

RS-09-025

10 CFR 50.4
10 CFR 50 Appendix E

February 17, 2009

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

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. 50-454, 50-455 and 72-68

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 1, 2, and 3
Facility Operating License No. DPR-2
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-010, 50-237, 50-249 and 72-37

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373, 50-374 and 72-70

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352, 50-353 and 72-65

Peach Bottom Atomic Power Station, Units 1, 2, and 3
Facility Operating License No. DPR-12
Renewed Facility Operating License Nos. DPR-44, and DPR-56
NRC Docket Nos. 50-171, 50-277, 50-278 and 72-29

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254, 50-265 and 72-53

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

Subject: Revision to Exelon Nuclear Standardized Radiological Emergency Plan
Implementing Procedures

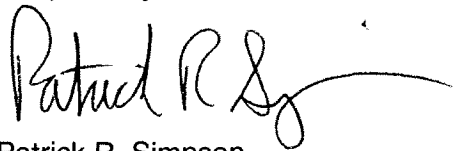
In accordance with 10 CFR 50, Appendix E, Section V, "Implementing Procedures," Exelon Generating Company, LLC (EGC) is submitting changes to the following Emergency Plan procedures.

Procedure No.	Revision	Title
EP-AA-112-400-F-06	D	EOC COMMUNICATOR CHECKLIST
EP-AA-112-400-F-10	E	SECURITY COORDINATOR (EOF) CHECKLIST
EP-AA-112-400-F-17	C	DOSE ASSESSMENT COORDINATOR CHECKLIST
EP-AA-112-400-F-21	C	ENVIRONMENTAL COORDINATOR CHECKLIST
EP-AA-112-400-F-32	B	LIST OF COMMONLY ASKED QUESTIONS AT EOCs
EP-AA-112-400-F-37	B	KEY STATE AGENCY LISTING

These changes were evaluated under the requirements of 10 CFR 50.54(q) and were determined not to result in a decrease in the effectiveness of the Emergency Plan. The revised procedures were implemented on January 30, 2009, and are being submitted within 30 days of implementation as required by 10 CFR 50, Appendix E. Copies of the revised procedures are provided in the attachments to this letter.

There are no commitments in this letter. If you have any questions concerning this letter, please contact Amy Hambly at (630) 657-2808.

Respectfully,



Patrick R. Simpson
Manager – Licensing

Attachments:

1. EP-AA-112-400-F-06, Revision D, "EOC Communicator Checklist"
2. EP-AA-112-400-F-10, Revision E, "Security Coordinator (EOF) Checklist"
3. EP-AA-112-400-F-17, Revision C, "Dose Assessment Coordinator Checklist"
4. EP-AA-112-400-F-21, Revision C, "Environmental Coordinator Checklist"
5. EP-AA-112-400-F-32, Revision B, "List of Commonly Asked Questions at EOCs"
6. EP-AA-112-400-F-37, Revision B, "Key State Agency Listing"

bcc: NRC Project Manager, NRR – Braidwood Station
NRC Project Manager, NRR – Byron Station
NRC Project Manager, NRR – Clinton Power Station
NRC Project Manager, NRR – Dresden Nuclear Power Station
NRC Project Manager, NRR – LaSalle County Station
NRC Project Manager, NRR – Limerick Generating Station
NRC Project Manager, NRR – Peach Bottom Atomic Power Station
NRC Project Manager, NRR – Quad Cities Nuclear Power Station
NRC Project Manager, NRR – Three Mile Island Station
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Site Vice President – Byron Station (without attachments)
Site Vice President – Clinton Power Station (without attachments)
Site Vice President – Dresden Nuclear Power Station (without attachments)
Site Vice President – LaSalle County Station (without attachments)
Site Vice President – Limerick Generating Station (without attachments)
Site Vice President – Peach Bottom Atomic Power Station (without attachments)
Site Vice President – Quad Cities Nuclear Power Station (without attachments)
Site Vice President – Three Mile Island Station (without attachments)
Regulatory Assurance Manager – Braidwood Station (without attachments)
Regulatory Assurance Manager – Byron Station (without attachments)
Regulatory Assurance Manager – Clinton Power Station (without attachments)
Regulatory Assurance Manager – Dresden Nuclear Power Station (without attachments)
Regulatory Assurance Manager – LaSalle County Station (without attachments)
Regulatory Assurance Manager – Limerick Generating Station (without attachments)
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EP Manager – Peach Bottom Atomic Power Station (without attachments)
EP Manager – Quad Cities Nuclear Power Station (without attachments)
EP Manager – Three Mile Island Station (without attachments)
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Commitment Tracking Coordinator – West (M. Mathews)
Regulatory Assurance Specialist – A. Hambly

Attachment 1

EP-AA-112-400-F-06

"EOC Communicator Checklist"

Revision D

EOC COMMUNICATOR CHECKLIST

Section 1, Initial Actions

Section 2, Ongoing Actions

Section 3, Closeout Actions

NOTE: Steps in this checklist may be performed in an order other than listed or they may be omitted if not applicable.

1. **INITIAL ACTIONS**

1.1. **SIGN IN** on the EOF Organizational Board.

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1.2. **REPORT** your arrival to the Logistics Manager and **OBTAIN** an initial briefing on the event.

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1.3. **INITIATE** a position log documenting significant actions performed and communications related to your position.

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Tab 1

Mid-Atlantic Region

1.4. **CONTACT** designated Exelon Nuclear Liaisons, using the information listed in the ERO Call Out List, and **DISPATCH** to State EOCs for the affected Station: **PA**: LGS / PBAPS / TMI events, and **MD**: PBAPS events only).

☐

Mid-West Region

1.5. **CONTACT** the TSC Logistics Coordinator to request and/or **VERIFY** the dispatch of the County EOC Liaisons for the following:

- When the County requests the EOC Liaisons **OR**
- Site Area Emergency or General Emergency Declaration

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1.6. **RECORD OR ENTER** the names of the EOC Liaisons as appropriate.

