

10 CFR 50.90

JAFP-17-0073

July 31, 2017

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

James A. FitzPatrick Nuclear Power Plant  
Renewed Facility Operating License No. DPR-59  
Docket No. 50-333

James A. FitzPatrick Nuclear Power Plant Independent Spent Fuel Storage Installation  
General License SFGL-12  
Docket No. 72-012

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

In accordance with 10 CFR 50.90, "*Application for amendment of license, construction permit, or early site permit*," Exelon Generation Company, LLC (Exelon) requests amendments to the licenses cited for the James A. FitzPatrick Nuclear Power Plant (FitzPatrick).

Specifically, the proposed change would revise the description for Emergency Response Organization (ERO) requalification training frequency defined in FitzPatrick's governing Emergency Plan from annually to "*once per calendar year not to exceed 18 months between training sessions*." The Emergency Plan is described in the FitzPatrick's Final Safety Analysis Report (FSAR). In accordance with 10 CFR 50.54, "*Conditions of licenses*," paragraph (q), "*Emergency plans*," Exelon requests U.S. Nuclear Regulatory Commission (NRC) approval of the proposed change to the FitzPatrick Emergency Plan.

The proposed change has been reviewed by the Onsite Safety Review Committee at the station in accordance with the requirements of the FitzPatrick Quality Assurance Program.

Attachment 1 provides an evaluation of the proposed change, including a detailed description, technical and regulatory evaluation including a no significant hazards consideration, and an environmental consideration. Attachment 2 contains mark-ups of the existing Emergency Plan pages showing the proposed change to the facility's Emergency Plan.

U.S. Nuclear Regulatory Commission  
License Amendment Request  
Revise ERO Requalification Training Frequency  
Docket Nos. 50-333 and 72-012  
July 31, 2017  
Page 2

Exelon requests approval of the proposed license amendment by July 31, 2018. Once approved, the amendment shall be implemented within 90 days.


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 New York of this application for license amendment 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 31<sup>st</sup> day of July 2017.

Respectfully,

A handwritten signature in black ink, appearing to read "David T. Gudger", with a stylized flourish at the end.

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

Attachments: 1) Evaluation of Proposed Change  
2) FitzPatrick Emergency Plan Mark-up

cc: Regional Administrator – NRC Region I  
NRC Senior Resident Inspector – J.A. FitzPatrick  
NRC Project Manager, NRR – J.A. FitzPatrick  
A.L. Peterson, NYSERDA  
D. Currier, Oswego County EMO

## **ATTACHMENT 1**

### **License Amendment Request**

### **EVALUATION OF PROPOSED CHANGE**

Subject: License Amendment Request to Revise the Emergency Plan Requalification Training Frequency for Emergency Response Organization for the James A. FitzPatrick Nuclear Power Plant

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
  - 4.1 Applicable Regulatory Requirements/Criteria
  - 4.2 Precedent
  - 4.3 No Significant Hazards Consideration
  - 4.4 Conclusions
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

## **ATTACHMENT 1**

### **1.0 SUMMARY DESCRIPTION**

In accordance with 10 CFR 50.90, "*Application for amendment of license, construction permit, or early site permit*," Exelon Generation Company, LLC (Exelon) requests an amendment to the James A. FitzPatrick Nuclear Power Plant (FitzPatrick) Renewed Facility Operating License (FOL) and Independent Spent Fuel Storage Installation General License.

The proposed change would revise the description of Emergency Response Organization (ERO) requalification training frequency defined in the station's Emergency Plan. The proposed frequency will be defined as "*once per calendar year not to exceed 18 months between training sessions*." In this context, training session refers to the annual requalification training received by the ERO.

The Emergency Plan is described in the facility's Final Safety Analysis Report (FSAR). In accordance with 10 CFR 50.54, "*Conditions of licenses*," paragraph (q), "*Emergency plans*," Exelon requests U.S. Nuclear Regulatory Commission (NRC) approval of the proposed change to the Fitzpatrick Emergency Plan.

