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DTE Energy



10 CFR 50.12
RIS 2006-03

October 22, 2010
NRC-10-0074

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

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Detroit Edison's Letter to NRC, "Fermi 2 Exemption Request from the Biennial Emergency Preparedness Exercise Requirement in 10 CFR 50, Appendix E, Section IV.F.2.b," NRC-10-0061, dated August 3, 2009

Subject: Response to Request for Additional Information Regarding Fermi 2 Exemption Request from the Biennial Emergency Preparedness Exercise Requirement in 10 CFR 50, Appendix E, Section IV.F.2.b

In Reference 2, Detroit Edison submitted a request for an exemption from the requirement of 10 CFR 50, Appendix E, Section IV.F.2.b for conducting a biennial emergency preparedness exercise. The submittal requested an exemption from conducting an emergency preparedness biennial evaluated exercise in the calendar year 2010.

In an e-mail from Mr. Mahesh Chawla to Mr. Alan Hassoun dated September 13, 2010, the NRC requested additional information (RAI) regarding the justification for the exemption. The RAI questions were discussed in a telephone conversation between NRC staff and Detroit Edison personnel on September 17, 2010.

Detroit Edison has considered the information provided in the RAI and the discussion held during the telephone conference on September 17, 2010. As a result, Detroit Edison has determined that postponement of the exercise into calendar year 2011 is an

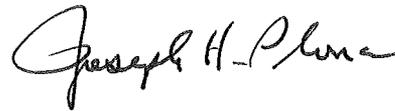
acceptable alternative to the original request for crediting the response to the actual event on June 6, 2010 in place of the 2010 exercise.

The additional information requested by NRC staff is provided in Enclosure 1 to this letter. Enclosure 2 provides drill critique summaries for drills conducted since the last biennial exercise.

There are no new commitments included in this document.

Should you have any questions or require additional information, please contact Mr. Rodney W. Johnson of my staff at (734) 586-5076.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph H. Plume". The signature is written in a cursive style with a large initial "J".

Enclosures:

- 1) Response to Request for Additional Information
- 2) Drill Critique Summaries

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

**Enclosure 1 to
NRC-10-0074**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

Response to Request for Additional Information

Response to Request for Additional Information:

The Statements of Consideration for the Final Rule to clarify the standards that will be applied when the NRC considers whether to grant exemptions from the requirements codified in 10 CFR Part 50 published in the Federal Register (50 FR 50777; December 12, 1985) state:

“Section 50.12(a)(2)(iii) addresses those situations where compliance would result in undue hardship or other cost that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by other similarly situated. This is intended to provide equitable treatment to applicants or licensees who, because of some unusual circumstances, are affected in a manner different than that of other similarly situated licensees or applicants.

Section 50.12(a)(2)(v) establishes a condition where the exemption would provide only temporary relief from the applicable regulation. This would cover the so-called ‘scheduler’ exemptions where the relief sought is limited to a specific amount of time or until a specific event occurs.”

Regulatory Issue Summary (RIS) 2006-03, “,” further states:

“A licensee request for an exemption should include a list of all drills, exercises, and other training activities conducted since the previous biennial exercise and all drills, exercises, and other training activities scheduled before the next biennial exercise. The list helps establish a basis for assurance that the licensee has regularly exercised its emergency response strategies and personnel in coordination with offsite authorities, that postponing the biennial exercise will not pose an undue risk to public health and safety, and that a good faith effort has been made to satisfy the underlying purpose of the rule.”

RAI # 1:

Pursuant to 10 CFR 50.12(a)(2), the Commission will not consider granting an exemption unless special circumstances are present. Please provide further justification that special circumstances are present to form the basis of this exemption request for “crediting the response to the actual event in lieu of the 2010 exercise,” instead of the postponement of the exercise into Calendar Year 2011.

Response:

Detroit Edison has considered the information provided in the RAI and the discussion during the telephone conference held on September 17, 2010 with NRC staff. As a result, Detroit Edison has determined that postponement of the exercise into calendar year 2011 is an acceptable

alternative to the original request for crediting the response to the actual event on June 6, 2010 in place of the 2010 exercise.

RAI # 2:

Please provide further justification as to why an exercise per 10 CFR 50 Appendix E IV.F.2.b cannot be conducted in calendar year 2010.

