

REPORTABLE EVENT RAD 1.4:

Liquid Effluent Release

Requirement: 10 CFR 50.73(a)(2)(viii)(B)
10 CFR 20.2203 (a)(3)

§ 50.73(a)(2)(viii)(B): The licensee shall report ... any liquid effluent release that, when averaged over a time period of 1 hour, exceeds 20 times the applicable concentrations specified in Appendix B to 10 CFR 20, Table 2, Column 2, at the point of entry into the receiving waters (i.e., unrestricted area) for all radionuclides except tritium and dissolved noble gases.

§ 20.2203(a)(3): ... each licensee shall submit a written report ... after learning of ... levels of radiation or concentrations of radioactive material in –

- (i) A restricted area in excess of any applicable limit in the license; or
- (ii) An unrestricted area in excess of 10 times any applicable limit set forth in this part or in the license (whether or not involving exposure of any individual in excess of the limits in 10 CFR 20.1301).

**Time
Limit** **Required Notification(s):**

NONE No immediate notification is required for this Reportable Event.

**Time
Limit** **Required Written Report(s):**

30 DAYS Submit a written report to the NRC within 30 days of discovery of levels of radiation or concentrations of radioactive material in excess of the limits of § 20.2203(a)(3). Prepare and submit the report in accordance with the requirements of § 20.2203(b) and (c). [10 CFR 20.2203(a)(3)] [T-14]

60 DAYS Submit a Licensee Event Report to the NRC within 60 days of discovery of the occurrence of any liquid effluent release that exceeded the limits of § 50.73(a)(2)(viii)(B), if the release occurred within 3 years of the date of discovery. [10 CFR 50.73(a)(1), 10 CFR 50.73(a)(2)(viii)(B)] [T-10]

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Discussion:

- o NRC guidance on this Reportable Event is provided in NUREG 1022, Revision 2, Section 3.2.9.
- o The occurrence of this event may require activation of the Emergency Plan. In that case, notification will be made per the Emergency Plan, and a duplicate notification per this Reportable Event is not required. [See SAF 1.1]
- o "Unrestricted Area" means any area at or beyond the site boundary, access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, and any area within the site boundary used for residential quarters or industrial, commercial, institutional and recreational facilities.
- o The location used as the point of release for calculation purposes should be determined using the expanded definition, listed above, for an unrestricted area as specified in NUREG 0133 to maintain consistency with the TS.

Related Reportable Events:

- o RAD 1.1, Events Involving Byproduct, Source or Special Nuclear Material That Cause or Threaten to Cause Significant Exposure or Release
- o RAD 1.2, Events Involving Loss of Control of Licensed Material That Cause or Threaten to Cause Exposure or Release

References:

- o NUREG 1022, Revision 2
- o NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants"
- o NRC Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes," September 1985
- o 10 CFR 50.73
- o 10 CFR 20.2203

REPORTABLE EVENT RAD 1.34:

Industry Groundwater Protection Initiative (GPI) Voluntary Communication

Requirement: NEI 07-07, "Industry Ground Water Protection Initiative – Final Guidance Document" (August 2007)

Objective 2.2: Make informal communication as soon as practicable (no later than the end of the next business day) to appropriate State/Local officials, with follow-up notification to the NRC, as appropriate, regarding significant on-site leaks/spills into ground water and on-site or off-site water sample results exceeding the criteria in the REMP as described in the ODCM ...

Objective 2.3: Submit a written 30-day report to the NRC for any water sample result for on-site ground water that is or may be used as a source of drinking water that exceeds any of the criteria in the licensee's existing REMP as described in the ODCM ... for 30-day reporting of off-site water sample results. Copies of the written 30-day reports for both on-site and off-site water samples shall also be provided to the appropriate State/Local officials.

Objective 2.4: Document all on-site ground water sample results and a description of any significant on-site leaks/spills into ground water for each calendar year in the Annual Radiological Environmental Operating Report (AREOR) for REMP or the Annual Radioactive Effluent Release Report (ARERR) for the RETS as contained in the appropriate reporting procedure, beginning with the report for calendar year 2006.

**Time
Limit** **Required Notification(s):**

END OF NEXT
BUSINESS DAY

Perform voluntary informal communications to State/local offsite agencies (as determined per HR-AA-1001), NEI (GW_Notice@nei.org) and the ANI for events requiring voluntary communications as determined from the flowchart in Attachment 2. Complete Attachment 1 and provide the information on the completed attachment to the State/local offsite agencies [NEI 07-07, Objective 2.2].

30 DAYS

Submit a voluntary written 30-day report to the NRC for any GPI water sample result for onsite groundwater that is or may be used as a source of drinking water that exceeds any of the criteria in the licensee's existing REMP as described in the ODCM for 30-day reporting of offsite water sample results. Copies of the written 30-day reports for both onsite and offsite water samples shall also be provided to the appropriate State/Local officials. [NEI 07-07, Objective 2.3].

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***Time
Limit*** ***Required Written Report(s):***

ANNUAL REPORT Voluntarily document all onsite groundwater sample results and a description of any significant onsite leaks/spills into groundwater for each calendar year in the Annual Radiological Environmental Operating Report (AREOR) for REMP or the Annual Radioactive Effluent Release Report (ARERR) for the RETS as contained in the appropriate reporting procedure, beginning with the report for calendar year 2006. [NEI 07-07, Objective 2.4].

Discussion:

○ **Applicability (Read entire section before determining reportability nature of the event)**

The voluntary communications under this reportable event are applicable to elevated groundwater radionuclide concentrations or leaks / spills from station sources containing licensed material that meet the criteria in NEI 07-07, and are any of the following:

- Newly occurring, event-related releases of licensed material.
- Newly identified elevated radionuclide concentrations detected in groundwater samples above expected baseline levels for releases that have not been previously reported.
- Condensation from steam releases to the air that reach the ground. Only the radionuclides in the condensation need to be considered.
- Reportings of “unpermitted releases of radionuclides” as defined in 415 ILCS 5/13.6(c) from Illinois nuclear power plants per LS-MW-1320, Reportable Event RAD 3.4.

This reportable event is NOT applicable for any of the following:

- Releases from station sources containing licensed material exclusively to the air.
- Newly identified elevated radionuclide concentrations in groundwater monitoring wells or remediation wells installed for previously reported releases of licensed material.
- Newly identified elevated radionuclide concentrations in monitoring wells attributable to changes in baseline levels not tied to station operations.
- Routine batch or continuous liquid or gaseous releases conducted in accordance with Station procedures.
- Releases of radioactive materials attributed solely to recapture (See NRC RIS 2008-03).

