



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION I  
2100 RENAISSANCE BLVD., SUITE 100  
KING OF PRUSSIA, PA 19406-2713

December 4, 2015

Mr. Peter M. Orphanos, Site Vice President  
Nine Mile Point Nuclear Station, LLC  
Exelon Generation Company, LLC  
P.O. Box 63  
Lycoming, NY 13093-0063

SUBJECT: NINE MILE POINT NUCLEAR STATION: EVALUATED EMERGENCY  
PREPAREDNESS EXERCISE – INSPECTION REPORT 05000220/2015502  
AND 05000410/2015502

Dear Mr. Orphanos:

On October 22, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection of the evaluated emergency preparedness exercise at your Nine Mile Point Nuclear Station. The enclosed inspection report documents the inspection results, which were discussed on October 22, 2015, with you, and other members of your staff.

The inspection examined activities conducted under your licenses as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your licenses. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings were identified.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter and its enclosure and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system, Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

***/RA John R. Cherubini for/***

Raymond R. McKinley, Chief  
Plant Support Branch 1  
Division of Reactor Safety

Mr. Peter M. Orphanos, Site Vice President  
 Nine Mile Point Nuclear Station, LLC  
 Exelon Generation Company, LLC  
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Raymond R. McKinley, Chief  
 Plant Support Branch 1  
 Division of Reactor Safety

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P. Orphanos

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Docket Nos. 50-220 and 50-410  
License Nos. DPR-63 and NPF-69

Enclosure:  
NRC Inspection Report Nos. 05000220/2015502  
and 05000410/2015502

cc w/encl: Distribution via ListServ  
D. Musick RAC Chair, FEMA, Region II

Letter to Peter Orphanos from Raymond McKinley

SUBJECT: NINE MILE POINT NUCLEAR STATION: EVALUATED EMERGENCY  
PREPAREDNESS EXERCISE – INSPECTION REPORT 05000220/2015502 AND  
05000410/2015502

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**U.S. NUCLEAR REGULATORY COMMISSION**

**REGION I**

Docket Nos.: 50-220 and 50-410

License Nos.: DPR-63 and NPF-69

Report No.: 05000220/2015502 and 05000410/2015502

Licensee: Exelon Generation Company

Facility: Nine Mile Point Nuclear Station

Location: Lycoming, NY

Dates: October 19 – 23, 2015

Inspectors: S. Barr, Senior Emergency Preparedness Inspector, Division of  
Reactor Safety (DRS), Region I (Lead)  
P. Elkman, Senior Emergency Preparedness Inspector, DRS, Region IV  
D. Everhart, Physical Security Inspector, DRS, Region I  
T. Dunn, Operations Inspector, DRS, Region I  
T. Hedigan, Operations Inspector, DRS, Region I

Approved By: Raymond R. McKinley, Chief  
Plant Support Branch 1  
Division of Reactor Safety

## **SUMMARY OF FINDINGS**

IR 05000220/2015502 and 05000410/2015502; 10/19 – 23/2015; Nine Mile Point Nuclear Station; Exercise Evaluation – Hostile Action (HA) Event; Exercise Evaluation – Scenario Review; Performance Indicator Verification.

This report covers an announced inspection conducted by five Regional based inspectors. No findings were identified during the inspection. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5.

### **Cornerstone: Emergency Preparedness**

No findings were identified.

## REPORT DETAILS

### 1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

1EP7 Exercise Evaluation – Hostile Action Event (71114.07 – 1 Sample)

#### a. Inspection Scope

Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix E, Section IV.F.2.j, requires in part that nuclear power reactor licensees, in each eight calendar year exercise cycle, provide the opportunity for their emergency response organization (ERO) to demonstrate proficiency in the key skills necessary to respond to a hostile action (HA) directed at the plant site. Exelon designed the October 20, 2015, Nine Mile Point EP exercise to satisfy that requirement, and the U.S. Nuclear Regulatory Commission (NRC) inspected the Nine Mile Point HA event exercise to assess Exelon's ability to effectively implement the Nine Mile Point Emergency Plans during an HA event. This overall exercise inspection activity represented the completion of one sample on a biennial cycle.

The exercise evaluation consisted of the following review and assessment:

- The adequacy of the Exelon ERO's performance in the biennial full-participation exercise regarding the implementation of the planning standards described in 10 CFR 50.47(b) (4), (5), (9), and (10), which are: emergency classification; offsite notification; radiological assessment; onsite protective actions, and public protective action recommendations, respectively.
- The overall adequacy of Exelon's emergency response facilities with regard to Emergency Plan commitments. The facilities assessed were the Control Room Simulator, the Alternative Facility (AF), the Central Alarm Station (CAS), the Incident Command Post (ICP), and the Emergency Operations Facility (EOF).
- A review of other performance areas, such as the Exelon ERO's: recognition of abnormal plant conditions; command and control, including interactions with site security staff; intra- and inter-facility communications; prioritization of mitigating activities; utilization of repair and field monitoring teams; interface with offsite agencies, including local law enforcement agencies; staffing and procedure adequacy; and the overall implementation of the Nine Mile Point Emergency Plan and the implementing procedures.
- A review of past performance issues from the last NRC Nine Mile Point exercise inspection report and recent Exelon Nine Mile Point EP drill reports, to determine the effectiveness of licensee corrective actions as demonstrated during the October 20, 2015, exercise and to ensure compliance with 10 CFR 50.47(b)(14).