### **2.0 DETAILED DESCRIPTION**

Planning Standard 10 CFR 50.47(b)(15) specifies that radiological Emergency Response Organization (ERO) training is provided to those who may be called on to assist in an emergency. This is further expanded in regulatory guidance provided in NUREG-0654, Revision 1, "*Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*," which specifies that organizations shall establish specialized initial and periodic retraining programs for those who may be called upon to assist in an emergency and that each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.

#### **2.1 James A. FitzPatrick Nuclear Power Plant Emergency Response Plan**

The FitzPatrick Emergency Plan provides the following frequency requirements for ERO training in Section 8.

##### *8.2 Training of Emergency Personnel*

*Plant personnel, participating corporate personnel, and offsite response organization personnel that respond to onsite requests for assistance receive emergency response training in accordance with their roles in an emergency...*

*...Personnel assigned to the JAFNPP with specific emergency preparedness duties and responsibilities shall receive specialized training for their respective assignments. The types of training given in conjunction with Emergency Preparedness are:*

- a. Training for directors, coordinators, and personnel responsible for accident assessment*
- b. Emergency Communications training*

- c. *Training for Radiological Monitoring Teams and Radiological Assessment personnel*
- d. *Emergency access control, evacuation and accountability*
- e. *Search and rescue/first aid response*
- f. *Emergency repair/corrective actions*
- g. *Training for onsite fire fighting personnel*
- h. *Medical support personnel*
- i. *Offsite fire fighting personnel*
- j. *Severe Accident Management training*

*Figure 8.1 – Emergency Response Training presents a summary of the emergency response training program including type of training, personnel receiving training, frequency of training and retraining, applicable procedures, and objectives of the training.*

The FitzPatrick Emergency Plan currently states the ERO requalification training is "annual" for the site emergency response personnel. The term "annual" is not specifically defined within the Emergency Plan although it is described in implementing procedures (i.e., SAP-20); however, FitzPatrick implements ERO requalification training every 12 months. The proposed change in the ERO requalification training frequency for FitzPatrick would result in a change to the Emergency Plan. Section 8, *Figure 8.1, Emergency Response Training* provides a description regarding the ERO requalification training frequency. Exelon proposes to modify the discussion to define the training frequency as: "once per calendar year not to exceed 18 months between training sessions," as described below.

<b>Title / Function</b>	<b>Assigned Personnel</b>	<b>Frequency</b>
<i>Emergency Plan Indoctrination for Essential Personnel</i>	<i>Essential personnel who may be assigned to specific response functions in JAFNPP Emergency Plan.</i>	<i>Before assuming position, <b>Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</b></i>
<i>Emergency Plan Training for directors, coordinators, and personnel responsible for accident assessment</i>	<i>Designated Primary and Alternates</i> a. <i>Emergency Director</i> b. <i>EOF Manager</i> c. <i>Operations Coordinator*</i>	<i>Before assuming position, <b>Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</b></i>
<i>Emergency Plan Training for Licensed Operators and Shift Technical Advisors</i>	<i>Any personnel not listed above who are assigned to a position that requires a valid USNRC Operator License, or who are designated as STAs.</i>	<i>Before assuming position, <b>Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</b></i>
<i>Emergency Plan Training for Non-Licensed Operators</i>	<i>Non-Licensed Operators</i>	<i>Before assuming position, <b>Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</b></i>
<i>Emergency Communications</i>	<i>Designated Primary and Alternates:</i>	<i>Before assuming position, <b>Annually Once per calendar</b></i>

