Exelon Generation®

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10 CFR 50.90

November 4, 2015

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

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Calvert Cliffs Independent Spent Fuel Storage Installation
Materials License No. SNM-2505
Docket No. 72-8

Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220, 50-410, and 72-1036

R. E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket Nos. 50-244 and 72-67

Subject: Supplemental Response for License Amendment Request to Revise the Emergency Plan Requalification Training Frequency for Emergency Response Organization Personnel

Reference: Letter from James Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, *"License Amendment Request to Revise the Emergency Plan Requalification Training Frequency for Emergency Response Organization Personnel,"* dated July 29, 2015

By letter dated July 29, 2015 (Reference), Exelon Generation Company, LLC (Exelon) submitted the subject License Amendment Request (LAR) for Calvert Cliffs Nuclear Power Plant, Units 1 and 2, Nine Mile Point Nuclear Station, Units 1 and 2, and the R. E. Ginna Nuclear Power Plant.

The proposed changes would revise the description for Emergency Response Organization (ERO) requalification training frequency defined in Exelon's governing Emergency Plans for the named stations from annually to *"once per calendar year not to exceed 18 months between training sessions."*

Subsequently, it was determined that the marked-up pages included an annotation on the top of the page indicating *"Exelon Confidential/Proprietary"* information. Exelon typically submits emergency preparedness related information (e.g., Emergency Plan and associated implementing procedures changes) pursuant to 10 CFR 2.390 requesting that the information be withheld from public disclosure. However, the marked-up pages submitted in support of this LAR are not considered to be of a confidential/proprietary nature. Therefore, the marked-up pages are being resubmitted with the annotation removed. There are no other changes to the marked-up pages. The attachment to this submittal includes the updated marked-up pages for each affected facility's Emergency Plan.

Exelon has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of the July 29, 2015, letter (Reference). Exelon has concluded that the information provided in this response does not affect the bases for concluding that the proposed LAR does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, Exelon has concluded that the information in this response does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed LAR.

There are no regulatory commitments contained in this submittal.

In accordance with 10 CFR 50.91, *"Notice for public comment; State consultation,"* paragraph (b), Exelon is notifying the State of Maryland and the State of New York of this application for license amendments by transmitting a copy of this letter and its supporting attachments to the designated state officials.

Should you have any questions regarding this submittal, please contact Richard Gropp at (610) 765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 4th day of November 2015.

Respectfully,

David T. Gudger
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Exelon Nuclear Radiological Emergency Plan Station Annex – Updated Marked-up Pages

| | | |
|---|---|---|
| cc: | Regional Administrator - NRC Region I | w/ Attachment |
| | NRC Senior Resident Inspector - Calvert Cliffs | " |
| | NRC Senior Resident Inspector - Nile Mile Point | " |

cc: (continued)

| | |
|---|---|
| NRC Senior Resident Inspector - R. E. Ginna | w/ Attachment |
| NRC Project Manager, NRR - Exelon Fleet | " |
| NRC Project Manager, NRR - Calvert Cliffs | " |
| NRC Project Manager, NRR - Nile Mile Point | " |
| NRC Project Manager, NRR - R.E. Ginna | " |
| S. T. Gray, State of Maryland | " |
| A. L. Peterson, NYSERDA | " |

# ATTACHMENT

## Exelon Nuclear Radiological Emergency Plan Station Annex - Updated Marked-up Pages

**Exelon Nuclear Radiological Emergency Plan**
**Annex for Calvert Cliffs Station**

**Marked-up Emergency Plan Pages**

Page

CC 6-1

# Section 6: Maintaining Nuclear Emergency Preparedness

## 6.1 Training

An integrated training program provides for and ensures initial, annual, and continuing training of appropriate individuals and groups involved in emergencies.

### 6.1.1 General Orientation

General Employee Training describes the program that provides training to all persons having access to Calvert Cliffs Nuclear Power Plant and includes Emergency Plan indoctrination.