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1.7. **ESTABLISH** contact with applicable Key State Agencies.

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EOC COMMUNICATOR CHECKLIST

- A. **COMPLETE** Key State Agency Listing form (EP-AA-112-400-F-37) and **PROVIDE** a copy to the Logistics Manager and Regulatory Liaison.



Tab 2

Quad Cities

- B. **VERIFY** with the State of Iowa that the Emergency Response Data System (ERDS) is functioning. **If NOT, then CONTACT** a 2nd ENS Communicator to support communications with the Iowa EOC.

**Coatesville EOF**

- C. **DETERMINE** whether State Representatives have been dispatched to the EOF and/or stations, and **IDENTIFY** their names(s) and estimated arrival times if applicable.

**Cantera EOF**

- 1.8. **USE** Key County Agency Listing (Midwest Region) (form EP-AA-112-400-F-38) to contact the affected County Emergency Managers and establish whether the County organization has been activated and inform them whether or not an EOC Liaison has been dispatched.



Tab 3

- 1.9. **PROVIDE** an update to the Logistics Manager and Regulatory Liaison on:



- Status of activation of State/County Emergency Operations Centers (EOCs), and radiological assessment centers as applicable.
- Requests for the dispatching of Exelon Nuclear Liaisons.

2. **ONGOING ACTIONS**

- 2.1. At a Site Area Emergency or when contacted by Liaison from EOC(s), **ESTABLISH** a conference call/ bridge between the EOF and Exelon Nuclear Liaisons using the instructions in the ERF Telephone Directory entitled, "Teleconferencing Services."



EOC COMMUNICATOR CHECKLIST

- | | | |
|--|--------------------------|---|
| <p>A. If the conference bridge fails for any reason, then SET UP a conference call with the EOC Liaisons using the conference function on the phone.</p> | <input type="checkbox"/> | |
| <p>2.2. KEEP EOC Liaisons informed on the following issues:</p> | | |
| <p>A. INFORM Liaison(s) of significant changes in plant conditions, station priorities, fission product barrier integrity or release status.</p> | <input type="checkbox"/> | |
| <p>B. OBTAIN further clarification from the Operations Advisor on plant / system / equipment status in response to inquiries.</p> | <input type="checkbox"/> | |
| <p>C. UPDATE the EOC Liaisons, at a minimum, whenever a new notification form is issued.</p> | <input type="checkbox"/> | |
| <p>D. REVIEW items listed on the list of commonly asked questions, as conditions change.</p> | <input type="checkbox"/> | |
| <p><u>NOTE:</u> FAXING OF PLANT DATA AND FORMS</p> <p>Do <u>not</u> fax plant data or notification forms to the County EOC Liaisons, since the recommended PARs on our form may differ from the State recommended protective actions.</p> | | |
| <p>2.3. ENSURE that the following is faxed to the County and State Liaisons:</p> <ul style="list-style-type: none"> – Exelon Nuclear Key Position List – Key State Agency Listing – Approved Press Releases – Approved Chronological Event Description Logs (issued from the JIC) | <input type="checkbox"/> | <div style="border-left: 1px solid black; height: 100px; margin-left: 10px;"></div> |
| <p>2.4. ASSIST the Logistics Manager to maintain an accurate record of event-related activities.</p> | <input type="checkbox"/> | |
| <p>2.5. ADVISE the Regulatory Liaison if informed of additional State and/or County personnel being dispatched to the EOF and/or JIC.</p> | <input type="checkbox"/> | |
| <p>2.6. PERFORM a shift turnover with on-coming personnel using the guidance provided on the back of ERO Position Log sheets.</p> | <input type="checkbox"/> | <div style="border-left: 1px solid black; height: 100px; margin-left: 10px;"></div> |

Tab 4

Tab 1

EOC COMMUNICATOR CHECKLIST

3. CLOSEOUT ACTIONS

- 3.1. **INFORM** offsite Liaisons when EOF is deactivated.
- 3.2. **REVIEW** documentation generated by EOC Communicator(s) during event for completeness and accuracy.
- 3.3. **DELIVER** all documentation to the Logistics Manager.
- 3.4. **PARTICIPATE** in event critiques as necessary.

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Position Binder Tab Index		
Tab No.	Contents	Number*
**	EP-AA-112-400-F-06, EOC Communicator Checklist	2
1	EP-AA-112-F-08, ERO Position Log	5
2	EP-AA-112-400-F-37, Key State Agency Listing	5
3	EP-AA-112-400-F-38, Key County Agency Listing (Midwest Region)	5
4	EP-AA-112-400-F-32, List of commonly asked questions at EOCs	2

* Denotes typical number of copies of procedure or form to be placed in position binder. Forms are also available in designated storage areas in Emergency Response Facilities, can be copied or can be obtained electronically. The minimum number to be placed in the position binder is one.

** Position Specific Checklist placed before Tab 1

Attachment 2

EP-AA-112-400-F-10

"Security Coordinator (EOF) Checklist"

Revision E

SECURITY COORDINATOR (EOF) CHECKLIST

Section 1, Initial Actions

Section 2, Ongoing Actions

Section 3, Closeout Actions

NOTE: Steps in this checklist may be performed in an order other than listed or they may be omitted if not applicable.

