organization. Personnel staffing these corporate organizations are covered in detail in Section B.5 of this plan.

The Corporate Emergency Response Organization is staffed by Exelon personnel, and operates out of the Emergency Operations Facility (EOF) and the Joint Information Center (JIC). The Corporate ERO is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, the Corporate ERO has long term liaison responsibilities with Federal, State, and local authorities.

The Emergency News Center (ENC) function is responsible for the collection and analysis of event information and status, and development of Company news statements. This information is then communicated to the JIC Spokespersons. The ENC function may be located at either the EOF or the JIC.

The Corporate ERO is activated at an Alert. The EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. Within the EOF, the Corporate Emergency Director shall assume Command and Control from the Station Emergency Director when classification escalates to an Alert or higher, unless the EOF capabilities are limited such that the overall control and responsibility for PARs and offsite notifications cannot be assumed. The EOF may also function in a supporting role to the station when the Station Emergency Director maintains Command and Control.

8. Industry/Private Support Organizations

Exelon Nuclear retains contractors to provide supporting services to nuclear generating stations. A contract/purchase order with a private contractor is acceptable in lieu of an agreement letter for the specified duration of the contract. Among services currently provided are the following:

a. Institute of Nuclear Power Operations (INPO): Experience has shown that a utility may need resources beyond in-house capabilities for the recovery from a nuclear plant emergency. One of the roles of the Institute of Nuclear Power Operations (INPO) is to assist affected utilities by quickly applying the resources of the nuclear industry to meet the needs of an emergency. INPO has an emergency response plan that enables it to provide the following emergency support functions:

- Assistance to the affected utility in locating sources of emergency personnel, equipment and operational analysis.
- INPO, Electric Power Research Institute (EPRI) and Nuclear Energy Institute (NEI) maintain a coordination agreement on emergency information with their member utilities.
- INPO provides the "Nuclear Network", or its replacement, electronic communications system to its members, participants, NEI, and EPRI to coordinate the flow of media and technical information about the emergency.
- Exelon Nuclear may obtain utility industry information and assistance from any party to this agreement through the coordination of INPO.

To support these functions, INPO maintains the following emergency support capabilities:

- A dedicated emergency call number.
- Designated INPO representative(s) who can be quickly dispatched to the utility emergency response organization to coordinate INPO support activities and information flow.

PART II: Planning Standards And Criteria

Exelon Nuclear

Functional Area	Major Tasks	Emergency Positions	Minimum Shift Size	Minimum Staffing		Full Augmentation			
				*60 Minute Augmentation	Other On-Call				
11. Public Information	Media Interface	Corporate Spokesperson (JIC)				1	1		
		Rad Protection Spokesperson (JIC)					1		
		Technical Spokesperson (JIC)					1		
	Information Development	Public Information Director					1		
		News Writer						1	
	Media Monitoring and Rumor Control Facility Operation and Control	Media Monitoring Staff							(b)
		Rumor Control Staff							(b)
		JIC Director (JIC)						1	
		JIC Coordinator (JIC)							1
		Administrative Coordinator (JIC)							1
	Access Controls (JIC)				1				
	Facility Support Staff (JIC)				(b)				
TOTAL:			10	37	3	32^(b)			

* Response time is based on optimum travel conditions.

(a) May be provided by personnel assigned other functions.