Response:

Rescheduling the cancelled exercise in calendar year 2010 is not considered due to the unavailability of resources necessary to prepare for and conduct an NRC-evaluated exercise. Detroit Edison resources since the cancellation of the exercise were devoted to safely planning and preparing for the fall refueling outage.

RAI # 3:

Please provide further justification as to why an exercise per 10 CFR 50 Appendix E IV.F.2.b cannot be conducted in calendar year 2011.

Response:

As stated in the response to RAI # 1, Detroit Edison has determined that postponement of the exercise into calendar year 2011 is an acceptable alternative to the original request.

RAI # 4:

Attachment 2 to the exemption request provides only the dates of drills conducted since the last biennial exercise and does not describe the principal functional areas that were drilled or how those functional areas were assessed.

Per 10 CFR 50 App. E IV.F.2.b, please provide documentation to show that "...the licensee has taken actions necessary to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include activities such as management and coordination of emergency response, accident assessment, protective action decision making, and plant system repair and corrective actions."

Response:

For drills conducted since the last biennial exercise, drill objectives and the performance assessment for these objectives are provided in Enclosure 2.

RAI # 5:

Please provide documentation of how planning standards (9) and (10) of 10CFR50.47.b were exercised and assessed as part of the actual event that occurred on June 6, 2010.

Response:

These planning standards were not challenged during the actual event. As provided in the response to RAI # 4, objectives covering these planning standards have been included and assessed in drills performed since the last biennial exercise.

Since Detroit Edison is no longer requesting that the actual event replace the scheduled exercise, this RAI is no longer relevant to the exemption request, as amended herein.

RAI # 6:

Please provide specific justification for the claim made in the final sentence of page 4, based on Statement of Considerations for the Final Rule:

“Specifically, the underlying purpose of the rule has been adequately served in responding to the actual event on June 6, 2010.”

Response:

As stated in the response to RAI # 1, Detroit Edison is no longer relying on the response to the actual event as a basis for meeting the requirement of the biennial exercise. Therefore, this RAI is no longer relevant to the exemption request.

RAI # 7:

Please explain how the granting of this exemption would, as stated in 10 CFR 50.12(a)(2)(v), “provide only temporary relief from the applicable regulation...”

Response:

The exemption as currently requested is for a temporary scheduling relief from the requirement of conducting an exercise in calendar year 2010 and requests its postponement until 2011. An exercise will continue to be required in calendar year 2012 and biennially thereafter.

**Enclosure 2 to
NRC-10-0074**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

Drill Critique Summaries

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

45a	08/06/08	Robin L. Zipfel
Scenario #	Date Implemented	Drill Coordinator
#4	Red	
Control Room Shift	ERO Team	

B. All Overall Drill/Exercise Objectives Met? Yes No

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<i>S</i>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	S
A3	Develop an effective mitigation and response strategy.	S
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<i>S</i>
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	S
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<i>S</i>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<i>S</i>
E1	Demonstrate timely and accurate initial notifications of plant events.	S
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
<i>F</i>	<i>Emergency Communication System – Planning Standard</i>	<i>S</i>
F1	Demonstrate effective inter- and intra-facility communications.	S
F2	Demonstrate effective logkeeping.	S
<i>H</i>	<i>Emergency Facilities and Equipment – Planning Standard</i>	<i>S</i>

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

45a	09/24/08	Robin L. Zipfel
Scenario #	Date Implemented	Drill Coordinator
#1	Blue	
Control Room Shift	ERO Team	

B. All Overall Drill/Exercise Objectives Met? Yes No

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<i>S</i>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	S
A3	Develop an effective mitigation and response strategy.	S
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<i>S</i>
B1	Demonstrate activation of the Emergency Response Organization.	S
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	S
<i>C</i>	<i>Emergency Response Support And Resources</i>	<i>S</i>
C3	Demonstrate the ability to activate the State and County Liaisons.	S
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<i>S</i>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<i>S</i>
E1	Demonstrate timely and accurate initial notifications of plant events.	S
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
E3	Demonstrate the ability to perform prompt, information notifications to the NRC.	S

