The Detroit Edison Company
One Energy Plaza, Detroit, MI 48226-1279

10 CFR 26
10 CFR 52.79

December 16, 2010
NRC3-10-0057

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

References: 1) Fermi 3
Docket No. 52-033
2) Letter from Jerry Hale (USNRC) to Jack M. Davis (Detroit Edison), "Request for Additional Information Letter No. 48 Related to the SRP Section 13.3 and 13.07 for the Fermi 3 Combined License Application," dated November 23, 2010

Subject: Detroit Edison Company Response to NRC Request for Additional Information (RAI) Letter No. 48

In Reference 2, the NRC requested additional information to support the review of certain portions of the Fermi 3 Combined License Application (COLA). The responses to the RAIs are provided in Attachments 1 through 5 of this letter. Information contained in this response will be incorporated into a future COLA submission as described in the attachments.

If you have any questions, or need additional information, please contact me at (313) 235-3341.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 16th day of December 2010.

Sincerely,

Peter W. Smith, Director
Nuclear Development – Licensing & Engineering
Detroit Edison Company

D095
NRO

Attachments: 1) Response to RAI Letter No. 48, RAI Question No. 13.07-1
2) Response to RAI Letter No. 48, RAI Question No. 13.07-2
3) Response to RAI Letter No. 48, RAI Question No. 13.07-3
4) Response to RAI Letter No. 48, RAI Question No. 13.07-4
5) Response to RAI Letter No. 48, RAI Question No. 13.03-56

cc: Adrian Muniz, NRC Fermi 3 Project Manager
Jerry Hale, NRC Fermi 3 Project Manager
Bruce Olson, NRC Fermi 3 Environmental Project Manager
Fermi 2 Resident Inspector
NRC Region III Regional Administrator
NRC Region II Regional Administrator
Supervisor, Electric Operators, Michigan Public Service Commission
Michigan Department of Natural Resources & Environment
Radiological Protection Section

Attachment 1
NRC3-10-0057

Response to RAI Letter No. 48
(eRAI Tracking No. 5244)

RAI Question No. 13.07-1

NRC RAI 13.07-1

Under 10 CFR 52.79(a)(44), the Applicant's FSAR must contain a description of the fitness for duty (FFD) program required by 10 CFR Part 26 and its implementation. How does the Applicant intend to update its FFD program for the construction phase? NEI 06-06 provides examples of FFD programs and, if this guidance is endorsed by the NRC, will provide an acceptable method of complying with the NRC's regulations. If the NRC endorses NEI 06-06, does the Applicant intend to update its FFD program for the construction phase to comply with NEI 06-06? If future revisions to NEI 06-06 are endorsed by the NRC, does the Applicant intend to update its FFD program for the construction phase to comply with certain clarifications, additions, and exceptions in these future, endorsed revisions, as necessary?

Response

Detroit Edison will implement a construction phase Fitness for Duty (FFD) program that follows the guidance in the NRC-endorsed revision of NEI 06-06. The Fermi 3 FSAR, Section 13.7 does not commit to a specific revision of NEI 06-06, but will be updated to commit to Revision 5 of NEI 06-06. Detroit Edison will evaluate changes in subsequent revisions of NEI 06-06 and modify the construction phase FFD program to incorporate substantial changes determined to be appropriate.

Proposed COLA Revision

Fermi 3 FSAR Table 1.6-201 and Section 13.7 will be revised as described above. The FSAR markups for this response and the responses to RAIs 13.07-2, 13.07-3 and 13.07-4 are attached.

Markup of Detroit Edison COLA
(following 7 pages)

The following markup represents how Detroit Edison intends to reflect this RAI response in a future submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

Table 1.6-201 Referenced Topical Reports [EF3 SUP 1.6-1]