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- Releases contained wholly inside a plant building, containment unit or an outside structure with a non-permeable surface.
- A spill or leak to a semi-impermeable or impermeable surface that is re-contained or remediated before the close of the next business day.
- Releases, leaks or spills of radionuclides directed to NPDES (NJPDES in New Jersey) permitted outfalls.
- Releases, leaks or spills of liquid Radwastes whose chemical makeup would interfere with the tritium analysis.

○ Evaluation of Releases

Evaluate releases for reportability as follows:

- Review the circumstances of the release for applicability.
- Determine reportability of the spill or leak or sample result(s) using the flowchart in Attachment 2.
- Report the spill or leak or sample result(s) as required.

○ End of next business day State/Local offsite agency notifications

Communication to the designated State/Local officials shall be made before the end of the next business day if an inadvertent leak or spill to the environment has or can potentially get into the groundwater **and** exceeds any of the following criteria:

- If a spill or leak exceeding 100 gallons from a source containing licensed material;
- If the volume of a spill or leak cannot be quantified but is likely to exceed 100 gallons from a source containing licensed material, or
- Any leak or spill, regardless of volume or activity, deemed by the licensee to warrant voluntary communication.

“Leak or spill” events that meet the NEI criteria shall be communicated regardless of whether or not the onsite groundwater is, or could be used as, a source of drinking water. The quantity of liquid resulting from leaks or spills of solid materials, waste or steam leaks should be evaluated with respect the criteria above.

“Source containing licensed material” means a liquid, including steam, for which a statistically valid positive result is obtained when the sample is analyzed to *a priori* lower limits of detection (analytical sensitivity). The analytical sensitivity for identifying a source containing licensed material is, at a minimum, the licensee’s lower limits of detection that are required for radioactive liquid effluents for all isotopes.

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Spills or leaks with the “potential to reach groundwater” means:

- Spills or leaks directly onto native soil or fill,
- Spills or leaks onto an artificial surface (i.e. concrete or asphalt) if the surface is cracked or the material is porous or unsealed.
- Spills or leaks that are directed into unlined or non-impervious ponds or retention basins (i.e. water hydrologically connected to groundwater).

Determine the designated State/Local local offsite agencies to be notified in accordance with HR-AA-1001. Contact onsite Regulatory Assurance to determine if there are any existing station commitments to notify specific local agencies of these events. The station shall document any agreement with State/Local officials that differs from the NEI 07-07 industry guidance. For example, some state or local authorities have indicated that they do not wish leaks/spills to be included in the voluntary communication protocol or that the voluntary communication should be completed in a shorter timeframe. These agreements should be indicated on the HR-AA-1001 notification list.

Communication with the designated State/Local officials shall be made before the end of the next business day for a water sample result of:

- Offsite groundwater or surface water that exceeds any of the REMP reporting criteria for water as described in the ODCM, or
- Onsite surface water, that is hydrologically connected to groundwater, or onsite groundwater that is or could be used as a source of drinking water, that exceeds any of the REMP reporting criteria for water as described in the ODCM.

Document the basis for concluding that the onsite groundwater is not or would not be considered a source of drinking water. Examples of a defensible basis are documents from the regulatory agency with jurisdiction over groundwater use.

When communicating to the State/Local officials, be clear and precise in quantifying the actual release information as it applies to the appropriate regulatory criteria (i.e. put it in perspective). Complete Attachment 1 and provide the information listed in the attachment as part of the informal communication.

Contact NEI by email to GW_Notice@nei.org and the ANI by telephone as part of a voluntary communication event described above.

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○ **4-Hour NRC ENS Notification**

The 4-hour NRC ENS notification described under Reportable Event (SAF 1.9) is not mandatory under this reportable event because:

- The State and Local communications being performed are voluntary in nature and are not required by any Federal or State regulations, and
- NEI and NRC are agreed that NRC will be receiving a voluntary 30-day report of the event.

However, to verify the need for performing the 4-hour NRC ENS notification described under Reportable Event (SAF 1.9), refer to the guidance for performing voluntary reporting to the NRC in LS-AA-1400, Event Reporting Guidelines 10 CFR 50.72 and 50.73 (NUREG-1022, Revision 2).

○ **30-Day NRC Report**

All groundwater samples shall be analyzed and compared to the standards and limits contained in the station's REMP as described in the ODCM. Pre-2006 ODCM requirements specify a written 30-day report to the NRC for REMP sample results that exceed any of the REMP reporting criteria. Under the GPI, a written 30-day NRC report is also required for all onsite sample results that exceed any of the REMP reporting criteria and could potentially reach the groundwater that is or could be used in the future as a source of drinking water. If the groundwater is not currently used for drinking water but is potable, each station should consider the groundwater as a potential source of drinking water (See NEI 07-07, Objective 2.2, Acceptance Criterion b, for documentation needed).

The initial discovery of groundwater contamination greater than the REMP reporting criterion is the event documented in a written 30-day report. It is not expected that a written 30-day report will be generated each time a subsequent sample(s) suspected to be from the same "plume" identifies concentrations greater than any of the REMP criteria as described in the ODCM. The station should evaluate the need for additional reports or communications based on unexpected changes in conditions.

The 30-day NRC report should include the information listed in NEI 07-07, Objective 2.3, Acceptance Criterion b. All written 30-day NRC reports are to be concurrently forwarded to the designated State/Local officials contacted during the end of next business day State/Local offsite agency notifications.

○ **Annual Report**

The Annual Radiological Environmental Operating Report (AREOR) for REMP or the Annual Radioactive Effluent Release Report (ARERR) for the RETS shall include the information listed in NEI 07-07, Objective 2.4, Acceptance Criteria b and c.