1. **INITIAL ACTIONS**

- | | |
|--|--|
| 1.1. SIGN IN on the EOF Organization Board. | <input type="checkbox"/> |
| 1.2. REPORT your arrival to the Logistics Manager. | <input type="checkbox"/> |
| 1.3. INITIATE and MAINTAIN a position log documenting significant actions performed and communications related to your position. | <input type="checkbox"/>
Tab 1 |
| 1.4. CONTACT the Security Coordinator in the TSC and obtain information to complete a Security Data Sheet. | <input type="checkbox"/>
Tab 2 |
| 1.5. BRIEF the Logistics Manager of the security-related information obtained. | <input type="checkbox"/> |
| 1.6. REPORT information related to the security-based EAL classifications directly to the Corporate Emergency Director. | <input type="checkbox"/> |
| 1.7. INFORM Corporate Nuclear Security of the status of the event. | <input type="checkbox"/> |

2. **ONGOING ACTIONS**

- | | |
|---|--------------------------|
| 2.1. ASSIST in coordinating access control activities at the EOF and JIC with the EOF Logistics Manager and JIC Coordinator. | <input type="checkbox"/> |
| 2.2. If a Security Event is in progress or is determined to be credible, then REPORT directly to the Corporate Emergency Director and PERFORM the following: | |
| A. REQUEST the CED to place the Operation's Shift Manager on speaker phone and LISTEN to the updates on the on-going event. | <input type="checkbox"/> |
| B. PROVIDE appropriate security related information to the Public Information Director. | <input type="checkbox"/> |
| C. CONSIDER calling in another Security Coordinator to address the remainder of the responsibilities in this checklist. | <input type="checkbox"/> |

SECURITY COORDINATOR (EOF) CHECKLIST

- D. **PROVIDE** and **INTERPRET** information on Station Nuclear Security Plan response, contingency measures implemented, and security-related emergency action levels (EALs). ☐
- E. **CONFIRM** with the TSC Security Coordinator that the "Two-Person, Line of Sight" Rule has been implemented during a specific, credible insider threat. ☐

Mid-West Region

- 2.3. **OBTAIN** the traffic control access map, if available, and **IDENTIFY** roadblocks, relocation routes, relocation centers, etc. (IPRA – Map A) ☐

NOTE: EP-AA-113, Personnel Protective Actions, may be used to support the evacuation process.

Tab 4

Tab 5

- 2.4. **PROVIDE** assistance to the TSC Security Coordinator:
- **COORDINATE** additional security support at the station, or Relocation Center [Mid-West Region], as required from unaffected stations or security contractor. ☐
 - **COORDINATE** access to the site with the EOF Administrative Coordinator, Radiation Protection Manager and LLEA, as necessary. ☐
 - **PROVIDE** other assistance as requested by the TSC Security Coordinator. ☐
- 2.5. In coordination with the TSC Security Coordinator, **ESTABLISH** contact with Local Law Enforcement Agencies (LLEA), State, and FBI if appropriate. ☐
- A. **INFORM** them of your role as primary contact point for the event from a security/access control point. (Notify TSC that you are doing this) ☐
- B. **COMPLETE** a Security Supplemental Support Worksheet with names and phone numbers for the agencies and personnel contacted. ☐
- C. **SERVE** as the primary liaison for local, State and Federal Law Enforcement Agencies during security related events. ☐

Tab 3

SECURITY COORDINATOR (EOF) CHECKLIST

NOTE: State, Federal and Local representatives, who may be present in the EOF, which is located outside the protected area and do not have responsibilities directly affecting reactor safety, are not covered by the FFD rule.

- 2.6. **ASSIST** the EOF Administrative Coordinator with EOF access and FFD requirements.

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Cantera EOF

- A. **ARRANGE** for building access to provide checkpoints at the EOF entrance.
- B. **ENSURE** appropriate doors, per EP-AA-112-600-F-27, leading to the EOF have been secured.
- C. **ENSURE** signs restricting access to authorized personnel only have been placed on the appropriate doors leading to the EOF.

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Tab 6

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Midwest Region

NOTE: The JIC Access Controller reports their arrival to the EOF Security Coordinator.

- 2.7. **DIRECT** the activities of the Access Control Coordinator at the JIC.

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- 2.8. **COORDINATE** security-related activities within the EOF.

- A. **ENSURE** access control is maintained for EOF and JIC obtaining additional resources if needed.
- B. **TRACK** site accountability and evacuation activities.
- C. **KEEP** Logistics Manager and EOF staff informed on security related issues at the EOF and at the affected station.

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- 2.9. **When** EOF/JIC next-shift staffing is being developed **then, ADVISE** the Administrative Coordinator of travel routes that should be avoided by relief personnel due to traffic control points established by LLEAs.

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- 2.10. **COORDINATE** with the Environmental Coordinator travel by the Field Monitoring Team within the EPZ.

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SECURITY COORDINATOR (EOF) CHECKLIST

- | | |
|--|--------------------------|
| <p>A. ENSURE LLEAs (staffing roadblocks) are informed of the Field Monitoring Team locations.</p> | <input type="checkbox"/> |
| <p>2.11. SERVE as the primary contact to the Security Contractors for additional support, if necessary.</p> | <input type="checkbox"/> |
| <p>2.12. ASSESS all significant emergency events and system/component failures for the potential of intentional transgression.</p> | <input type="checkbox"/> |
| <p>2.13. OBTAIN additional resources to support access control measures needed at the EOF and JIC, with the EOF Logistics Manager and JIC Coordinator respectively.</p> | <input type="checkbox"/> |
| <p>2.14. PERFORM a shift turnover with on-coming personnel using the guidance provided on the back of ERO Position Log sheets.</p> | <input type="checkbox"/> |
| <p>3. <u>CLOSEOUT ACTIONS</u></p> | |
| <p>3.1. PROVIDE all documentation completed by the Security Coordinator during the event to the Logistics Coordinator</p> | <input type="checkbox"/> |
| <p>3.2. PARTICIPATE in event critiques reviews as necessary.</p> | <input type="checkbox"/> |

Tab 1

Position Binder Tab Index		
Tab No.	Contents	Number*
**	EP-AA-112-400-F-10, Security Coordinator (EOF) Checklist	2
1	EP-AA-112-F-08, ERO Position Log	5
2	EP-AA-112-400-F-40, Security Data Sheet	5
3	EP-AA-112-400-F-41, Security Supplemental Support Worksheet	5
4	EP-AA-113, Personnel Protective Actions	1
5	Mid-Atlantic EP-AA-113-F-08, PBAPS ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
	EP-AA-113-F-09, LGS ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
	EP-AA-113-F-10, TMI ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
	Mid-West EP-AA-113-F-17, BRAIDWOOD ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1

