



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 1, 2010

Mr. Charles G. Pardee
President and Chief Nuclear Officer
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION, UNIT NO. 1 - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO EMERGENCY PLAN CHANGE REQUEST
(TAC NO. ME1727)

Dear Mr. Pardee:

By letter to the Nuclear Regulatory Commission (NRC) dated June 19, 2009 (Agencywide Documents Access and Management System Accession No. ML091700736), Exelon Generation Company, LLC submitted a request for approval of changes to the Emergency Plan, for the Clinton Power Station, Unit No. 1.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on February 24, 2010, it was agreed that you would provide a response within 30 days from the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1115.

Sincerely,

A handwritten signature in black ink that reads "Nicholas J. DiFrancesco".

Nicholas J. DiFrancesco, Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

CLINTON POWER STATION, UNIT NO. 1

DOCKET NO. 50-461

In reviewing the Exelon Generation Company's submittal dated June 19, 2009 (Agencywide Documents Access and Management System Accession No. ML091700736), related to Emergency Plan Changes, for the Clinton Power Station, Unit No. 1, the Nuclear Regulatory Commission staff has determined that the following information is needed in order to complete its review:

RAI #	SECTION	Question
1	III.a	Are radiation work permits available/active for use during emergency conditions, i.e., higher set points for dose and dose rate? If not, what is the timeframe and process to develop/activate for workers to use?
2	III.a	Section III.a states, "Operations maintain high radiation area keys for needed access under emergency conditions." 1. Are high radiation area briefings procedurally required to inform Operation personnel of area dose rates prior to entry for mitigating actions? 2. Are Operations personnel qualified to perform self-monitoring in areas where radiation levels have not been identified?
3	III.c	Section III.c states, "Emergency issuance requires a TLD number and name of the person to who it is issued. This task does not require an ANSI qualified RPT to perform." Are on-shift emergency response organization (ERO) members trained/knowledgeable of how to perform this task?
4	III.c	Section III.c states, "If an electronic dosimeter is lost or damaged, additional electronic dosimeters are maintained in a fast-activation mode for immediate monitoring. This task does not require an ANSI qualified RPT to perform." Are on-shift ERO members trained/knowledgeable of how to perform this task?
5	III.c	Section III.c states, "Additionally, if an electronic dosimeter is lost or damaged, self-reading pencil dosimeters are pre-staged for emergency use. Issuance of these do not require an ANSI qualified RPT." Are on-shift ERO members trained/knowledgeable of how to perform this task?

Enclosure

RAI #	SECTION	Question
6	III.d	<p>Section III.d states, "Dose rates in the auxiliary building, fuel building and containment would make these areas inaccessible one hour following an event based on this analysis. The dose rates from this table indicate that the majority of the plant areas needed for access to perform mitigating actions remain accessible without RP coverage following an event." Do plant procedures require access to the auxiliary building, fuel building or containment to perform mitigating actions following an event? If so, would these areas be accessible without RP coverage?</p>
7	III.e	<p>Section III.e states, "A review of the design basis events verifies that two RP personnel can perform all the RP tasks necessary to respond to the event for the initial 60 minutes." Please provide a copy of this review.</p>
8	Page 7 of 11	<p>The discussion for "Replacing Mechanical Responder with a Non-licensed Operator (NLO)," states, "Overall, for all items reviewed the need for maintenance personnel within the first 90 minutes of an emergency condition is limited to those actions associated with the Emergency Operating Procedures or for troubleshooting or abnormal system alignment to operated equipment that did not respond as expected during the event."</p> <p>NUREG-0654/FEMA-REP-1, Table B-1 guidance for repair and corrective actions states that two individuals, one with mechanical maintenance/rad waste operator experience and one with electrical maintenance/instrumentation and control experience, should be designated on-shift, but may be provided by shift personnel assigned other functions.</p> <p>The staff views that the function of the maintenance position during the time frame in question is to provide for minor or limited scope damage repair and corrective functions such as:</p> <ul style="list-style-type: none"> • Identification and operation of faulty valves, clogged filters, packing and/or seal adjustments, install/remove hoses for draining and venting of plant piping and equipment, and/or troubleshooting. <p>Are NLO's trained/qualified to perform minor or limited scope damage repair and corrective actions?</p>
9	Page 9 of 11	<p>Final paragraph states, "Additionally, the station has successfully demonstrated the capability to fully staff and activate the ERO facilities in a September 16, 2004, off-hours augmentation drive-in drill." Is this the only time that this off-hours augmentation has been performed and are there any scheduled to periodically validate ERO response capabilities in the future?</p>

March 1, 2010

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/RA/
Nicholas J. DiFrancesco, Project Manager
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DATE	02/26/10	02/26/10	03/01/10

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