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Definition of Terms:

1. **Discharge:** This term includes but is not limited to, any leaking, pumping, pouring, emitting, emptying, or dumping of material that contain radioactive materials. For purposes of this guidance, the term discharge shall **not** include any discharge of licensed radioactive material to the licensed discharge point that is authorized by a license issued by the Nuclear Regulatory Commission (NRC) or a permit issued by other authorized federal or state agency.
2. **New Release:** The detection of a radionuclide not previously identified at specified sampling location, the unexpected increase in concentrations of a previously detected radionuclide, or a new discharge in a previously impacted area. A new release does not include expected migration of a known or historic release.
3. **Confirmed result:**
 - i) Confirmation via onsite analysis of two independent samples that the released material contains radionuclides.
 - ii) Confirmation via offsite analysis of two (2) independent samples that the concentration exceeds the reporting values.
 - iii) If material discharged is known to contain radionuclides via means other than sampling (e.g., the release is known to have originated from a system known to contain radionuclides), then the result is considered confirmed without sampling and analysis. An analysis, however, must be performed to identify the specific radionuclide concentration, although this analysis must not delay notification.
4. **Knowledge of Process:** The use of documented evidence (e.g., sampling data) or an individual(s) knowledge of the process (e.g., inputs, potential inputs and operating status of a system) to determine that a system contains, potentially contains or does not contain radiologically contaminated liquids.
5. **Recapture:** Previously discharged radioactive materials in gaseous or liquid effluents (does not apply to radioactive materials in solid materials or soil) that are returned from the environment to an operating nuclear power facility or to an operating nuclear fuel cycle facility. The NRC has determined that radioactive material properly released in gaseous or liquid effluents to the environment is **not** considered licensed material when returned to the facility as long as the concentration of radioactive material does not exceed 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," exempt concentration limits (otherwise a general or specific license is required). The water containing radioactive material returned from the environment can be used by the licensee and returned to the environment without being considered a new radioactive material effluent release. The basis for this determination is that the licensee has already accounted for this radioactive material when the effluent was originally released, provided that the subsequent use, possession, or release does not introduce a new significant dose pathway to a member of the public.

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6. **Significant (leak or spill):** An item or incident that is of interest to the public or stakeholders. It does not imply or refer to regulatory terminology nor is it intended to indicate that the leak or spill has public health and safety or environmental protection consequences.
7. **Voluntary:** Not required by statute or regulation, but is required by Exelon commitment to the NEI Ground Water Protection Initiative.

Related Reportable Events:

- RAD 1.4, Liquid Effluent Release
- RAD 1.8, Effluent Release
- RAD 1.21, Release Of Radionuclides
- RAD 1.22, Release Of Hazardous Substance (Including Radionuclides)
- RAD 3.1, Events Involving Byproduct, Source, Or SNM Causing Significant Exposure Or Release
- RAD 3.2, Events Involving Licensed Material Causing Exposure Or Release
- SAF 1.9, News Release or Notification of Other Government Agency
- RAD 3.4, Unpermitted Releases of Radionuclides at Illinois Nuclear Power Plants

References:

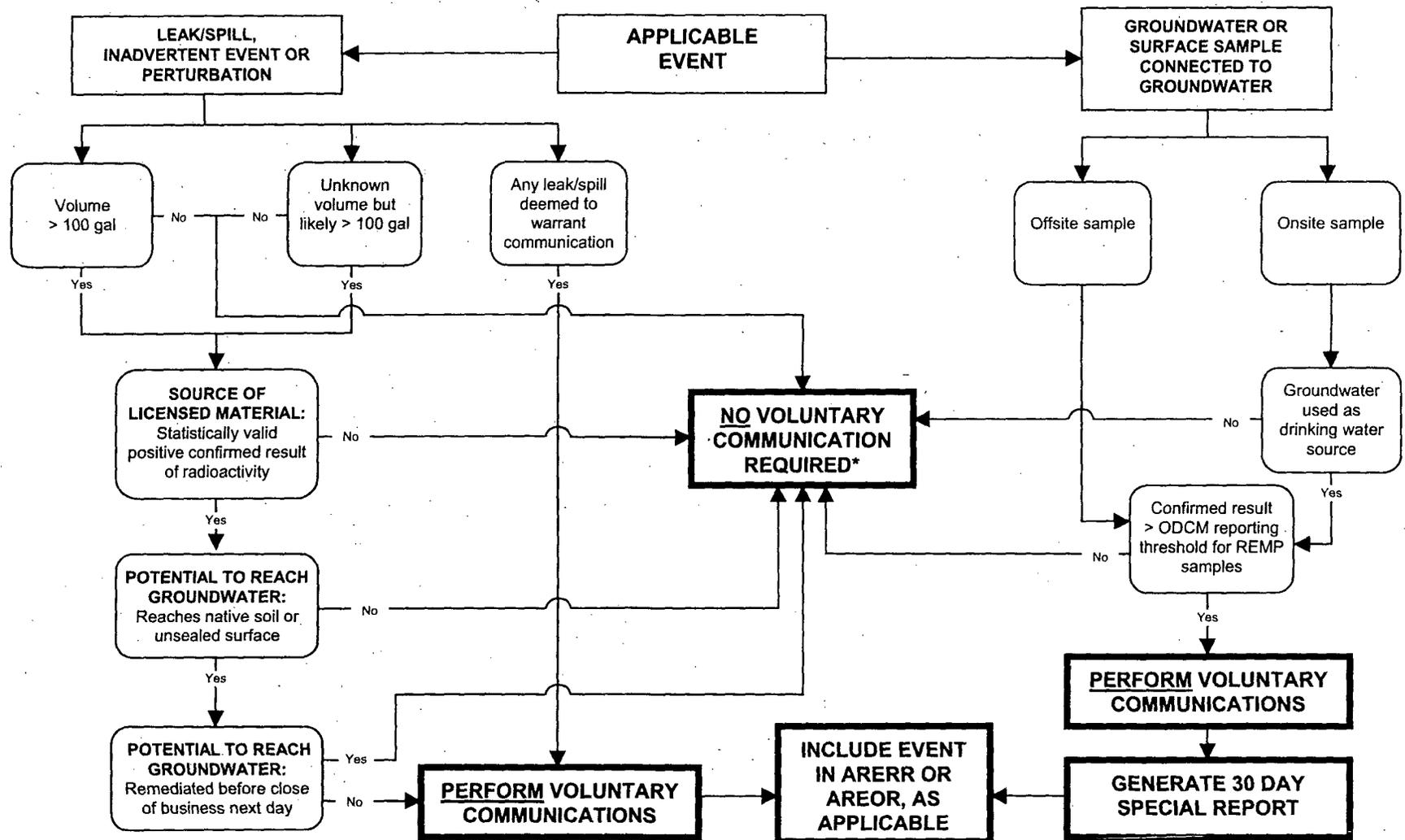
- NEI 07-07, Industry Ground Water Protection Initiative – Final Guidance Document (August 2007)
- NRC Regulatory Issue Summary (RIS) 2008-03, Return/Re-Use of Previously Discharged Radioactive Effluents
- CY-AA-170-4000, Radiological Groundwater Protection Program Implementation
- EN-AA-407, Response to Unplanned Discharges, Spills, and Accumulations of Licensed Radionuclides to Groundwater, Surface Water or Soil
- ANI Nuclear Liability Insurance Guideline 07-01, Potential for Unmonitored and Unplanned Off-Site Releases of Radioactive Material