	Mid-West	EP-AA-113-F-18, BYRON ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
		EP-AA-113-F-19, DRESDEN ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
		EP-AA-113-F-20, LASALLE ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
		EP-AA-113-F-21, QUAD CITIES ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
		EP-AA-113-F-22, CLINTON ASSEMBLY, ACCOUNTABILITY AND EVACUATION GUIDELINES	1
6	Mid-West	EP-AA-112-600-F-27, Cantera JIC Activation	1

* Denotes typical number of copies of procedure or form to be placed in position binder. Forms are also available in designated storage areas in Emergency Response Facilities, can be copied or can be obtained electronically. The minimum number to be placed in the position binder is one.

** Position Specific Checklist placed before Tab 1

Attachment 3

EP-AA-112-400-F-17

"Dose Assessment Coordinator Checklist"

Revision C

DOSE ASSESSMENT COORDINATOR CHECKLIST

Section 1, Initial Actions

Section 2, Ongoing Actions

Section 3, Situational Actions

3.1 Offsite Post Accident Sampling Analysis [Limerick / Peach Bottom]

3.2 SGTS Filter Loading [Limerick / Peach Bottom]

Section 4, Closeout Actions

NOTE: Steps in this checklist may be performed in an order other than listed or they may be omitted if not applicable.

1. **INITIAL ACTIONS**

1.1. **SIGN IN** on the EOF Organization Board.

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1.2. **REPORT** your arrival to the EOF Radiation Protection Manager and **OBTAIN** a briefing on the history and current event status.

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1.3. **INITIATE** and **MAINTAIN** a position log documenting significant actions performed and communications related to your position.

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Tab 1

1.4. **ESTABLISH** contact with the Radiation Controls Coordinator in the TSC and **OBTAIN** a briefing using a Dose Assessment Turnover Form (EP-AA-112-F-05).

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Tab 2

1.5. **VERIFY** the arrival of the following positions and **DETERMINE** status of actions needed to assume control of offsite dose assessment and Health Physics Network (HPN) communications:
[*Designates "Minimum Staffing" position]

– **HPN Communicator*:**

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– Dose Assessor:

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A. **If** the EOF Dose Assessor is not yet present, **then PERFORM** the actions outlined in the Dose Assessor Checklist on an interim basis to support the transfer of Command and Control from the TSC.

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Tab 3

B. **INFORM** the EOF Radiation Protection Manager of the arrival of staff members and readiness to assume dose assessment duties from the TSC.

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DOSE ASSESSMENT COORDINATOR CHECKLIST

1.6.	BRIEF the EOF Protective Measures Group on the current information.	<input type="checkbox"/>
1.7.	TRANSFER responsibility for offsite dose assessments from the TSC to the EOF as follows:	<input type="checkbox"/>
	A. OBTAIN authorization from the EOF Radiation Protection Manager to execute the transfer.	<input type="checkbox"/>
	B. RECORD time transfer of dose assessment is authorized (time):	<input type="checkbox"/>
	C. BRIEF the Dose Assessor using the completed Dose Assessment Turnover Form.	<input type="checkbox"/>
	D. DIRECT the Dose Assessor to contact the TSC Radiation Controls Coordinator to acknowledge the transfer of responsibility for performing offsite dose projections to the EOF.	<input type="checkbox"/>
1.8.	INFORM the EOF Radiation Protection Manager when the following has been completed:	<input type="checkbox"/>
	A. RECORD time Transfer of dose assessment occurred: (time):	<input type="checkbox"/>
	B. RECORD time Communications established with the NRC via HPN: (time):	<input type="checkbox"/>
2.	<u>ONGOING ACTIONS</u>	<input type="checkbox"/>
2.1.	DIRECT the activities of the Dose Assessor and HPN Communicator to MONITOR progress in the performance of their duties:	<input type="checkbox"/>
	A. <u>Dose Assessor</u> – Monitors meteorology and station effluents conditions and performs dose assessment calculations.	<input type="checkbox"/>
	B. <u>HPN Communicator</u> – Establishes and maintains communications with the NRC.	<input type="checkbox"/>
2.2.	ASSIST the Dose Assessor in evaluating dose projection results and in determining correct input for dose model (i.e., reduction factors, release / ventilation path, Reactor operating mode, etc.).	<input type="checkbox"/>
	A. RESOLVE questions regarding release duration, release path, application of reduction factors (i.e., filtration, scrubbing, plate out, etc.), and the potential for Containment venting with the Technical Support Group.	<input type="checkbox"/>

2.3. **REMAIN** cognizant of forecast and meteorological data and **ENSURE** status is updated periodically by the Environmental Coordinator.

- 2.4. **INTERPRET** dose projection and release data against the following:

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Tab 4

- EAL threshold values (under Recognition Category 'R', "Abnormal Radiation Levels and Effluents")
- PARs using dose-based values per EP-AA-111, "Emergency Classification and Protective Action Recommendations"

- A. **RECOMMEND** a change in event classification, as required, based on effluent releases or offsite dose projections.

- B. **ADVISE** the EOF Radiation Protection Manager on issues relating to PARs at the General Emergency classification:

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- 1) If dose assessment results are **NOT** available, then **MAKE** an immediate recommendation based only on the applicable Plant-based PAR Flowcharts.

- 2) If dose assessment results ARE available, then **IDENTIFY** subareas / sectors where the EPA-400 TEDE (1 Rem) and Thyroid CDE (5 Rem) protective action guidelines are exceeded and **REVIEW** existing PAR per EP-AA-111.

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Tab 4

- 2.5. **NOTIFY** the EOF Radiation Protection Manager and Environmental Coordinator when a radiological release is detected, its magnitude changes significantly, or a change in wind direction may impact downwind areas.