DRILL/EXERCISE CRITIQUE SUMMARY

B. All Overall Drill/Exercise Objectives (continued)

<i>F</i>	<i>Emergency Communication System – Planning Standard</i>	<i>S</i>
F1	Demonstrate effective inter- and intra-facility communications.	S
F2	Demonstrate effective logkeeping.	S
<i>G</i>	<i>Public Education and information</i>	<i>S</i>
G1	Demonstrate effective rumor control.	S
G2	Demonstrate the ability to conduct effective news media briefings.	S
G3	Demonstrate proper response to technical questions from the media.	S
G4	Demonstrate adequate security controls for the facility.	S
<i>H</i>	<i>Emergency Facilities and Equipment – Planning Standard</i>	<i>S</i>
H1	Demonstrate effective turnover(s) of responsibilities between emergency response facilities.	S
H2	Demonstrate timely and effective status board updates.	S
H3	Demonstrate the ability to inspect, inventory, and use of E-kits.	S
H4	Demonstrate adequate preparation and use of damage control teams.	S
H5	Demonstrate the ability to obtain current and forecast meteorological data.	S
<i>I</i>	<i>Accident Assessment – Planning Standard</i>	<i>S</i>
I1	Demonstrate accurate and timely dose assessment operations.	S
I2	Demonstrate effective operations of the IPCS/SPDS system.	S
I3	Demonstrate timely activation and dispatch on-site and off-site RETs.	S
I5	Demonstrate effective plume tracking operations.	S
I6	Demonstrate the performance and evaluation of portable air samples.	S
<i>J</i>	<i>Protective Response – Planning Standard</i>	<i>S</i>
J1	Recognize when to activate the on-site alarm system.	S
J2	Formulate on-site protective actions.	S
J3	Demonstrate the ability to perform Assembly and Accountability in a timely manner.	S
J4	Formulate timely and accurate offsite protective action recommendations.	S
J6	Demonstrate the ability to establish and implement appropriate radiological controls.	S

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

<u>39</u> Scenario #	<u>03/04/09</u> Date Implemented	<u>Robin L. Zipfel</u> Drill Coordinator
<u>#4</u> Control Room Shift	<u>Red</u> ERO Team	

B. All Overall Drill/Exercise Objectives Met? Yes No

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<i>S</i>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	S
A3	Develop an effective mitigation and response strategy.	S
A4	Identify and obtain emergency support resources	N/O
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<i>S</i>
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	S
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<i>S</i>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<i>S</i>
E1	Demonstrate timely and accurate initial notifications of plant events.	S
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
E3	Demonstrate the ability to perform prompt, information notifications to the NRC.	S

DRILL/EXERCISE CRITIQUE SUMMARY

B. All Overall Drill/Exercise Objectives (continued)

<i>F</i>	<i>Emergency Communication System – Planning Standard</i>	<i>S</i>
F1	Demonstrate effective inter- and intra-facility communications.	S
F2	Demonstrate effective logkeeping.	S
<i>G</i>	<i>Public Education and information</i>	<i>S</i>
G2	Demonstrate the ability to conduct effective news media briefings.	S
G3	Demonstrate proper response to technical questions from the media.	S
<i>H</i>	<i>Emergency Facilities and Equipment – Planning Standard</i>	<i>S</i>
H1	Demonstrate effective turnover(s) of responsibilities between emergency response facilities.	S
H2	Demonstrate timely and effective status board updates.	S
H3	Demonstrate the ability to inspect, inventory, and use of E-kits.	S
H4	Demonstrate adequate preparation and use of damage control teams.	S
H5	Demonstrate the ability to obtain current and forecast meteorological data.	S
<i>I</i>	<i>Accident Assessment – Planning Standard</i>	<i>S</i>
I1	Demonstrate accurate and timely dose assessment operations.	S
I2	Demonstrate effective operations of the IPCS/SPDS system.	S
I3	Demonstrate timely activation and dispatch on-site and off-site RETs.	S
I5	Demonstrate effective plume tracking operations.	S
I6	Demonstrate the performance and evaluation of portable air samples.	S
<i>J</i>	<i>Protective Response – Planning Standard</i>	<i>S</i>
J1	Recognize when to activate the on-site alarm system.	S
J2	Formulate on-site protective actions.	S
J4	Formulate timely and accurate offsite protective action recommendations.	S
J6	Demonstrate the ability to establish and implement appropriate radiological controls.	S