**ATTACHMENT 1
INDUSTRY GROUNDWATER PROTECTION INITIATIVE (GPI)
VOLUNTARY COMMUNICATION**

1. Provide a statement that a voluntary communication is being made as part of the NEI Ground Water Protection Initiative.
2. Station Name: _____
3. Station Address: _____
4. Date and Time of Spill / Leak or Sample Result(s): _____
5. Specific Location of Release or Sample Result(s): _____
6. Source of the Spill / Leak (if known): _____
7. Is the leak stopped and the spill contained? YES NO
8. List of verified radionuclide contaminant concentrations (in pCi/L) in material released:

<u>Tritium (H3)</u>		pCi/L
_____		pCi/L
_____		pCi/L
9. Estimate of the potential or bounding annual dose to a member of the public, if available at this time:
10. Actions already taken in response to containing and mitigating the release and a general description of future actions.
11. Estimated time / date station will provide additional information or follow-up.
Date: _____ Time: _____
12. Name of Individual Making Report: _____ Telephone No. _____

**ATTACHMENT 2
 COMMUNICATION PROTOCOL FOR LEAK/SPILL AND GROUNDWATER SAMPLE RESULTS**



SIGNIFICANT EVENT REPORTING

1. PURPOSE

- 1.1. This procedure describes the protocol to be used for reporting occurrences and significant events to ensure proper response is initiated both onsite and offsite, and to ensure that appropriate management is promptly informed of the event or occurrence. It further delineates the Duty Officers' responsibilities and qualifications; specifically, those of the Duty Station Manager, Nuclear Duty Officer, and Duty Executive.

2. TERMS AND DEFINITIONS

- 2.1. Station Duty Team is a list of pre-designated on-call personnel.

3. RESPONSIBILITIES

3.1. Duty Executive

- 3.1.1. The Duty Executive is responsible to facilitate rapid event response for significant events.

3.2. Nuclear Duty Officer (NDO)

- 3.2.1. The Nuclear Duty Officer is the designated representative of Exelon Nuclear corporate management. The NDO is responsible for the initial notification to senior corporate management of an operational event or occurrence at one of the sites or related location, initial event response, and augmentation as required based on the nature of the event.

- 3.2.2. The NDO is appointed by the Senior Vice President and/or the Chief Nuclear Officer (CNO).

- 3.2.3. The Nuclear Duty Officer should be a previously-licensed/certified Senior Reactor Operator. The NDO should have experience as a member of a site operations management team.

3.3. Duty Station Manager

- 3.3.1. The Duty Station Manager is the designated representative of station management to whom initial notification of an event or occurrence is made by the Shift Manager.

- 3.3.2. The Duty Station Manager is responsible to create a one page executive summary (including simplified drawings or sketches) for events described in section 4.2.3.5 of this procedure.

3.4. Shift Manager

- 3.4.1. The Shift Manager is the designated representative of Station senior management and has command and control authority for the site.
- 3.4.2. The Shift Manager is responsible for directing appropriate immediate actions to place the unit(s) in a safe and stable condition following any transient/event, maintaining safe and conservative operation of the facility as the highest priority.
- 3.4.3. The Shift Manager is responsible for initial determination of all reportable or potentially reportable items, and is responsible to ensure that appropriate notifications are performed.
- 3.4.4. The Shift Manager is responsible for notification to Station Security of a Potential Sabotage/Tampering Event and have Security screen the event in accordance with SY-AA-101-132, "Assessment and Response to Suspicious Activity and Security Threats," to determine if any security related actions, notifications or reporting requirements are required.

3.5. Functional Area Duty Manager

- 3.5.1. During duty period, individual must be fit for duty at all times, available, and reachable by telephone, pager, or cell phone at all times.
- 3.5.2. The functional area duty person shall function as the single point of contact for the functional area during his/her duty period. This responsibility includes:
 - 1. When contacted (telephone, text page, etc.), the duty person must respond to all requests for emergent assistance, including conference calls.
 - 2. Maintaining a functional area contact list so that the duty person is able to contact other members of the functional area as needed to assist with a particular issue or problem.
 - 3. The functional area contact list should reflect individuals that are unavailable and their respective backup.
 - 4. Assuming leadership for resolving functional area issues affecting one or more sites.
- 3.5.3. Functional area duty individuals have the authority to re-assign personnel within the functional area as needed to best address the issue.
- 3.5.4. Duty personnel must support all emergent work requests.
- 3.5.5. Duty personnel should interface with the sites as required and as requested by the NDO.
- 3.5.6. When duty personnel are interfacing with the individual sites on emergent issues, the NDO should be updated as necessary.

4. MAIN BODY

4.1. Declaration of Emergency Plan (EP) Classification

4.1.1. For declarations of any EP classification, notifications shall be made in accordance with applicable site emergency plan procedures.

1. Initial notification to the NDO shall be made by the Duty Station Manager or Transmission Operations dispatcher/System Operations dispatcher.
2. The NDO should immediately call the affected station to obtain plant status.
3. The NDO shall promptly report any EP event classification to the Duty Executive and the Chief Nuclear Officer.
4. The CNO shall notify the CEO of an EP emergency declaration in a timeframe consistent with the impact of the event.
5. The NDO shall perform the EP duties for the classified event per EP-AA-112-400-F-01, Nuclear Duty Officer Checklist.

4.2. Other Events Requiring Regulatory or Offsite Notification

NOTE: Attachment 2, Shift Manager Notification Worksheet, may be used by the Shift Manager as an aid to make the proper notifications.

4.2.1. The Shift Manager will notify station Security to perform an assessment of the potential sabotage/tampering event in accordance with SY-AA-101-132, "Assessment and Response to Suspicious Activity and Security Threats."

4.2.2. The Shift Manager will notify the Duty Station Manager for any of the events listed in Attachment 1.

1. If the Duty Station Manager cannot be reached, **then** the Shift Manager shall ensure notifications are made in accordance with Attachment 1.

4.2.3. The Duty Station Manager shall use Attachment 1 in determining communication requirements.

4.2.4. The Duty Station Manager is responsible for initial coordination of site response to the event or occurrence, including notification to station senior management, the NDO, and the Chief Nuclear Officer as described in step 4.2.3.5 below.

1. The Duty Station Manager is responsible to ensure that the Nuclear Duty Officer has been notified and has adequate information for communication.