- 2.6. **ADVISE** the EOF Radiation Protection Manager when a situation requires the issuing of a State/Local notification and **ASSIST** in completing the notification form. Situations which require notifications:

- Change in Protective Action Recommendations (PAR).
- Change in Radioactive Release conditions.
- Change in Wind Direction that change effected offsite areas.

DOSE ASSESSMENT COORDINATOR CHECKLIST

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|--|--|
| 2.7. PROVIDE recommendations to the Environmental Coordinator on the appropriate deployment of Field Monitoring Teams and the collection of environmental samples to confirm projected position of the radiological release plume, expected dose / dose rates and deposition. | <input type="checkbox"/> |
| 2.8. ASSIST the Radiation Protection Manager and the Environmental Coordinator in determining the need for issuance of KI or emergency exposure extensions to Field Monitoring Team personnel per EP-AA-113, "Personnel Protective Actions." | <input type="checkbox"/>
Tab 5 |
| 2.9. ASSIST the HPN Communicator in responding to information requests from the NRC. | <input type="checkbox"/> |
| 2.10. COORDINATE requests for in-plant / on-site sampling and analysis by the station through the TSC Radiation Controls Engineer. | <input type="checkbox"/> |
| A. CONSIDER performing analysis of release to determine isotopic mix for input into the dose projection model per EP-MW(MA)-110-200, "Dose Assessment". | <input type="checkbox"/>
Tab 6 |
| 2.11. PROVIDE release and dose assessment data to Radiological Spokesperson, EOF HPN Communicator, and the State Environmental Coordinator (MW Region only), upon request. | <input type="checkbox"/> |
| 2.12. ASSIST the EOF Radiation Protection Manager in interfacing with Health Physics and Environmental Assessment personnel from the NRC, State and other offsite agencies as needed. | <input type="checkbox"/> |
| 2.13. PERFORM a shift turnover with on-coming personnel using the guidance provided on the back of ERO Position Log sheets. | <input type="checkbox"/>
Tab 1 |

DOSE ASSESSMENT COORDINATOR CHECKLIST**3. SITUATIONAL ACTIONS****Limerick / Peach Bottom****3.1. OFFSITE POST ACCIDENT SAMPLING ANALYSIS**

- A. **If** assistance is requested by the TSC on coordinating offsite analysis, **then OBTAIN** the following information from the TSC: size or type, source, and dose rate on contact and 3 feet of the sample.
- B. **CONTACT** the Babcock and Wilcox (B&W) Lynchburg Research Center, using the 24-hour number listed in the ERF Telephone Directory, and **PROVIDE** the following:
- Utility / Station /Unit
 - No of samples, including type and measured radiation levels at surface & 3'
 - Estimated shipment time, method of transportation, and name of carrier
- C. **If** the Pool Inventory Management Cask is necessary or a leak test is required, **then COORDINATE** request through the Logistics Manager to the vendor representative.
- D. **NOTIFY** the TSC Radiation Protection Manager when shipment is in route.

Limerick / Peach Bottom**3.2. STANDBY GAS TREATMENT SYSTEM (SGTS) FILTER LOADING**

NOTE: Each train of SGTS has been designed to be more than adequate for the absorption of all expected iodine. For more information, REFER to PIMS EWR A0659758.

- 3.3. **CONSIDER** loading capacity of the SGTS filters for extended releases.

DOSE ASSESSMENT COORDINATOR CHECKLIST**4. CLOSEOUT ACTIONS**

4.1. **COLLECT** and **REVIEW** dose assessment documentation for accuracy and completeness.

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4.2. **DELIVER** documentation to the Radiation Protection Manager.

☐

4.3. **PARTICIPATE** in event critiques reviews as necessary.

☐

Position Binder Tab Index		
Tab No.	Contents	Number*
**	EP-AA-112-400-F-17, Dose Assessor Coordinator Checklist	2
1	EP-AA-112-F-08, ERO Position Log	5
2	EP-AA-112-F-05, Dose Assessment Turnover Form	5
3	EP-AA-112-400-F-18, Dose Assessor Checklist	1
4	EP-AA-111, Emergency Classification and Protective Action Recommendations	1
5	EP-AA-113, Personnel Protective Actions	1
6	Mid-Atlantic Region EP-MA-110-200, Dose Assessment	1
	Mid-West Region EP-MW-110-200, Dose Assessment	

* Denotes typical number of copies of procedure or form to be placed in position binder. Forms are also available in designated storage areas in Emergency Response Facilities, can be copied or can be obtained electronically. The minimum number to be placed in the position binder is one.

** Position Specific Checklist placed before Tab 1.

Attachment 4

EP-AA-112-400-F-21

"Environmental Coordinator Checklist"

Revision C

ENVIRONMENTAL COORDINATOR CHECKLIST

Section 1, Initial Actions

Section 2, Ongoing Actions

Section 3, Situational Actions

3.1 Environmental Sampling [Mid-West Region]

3.2 Environmental Sampling [Limerick / Peach Bottom]

Section 4, Closeout Actions

NOTE: Steps in this checklist may be performed in an order other than listed or they may be omitted if not applicable.

1. **INITIAL ACTIONS**

1.1. **SIGN IN** on the EOF Organization Board.

☐

1.2. **REPORT** your arrival to the Radiation Protection Manager

☐

1.3. **OBTAIN** an initial update of the plant status, effluent releases and on-site and off-site protective actions from the Dose Assessment Coordinator.

☐

1.4. **INITIATE** and **MAINTAIN** a position log documenting significant actions performed and communications related to your position.

☐

Tab 1

1.5. **VERIFY** the arrival of the following support positions: ***[None of these positions are designated "minimum staffing" required for facility activation.]***:

☐

– Field Team Communicator

– State Environs Communicator **[MW Region only]**

A. **If** the Field Team Communicator is not yet present, **then** **PERFORM** the actions outlined in the Field Team Communicator Checklist on an interim basis to support the transfer of Command and Control from the TSC.