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

40a	05/19/09	Robin L. Zipfel
Scenario #	Date Implemented	Drill Coordinator
#5	Red	
Control Room Shift	ERO Team	

B. All Overall Drill/Exercise Objectives Met? Yes No

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<i>S</i>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	S
A3	Develop an effective mitigation and response strategy.	S
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<i>S</i>
B1	Demonstrate activation of the Emergency Response Organization	S
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	S
<i>C</i>	<i>Emergency Response Support and Resources</i>	<i>N/A</i>
C3	Demonstrate the ability to activate the State and County Liaisons	N/A
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<i>S</i>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<i>S</i>
E1	Demonstrate timely and accurate initial notifications of plant events.	U
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
E3	Demonstrate the ability to perform prompt, information notifications to the NRC.	S

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

46	07/14/09	Robin L. Zipfel
Scenario #	Date Implemented	Drill Coordinator
#3	Gold	
Control Room Shift	ERO Team	

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<i>S</i>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	S
A3	Develop an effective mitigation and response strategy.	S
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<i>S</i>
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	S
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<i>S</i>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<i>S</i>
E1	Demonstrate timely and accurate initial notifications of plant events.	S
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
E3	Demonstrate the ability to perform prompt, information notifications to the NRC.	S
<i>F</i>	<i>Emergency Communication System – Planning Standard</i>	<i>S</i>
F1	Demonstrate effective inter- and intra-facility communications.	S
F2	Demonstrate effective logkeeping.	S
<i>H</i>	<i>Emergency Facilities and Equipment – Planning Standard</i>	<i>S</i>
H1	Demonstrate effective turnover(s) of responsibilities between emergency response facilities.	S

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

<u>43</u> Scenario #	<u>08/18/09</u> Date Implemented	<u>Robin L. Zipfel</u> Drill Coordinator
<u>#3</u> Control Room Shift	<u>Green</u> ERO Team	

B. All Overall Drill/Exercise Objectives Met? Yes No

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<u>S</u>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	U
A3	Develop an effective mitigation and response strategy.	S
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<u>U</u>
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	U
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<u>S</u>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<u>U</u>
E1	Demonstrate timely and accurate initial notifications of plant events.	U
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
E3	Demonstrate the ability to perform prompt, information notifications to the NRC.	S
<i>F</i>	<i>Emergency Communication System – Planning Standard</i>	<u>S</u>
F1	Demonstrate effective inter- and intra-facility communications.	S
F2	Demonstrate effective logkeeping.	S

DRILL/EXERCISE CRITIQUE SUMMARY

<i>G</i>	<i>Public Education and Information – Planning Standard</i>	<u>U</u>
G2	Demonstrate the ability to conduct effective news media briefings.	U
G3	Demonstrate proper response to technical questions from the media.	S
<i>H</i>	<i>Emergency Facilities and Equipment – Planning Standard</i>	<u>U</u>
H1	Demonstrate effective turnover(s) of responsibilities between emergency response facilities.	U
H2	Demonstrate timely and effective status board updates.	U
H3	Demonstrate the ability to inspect, inventory, and use of E-kits.	S
H4	Demonstrate adequate preparation and use of damage control teams.	S
H5	Demonstrate the ability to obtain current and forecast meteorological data.	S
<i>I</i>	<i>Accident Assessment – Planning Standard</i>	<u>S</u>
I1	Demonstrate accurate and timely dose assessment operations.	S
I2	Demonstrate effective operations of the IPCS/SPDS system.	S
I3	Demonstrate timely activation and dispatch on-site and off-site RETs.	S
I5	Demonstrate effective plume tracking operations.	S
I6	Demonstrate the performance and evaluation of portable air samples.	S
<i>J</i>	<i>Protective Response – Planning Standard</i>	<u>U</u>
J1	Recognize when to activate the on-site alarm system	S
J2	Formulate on-site protective actions.	U
J4	Formulate timely and accurate offsite protective action recommendations.	U
J6	Demonstrate the ability to establish and implement appropriate radiological controls.	S
<i>K</i>	<i>Radiological Exposure Controls - Planning Standard</i>	<u>S</u>
K1	Demonstrate the ability to apply the emergency exposure guidelines of EP-201-03.	S
K2	Demonstrate the ability to program emergency dose extensions into electronic dosimetry devices.	S