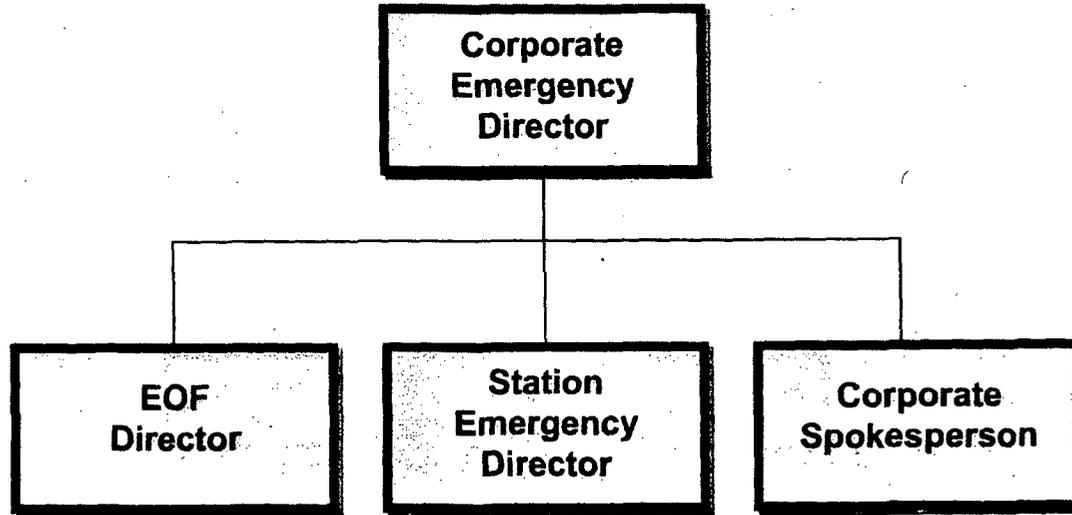
(b) Personnel numbers depend on the type and extent of the emergency.

(c) Fire Brigade per FSAR/Technical Specifications, as applicable.

(d) Per Security Plan.

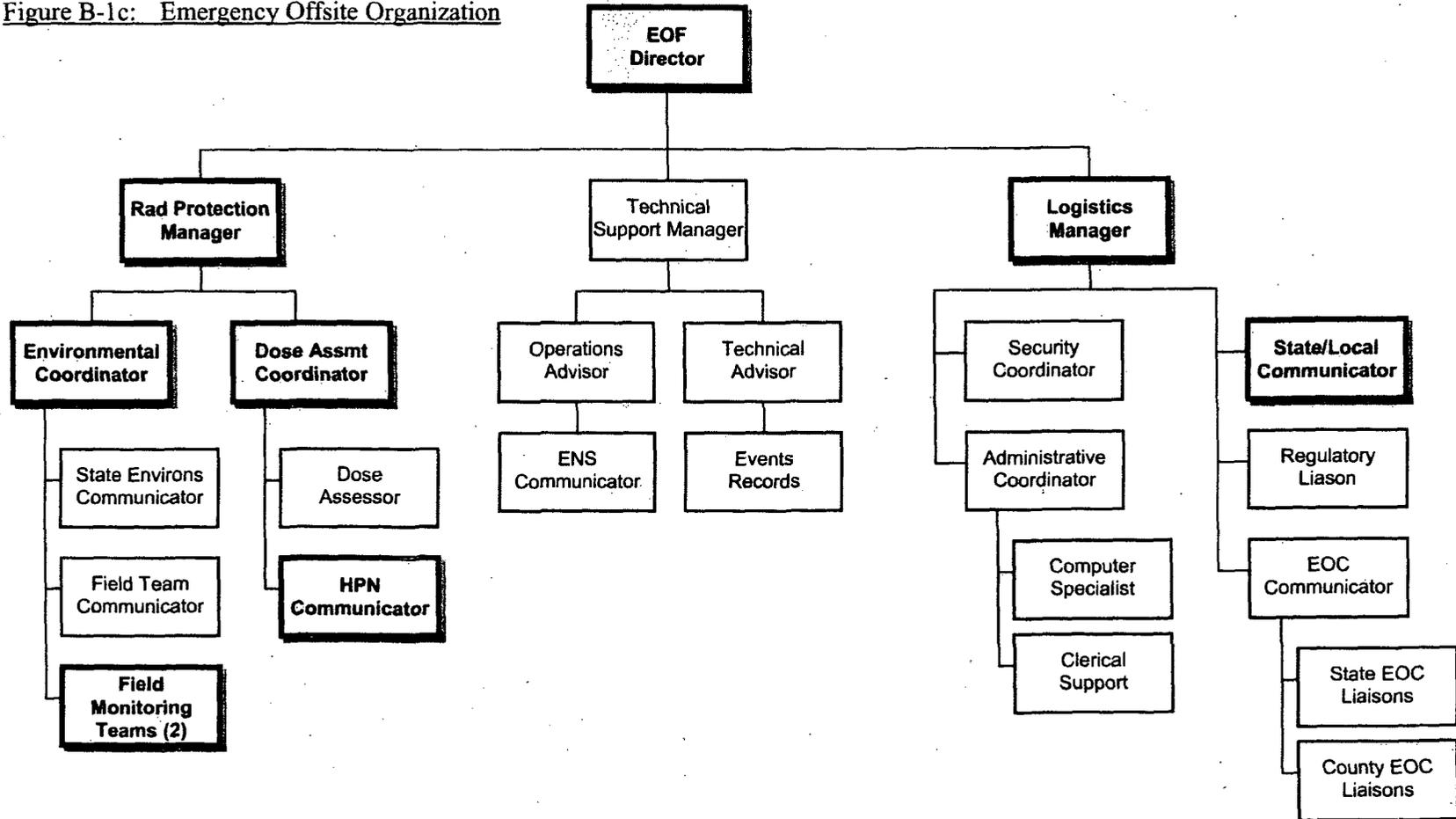
Note: OSC Group Leads can be used to fill technical/craft positions in Maintenance, RP and Chemistry.