Report No.	Title	Section No.
NEI 06-13A	Nuclear Energy Institute, "Technical Report on Template for an Industry Training Program Description," NEI 06-13A, Revision 1, March 2008	Appendix 13 BB
NEI 06-14A	Nuclear Energy Institute, "Quality Assurance Program Description," NEI 06-14A, Revision 4, July 2007	17.5
NEI 07-02A	Nuclear Energy Institute, "Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed under 10 CFR Part 52," NEI 07-02A, March 2008	17.6
NEI 07-03	Nuclear Energy Institute, "Generic FSAR Template Guidance for Radiation Protection Program Description," NEI 07-03, Revision 3, October 2007	Appendix 12 BB
NEI 07-08	Nuclear Energy Institute, "Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are As Low As Is Reasonably Achievable (ALARA)," NEI 07-08, Revision 0, September 2007	Appendix 12 AA
NEI 07-09A	Nuclear Energy Institute, "Generic FSAR Template Guidance for Offsite Dose Calculation Manual (ODCM) Program Description," NEI 07-09A, Revision 0, March 2009	11.5
NEI 07-10A	Nuclear Energy Institute, "Generic FSAR Template Guidance for Process Control Program (PCP)," NEI 07-10A, Revision 0, March 2009	11.4
NEI 06-12	Nuclear Energy Institute, "B.5.b. Phase 2 & 3 Submittal Guideline," NEI 06-12, Revision 3, September 2009	13.6
NEI 08-09	Nuclear Energy Institute, "Cyber Security Plan for Nuclear Power Reactors", NEI 08-09, Revision 3, September 2009	13.6
ST-56834/P	General Electric Company, "ESBWR Steam Turbine - Low Pressure Rotor Missile Generation Probability Analysis," ST-56834/P, Revision 1, June 17, 2009	10.2
NEI 06-06	Nuclear Energy Institute, "Fitness for Duty Program Guidance for New Nuclear Power Plant Construction Sites," NEI 06-06, Revision 5, August 2009	13.7

Table 13.4-201 Operational Programs Required by NRC Regulations (Sheet 6 of 8) [STD COL 13.4-1-A] [STD COL 13.4-2-A]

Item	Program Title	Program Source (Required by)	Section	Implementation	
				Milestone	Requirement
		10 CFR 73.56 10 CFR 73.57			
	Safeguards Contingency Program	10 CFR 52.79(a)(36) 10 CFR 73.55 10 CFR 73, Appendix C	13.6	Prior to fuel receipt	License Condition **[COM 13.4-017]**
	Training and Qualification Program	10 CFR 73, Appendix B	13.6	Prior to fuel receipt	License Condition **[COM 13.4-017]**
	Cyber Security Plan	10 CFR 73.54 10 CFR 73.55 10 CFR 52.79(a)(36)	13.6	Prior to fuel receipt	License Condition **[COM 13.4-032]**
	~~Fitness for Duty (Construction - Mgt & Oversight personnel)~~	~~10 CFR 26, Subparts A-H, N, and O~~	~~13.7~~	~~Prior to on-site construction of safety- or security-related SSCs~~	~~License Condition **[COM 13.4-018]**~~
	~~Fitness for Duty (Construction - Workers & First Line Supv.)~~	~~10 CFR 26 Subpart K~~	~~13.7~~	~~Prior to on-site construction of safety- or security-related SSCs~~	~~License Condition **[COM 13.4-018]**~~
	~~Fitness for Duty (Operation)~~	~~10 CFR 26~~	~~13.7~~	~~Prior to fuel receipt~~	~~License Condition **[COM 13.4-019]**~~
	(portions applicable to SNM)	10 CFR 30.32 10 CFR 40.31	13.6	Prior to initial receipt of byproduct source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18)	10 CFR 30.32(a) 10 CFR 40.31(a) **[COM 13.4-030]**

Insert 1 here

Insert 1:

Program Title	Program Source (required by)	Section	Implementation Milestone	Implementation Requirement
FFD Program for Construction (Workers and First Line Supervisors)	10 CFR 26.4(f)	13.7	Prior to initiating 10 CFR 26 construction activities	10 CFR 26, Subpart K **[COM 13.4-018]**
FFD Program for Construction (Management and Oversight Personnel)	10 CFR 26.4(e)	13.7	Prior to initiating 10 CFR 26 construction activities	10 CFR 26, Subparts A through H, N and O **[COM 13.4-018]**
FFD Program for Security Personnel	10 CFR 26.4(e)(1)	13.7	Prior to initiating 10 CFR 26 construction activities	10 CFR 26, Subparts A through H, N and O **[COM 13.4-018]**
	10 CFR 26.4(a)(5)		Prior to the earlier of: a. Receipt of SNM in the form of fuel assemblies, b. Establishment of a PA, or c. 10 CFR 52.103(g) finding	10 CFR 26, Subparts A through I, N and O **[COM 13.4-019]**
FFD Program for FFD Program Personnel	10 CFR 26.4(g)	13.7	Prior to initiating 10 CFR 26 construction activities	10 CFR 26, Subparts A, B, D through H, N, O and C per licensee's discretion **[COM 13.4-018]**
FFD Program for Individuals Required to Physically Report to the TSC or EOF	10 CFR 26.4(c)	13.7	Prior to the conduct of the first full participation emergency preparedness exercise under 10 CFR 50, Appendix E, Section F.2.a	10 CFR 26, Subparts A through I, N and O, except for 10 CFR 26.205 through 10 CFR 26.209 **[COM 13.4-041]**