2. The Duty Station Manager will mobilize onsite and offsite personnel to support the needs of the Shift Manager.
 3. The Duty Station Manager will mobilize the Station Duty Team personnel upon entry into a 24-hour or less unplanned shutdown LCO. The Duty Station Manager should consider mobilizing the Duty Team upon entry into a 72-hour or less unplanned shutdown LCO.
 4. The Duty Station Manager will establish a conference call to discuss repair plans, normally within 30 minutes, following entry into a 24-hour or less unplanned shutdown LCO. Individuals that should be included on this conference call include the Duty Station Manager, Site VP, Plant Manager, Duty Executive, and NDO.
 5. The Duty Station Manager will provide a one page executive summary to the Chief Nuclear Officer within 24 hours for a plant event involving any of the following:
 - Unscheduled release of radiation; including discovery of tritium
 - Likely news media interest events;
 - Serious personnel injury;
 - Events that have the potential for significant financial impact;
 - Unplanned reactor trips, unplanned load reductions, or any transients that proceed differently than would be expected or that involve significant complications.
- 4.3. Upon notification, the Nuclear Duty Officer should review the event with the Duty Station Manager and/or Site Vice President (SVP) and confirm that proper classifications and notifications have been made. Individual events may fit into several categories, e.g., EP events, NRC ENS notifications, unplanned shutdown, etc. The NDO ensures that notifications in each applicable category are completed.
- 4.3.1. The NDO should immediately report to the Duty Executive, Chief Nuclear Officer, and other appropriate executives, events reported by the Duty Station Manager involving the following:
 - Unscheduled release of radiation; including discovery of tritium
 - Likely news media interest events;
 - Serious personnel injury;
 - Events that have the potential for significant financial impact;
 - Unplanned reactor trips, unplanned load reductions, or any transients that proceed differently than would be expected or that involve significant complications.
- 4.3.2. The NDO should report other events during the next working day.
- 4.3.3. The CNO shall notify the CEO of events described in step 4.3.1. in a timeframe consistent with the impact of the event.

- 4.4. A duty call-out list should be prepared identifying the Duty Executive, NDO, and Duty Station Manager for each site. The call-out list should contain appropriate telephone and pager numbers. This call-out list should be distributed to appropriate personnel.
- 4.5. Sites and the corporate office should establish and maintain a call-out structure of key personnel on a rotational basis. This structure will serve as the basis for the call-out list described above.
- 4.6. The on-call Duty Executive, NDO, and Duty Station Manager shall be available at all times during a scheduled tour of duty.
 - 4.6.1. To accomplish this objective, each individual shall carry an operable personal pager at all times and have ready access to telephone communications.
 - 4.6.2. The NDO and Duty Station Manager shall be fit for duty at all times during a scheduled tour of duty.

5. **DOCUMENTATION** - None

6. **REFERENCES**

- 6.1. OP-AA-106-101-1001, Event Response Guidelines
- 6.2. SY-AA-101-132, Assessment and Response to Suspicious Activity and Security Threats
- 6.3. OP-AA-300-1540, Reactivity Management Administration
- 6.4. NERC Standard CIP-001, Sabotage Reporting

7. **ATTACHMENTS**

- 7.1. Attachment 1, Notification Requirements
- 7.2. Attachment 2, Shift Manager's Notification Worksheet
- 7.3. Attachment 3, Special Notification and Reporting Requirements (Oyster Creek Only)

**ATTACHMENT 1
Notification Requirements
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EVENT	NOTIFY
<p>Reactivity Event, including any mis-positioned Control Rod events.</p> <p>Hazardous Material Incident.</p> <p>Shutdown Risk Classification > Scheduled) or Online Risk Classification ≥ Orange</p> <p>Fitness for Duty Event</p> <p>Injury requiring offsite medical attention or transportation via ambulance to an offsite medical facility. See Note 1 in "Notify" column.</p> <p>Major enforcement actions, fines or other sanctions or a serious operating event that could lead to this action, including events, which have been, or may be, brought to the attention of NRC upper management.</p> <p>Non-routine communications to/from NRC management, e.g. requests for Enforcement Discretion or Temporary Waiver of Compliance.</p> <p>Action Level II or greater chemistry parameters that lead to a plant derate or shutdown.</p> <p>An event of potential sabotage/tampering in which Station Security is coordinating investigations for confirmation of "Confirmed Tampering" in accordance with SY-AA-101-132.</p> <p>Any event or operating condition that occurs that is not enveloped in the plant design basis</p> <p>Any event that proceeds in a way significantly different than expected; for example:</p> <ul style="list-style-type: none"> • Unexpected ½ scram is received; • Any unexpected significant plant transient; • LCO action that will not be met within allowed time requirement; • Initiation of a prompt investigation or similar (OP-AA-106-101-1001). • Events of potential public interest. • Notification and response by Local Law Enforcement 	<p><input type="checkbox"/> Site VP</p> <p><input type="checkbox"/> Plant Manager</p> <p><input type="checkbox"/> Operations Director</p> <p><input type="checkbox"/> Nuclear Duty Officer</p> <p><input type="checkbox"/> Senior Resident Inspector</p> <p><input type="checkbox"/> Site Oversight Manager</p> <p><input type="checkbox"/> Site Medical (injuries only)</p> <p>Note 1: Transport of a potentially contaminated injured worker to an offsite medical facility requires notification to;</p> <p><input type="checkbox"/> Emergency Communications Dispatch Center IEMA (800 -782-7860 MW Stations only) and</p> <p><input type="checkbox"/> Iowa HSEMD (515-323-4360) if being transported from Quad Cities.</p> <p>Oyster Creek Only:</p> <ul style="list-style-type: none"> • Refer to OP-OC-106-101-1003, Contaminated Injured Person Worksheet.
<p>ENS</p> <p>Oyster Creek Only: Sea Turtle notifications are to be made via ENS per LS-AA-1400</p>	<p><input type="checkbox"/> Site VP</p> <p><input type="checkbox"/> Plant Manager</p> <p><input type="checkbox"/> Operations Director</p> <p><input type="checkbox"/> Nuclear Duty Officer</p> <p><input type="checkbox"/> Experience Assessment / Regulatory Assurance Manager</p> <p><input type="checkbox"/> Senior Resident Inspector</p> <p><input type="checkbox"/> Site Nuclear Oversight Manager</p>