Figure B-1a: Exelon Overall ERO Command Structure



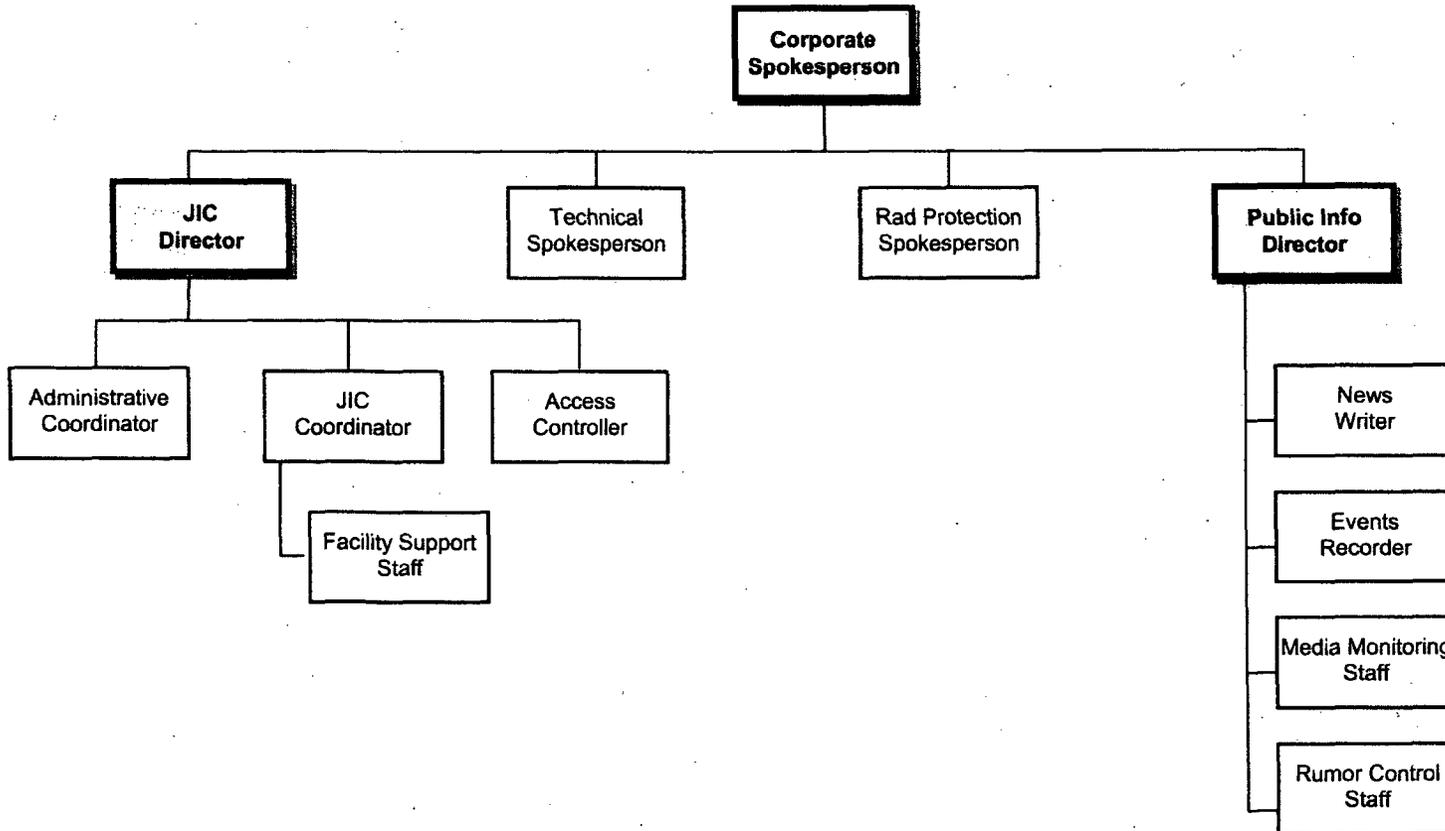
Shaded/Bold Boxes indicate minimum staffing positions.