Program Title	Program Source (required by)	Section	Implementation Milestone	Implementation Requirement
FFD Program for Operation	10 CFR 26.4(a) and 10 CFR 26.4(b)	13.7	Prior to the earlier of: a. Receipt of SNM in the form of fuel assemblies, a. Establishment of a PA, or b. 10 CFR 52.103(g) finding	10 CFR 26, Subparts A through I, N and O, except for individuals listed in 10 CFR 26.4(b) who are not subject to 10 CFR 26.205 through 10 CFR 26.209 **[COM 13.4-019]**

13.6-16-A **External Bullet Resisting Enclosures**

EF3 COL 13.6-16-A This COL item is addressed in Subsection 13.6.2

13.6-17-A **Site-Specific Locations of Security Barriers**

EF3 COL 13.6-17-A This COL item is addressed in Subsection 13.6.2

13.6-18-A **Ammunition for Armed Responders**

STD COL 13.6-18-A This COL item is addressed in Subsection 13.6.2

13.6-19-A **Site-Specific Update of the ESBWR Safeguards Assessment Report**

STD COL 13.6-19-A This COL item is addressed in Subsection 13.6.2

13.7 Fitness for Duty

~~STD~~ SUP 13.7-1

EF3

Insert 2 Here

~~The Fitness-for-Duty (FFD) Program is implemented and maintained in two phases: the construction phase program and the operating phase program. The construction phase program is consistent with NEI 06-06 (Reference 13.7-201), which is currently under NRC review. The construction phase program is implemented, as identified in Table 13.4-201, prior to on-site construction of safety- or security-related SSCs. The operations phase program is consistent with NEI 03-01 (Reference 13.7-201), which is currently under NRC review. The operations phase program is implemented prior to fuel receipt, as identified in Table 13.4-201.~~

References

13.7-201 Nuclear Energy Institute (NEI) "Fitness for Duty Program Guidance for New Nuclear Power Plant Construction Sites," NEI 06-06, Revision 5, August 2009

~~13.7-202 Nuclear Energy Institute (NEI) "Nuclear Power Plant Access Authorization Program," NEI 03-01.~~

EF3 COL 13.1-1-A

Appendix 13AA Design and Construction Responsibilities

13AA.1 **Design and Construction Activities**

Detroit Edison has substantial experience in the design, construction, and operation of nuclear power plants and substantial experience in activities of similar scope and complexity. Detroit Edison was responsible for the design and construction activities associated with Fermi 2. Detroit Edison oversaw the activities of a number of engineering, design and construction companies, including General Electric Company, Sargent &

Insert 2:

The Fitness for Duty (FFD) Program is implemented and maintained in multiple and progressive phases dependent on the activities, duties, or access afforded to certain individuals at the construction site. In general, two different FFD programs will be implemented: a construction phase FFD program and an operating phase FFD program. The construction and operating phase programs are implemented as identified in Table 13.4-201.

The construction phase FFD program is consistent with NEI 06-06 (Reference 13.7-201). NEI 06-06 applies to persons constructing or directing the construction of safety- and security-related structures, systems, or components performed onsite where the new reactor will be installed and operated. Management and oversight personnel, as further described in NEI 06-06, and security personnel prior to the receipt of special nuclear material in the form of fuel assemblies (with certain exceptions) will be subject to the operating phase FFD program that meets the requirements of 10 CFR Part 26, Subparts A through H, N, and O. Following the receipt of special nuclear material onsite in the form of fuel assemblies, security personnel as described in 10 CFR 26.4(a)(5) will meet the requirements of an operating phase FFD program. **[START COM 13.7-001]** Prior to the issuance of a Combined License for Fermi 3, Detroit Edison will review and revise, as necessary, the Fermi 3 construction phase FFD program, should substantial revisions occur to either NEI 06-06 following NRC endorsement, or to the requirements of 10 CFR Part 26**[END COM 13.7-001]**.