### 6.1.2 Emergency Personnel

Plant procedures establish a training program for instructing personnel who implement radiological emergency plans. Specialized initial training, annual, and continuing training programs (including scope, nature and frequency) is provided for:

1. Directors or coordinators of response organizations.
2. Personnel responsible for accident assessment.
3. Radiological monitoring teams and radiological analysis personnel.
4. Security and fire fighting personnel.
5. On-site repair and damage control/correctional action teams.
6. First aid and rescue personnel. This training includes courses equivalent to or exceeding Red Cross Multi-Media.
7. Local support services personnel including Emergency Management/Emergency Services personnel. Site specific training is provided to those off-site organizations who may be called upon to provide assistance.
8. Medical support personnel.
9. Recovery Organization personnel.
10. Personnel responsible for transmission of emergency information instructions.

~~The training program for members of the emergency organizations includes practical drills in which individuals demonstrate ability to perform assigned emergency functions. In the context of station ERO training for those individual holding ERO positions, annually is defined as once every 12 months.~~

***Annual requalification training as applied to those personnel assigned Exelon ERO positions is defined as once per calendar year not to exceed 18 months between training sessions.*** *The training program for members of the emergency organizations includes practical drills in which individuals demonstrate ability to perform assigned emergency functions.* ***The training frequency for the practical drills is at least once every 2 years.***

### 6.1.3 Public

1. Calvert Cliffs
dissemination of
what their action
not necessarily li
   a. Educational information on radiation.
   b. Contact for additional information.
   c. Protective measures, e.g., evacuation routes and reception centers, sheltering, respiratory protection, radioprotective drugs.

**Exelon Nuclear Radiological Emergency Plan**
**Annex for Nine Mile Point Station**

**Marked-up Emergency Plan Pages**

Pages

NM 6-11
NM 6-12

## FIGURE 6.2
## INITIAL TRAINING AND PERIODIC RETRAINING*

Once per calendar year not to exceed 18 months between training sessions.

| Emergency Response Category | Involved Personnel (Typical) | Initial Training and Periodic Retraining |
|---|---|---|
| 1. Emergency Plan Indoctrination | Persons granted unescorted access to the Protected Area | Initial - Emergency Plan content and implementation; specifically: personal actions, warnings, assembly areas, use of station communications, personnel accountability and evacuation to an offsite assembly area. |
| 2. Emergency Directors/ ERF Coordinators | Plant Manager; Managers of Operations, SMs, Initial responders, and others as designated | Initial - Instruction on the scope, responsibilities, and function of the Emergency Plan and Implementing Procedures, including Incident Command System (ICS) concepts, position titles and terminology.<br><br>Periodic ~~(On an annual basis*)~~ Review of any changes made since the last training period. |
| 3. Personnel responsible for accident assessment and/or accident management | SM/Emergency Director and the Emergency Director at EOF, TSC, OSC and EOF Managers; and Alternates | Initial - Instruction on the NMPNS Emergency Plan and Implementing Procedures and Technical Support Guidelines germane to their particular assessment/management function, including Incident Command System (ICS) concepts, position titles and terminology.<br><br>Periodic - Retraining will be ~~on an annual basis*~~ and will include a review of the above material and any changes made since the last training period. |
| 4. Radiological Monitoring /Analysis personnel | Radiation Management Supervisors, Radiation Protection Technicians, and others as designated | Selected Radiation Protection personnel receive substantial training in radiation monitoring.<br><br>Initial - Training for personnel performing radiation monitoring and analysis duties will consist of instruction in the downwind and/or in plant radiation monitoring and sampling Implementing Procedures, including Incident Command System (ICS) concepts, position titles and terminology.<br><br>Periodic - Retraining will be ~~on an annual basis*~~ with hands-on instrumentation usage including interpretation of results. |