Figure B-1c: Emergency Offsite Organization



Shaded/Bolded Boxes indicate minimum staffing positions.

Figure B-1d: Emergency Public Information Organization



Shaded/Bolded Boxes indicate minimum staffing positions.

Section C: Emergency Response Support and Resources

This section describes the provisions for requesting and effectively utilizing support resources and for accommodating offsite officials at the Exelon Nuclear emergency response facilities.

1. Federal Response Support and Resources

Assistance is available from federal agencies through the Federal Radiological Emergency Response Plan (FRERP). The lead federal agency who provides direct assistance to Exelon during an emergency is the Nuclear Regulatory Commission (NRC). Other federal agencies, such as the Federal Emergency Management Agency (FEMA) and the Department of Energy (DOE), provide assistance to the state through implementation of the FRERP.

- a. Sections A and B of this plan identify the specific individuals by title who are authorized to request federal assistance.
- b. Federal agencies that may provide assistance in direct support of Exelon Nuclear in the event of an accident are identified in Section A of this plan. If needed, federal resources are made available to Exelon Nuclear in an expeditious and timely manner.
- c. Each emergency response facility has the equipment and communications capability necessary for a continuous high level of response, interaction, and communication among key personnel during emergency conditions. The emergency facilities are able to accommodate federal representatives with working areas provided for their use. Accommodations for the expected NRC site response team assume the following approximate numbers for each facility:

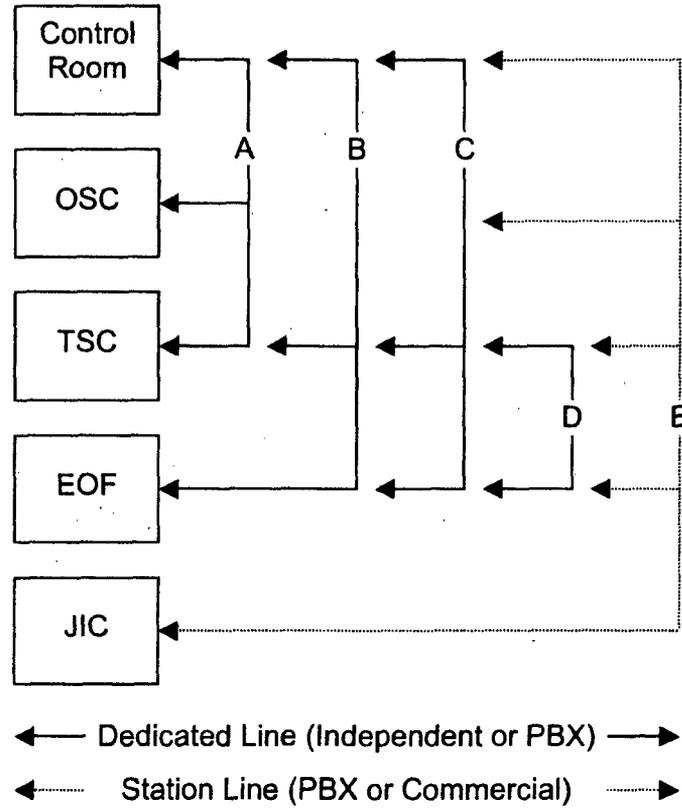
	Initial Activation (minimum)	Full Activation
EOF	9	16
TSC	3	5
CR	1	1
JIC	1	10

2. Liaisons

- a. The NRC, FEMA, and the state(s) may dispatch representatives to the EOF where accommodations have been provided.
- b. At the Alert level and above, Exelon Nuclear personnel may be assigned as liaisons to the requesting state's and/or county Emergency Operations Center (EOC). These representatives act as technical liaisons to interpret emergency action levels and protective action recommendations made by Exelon.