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

<u>43</u>	<u>08/25/09</u>	<u>Robin L. Zipfel</u>
Scenario #	Date Implemented	Drill Coordinator
<u>#4</u>	<u>Green</u>	
Control Room Shift	ERO Team	

B. All Overall Drill/Exercise Objectives Met? Yes No

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<u>S</u>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	S
A3	Develop an effective mitigation and response strategy.	S
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<u>S</u>
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	S
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<u>S</u>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<u>S</u>
E1	Demonstrate timely and accurate initial notifications of plant events.	S
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
E3	Demonstrate the ability to perform prompt, information notifications to the NRC.	S
<i>F</i>	<i>Emergency Communication System – Planning Standard</i>	<u>S</u>
F1	Demonstrate effective inter- and intra-facility communications.	S
F2	Demonstrate effective logkeeping.	S

DRILL/EXERCISE CRITIQUE SUMMARY

<i>G</i>	<i>Public Education and Information – Planning Standard</i>	<u>S</u>
G1	Demonstrate the ability to conduct effective news media briefings.	S
G2	Demonstrate proper response to technical questions from the media.	S
<i>H</i>	<i>Emergency Facilities and Equipment – Planning Standard</i>	<u>S</u>
H1	Demonstrate effective turnover(s) of responsibilities between emergency response facilities.	S
H2	Demonstrate timely and effective status board updates.	S
H3	Demonstrate the ability to inspect, inventory, and use of E-kits.	S
H4	Demonstrate adequate preparation and use of damage control teams.	S
H5	Demonstrate the ability to obtain current and forecast meteorological data.	S
<i>I</i>	<i>Accident Assessment – Planning Standard</i>	<u>S</u>
I1	Demonstrate accurate and timely dose assessment operations.	S
I2	Demonstrate effective operations of the IPCS/SPDS system.	S
I3	Demonstrate timely activation and dispatch on-site and off-site RETs.	S
I5	Demonstrate effective plume tracking operations.	S
I6	Demonstrate the performance and evaluation of portable air samples.	S
<i>J</i>	<i>Protective Response – Planning Standard</i>	<u>S</u>
J1	Recognize when to activate the on-site alarm system	S
J2	Formulate on-site protective actions.	S
J4	Formulate timely and accurate offsite protective action recommendations.	S
J6	Demonstrate the ability to establish and implement appropriate radiological controls.	S
<i>K</i>	<i>Radiological Exposure Controls - Planning Standard</i>	<u>S</u>
K1	Demonstrate the ability to apply the emergency exposure guidelines of EP-201-03.	S
K2	Demonstrate the ability to program emergency dose extensions into electronic dosimetry devices.	S

DRILL/EXERCISE CRITIQUE SUMMARY

PART 1: Administrative Summary

A. Drill/Exercise Implementation

<u>47</u>	<u>12/09/09</u>	<u>Robin L. Zipfel</u>
Scenario #	Date Implemented	Drill Coordinator
<u>#4</u>	<u>Blue</u>	
Control Room Shift	ERO Team	

Obj. #	Objective description	Assessment
<i>A</i>	<i>Assignment and Responsibility - Planning Standard</i>	<i>S</i>
A1	Demonstrate the ability to establish and maintain priorities for the emergency response effort.	S
A2	Provide effective periodic briefings throughout the emergency.	S
A3	Develop an effective mitigation and response strategy.	S
A4	Identify and obtain emergency support resources.	S
<i>B</i>	<i>Onsite Emergency Organization - Planning Standard</i>	<i>S</i>
B2	Demonstrate the ability to staff the (<i>Emergency Response Facility</i>) in a timely manner.	S
<i>C</i>	<i>Emergency Response Support and Resources - Planning Standard</i>	<i>S</i>
C1	Demonstrate the ability to activate the State and County Liaisons.	S
<i>D</i>	<i>Emergency Classification System - Planning Standard</i>	<i>S</i>
D1	Demonstrate the ability to accurately classify simulated plant conditions in a timely manner.	S
<i>E</i>	<i>Notification Methods and Procedures - Planning Standard</i>	<i>S</i>
E1	Demonstrate timely and accurate initial notifications of plant events.	U
E2	Demonstrate the ability to provide informative and timely follow-up notifications to offsite authorities.	S
E3	Demonstrate the ability to perform prompt, information notifications to the NRC.	S
<i>F</i>	<i>Emergency Communication System - Planning Standard</i>	<i>S</i>
F1	Demonstrate effective inter- and intra-facility communications.	S
F2	Demonstrate effective logkeeping.	S