once per calendar year not to exceed 18 months between training sessions

**FIGURE 6.2 (Cont.)**
**INITIAL TRAINING AND PERIODIC RETRAINING***

| Emergency Response Category | Involved Personnel (Typical) | Initial Training and Periodic Retraining |
|---|---|---|
| 5. Fire Response /First Aid/Rescue/Medical Support | NMPNS Fire Brigade/Offsite Fire Departments Ambulance and Hospital Personnel | Designated members will receive training as appropriate in basic patient care and treatment. Members will also be instructed on the availability of onsite medical treatment supplies and equipment; communication systems; access controls radiological hazards; and roles, interfaces and responsibilities with local fire/ medical support personnel, including Incident Command System (ICS) concepts, position titles and terminology. |
| 6. Damage Control/Repair Teams personnel | Nuclear Operators, Nuclear Auxiliary Operators, Maintenance Supervision, I&C Supervision, Radiation Protection Supervision Selected Maintenance, I&C and Radiation Protection Personnel, and others as designated | Repair and Damage Control are considered a normal part of the job functions of the listed personnel and, as such, special training in these functions, other than appropriate emergency plan and procedures training, is not required. |
| 7. Security Personnel/Local Law Enforcement Officials | Security personnel assigned responsibilities for Emergency Plan function, and Local Law Enforcement Officials. | Training and retraining requirements are outlined in the Nine Mile Point Nuclear Security Training and Qualification Plan, including Incident Command System (ICS) concepts, position titles and terminology. |
| 8. Communication Personnel | As designated | Initial - Training shall consist of a review of appropriate Implementing Procedures, communications equipment and messages, including Incident Command System (ICS) concepts, position titles and terminology.<br><br>Periodic - Retraining will be conducted ~~annually*~~. |

~~* In the context of station ERO training for those individual holding ERO positions, annually is defined as once every 12 months.~~

once per calendar year not to exceed 18 months between training sessions.

**Exelon Nuclear Radiological Emergency Plan**
**Annex for Ginna Nuclear Station**

**Marked-up Emergency Plan Pages**

Page

GN 6-1

## Section 6: Maintaining Nuclear Emergency Preparedness

Formalized training program(s) have been established to ensure that all personnel who actively participate in the Nuclear Emergency Plan maintain their familiarity with the plan and their required response. A radiation emergency exercise shall be conducted at least annually, with emphasis placed upon orderly implementation of the emergency plan.

It is the Company management's expectation that responders will respond immediately upon being notified and not wait for additional time. This expectation is reinforced as part of the responder training.

Personnel trained for onsite response to a radiation emergency are part of the regular plant staff and are trained to specific responsibilities within the emergency organization. Training is documented by the Manager, Emergency Preparedness and the Emergency Preparedness Staff. Any emergency plan work by consultants will be under the control of, and reviewed by, the Manager, Emergency Preparedness.

Exercises shall be evaluated by the Manager, Emergency Preparedness and reviewed by the Emergency Preparedness Station and Corporate Management, thereby assuring the effectiveness of the plan throughout the lifetime of the R. E. Ginna facility.

### 6.1 Training and Drills:

Training classes on the emergency plan shall be conducted ~~annually (+/- 3 months)~~ **once per calendar year not to exceed 18 months between training sessions** ~~for all Ginna emergency~~ response personnel ~~who may actively participate~~ in the radiation emergency plan. Details of the training programs are established in Exelon ERO Training and Qualification procedure. Training will include a demonstration of their ability to perform the functions to which they may be assigned by participating in a Drill or Exercise at least once every two years. During drills, on-the-spot corrections of erroneous performance may be made, followed by a critique or corrective action.

Provisions must be made to start a drill or exercise between 6:00 p.m. and 4:00 a.m. at least once in every eight-year cycle. Some drills or exercises should be unannounced.

Specialized training will be provided for:

1. Technical Support Center assignees
2. Operations Support Center assignees
3. First Aid Teams
4. Offsite Monitoring Teams
5. Emergency Operations Facility personnel
6. Security personnel
7. Local Emergency Support Services personnel
8. Fire Brigade personnel
9. Dose Assessment personnel
10. Core Damage Assessment personnel