- 1) Nuclear Accident Reporting System (NARS): The NARS is a dedicated communications system that has been installed for the purpose of notifying State and local authorities of declared nuclear emergencies. This system links together the station Control Rooms, the EOF, TSCs and State and local authorities as appropriate. The specific design, operation, and responsibility for maintenance of the NARS systems vary between Exelon Nuclear regions.
- 2) Damage Control Line: A dedicated telephone link called the Damage Control Line that enables communication between the Control Room, the TSC and the OSC to coordinate the dispatching of emergency damage control teams from the OSC (see Figure F-2).
- 3) Operations Status Line: A dedicated telephone link called the Operations Status Line that enables communication between the Control Room, the TSC and the EOF to monitor the activities of the Control Room staff (see Figure F-2).
- 4) Technical Conference Line: A dedicated telephone line called the Technical Conference Line between the TSC and the EOF to communicate mitigating activities and priorities for the station to the EOF (see Figure F-2).
- 5) Director's Hotline: A dedicated telephone link called the Director's Hotline that enables direct Emergency Director communication between the Control Room, TSC, and the EOF (see Figure F-2).
- 6) Private Branch Exchange (PBX) Telephone System: The PBX telephone system provides communication capability between telephones located within the plant by dialing a four-digit station code. The PBX is used to connect the CR, TSC, EOF, and OSC. The PBX telephone system also provides for outside communications through interconnections with the corporate telephone communications system and commercial telephone lines.
- 7) Local Commercial Telephone System: This system provides standard commercial telephone service through the public infrastructure, consisting of central offices and the wire line and microwave carrier. The commercial telephone system includes connections to PBX, emergency telephone system, dedicated lines to emergency facilities, and lines to the JICs. The commercial vendor provides primary and secondary power for their lines at their central office.
- 8) Emergency Response Data System (ERDS): The ERDS will supply the NRC with selected plant data points on a near real time basis. ERDS is activated by the ERO as soon as possible but not later than one hour after declaration of an Alert, Site Area Emergency or General Emergency. The selected data points are transmitted via modem to the NRC at approximately 1-minute intervals.

Figure F-2: ERF Communications Matrix



A = Damage Control Line between the OSC, TSC, and Control Room.

B = Directors Hotline line between the Control Room, TSC and EOF.

C = Operations Line between the TSC, Control Room and EOF.

D = Technical Conference Line between the TSC and EOF.

E = Station telephone line.

Section G: Public Education and Information

This section describes the Exelon Nuclear public education and information program. It outlines the methods for distributing public information materials on an annual basis and describes how the public is informed in the event of an emergency.

1. Public Information Publication

The state has overall responsibility for maintaining a continuing disaster preparedness public education program. The emergency public information publication for the Exelon Nuclear generating stations is updated annually, in coordination with state and county agencies, to address how the general public is notified and what their actions should be in an emergency. Exelon distributes the publication on an annual basis by mail to all residents within the ten-mile plume exposure EPZs and to appropriate locations where a transient population may obtain a copy. The public information publication includes the following information:

- a. Educational information on radiation.
- b. A description of the times that require public notification (what to do if a take-shelter or evacuate recommendation is given).
- c. A map of major evacuation routes.
- d. 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.

2. Public Education Materials

Public information publications instruct the public to go indoors and turn on their radios when they hear the ANS sirens operating. These publications also identify the local radio stations to which the public should tune in for information related to the emergency.

3. Media Accommodations

- a. The Exelon Communications and Public Affairs Department is notified when an Unusual Event or higher Emergency condition exists. They will handle public and media inquiries in the early stages of the event (until the JIC is activated) by distributing background information, news releases, and providing information to corporate management.
 - 1) The Emergency Public Information Organization: The Emergency Public Information Organization is part of the Corporate ERO. It may be activated at any time at the discretion of the Nuclear Duty Officer. However, when there is a procedural requirement to activate the EOF, the Emergency Public Information Organization shall also be activated.