- The licensee's post-exercise critiques, to evaluate Exelon's self-assessment of its Nine Mile Point ERO performance during the October 20, 2015, exercise and to ensure compliance with 10 CFR, Part 50, Appendix E, Section IV.F.2.g.

The inspectors reviewed the documents listed in the attachment to this report.

b. Findings

No findings were identified.

1EP8 Exercise Evaluation – Scenario Review (71114.08 – 1 Sample)

a. Inspection Scope

Prior to the October 20, 2015, EP exercise, the NRC inspectors conducted an in-office review of the exercise objectives and scenario, which Exelon had submitted to the NRC, to determine if the exercise would test major elements of the Nine Mile Point Emergency Plan as required by 10 CFR 50.47(b)(14). This overall exercise inspection activity represented the completion of one sample on a biennial cycle.

The inspectors reviewed the documents listed in the attachment to this report.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES (OA)

4OA1 Performance Indicator Verification (71151 – 3 Samples)

a. Inspection Scope

The inspectors reviewed data for the Nine Mile Point EP Performance Indicators (PI), which are: (1) Drill and Exercise Performance (DEP) (EP01); (2) ERO Drill Participation (EP02); and (3) Alert and Notification System (ANS) Reliability (EP03). The last NRC EP PI inspection at Nine Mile Point was conducted in the first calendar quarter of 2014, so the inspectors reviewed supporting documentation from EP drills and tests from the first calendar quarter of 2014 through the third calendar quarter of 2015, to verify the accuracy of the reported PI data. The review of these PIs was conducted in accordance with NRC Inspection Procedure 71151, using the acceptance criteria documented in NEI 99-02, "Regulatory Assessment Performance Indicator Guidelines," Revision 7.

This inspection activity represented the completion of three samples.

b. Findings

No findings were identified.



**4OA6 Meetings, including Exit**

On October 22, 2015, the inspectors presented the results of this inspection to Mr. William Trafton, Plant Manager, and other members of the Exelon staff. The inspectors verified that no proprietary information was retained by the inspectors or documented in this report.

**ATTACHMENT**

**SUPPLEMENTAL INFORMATION**

**KEY POINTS OF CONTACT**

**Licensee Personnel**

P. Orphanos, Site Vice President  
V. Cwietniewicz, Exelon Mid-Atlantic Emergency Planning Manager  
W. Trafton, Plant Manager  
T. Barlow, Manager, Emergency Preparedness  
J. Westermann, Manager, Emergency Preparedness

**LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

None.

**LIST OF DOCUMENTS REVIEWED**

**Section 1EP7: Exercise Evaluation – Hostile Action (HA) Event**

EP-AA-1000, Exelon Nuclear Standardized Emergency Plan (Revision 26)  
EP-AA-1011, Exelon Nuclear Radiological Emergency Plan Annex for Nine Mile Point  
(Revision 0)  
EP-AA-112-700, Alternative Facility Operation (Revision 0)  
EP-AA-122, Drill and Exercise Program (Revision 18)  
EP-AA-122-200, Drill and Exercise Execution (Revision 0)  
EP-AA-122-300, Drill and Exercise Evaluation (Revision 1)  
SE-23, Response to Security Threats – Procedure (Revision 18)  
Nine Mile Point Emergency Plan Implementing Procedures  
Nine Mile Point October 20, 2015, Emergency Exercise Scenario Package  
Nine Mile Point Emergency Preparedness Drill Reports, January 2014 - September 2015  
Exelon Generation Nine Mile Point 2015 Graded Exercise Evaluation Report (dated 10/20/15)

**Section 1EP8: Exercise Evaluation – Scenario Review**

EP-AA-1000, Exelon Nuclear Standardized Emergency Plan (Revision 26)  
EP-AA-1011, Exelon Nuclear Radiological Emergency Plan Annex for Nine Mile Point  
(Revision 0)  
EP-AA-122, Drill and Exercise Program (Revision 18)  
EP-AA-122-100, Drill and Exercise Planning and Scheduling (Revision 1)  
Nine Mile Point October 20, 2015, Emergency Exercise Scenario Package

**Section 40A1: Performance Indicator (PI) Verification**

LS-AA-2110, Monthly Data Elements for NRC Emergency Response Organization (ERO) Drill Participation (Revision 6)  
LS-AA-2120, Monthly Data Elements for NRC Drill/Exercise Performance (Revision 4)  
LS-AA-2130, Monthly Data Elements for NRC Alert and Notification System (ANS) Reliability (Revision 5)  
EP-AA-125-1001, EP Performance Indicator Guidance (Revision 7)  
DEP PI Data, January 2014 – September 2015  
ERO Drill Participation PI data, January 2014 – September 2015

**LIST OF ACRONYMS**

ADAMS	Agencywide Documents Access and Management System
AERF	Alternative Emergency Response Facility
AF	Alternative Facility
ANS	Alert Notification System
CAS	Central Alarm Station
CFR	Code of Federal Regulations
DEP	Drill and Exercise Performance
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
HA	Hostile Action
ICP	Incident Command Post
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
PAR	Protective Action Recommendation
PI	Performance Indicator
RSPS	Risk Significant Planning Standard