The following site-specific information is provided:

- The construction site area will be defined in the Construction Security Plan and will be under the control of the Engineering, Procurement and Construction (EPC) Contractor. The 10 CFR Part 26 requirements will be implemented for the construction site area based on the descriptions provided in Table 13.4-201.

- Construction Workers & First Line Supervisors (EPC Contractor employees and subcontractors) are covered by a Detroit Edison approved EPC Contractor FFD Program (elements Subpart K).

- Detroit Edison employees and Detroit Edison subcontractor's construction management and oversight personnel are covered by a Detroit Edison Operations FFD Program and EPC Contractor employees and subcontractors, construction management, and oversight personnel will be covered by a Detroit Edison approved EPC Contractor FFD Program (elements Subpart A through H, N and O).

- Detroit Edison security personnel are covered by a Detroit Edison Operations FFD Program and the EPC Contractor security personnel are covered by a Detroit Edison approved EPC Contractor FFD Program (elements Subpart A through H, N and O). This coverage is applicable from the start of construction activities to the earlier of (1) the receipt of Special Nuclear Material (SNM) in the form of fuel assemblies, or (2) the establishment of a Protected Area (PA), or (3) the 10 CFR 52.103(g) finding.

- Detroit Edison FFD Program personnel are covered by a Detroit Edison Operations FFD Program and the EPC Contractor's FFD Program personnel will be covered by a Detroit Edison approved EPC Contractor FFD Program (elements Subpart A through H, N and O).

- Detroit Edison security personnel protecting fuel assemblies are covered by a Detroit Edison Operations FFD Program (elements Subpart A through I, N and O).

- Personnel required to physically report to the Technical Support Center (TSC) or Emergency Operations Facility (EOF) when that requirement is in effect are covered by a Detroit Edison Operations FFD Program.

The operations phase FFD program is consistent with all applicable subparts of 10 CFR Part 26.

Attachment 2
NRC3-10-0057

Response to RAI Letter No. 48
(eRAI Tracking No. 5244)

RAI Question No. 13.07-2

NRC RAI 13.07-2

Under 10 CFR 52.79(a)(44), the Applicant's FSAR must contain a description of the fitness for duty (FFD) program required by 10 CFR Part 26 and its implementation. Describe how the COL Application, FSAR, Part 2, Table 13.4-201, (Sheet 13-43), comports with 10 CFR 26, Sections 26.3 and 26.4, and guidance in NRC's letter to the Nuclear Energy Institute dated December 2, 2009, entitled "Status of U.S. Nuclear Regulatory Commission Review and Endorsement of NEI 06-06, "Fitness for Duty Program Guidance for New Nuclear Power Plant Construction Sites"? In particular, provide site specific information to clearly and sufficiently describe your operational FFD program, in terms of the scope and level of detail to allow as reasonable assurance of finding of acceptability. For example, will Fermi 3 base its Section 26.4(a) and (b) FFD program for Behavioral Observation Program and drug and alcohol testing on an operational unit program or develop its own specific program? Please describe substantial differences, if any.

Response

The guidance contained in the NRC's letter to the Nuclear Energy Institute (NEI) dated December 2, 2009 was reviewed. Information will be incorporated into Table 13.4-201 and Section 13.7 of the Fermi 3 FSAR consistent with the guidance.

Proposed COLA Revision

Fermi 3 FSAR Table 13.4-201 and Section 13.7 will be revised as described above. The FSAR markup is contained in the response to RAI 13.07-1.

Attachment 3
NRC3-10-0057

Response to RAI Letter No. 48
(eRAI Tracking No. 5244)

RAI Question No. 13.07-3

NRC RAI 13.07-3

Under 10 CFR 52.79(a)(44), the Applicant's FSAR must contain a description of the fitness for duty (FFD) program required by 10 CFR Part 26 and its implementation. In the COL Application, FSAR, Part 2, STD SUP 13.7-1, the Applicant states that the operations phase FFD program is consistent with NEI 03-01. Considering the recent amendment to 10 CFR Part 26, published on March 31, 2008, does the Applicant still intend to reference NEI 03-01 for the operations FFD program, instead of 10 CFR Part 26, which the Applicant referenced in the FSAR, Part 2, Table 13.4-201?