The primary purpose of the Emergency Public Information Organization is to disseminate information from Exelon Nuclear's ERO about the emergency events to the public, via the news media. However, the authority for issuance of news releases for the classification of an Unusual Event or prior to ERO activation will always reside with the Exelon Communications and Public Affairs Department. Upon activation, the Emergency Public Information Organization has the responsibility and authority for issuance of news releases to the public.

The Emergency Public Information Organization is comprised of senior managers from Exelon Nuclear who will function as spokespersons, and other Exelon Nuclear individuals including personnel from the Governmental Affairs and Human Relations areas. Exelon Nuclear's spokespersons disseminate information to the news media/public concerning the emergency events out of a Joint Information Center (JIC).

- 2) The Joint Information Center (JIC): The JIC is the facility in which media personnel gather to receive information related to the emergency event. The JIC is the location where approved news releases will be provided to the media for dissemination to the public. News releases are coordinated between the EOF and JIC personnel and State and/or Federal representatives in the JIC. Exelon public information personnel operate from the EOF and the JIC, which is under the direction of the Corporate Spokesperson and functions as the single point contact to interface with Federal, State, and local authorities who are responsible for disseminating information to the public.

Each station has a designated JIC. Each JIC is equipped with appropriate seating, lighting and visual aids to allow for public announcements and briefings to be given to the news media. Additionally, JICs are equipped with commercial telephone lines for making outgoing calls. The Emergency Public Information Organization functions from the JIC and EOF in preparing and releasing utility information about the emergency event. The JIC is activated at the declaration of an Alert or higher classification. Functions of the JIC include:

- Serving as the primary location for accumulating accurate and current information regarding the emergency conditions and writing news releases.
 - Providing work space and phones for public information personnel from the state, counties, NRC, FEMA, and industry-related organizations.
 - Providing telephones for use by the news media personnel.
 - Providing responses to media inquiries through Media Monitoring Staff telephones that the media can call for information about an emergency.
- b. The news media is not permitted into the EOF during an emergency.

4. Coordination of Public Information

- a. The JIC is staffed by Exelon and government public information representatives who will be the source of public information during an emergency at the station. The Corporate Spokesperson is the primary spokesperson for Exelon Nuclear. The Corporate Spokesperson has direct access to all necessary information (see Section B.5).
- b. The JIC is staffed by federal, state, county, and utility personnel to assure timely, periodic exchange and coordination of information. Representatives coordinate information prior to conducting news briefings.
- c. Rumors or misinformation are identified during an emergency by the media/rumor control monitors. They respond to public and news media calls and monitor media reports.

5. Media Orientation

Emergency Preparedness, in conjunction with Exelon Communications and Public Affairs Department, offers training (at least annually) to acquaint news media with the E-Plan, information concerning radiation, and points of contact for release of public information in an emergency. Training is provided for those media agencies that accept the training offer.

4. Activation

NOTE: NUREG-0654 Criterion II.B.5 states that the "licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency". It further defines that short period as 30 and 60 minutes. The time frames for rapid augmentation of a nuclear power plant staff in the event of an emergency are not rigid inviolate requirements but rather goals. It is Exelon Nuclear's intent to expend its best efforts to meet the augmentation criteria goals regarding staffing Emergency Response Facilities with sufficiently skilled individuals capable of handling an emergency. Both the NRC and Exelon Nuclear realize that due to diversity of normal residential patterns for the stations' staff, possible adverse weather conditions and road congestion, these time frames might be exceeded.

Exelon Nuclear has put into place plans and procedures to ensure timely activation of its emergency response facilities. The Shift Manager (as Shift Emergency Director) will initiate a call-out in accordance with the implementing procedures. The ERO augmentation process identifies individuals who are capable of fulfilling the specific response functions that are listed in Table B-1. This table was developed based on the functions listed in NUREG-0654, Table B-1.

Although the response time will vary due to factors such as weather and traffic conditions, a goal of 60 minutes for minimum staffing, following the declaration of an Alert or higher emergency classification, has been established for the ERO personnel responding to the station emergency facilities and the EOF. Additionally, plans have been developed to ensure timely functional activation and staffing of the JIC when the classification of Alert is declared.

It is the goal of the organization to be capable of activating the applicable Emergency Response Facility within 15 minutes of achieving minimum staffing. The facility can be declared activated when the following conditions are met:

- a. Minimum staffing has been achieved.
- b. Personnel have been briefed on the situation.
- c. The facility is functionally capable of performing the appropriate activity.