☐

1.6. **INFORM** the Radiation Protection Manager of the arrival of staff members and readiness to assume duties from the TSC.

☐

1.7. **OBTAIN** the latest meteorological and effluent data and **UPDATE** status boards accordingly

☐

ENVIRONMENTAL COORDINATOR CHECKLIST

- | | |
|--|--|
| 1.8. CONTACT the National Weather Service (NWS) or meteorological contractor / supplier to obtain the most recent meteorological forecast data and | <input type="checkbox"/> |
| 1.9. RECORD forecast on Meteorological Forecast Worksheet (form EP-AA-112-400-F-42). | <input type="checkbox"/> |
| 1.10. DISCUSS the projected or potential doses downwind, the wind direction, and the wind speed with the Dose Assessment Coordinator or Dose Assessor and OBTAIN the most recent meteorological forecast data. | <input type="checkbox"/> |
| <u>NOTE:</u> If possible, a joint call with the EOF Dose Assessment Coordinator should be made to the TSC Radiation Controls Coordinator to turnover dose assessment and control of field monitoring teams. | |
| 1.11. CONTACT the TSC Radiation Controls Coordinator and DISCUSS / CONFIRM current Field Monitoring Team deployment / status, accident conditions, meteorological conditions and release status, etc. | <input type="checkbox"/> |
| A. COMPLETE Field Monitoring Team Turnover Checklist (EP-AA-112-500-F-11) in anticipation of assuming responsibility for field team operations and PROVIDE a copy to the Field Team Communicator. | <input type="checkbox"/>
Tab 2 |
| B. REQUEST that copies of completed Field Survey Data Sheets and Environmental Assessment Logs be faxed to the EOF for review. | <input type="checkbox"/> |
| 1.12. BRIEF the EOF Protective Measures Group on the current information. | <input type="checkbox"/> |
| 1.13. COORDINATE the transfer of responsibility for Field Monitoring Teams from the TSC to the EOF as follows: | <input type="checkbox"/> |
| A. OBTAIN authorization from the EOF Radiation Protection Manager to execute the transfer. | <input type="checkbox"/> |
| B. DIRECT the Field Team Communicator to: | <input type="checkbox"/> |
| 1) CONTACT the TSC Radiation Controls Coordinator to acknowledge the transfer field monitoring team control to the EOF. | <input type="checkbox"/> |

ENVIRONMENTAL COORDINATOR CHECKLIST

2) **INFORM** the teams that the EOF is now directing field survey activities.

☐

C. **INFORM** the EOF Radiation Protection Manager when the EOF has accepted control of Field Monitoring Teams.

☐

1.14. **DETERMINE** information needs of the Dose Assessment Coordinator, Dose Assessor, HPN Communicator, and the State Environs Communicator (MW Region) and **ENSURE** updates are provided to support those needs.

☐

Mid-West Region

1.15. **CONTACT** the State of Illinois Radiological Environmental Assessment Center (REAC) and **ESTABLISH** contact with the Environmental Analyst

☐

2. ONGOING ACTIONS

NOTE: For events with no offsite radiological concerns, one or both Field Monitoring Teams may be recalled and team members released back to the OSC to support onsite response

2.1. **REVIEW** release status and potential with the EOF Radiation Protection Manager and Dose Assessment Coordinator.

☐

A. If there has NOT been a release and the potential for a release is very low, **then OBTAIN** the concurrence of the EOF Radiation Protection Manager to recall Field Monitoring Teams.

☐

1) **CONTINUE** to monitor conditions and reactivate Field Monitoring Team(s) if required.

☐

B. If **NO** release is in progress but a significant potential for a release exists, **then CONSIDER** the following precautionary measures to document the environmental impact of event:

☐

Mid-Atlantic Region

ENVIRONMENTAL COORDINATOR CHECKLIST

- 1) **CONTACT** the Environmental Services Vendor (ESV) per Section 3.2 to perform these activities in coordination with the EOF. ☐

- 2) **COLLECT** reference samples of grass, water, and soil at or near the periphery of the station. Document the sampling locations.

NOTE: The following ALARA considerations apply:

- Field Monitoring Teams should take and report dose rates upon arrival to the monitoring location. If habitable, sampling should proceed as instructed.
- In radiation fields greater than 1 R/hr, the Field Monitoring Team should leave the area during sampling and return to retrieve their air sampling equipment.
- Field Monitoring Teams should request further instructions when radiation levels approach 100 mR/hr.

- C. If a release is "in progress" or imminent, **then MAINTAIN** cognizance of Field Monitoring Team exposures. ☐

- 1) **REVIEW** Protective Equipment and Personnel Dosimetry form (EP-AA-112-500-F-02) to determine if additional protective equipment or personnel dosimetry is warranted. ☐

Tab 3

- 2) If personnel are or will be exposed to elevated levels of airborne radioiodines or may be required to receive radiation exposures in excess of normal limits **then, INFORM** the Radiation Protection Manager immediately and **REFER** to procedure EP-AA-113, Personnel Protective Actions for guidance on emergency exposures and use of Thyroid Blocking Agents (KI). ☐

Tab 4, 5 & 6

- 3) **IF** the need for KI has been determined and approved for the Field Monitoring Teams (FMT) **THEN VERIFY** the following actions and record times: ☐

Time FMT(s) were informed to take KI:

ENVIRONMENTAL COORDINATOR CHECKLIST

- | | | |
|--|--------------------------|--|
| <p>a. ENSURE that the TSC RPM has the information to complete the KI Issuance Verification on the appropriate Thyroid Blocking Agent Authorization Form(s) (EP-AA-113-F-03) after personnel named on the form have been instructed to take KI.</p> | <input type="checkbox"/> | |
| <p>4) IDENTIFY a monitoring and sample strategy that addresses the following:</p> <ul style="list-style-type: none"> – Positioning of teams to the monitoring locations so that they approach a suspected plume or release point from the upwind or crosswind direction while continuously monitoring radiological conditions to ensure that proper protective measures are established. – Monitoring of dose rates in the center of the prevailing wind direction downwind of the plant prior to a possible release. – Establishing of air-sample equipment in the downwind areas. Air sampling should occur as near as possible to the plume centerline (location of maximum dose rate). Air sampling should be performed within a two-mile radius of the plant. | <input type="checkbox"/> | |
| <p>5) OBTAIN the estimated location and footprint of release plume from the Dose Assessment Coordinator and PLOT using available EPZ maps.</p> | <input type="checkbox"/> | |
| <p>2.2. INSTRUCT the Field Team Communicator on the deployment of Field Monitoring Teams:</p> | <input type="checkbox"/> | |
| <p>A. POSITION one Field Monitoring Team as early as practical in potentially affected sectors that may require extended travel times to reach, such as opposite sides of rivers and lakes.</p> | <input type="checkbox"/> | |
| <p>B. PROVIDE alternate routes to enter and exit affected sectors in anticipation of changing weather conditions when possible</p> | <input type="checkbox"/> | |
| <p>C. TRAVERSE the plume to obtain dose profile (particularly in the 1/2 miles to 2 mile zone) and LOCATE the plume by identifying the centerline for obtaining the highest dose rate.</p> | <input type="checkbox"/> | |
| <p>D. OBTAIN air samples to determine iodine content.</p> | <input type="checkbox"/> | |

ENVIRONMENTAL COORDINATOR CHECKLIST

- | | |
|--|--------------------------|
| 2.3. COORDINATE with the EOF (or TSC) Security Coordinator concerning State and local roadblocks to ensure Field Monitoring Teams have access to sampling locations. | <input type="checkbox"/> |
| 2.4. DIRECT the Field Team Communicator to provide hourly updates to Field Monitoring Teams to include: <ul style="list-style-type: none">– Pertinent information on issued State/Local notification forms– Current classification– Plant status– Protective Action Recommendations– Environmental Release information– Meteorology information (wind direction/speed, current and forecasted weather conditions). A. If a radiological release occurs or plume location / magnitude changes significantly, then DIRECT the Field Team Communicator to immediately update the Field Monitoring Teams with the latest information concerning the release, including wind direction, wind speed, projected downwind doses, and general plant status. | <input type="checkbox"/> |
| 2.5. VERIFY that the Field Team Communicator is using status boards to track the following Field Monitoring Team information: <ul style="list-style-type: none">– Routes and current locations– Estimated times of arrival to monitoring locations– Cumulative personal doses A. MAINTAIN cognizance of team member exposure and location in respect to release plume. | <input type="checkbox"/> |
| 2.6. PROVIDE periodic updates to the Dose Assessment Coordinator and Dose Assessor on dose rates and contamination as measured by the Field Monitoring Teams and COMPARE against dose projection model output. | <input type="checkbox"/> |

ENVIRONMENTAL COORDINATOR CHECKLIST**Coatesville EOF**

NOTE: The Environmental Liaison is responsible for communicating listed directly to State representatives present at the EOF. The State Environs Communicator is NOT staffed.

- 2.7. **COORDINATE** with the State(s) Environmental Communicator to integrate activities and data collected between the State and Exelon Nuclear Field Monitoring Teams: ☐
- A. **PROVIDE** the following data: ☐
- Number of Exelon Nuclear Field Monitoring Teams and Locations
 - Sampling strategy
 - Summary of field data collected
- B. **ENSURE** state agencies are updated hourly on environmental monitoring activities and sample results. ☐
- 2.8. **PROVIDE** environmental data to Radiological Advisor/Spokesperson, upon request. ☐
- 2.9. **ASSIST** the HPN Communicator in responding to inquiries from the NRC regarding environmental monitoring activities and results ☐
- 2.10. **DETERMINE** if the number of Field Monitoring Teams is adequate. At least two teams should be maintained ☐
- A. **If** additional teams are needed, **then COORDINATE** the identification and mobilization of personnel and equipment from the unaffected Stations through the EOF Administrative Coordinator to augment existing capabilities and/or provide relief. ☐
- 1) **USE** Field Monitoring Team Dispatch Log (EP-AA-112-500-F-10) to **BRIEF** new Field Monitoring Teams as they contact the EOF. ☐
- Tab 7**

ENVIRONMENTAL COORDINATOR CHECKLIST

- | | |
|--|--------------------------|
| B. If unable to perform all the actions necessary to assess the environment because of the limited resources, then FOCUS on the following priorities: | <input type="checkbox"/> |
| – #1 Monitor dose rates to check for an undetected release or to track and assess a release in progress | |
| – #2 Obtain air samples to confirm iodine concentrations. | |
| 2.11. DEVELOP a Recovery Environmental Monitoring and Sampling Plan in coordination with affected States. | <input type="checkbox"/> |
| A. REFER to Section 3 of this attachment for guidance on environmental sampling and analysis. | <input type="checkbox"/> |
| 2.12. PROVIDE for relief for the Field Monitoring Team personnel. | <input type="checkbox"/> |
| A. ENSURE that the on-coming team is briefed using Field Monitoring Team Dispatch Log. | <input type="checkbox"/> |
| B. REFER the Field Monitoring Teams to the Field Monitoring Team Turnover Checklist to ensure the off-going and on-coming team members exchange appropriate information concerning field-monitoring activities. | <input type="checkbox"/> |
| 2.13. PERFORM a shift turnover with on-coming personnel using the guidance provided on the back of ERO Position Log sheets. | <input type="checkbox"/> |
- Tab 7
- Tab 2
- Tab 1

ENVIRONMENTAL COORDINATOR CHECKLIST

3. SITUATIONAL ACTIONS

Mid-West Region

3.1. ENVIRONMENTAL SAMPLING PROCESS

- A. **DIRECT** the collection of environmental samples in accordance with the Midwest Environmental Sample Collection Guidelines (EP-AA-112-500-F-05)
- B. **COORDINATE** the transfer of environmental samples to Radio-analytical Labs and the Radio-analytical Environmental Contractor.
 - 1) **REFER** to Midwest Transfer of Shipment of Radiological Samples to Radiological Laboratories form (EP-AA-112-500-F-06).
- C. **CONTACT** the environmental TLD contractor to verify their availability, if needed.
 - 1) **REQUEST** that any scheduled TLD change-outs be delayed until further notice.
 - 2) **CONSULT** the Dose Assessment Coordinator to develop a special TLD change-out and/or augmentation schedules based upon continuing radiological events.