Response

The basis for the Fermi 3 FFD program is contained in 10 CFR Part 26. Reference to NEI 03-01 will be removed from Section 13.7 of the Fermi 3 FSAR.

Proposed COLA Revision

Fermi 3 FSAR Section 13.7 will be revised as described above. The FSAR markup is contained in the response to RAI 13.07-1.

Attachment 4
NRC3-10-0057

Response to RAI Letter No. 48
(eRAI Tracking No. 5244)

RAI Question No. 13.07-4

NRC RAI 13.07-4

Under 10 CFR 52.79(a)(44), the Applicant's FSAR must contain a description of the fitness for duty (FFD) program required by 10 CFR Part 26 and its implementation. Describe why the licensee is proposing license conditions for FFD when Part 26 provides explicit implementation requirements.

Response

The basis for the Fermi 3 FFD program is contained in 10 CFR Part 26. Reference to a license condition will be removed from Table 13.4-201 of the Fermi 3 FSAR.

Proposed COLA Revision

Fermi 3 FSAR Table 13.4-201 will be revised as described above. The FSAR markup is contained in the response to RAI 13.07-1.

Attachment 5
NRC3-10-0057

Response to RAI Letter No. 48
(eRAI Tracking No. 5247)

RAI Question No. 13.03-56

NRC RAI 13.03-56

In response to Emergency Action Level (EAL) RAI 13.03-17, Detroit Edison (DTE) chose to follow Option 2 for the Fermi 3 Combined License Emergency Plan. Option 2 requires the applicant to submit an emergency plan section that describes the emergency classification system and addresses four critical elements required for an EAL scheme. DTE's four EAL definitions for Critical Element 1 are not consistent with definitions described in NEI 99-01, Revision 5, or the attached marked up pages showing corrections made to the EAL section of the plan. Revise the plan section D.1 "Classification System" description of the four emergency classification levels to be consistent with NEI 99-01, Revision 5 or, provide an acceptable justification for why this is not needed.

Response

The Emergency Action Level (EAL) definitions contained in Revision 2 of the Fermi 3 Emergency Plan have minor editorial differences from those contained in NEI 99-01, Revision 5 (and, more appropriately, NEI 07-01, Revision 0). The definitions in Revision 2 of the Fermi 3 Emergency Plan are exactly as they were proposed in the Detroit Edison response to NRC Request for Additional Information (RAI) 13.03-17.

The inconsistencies between the EAL definitions contained in Revision 2 of the Fermi 3 Emergency Plan and NEI 07-01, Revision 0 (or NEI 99-01, Revision 5) are not substantial. However, Detroit Edison will revise the definitions to be more consistent with NEI 07-01, Revision 0 while maintaining editorial consistency throughout the Fermi 3 Emergency Plan.

Proposed COLA Revision

The EAL definitions contained in Section D.1 of the Fermi 3 Emergency Plan are revised as described above. The markup of the Fermi 3 Emergency Plan for this response is attached.

Markup of Detroit Edison COLA
(following 4 pages)

The following markup represents how Detroit Edison intends to reflect this RAI response in a future submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

D. Emergency Classification System

This section describes the emergency classification and emergency action level scheme used to determine the minimum response to an abnormal event at Fermi 3. Detroit Edison has developed a standard emergency classification and action level scheme, based on system and effluent parameters, on which affected State and local response organizations may rely for determining initial offsite response measures.

1. Classification System

The emergency classification system is based on the four emergency classes described in 10 CFR 50, Appendix E. The Emergency Plan provides for classification of emergencies into four (4) categories or conditions covering the postulated spectrum of emergency situations and include: Notification of Unusual Event (referred to as Unusual Event), Alert, Site Area Emergency, and General Emergency. Each classification is characterized by EALs or event Initiating Conditions (ICs) and address emergencies of increasing severity.

A general description and the purpose of each classification level are provided in Sections A through D. The actions required by the licensee and by the state and/or local offsite authorities are also given for each emergency class.

Notification of

a. Unusual Event (NOUE)

Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

The purpose of this classification is to bring the response personnel and offsite agencies to a state of readiness in the event of escalation to a more severe action level classification, and to provide for systematic handling of event information and related decision making.