**ATTACHMENT 1
Notification Requirements
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EVENT	NOTIFY
<p>Shutdown LCO Entry, forced entry into a 72 hours or less shutdown LCO.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Site VP <input type="checkbox"/> Plant Manager <input type="checkbox"/> Operations Director <input type="checkbox"/> Nuclear Duty Officer <input type="checkbox"/> Duty Maintenance Director <input type="checkbox"/> Duty Engineering Director <input type="checkbox"/> Work Week Manager <input type="checkbox"/> Senior Resident Inspector
<p>Unplanned shutdown or load reduction</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Site VP <input type="checkbox"/> Plant Manager <input type="checkbox"/> Operations Director <input type="checkbox"/> Nuclear Duty Officer <input type="checkbox"/> Duty Maintenance Director <input type="checkbox"/> Duty Engineering Manager <input type="checkbox"/> Work Management Director <input type="checkbox"/> Work Week Manager <input type="checkbox"/> Senior Resident Inspector <input type="checkbox"/> Simulator Coordinator
<p>Significant breakdown of plant radiological or environmental controls</p> <p>Any serious personnel radioactive contamination requiring extensive on-site decontamination or outside assistance.</p> <p>Fish or wildlife mortality attributable to plant operations</p> <p>Operating conditions that are non-compliant with environmental permit conditions or environmental regulations; or operating conditions that could reasonably escalate into non-compliant conditions.</p> <p>Tritium sample results above limits</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Site VP <input type="checkbox"/> Plant Manager <input type="checkbox"/> Operations Director <input type="checkbox"/> Nuclear Duty Officer <input type="checkbox"/> Duty RP Manager <input type="checkbox"/> Senior Resident Inspector <input type="checkbox"/> Corporate Environmental Manager (for non-radiological environmental events)

**Attachment 2
Shift Manager's Notification Worksheet
Page 1 of 5**

DATE/TIME of Event	EVENT DESCRIPTION (use additional paper as necessary)																		
CURRENT POWER/MODE																			
PRIOR POWER/MODE																			
RECOVERY PLAN IF REQUIRED (use additional paper as necessary)																			
Does the event / condition require an EP Declaration? <input type="checkbox"/> YES, Perform required communications after completing notifications required per site specific EP procedures	Notify: SOS / OD NRC Operations Center Duty Station Manager (DSM) <ul style="list-style-type: none"> ▪ PM ▪ SVP ▪ NDO ▪ Manager, Reg. Assurance Group ▪ ANI and INPO (Alert or higher EAL) NRC Senior Resident Inspector	<table border="1"> <thead> <tr> <th style="background-color: #cccccc;">Date</th> <th style="background-color: #cccccc;">Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time							<table border="1"> <thead> <tr> <th style="background-color: #cccccc;">Date</th> <th style="background-color: #cccccc;">Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time						
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Date	Time																		
Does the event / condition require reporting to the NRC via ENS or to an outside agency per Exelon Reportability Reference Manual? <input type="checkbox"/> YES, Perform the following: →	If time permits: Independent SRO peer check completed NRC Form 361. SRO Signature Notify: SOS / OD NRC Operations Center DSM <ul style="list-style-type: none"> ▪ PM ▪ SVP ▪ NDO ▪ Manager, Reg. Assurance Group ▪ Manager, Nuclear Oversight Group ▪ Communication (as required) ▪ Environmental (as required) NRC Senior Resident Inspector	<table border="1"> <thead> <tr> <th style="background-color: #cccccc;">Date</th> <th style="background-color: #cccccc;">Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time							<table border="1"> <thead> <tr> <th style="background-color: #cccccc;">Date</th> <th style="background-color: #cccccc;">Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time						
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Attachment 2
Shift Manager's Notification Worksheet
Page 2 of 5