G	<i>Public Education and information - Planning Standard</i>	S
G1	Demonstrate effective rumor control.	NO
G2	Demonstrate the ability to conduct effective news media briefings.	S
G3	Demonstrate proper response to technical questions from the media.	NO
H	<i>Emergency Facilities and Equipment – Planning Standard</i>	S
H1	Demonstrate effective turnover(s) of responsibilities between emergency response facilities.	S
H2	Demonstrate timely and effective status board updates.	S
H3	Demonstrate the ability to inspect, inventory, and use of E-kits.	S
H4	Demonstrate adequate preparation and use of damage control teams.	S
H5	Demonstrate the ability to obtain current and forecast meteorological data.	S
I	<i>Accident Assessment – Planning Standard</i>	S
I2	Demonstrate effective operations of the IPCS/SPDS system.	S
I3	Demonstrate timely activation and dispatch on-site and off-site RETs.	S
I6	Demonstrate the performance and evaluation of portable air samples.	S
J	<i>Protective Response – Planning Standard</i>	S
J1	Recognize when to activate the on-site alarm system	S
J2	Formulate on-site protective actions.	S
J3	Demonstrate the ability to perform Assembly and Accountability in a timely manner.	S
J4	Formulate timely and accurate offsite protective action recommendations.	S*
J6	Demonstrate the ability to establish and implement appropriate radiological controls.	S
K	<i>Radiological Exposure Controls - Planning Standard</i>	S
K1	Demonstrate the proper personnel decontamination.	S
L	<i>Medical Support - Planning Standard</i>	S
L1	Demonstrate effective response to a potentially radiological medical emergency.	S
L2	Demonstrate completion of a body map.	S

* - PAR was assessed as satisfactory. Although the areas for the PAR were correct, the basis for the PAR was incorrect. This does not meet station expectations for excellence. CARD 09-29792

L3	Demonstrate proper assistance to medical personnel leaving the Radiological Emergency Area.	S
L4	Demonstrate the proper transfer of a potentially contaminated, injured patient to an ambulance.	S
N	<i>Human Performance - Planning Standard</i>	S
N1	Job Briefs	S
N2	Self Checking	S
N3	Verification Techniques	S
N4	Effective Communication	S
N5	Questioning Attitude	S
N6	Procedure Use and Adherence	S
LO	<i>NEI 06-04 Hostile Action Based Drill Limited Objectives - Planning Standard</i>	S
LO1	Demonstrate the ability to implement the emergency plan during a hostile action-based event	S
L02	Demonstrate the ability to make initial notifications to law enforcement and other first responder agencies during a hostile action-based event	S
L03	Demonstrate the ability to make accelerated NRC notifications.	S
L04	Demonstrate the ability of on-shift operations and security personnel to coordinate response actions among themselves, the IC and with law enforcement.	S
L05	Demonstrate the ability of operations and security personnel to coordinate responses by on-and off-site first responders (e.g. fire and medical response) after the threat is neutralized and prior to activation of ERO facilities.	S
L06	Demonstrate the ability to mobilize the ERO in a timely manner following threat neutralization.	S
L07	Demonstrate the ability of the site and the ERO to support activation and operation of an ICP.	S
L08	Demonstrate the ability of the ERO to coordinate in-plant and on-site response actions with security and the ICP.	S
L09	Demonstrate the ability to coordinate and conduct fire and medical responses in the field.	S
L10	Demonstrate the ability to account for on-site personnel once the threat is neutralized.	S
L11	Demonstrate Radiation protection for off-site responders.	S
L12	Demonstrate the ability to perform an assessment of off-site radiological consequences from a projected release.	S