Detroit Edison Actions:

1. Inform state and local offsite authorities of the nature of the unusual condition within 15 minutes following classification and notify the Nuclear Regulatory Commission (NRC) as soon as possible but within one hour.
2. Augment on-shift resources as needed
3. Assess and respond.
4. Escalate to a more severe class, if appropriate, or
5. Close out with verbal summary to offsite authorities.

State and/or Local Offsite Authority Actions:

1. Provide fire, ambulance, or security assistance, if requested.
2. Escalate to a more severe class, if appropriate.
3. Stand by until verbal closeout.

b. Alert

Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be limited to small fractions of the EPA ~~Protective Action Guideline~~ exposure levels.

The purpose of this classification is to ensure that emergency personnel are readily available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required, and provide offsite authorities with current status information.

Detroit Edison Actions:

1. Inform state and local authorities of Alert status and reason for Alert within 15 minutes following classification and to the NRC as soon as possible but within one hour.
2. Augment resources by activating the TSC, EOF, and OSC.
3. Assess and respond.
4. Mobilize and dispatch onsite monitoring teams with associated communication equipment if required.
5. Provide periodic plant status updates to offsite authorities.
6. Provide periodic meteorological assessments to offsite authorities and, if any releases of radioactive material as specified for an Alert in EPIP, "Emergency Classification" are occurring, provide dose estimates for those releases.
7. Escalate to a more severe class, if appropriate, or
8. Close out emergency class by verbal summary to offsite authorities.

State and/or Local Offsite Authority Actions:

1. Provide fire, ambulance, or security assistance, if required.
2. Augment resources and bring Emergency Operations Centers (EOCs) to standby.

3. Place key emergency personnel on standby status, including monitoring teams with associated communication equipment.

4. Provide confirmatory offsite radiation monitoring and ingestion pathway dose projections if actual releases substantially exceed Technical Specifications limits.

5. Escalate to a more severe class, if appropriate.

6. Maintain Alert status until verbal closeout or de-escalation of emergency class.

c. Site Area Emergency (SAE)

Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action (H, A) that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA ~~Protective Action Guideline~~ PAG exposure levels beyond the site boundary.

The purpose of the Site Area Emergency classification is to (1) assure that response centers are staffed; (2) assure that monitoring teams are dispatched; (3) provide consultation with offsite authorities, and (4) provide updates for the public through offsite authorities.

Detroit Edison Actions

1. Inform state and local offsite authorities of Site Area Emergency status and reason for emergency within 15 minutes following classification and to the NRC as soon as possible, but within one hour.

2. Augment resources by activating the TSC, OSC, EOF and JIC.

3. Assess and respond.

4. Dispatch onsite and offsite monitoring teams with associated communication equipment if required.

5. Provide regular plant status updates to offsite authorities and periodic press briefings with offsite authorities.

6. Make onsite senior technical and management staff available for consultation with NRC and state authorities on a periodic basis.

7. Provide meteorological data and dose estimates to offsite authorities for potential/actual releases as appropriate.

8. Provide release data and dose projections based on available plant condition information and foreseeable contingencies.

9. Escalate to General Emergency classification, if appropriate, or
10. Close out or de-escalate emergency classification by briefing offsite authorities.

State and/or Local Offsite Authority Actions:

1. Provide any assistance requested.
2. Provide public within 10-mile radius with periodic updates on emergency status.
3. Augment resources by activating EOCs.
4. Dispatch key emergency personnel, including monitoring teams with associated communications.
5. Alert other emergency personnel to standby status (for example, those needed for evacuation) and dispatch personnel to assigned near-site locations.
6. Provide offsite monitoring results to licensee and others, and jointly assess them.
7. Continuously assess information from licensee and offsite monitoring teams regarding changes to protective actions already initiated for public and mobilizing evacuation resources.
8. Consider placing milk animals within 2-mile radius on stored feed and assess need to extend distance.
9. Provide press briefings with licensee.
10. Escalate to General Emergency classification, if appropriate.
11. Maintain Site Area Emergency status until closeout or de-escalate of emergency class.

d. General Emergency (GE)

Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA ~~Protective Action Guidelines~~ PAG exposure levels offsite for more than the immediate site area.

The purpose of the General Emergency classification is to: (1) initiate predetermined protective actions for the public; (2) provide continuous assessment of information from Detroit Edison and offsite organization measurements; (3) initiate additional measures as indicated by actual or potential releases; (4) provide consultation with offsite authorities; and (5) provide updates for the public through offsite authorities.