<p>Did the following events/condition occur?-. Oil discharge into/upon navigable waters or adjoining shoreline.</p> <p><input type="checkbox"/> YES, Perform notifications →</p> <div style="border: 1px solid black; padding: 2px; width: fit-content;"> <p>Oyster Creek Only</p> </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> <p>NOTE: Refer to Attachment 3 for additional notification and reporting instructions.</p> </div>	<p>Notify:</p> <p>SOS / OD National Response Center (EPA) EPA NRC Operations Center DSM</p> <ul style="list-style-type: none"> ▪ PM ▪ SVP ▪ NDO ▪ Manager, Reg. Assurance Group ▪ First Energy (JCP&L) (Oyster Creek Only) <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th style="background-color: #cccccc;">Date</th> <th style="background-color: #cccccc;">Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time									<p>Date and Time all notifications have been completed by DSM</p>
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<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;"> <p>Oyster Creek Only</p> </div> <p>Did any of the following events/conditions occur?</p> <ul style="list-style-type: none"> • A leak or discharge of petroleum product, or hazardous substance, from the warehouse drop tank. • Spill or discharge of hazardous materials in a quantity that constitutes a reportable discharge into or upon surface waters, groundwater, or onto the ground (incl. Petroleum products) <p><input type="checkbox"/> YES, Perform notifications →</p> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> <p>NOTE: Refer to Attachment 3 for additional notification and reporting instructions.</p> </div>	<p>Notify:</p> <p>SOS / OD State DEP Ocean County Health Department NRC Operations Center DSM</p> <ul style="list-style-type: none"> ▪ PM ▪ SVP ▪ NDO ▪ Manager, Reg. Assurance Group ▪ First Energy (JCP&L) <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th style="background-color: #cccccc;">Date</th> <th style="background-color: #cccccc;">Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time									<p>Date and Time all notifications have been completed by DSM</p>
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<p>Did the following events/condition occur?</p> <p>Release of designated hazardous substances in amounts equal to or in excess of a EPA reportable quantity.</p> <p><input type="checkbox"/> YES, Perform notifications →</p> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;"> <p>Oyster Creek Only</p> </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> <p>NOTE: Refer to Attachment 3 for additional notification and reporting instructions.</p> </div>	<p>Notify:</p> <p>SOS / OD National Response Center (EPA) State DEP Lacey Twp. Police (Oyster Creek Only) NRC Operations Center DSM</p> <ul style="list-style-type: none"> ▪ PM ▪ SVP ▪ NDO ▪ Manager, Reg. Assurance Group ▪ First Energy (JCP&L) (Oyster Creek Only) <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th style="background-color: #cccccc;">Date</th> <th style="background-color: #cccccc;">Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time									<p>Date and Time all notifications have been completed by DSM</p>
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**Attachment 2
Shift Manager's Notification Worksheet
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<p>Did any of the following events / conditions occur?</p> <ul style="list-style-type: none"> RCRA Program Exception Report Submitted Environmental Noncompliance endangering health or Environment <p><input type="checkbox"/> YES, Perform notifications →</p> <p>Oyster Creek Only</p> <p><u>NOTE:</u> Refer to Attachment 3 for additional notification and reporting instructions.</p>	<p>Notify:</p> <p>SOS / OD State DEP NRC Operations Center DSM</p> <ul style="list-style-type: none"> PM SVP NDO Manager, Reg. Assurance Group <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th>Date</th> <th>Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time									<table border="1"> <thead> <tr> <th>Date</th> <th>Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time								
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<p>Did any of the following events / conditions occur?</p> <p>Incident threatening health or environment or release equal to or in excess of EPA reportable quantity</p> <p><input type="checkbox"/> YES, Perform notifications →</p> <p>Oyster Creek Only</p> <p><u>NOTE:</u> Refer to Attachment 3 for additional notification and reporting instructions.</p>	<p>Notify:</p> <p>SOS / OD National Response Center State DEP NRC Operations Center DSM</p> <ul style="list-style-type: none"> PM SVP NDO Manager, Reg. Assurance Group <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th>Date</th> <th>Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time									<table border="1"> <thead> <tr> <th>Date</th> <th>Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time								
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<p>Oyster Creek Only</p> <p>Did the following events/condition occur?</p> <ul style="list-style-type: none"> Loss of 10 or more sirens Spurious activation signal with 1 or more sirens still sounding <p><input type="checkbox"/> YES, Perform notifications →</p> <p><u>NOTE:</u> Refer to Attachment 3 for additional notification and reporting instructions.</p>	<p>Notify:</p> <p>SOS / OD Ocean County Police Dispatcher NRC Operations Center DSM</p> <ul style="list-style-type: none"> PM SVP NDO Manager, Reg. Assurance Group <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th>Date</th> <th>Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time									<table border="1"> <thead> <tr> <th>Date</th> <th>Time</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Date	Time								
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Attachment 2
Shift Manager's Notification Worksheet
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<p>Did any of the following events/conditions occur?</p> <ol style="list-style-type: none"> 1. Reactivity management event per OP-AA-300-1540. 2. Hazardous material incident 3. Sentinel / Oram Risk level is / or is planned to be ORANGE or RED 4. Fitness-for-duty event 5. Injury resulting in offsite medical attention 6. Major enforcement action, fine, or other sanction; serious operating event that could result in such action; including events which have been or maybe brought to NRC upper management attention 7. Non-routine communications to / from NRC 8. Reactor Water Chemistry above or at EPRI Action Level II 9. Any event or operation condition outside plant design basis 10. Any event that proceeds differently than expected <ol style="list-style-type: none"> a. Unexpected 1/2-scrum b. Unexpected, significant plant transient c. LCO action that will not be met within deadline d. Initiation of a prompt investigation e. Unplanned Risk Change <p><input type="checkbox"/> YES, Perform notifications →</p>	<p>Notify: SOS / OD</p> <p>DSM</p> <ul style="list-style-type: none"> ▪ PM ▪ SVP ▪ NDO ▪ Manager, Nuclear Oversight Group ▪ Communication (as required) ▪ Environmental (as required) <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th data-bbox="1199 400 1334 463">Date</th> <th data-bbox="1334 400 1498 463">Time</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="1199 463 1498 729">Date and Time all notifications have been completed by DSM</td> </tr> <tr> <td data-bbox="1199 729 1334 793"></td> <td data-bbox="1334 729 1498 793"></td> </tr> <tr> <td data-bbox="1199 793 1334 985"></td> <td data-bbox="1334 793 1498 985"></td> </tr> </tbody> </table>		Date	Time	Date and Time all notifications have been completed by DSM					
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Date and Time all notifications have been completed by DSM											
<ol style="list-style-type: none"> 1. Did the event/condition force entry into a ≤72hour shutdown LCO? 2. Did the event/condition force a plant shutdown or unplanned power reduction? <ol style="list-style-type: none"> le. Power reductions required due to high discharge temperature or required to perform an activity such as main condenser backwashing. 3. Did the event/condition involve a significant breakdown of plant radiological or environmental controls? <p><input type="checkbox"/> YES, Perform notifications →</p>	<p>Notify: SOS / OD</p> <p>DSM</p> <ul style="list-style-type: none"> ▪ Work Week Manager ▪ Director, Work Mgmt. (via WWM) ▪ Eng. Duty Manager ▪ PM ▪ SVP ▪ NDO ▪ Manager, Nuclear Oversight Group ▪ Simulator Coordinator <p>NRC Senior Resident Inspector</p>	<table border="1"> <thead> <tr> <th data-bbox="1199 985 1334 1049">Date</th> <th data-bbox="1334 985 1498 1049">Time</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="1199 1049 1498 1219">Date and Time all notifications have been completed by DSM</td> </tr> <tr> <td data-bbox="1199 1219 1334 1283"></td> <td data-bbox="1334 1219 1498 1283"></td> </tr> <tr> <td data-bbox="1199 1283 1334 1308"></td> <td data-bbox="1334 1283 1498 1308"></td> </tr> </tbody> </table>		Date	Time	Date and Time all notifications have been completed by DSM					
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Attachment 2
Shift Manager's Notification Worksheet
Page 5 of 5

<div style="border: 1px solid black; display: inline-block; padding: 2px;">Oyster Creek Only</div>		Notify: SOS / OD		<table border="1"> <thead> <tr> <th style="width: 50%;">Date</th> <th style="width: 50%;">Time</th> </tr> </thead> <tbody> <tr> <td colspan="2" style="text-align: center;">Date and Time all notifications have been completed by DSM</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Date	Time	Date and Time all notifications have been completed by DSM					
Date	Time											
Date and Time all notifications have been completed by DSM												
Did any of the following TS 6.9.3 Unique Reportability Requirement events occur?		DSM <ul style="list-style-type: none"> ▪ Work Week Manager ▪ Director, Work Mgmt. (via WWM) ▪ Eng. Duty Manager (via WWM) ▪ PM ▪ SVP ▪ NDO ▪ Manager, Nuclear Oversight Group 										
1. Leak test on a sealed source that yielded ≥ 0.005 μCi of removable contamination 2. A reportable event pursuant to the ODCM 3. EMRV or Safety Valve challenge or failure (non LER reportable). <ul style="list-style-type: none"> a. A "challenge" is an automatic actuation outside purposeful surveillance or testing. b. A special report is to be sent to the NRC within 60 days. 4. Any of the following SLC (Liquid Poison) Technical Specification conditions: <ul style="list-style-type: none"> a. 3.2.C.3 (b) b. 3.2.C.3 (e) (i) c. 4.2.E.5 5. Inoperable high-range radioactive noble gas effluent monitor (TS 3.13.H)		NRC Senior Resident Inspector										
<input type="checkbox"/> YES, Perform notifications →												
REQUIRED WRITTEN REPORT		LICENSEE EVENT REPORT										
CHECK ONE <input type="checkbox"/> REQUIRED <input type="checkbox"/> NOT REQUIRED	REPORT DUE WITHIN <input type="checkbox"/> 30 DAYS <input type="checkbox"/> 60 DAYS <input type="checkbox"/> OTHER _____	CHECK ONE <input type="checkbox"/> REQUIRED <input type="checkbox"/> NOT REQUIRED	REPORT DUE WITHIN <input type="checkbox"/> 30 DAYS <input type="checkbox"/> 60 DAYS <input type="checkbox"/> OTHER _____									