Tab 9



Tab 10



Limerick / Peach Bottom

3.2. ENVIRONMENTAL SAMPLING PROCESS

- A. **PERFORM** the actions listed on the Mid-Atlantic Mobilization and Direction of the Environmental Sampling Vendor (EP-AA-112-500-F-07) for the mobilization and coordination of Recovery Phase environmental monitoring activities.



Tab 11

ENVIRONMENTAL COORDINATOR CHECKLIST

4. CLOSEOUT ACTIONS

- 4.1. **REVIEW** all documentation generated by the Environmental Coordinator(s), Field Team Communicator(s) and State Environs Communicator(s) during the event. ☐
- 4.2. **DELIVER** documentation to the Radiation Protection Manager (EOF). ☐
- 4.3. **PARTICIPATE** in event critiques reviews as necessary. ☐

Position Binder Tab Index			
Tab No.	Contents		Number*
**	EP-AA-112-400-F-21, Environmental Coordinator Checklist		2
1	EP-AA-112-F-08, ERO Position Log		5
2	EP-AA-112-500-F-11, Field Monitoring Team Turnover Checklist		5
3	EP-AA-112-500-F-02, Protective Equipment and Personnel Dosimetry		5
4	EP-AA-113, Personnel Protective Actions		1
5	EP-AA-113-F-03, Thyroid Blocking Agent Authorization		5
6	EP-AA-113-F-02, Authorization for Emergency Exposure		5
7	EP-AA-112-500-F-10, Field Monitoring Team Dispatch Log		5
8	EP-AA-112-400-F-42, Meteorological Forecast Worksheet		5
9	Mid-Atlantic Region	Empty	2
	Mid-West Region	EP-AA-112-500-F-05, Midwest Environmental Sample Collection Guidelines	
10	Mid-Atlantic Region	Empty	2
	Mid-West Region	EP-AA-112-500-F-06, Midwest Transfer of Shipment of Radiological Samples to Radiological Laboratories	
11	Mid-Atlantic Region	EP-AA-112-500-F-07, Mid-Atlantic Mobilization and Direction of the Environmental Sampling Vendor	2
	Mid-West Region	Empty	

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** Position Specific Checklist placed before Tab 1.

Attachment 5

EP-AA-112-400-F-32

"List of Commonly Asked Questions at EOCs"

Revision B

LIST OF COMMONLY ASKED QUESTIONS AT EOCS

Date: _____ Time: _____

1. Have any injuries or fatalities occurred?
How many? _____
How did the accident occur? _____
What response actions are underway? _____
Names of injured and killed? _____
Any contamination involved? _____
Anyone taken to the hospital? _____
2. Has any offsite assistance been activated? Specify.
Fire _____
Police _____
Medical _____
State/Federal _____
3. When were the Exelon Nuclear emergency facilities activated? (TSC, OSC, EOF) _____
4. When did the JIC become operational? _____
5. Have non-essential personnel been evacuated from the site?
When? _____
How many people? _____
Where were they sent? _____
Was the site siren sounded? _____

LIST OF COMMONLY ASKED QUESTIONS AT EOCS

6. Have Exelon Nuclear Environs Field Teams been dispatched?

How many?

Where?

Are they finding any radiation?

7. Have State Liaisons arrived at the EOF? When?

8. Have NRC Site Teams arrived?

When?

9. Does American Nuclear Insurers have anyone on the scene yet, or on the way.

10. Has everyone at the plant been accounted for?

11. What was the radiation release path?

How is it monitored?

12. Is the reactor operating?

Is the plant shut down?

13. What actions are being taken to fix the problem?

14. Any estimate of how long it will take to make fixes?

Restore Electrical Power?

Establish Alternate Feed/Cooling?

Isolate the Leak?

Other?

Attachment 6

EP-AA-112-400-F-37

"Key State Agency Listing"

Revision B

KEY STATE AGENCY LISTING

1. **USE** the ERF Telephone Directory to find the telephone number.
2. **CONTACT** each agency listed in the table below.
3. **ASK** if Agency request Exelon Nuclear representative.
4. **RECORD** the name / contact number of the person directing the agency's response and check box if agency request Exelon Nuclear Liaison presence.

Midwest Region

Position	Name/Phone Number	Exelon Rep Requested
Illinois EMA (State EOC) Chief of Operations		<input type="checkbox"/>
Illinois DNS (REAC) REAC Manager		<input type="checkbox"/>
Illinois DNS (REAC) REAC Executive Officer		<input type="checkbox"/>
Illinois DNS (REAC) REAC Reactor Analyst		<input type="checkbox"/>
Illinois DNS (REAC) REAC Health Physics Specialist		<input type="checkbox"/>
Illinois DNS (IEMA) Public information Officer		<input type="checkbox"/>
Quad Only - Iowa EMD (State EOC) EMD Administrator		<input type="checkbox"/>
Quad Only - Iowa DPH (State EOC) State Radiological Coordinator		<input type="checkbox"/>

Mid-Atlantic Region

Position	Name/Phone Number	Exelon Rep Requested
Pennsylvania EOC (EOC Director)		<input type="checkbox"/>
Peach Bottom Only: Maryland EOC (EOC Director)		<input type="checkbox"/>