Although the minimum staffing criteria applies to the JIC, the 60 minute response time and 75 minute activation time are not applicable. Public Information personnel must first coordinate the decision to activate the JIC with the appropriate offsite authorities.

The Director in charge may elect to activate their facility without meeting minimum staffing, if it has been determined that sufficient personnel are available to fully respond to the specific event (this would not constitute a successful minimum staff response).

Initiating Condition	A predetermined UNIT condition where either the potential exists for a radiological emergency or such an emergency has occurred.
Integrated Drill	A drill conducted in the year that a Biennial Exercise is not scheduled including at least two Emergency Response Facilities in order to demonstrate at least two of the functions of management and control of emergency response, accident assessment, protective action decision-making, or plant system repair and corrective action.
Intermediate Phase	The period beginning after the source and releases have been brought under control and reliable environmental measurements are available for use as a basis for decisions on additional protective actions.
Joint Information Center	A Corporate Emergency Facility activated by Exelon and staffed by Exelon, State, and Federal Public Information personnel. This facility serves as the single point of contact for the media and public to obtain information about an emergency.
Late Phase	The period beginning when recovery action designed to reduce radiation levels in the environment to acceptable levels for unrestricted use are commenced and ending when all recovery actions have been completed. This period may extend from months to years (also referred to as the recovery phase).
Local Evacuation	The evacuation of personnel from a particular area, such as a room or building.
Main Control Room	The operations center of a nuclear power plant from which the plant can be monitored and controlled.
Monthly	Frequency of occurrence equal to once per calendar month.
Non-Essential Site Personnel	Those personnel not needed for the continuing existence or functioning of the ERO. They are personnel not required to fill certain positions in the ERO. Identification of non-essential personnel is circumstance-oriented as determined by the Station Emergency Director.

Attachment 4

Three Mile Island Units 1 and 2

PEMA Concurrence Documentation



PENNSYLVANIA EMERGENCY
MANAGEMENT AGENCY
2605 Interstate Drive
Harrisburg, Pennsylvania 17110-9364



September 11, 2007

Mr. Rusty West
Site Vice President, Three Mile Island
Three Mile Island Nuclear Station
P. O. Box 480
Middletown, PA 17057-0480

Dear Mr. West:

Exelon requested a letter which delineates agreement between the Commonwealth of Pennsylvania, the Risk and Support Counties and Exelon Nuclear regarding moving the Joint Information Center for Three Mile Island from its present location at 2574 Interstate Drive, Harrisburg, Pa. to 195 N. Caln Road, Coatesville, Pa.

This letter constitutes a mutual Statement of Agreement between the Commonwealth of Pennsylvania, the Risk and Support Counties and Exelon Nuclear regarding coordination of offsite response at the Exelon Joint Information Center in Coatesville Pennsylvania to nuclear incidents at Three Mile Island Nuclear Generating Station. This agreement is in consonance with Nuclear Regulatory Commission (NRC) and Federal Emergency Management Agency (FEMA) guidance as outlined in NUREG-0654/FEMA-REP-1, Revision 1 and Pennsylvania Consolidated Statutes, Title 35.

The Commonwealth of Pennsylvania has established its basic plan for emergency operations in the "Commonwealth of Pennsylvania Emergency Operations Plan". Annex E, "Radiological Emergency Response to Nuclear Power Plant Incidents."

Since portions of Cumberland, Dauphin, Lancaster, Lebanon and York counties are within the designated plume exposure pathway emergency planning zone for Three Mile Island Nuclear Generating Station, their respective emergency management agencies, in coordination with the Pennsylvania Emergency Management Agency have agreed that moving the Joint Information Center for Three Mile Island from its present location at 2574 Interstate Drive, Harrisburg, Pa. to 195 N. Caln Road, Coatesville, Pa. is acceptable. This change does not impact the ability for the Commonwealth to perform its requirements as delineated in Annex E, "Radiological Emergency Response to Nuclear Power Plant Incidents," or the Risk and Support Counties as described in their offsite radiological emergency response annexes to its emergency operations plans for use in the event of an incident at Three Mile Island Nuclear Generating Station.

Sincerely,



Robert French
Director