**Oyster Creek Only
Attachment 3
Special Notification and Reporting Requirements
Page 1 of 2**

NOTE: Normally, the Environmental Group will make governmental agency notifications (except NRC notifications) for environmental events. If this arrangement is impractical, the SM/DSM may assign these notifications to the Communications Group or an Operations Group (Ops) representative. For all potential NRC notifications those items should be reported in accordance with reportability manual.

ENVIRONMENTAL – SPILLS, DISCHARGES, RELEASES OF OIL AND/OR OTHER SUBSTANCES			
EVENT	AGENCY	NOTIFICATION/ DEPT. RESPONSIBLE	WRITTEN REPORT/ DEPT. RESPONSIBLE
Oil discharge into/upon navigable waters or adjoining shoreline	National Response Center	IMMEDIATE / (R/E)	
	EPA		60 days ¹ /(R/E)
	NRC	4 hours/ (Ops ENS)	
	First Energy ⁵ (JCP&L)	72 hours/ (R/E)	30 days/ (R/E)
Leak or discharge of petroleum product, or hazardous substance, from the warehouse drop tank.	NJDEP	IMMEDIATE / (R/E)²	30 days ¹ , 120days ¹ / (R/E)
	Ocean County Health Dept	IMMEDIATE / (R/E)²	120 days ¹ /(R/E)
	NRC	4 hours/ (Ops ENS)	
	First Energy ⁵ (JCP&L)	72 hours/ (R/E)	30 days/ (R/E)
Spill or discharge of hazardous materials in a quantity that constitutes a reportable discharge into or upon surface waters, groundwater, or onto the ground (incl. Petroleum products)	NJDEP	15 minutes/ (Ops)	30 days/ (R/E)
	Ocean County Health Dept	IMMEDIATE / (Ops)	24 hours/ (Ops or C/R) ⁶
	NRC	4 hours/ (Ops ENS)	
	First Energy ⁵ (JCP&L)	72 hours/ (R/E)	30 days/ (R/E)
Release of designated hazardous substances in amounts equal to or in excess of a EPA reportable quantity	National Response Center	IMMEDIATE / (R/E)	
	NJDEP	IMMEDIATE / (R/E)	ASAP ⁷
	Lacey Twp. Police	IMMEDIATE / (R/E)	ASAP ⁷
	NRC	4 hours/ (Ops ENS)	
	First Energy ⁵ (JCP&L)	72 hours/ (R/E)	30 days/ (R/E)
<p>NOTES:</p> <ol style="list-style-type: none"> 1) Written report due to EPA (40CFR 112.4(a)) if ≥1000 gal. Spill, or 2 events within any 12-month period 2) Upon confirmation of a release from the warehouse drop tank 3) After reporting a leak into the annular space of the warehouse drop tank 4) After reporting a discharge 5) Notify First Energy (JCP&L) only if First Energy (JCP&L) personnel or facilities affected 6) Provide a follow-up report every 72 hours until OCHD concurs in declaration of event termination 7) Following a release which requires immediate oral notification, a written follow-up report shall provide information required under 40 CFR 355.40 			
ENVIRONMENTAL – RCRA PROGRAM			
EVENT	AGENCY	NOTIFICATION/ DEPT. RESPONSIBLE	WRITTEN REPORT/ DEPT. RESPONSIBLE
Exception Report	NJDEP	IMMEDIATE / (R/E)¹	10 days ² /(R/E)
Incident threatening health or environment or release equal to or in excess of EPA reportable quantity (RQ)	National Response Center	IMMEDIATE / (R/E)	
	NJDEP ³	IMMEDIATE / (R/E)	15 days/(R/E)
	NRC	4 hours/ (Ops ENS)	
Incident of little or no environmental consequence	NJDEP		15 days/(R/E)
<p>NOTES:</p> <ol style="list-style-type: none"> 1) Notification required if signed manifest not returned by disposal facility within 35 days of shipment 2) Notification required if signed manifest not returned by disposal facility within 45 days of shipment 3) Make notification and written report to New Jersey Emergency Response Commission as well 			

**Oyster Creek Only
Attachment 3
Special Notification and Reporting Requirements
Page 2 of 2**

ENVIRONMENTAL - ASBESTOS COMMITMENTS			
EVENT	AGENCY	WRITTEN REPORT	RRM RELATED EVENTS
Exception Report ¹	EPA NJDEP	Note 2	
Demolition ¹	NJDEP	10 days PRIOR to demolition ³	ENV 2.35 ENV 2.2, ENV 2.3 ENV 2.4

NOTES:
 1) If waste shipment record is not received within 35 days of shipment, inquire as to the shipment status with the waste transporter or waste disposal site
 2) Notification required if waste disposal site owner/operator-signed waste shipment record not received by station within 45 days of shipment acceptance by waste transporter
 3) Department generating asbestos material shall notify Radwaste/Environmental report no later than 20 days PRIOR to beginning demolition.

NOTE: Normally, the Communications Group (Comm) will make notifications (except NRC notification) for the following events.

PROMPT NOTIFICATION SYSTEM MALFUNCTIONS			
EVENT	AGENCY	NOTIFICATION/ DEPT. RESPONSIBLE	WRITTEN REPORT/ DEPT. RESPONSIBLE
Loss of 10 or more sirens	Ocean County Police Dispatcher	IMMEDIATE/ (Comm/Ops)	
	NRC (SAF 1.10)	8 hours/ (Ops ENS) ²	
Spurious activation signal with 1 or more sirens still sounding	Ocean County Police Dispatcher	IMMEDIATE/ (Comm/Ops)	
	NRC (SAF 1.10)	4 hours/ (Ops ENS) ¹	

NOTES:
 1) Provide immediate follow-up reports per SAF 1.9 guidance
 2) Provide immediate follow-up reports per SAF 1.9 guidance