Title / Function	Assigned Personnel	Frequency
	a. ENS Communicator b. Offsite Communicators (EOF) c. EOF Communicators	<i>year not to exceed 18 months between training sessions thereafter.</i>
Radiological Assessment	Designated Primary and Alternates: a. Radiological Assessment Coordinator (EOF) b. Offsite Team Coordinator (EOF) c. Dose Assessor (EOF) d. Dose Assessor Support (EOF)	<i>Before assuming position, Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</i>
Radiological Controls and Surveys during Emergencies	Designated Primary and Alternates: a) In-Plant Radiological Controls and Downwind Survey Teams b) RP Technicians c) Chemistry Technicians d) Radiation Protection / Chemistry Coordinator e) Offsite Monitoring Team	<i>Before assuming position, Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</i>
Emergency Access Control, Evacuation and Accountability	Designated Primary and Alternates a. Plant Security Force b. Security Coordinator c. Security Shift Supervisor d. Nuclear Security Guards	<i>Before assuming position, Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</i>
Search and Rescue/First Aide Response	Plant Fire Bridage members.	<i>Before assuming position, Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</i>
Emergency Repair/ Corrective Actions Training	Designated Primary and Alternates: a. TSC Maintenance Coord. b. OSC Manager c. Mechanics d. Electricians e. Instrument and Control Technicians f. Electrical / I&C Coordinator g. Mechanical Coordinator	<i>Before assuming position, Annually Once per calendar year not to exceed 18 months between training sessions thereafter.</i>
Onsite Fire Fighting Personnel	a. Fire Brigade members and Supervisors as specified in the Fire Protection Procedures Manual	<i>Annually Once per calendar year not to exceed 18 months between training sessions.</i>



### 3.0 TECHNICAL EVALUATION

Exelon proposes to revise the site Emergency Plan for FitzPatrick in order to establish a common annual ERO qualification training frequency for Exelon personnel assigned to ERO positions and to align the training frequency across the Exelon fleet.

This constitutes a minor change which will allow application of common procedural guidance and administrative tracking tools throughout the Exelon fleet. This LAR does not affect established training frequencies for non-Exelon Offsite Response Organizations (ORO) responders where Exelon may provide periodic training.

Exelon's Mid-Atlantic stations (i.e., Limerick Generating Station, Oyster Creek Nuclear Generating Station, Peach Bottom Atomic Power Station, and Three Mile Island Nuclear Station), Midwest Stations (Braidwood Station, Byron Station, Clinton Power Station, Dresden Nuclear Power Station, LaSalle County Station, and Quad Cities Nuclear Power Station), and Northeast stations (Calvert Cliffs Nuclear Power Plant, Nine Mile Point Nuclear Station, and R. E. Ginna Nuclear Power Plant) previously submitted LARs to revise their ERO training frequency (References 6.3, 6.4, 6.5, and 6.6). These LARs requested approval to align the training frequency between those Exelon's stations to *"once per calendar year not to exceed 18 months between training sessions."* These LARs have been subsequently approved as noted in References 6.7, 6.8, and 6.9.

The revised training frequency applies only to those personnel assigned to ERO positions. The change does not apply to training for ORO provided by Exelon. This change also does not apply to training provided to Exelon personnel as part of their normal job specific duties (e.g., plant operations, maintenance, radiation protection, first aid, fire brigade).

From a business needs and resource perspective, there is a benefit to have all of Exelon's nuclear facilities perform ERO training under the same requirements. Exelon utilizes common procedures and programs to manage the Emergency Preparedness training program and having all of its stations under the same program would provide efficiency and simplicity in program administration.

#### James A. FitzPatrick Nuclear Power Plant

The ERO training frequency is not specifically defined in the FitzPatrick Emergency Plan although it is described in implementing procedures (i.e., SAP-20); however, FitzPatrick implements ERO qualification training every 12 months.

The current practice of utilizing a 12-month period for annual ERO training introduces some hardships and unintended consequences which can complicate the scheduling of training. For example, station maintenance outages or other major station events may require the ERO qualification cycle to be rescheduled (entirely or partially) either earlier or later within the year.

Considering FitzPatrick utilizes four ERO teams and train over several weeks or months; this may introduce individual tracking and scheduling complications, particularly when individuals switch to other ERO teams. Qualifications are required to be closely monitored. The need for emergent or individual training is minimized with this proposed change. The monitoring of

individual training becomes less burdensome by implementing a frequency of once per calendar year not to exceed 18 months between training sessions.

When the two frequencies for training requalification are compared over a period of several years, both methods result in the same number of training opportunities for the ERO personnel, with the understanding that the allowed grace periods are not permitted to extend training intervals.

The proposed changes in the ERO requalification training frequency for the FitzPatrick would allow alignment with other Exelon station ERO requalification training requirements. The flexibility to schedule training within the calendar year allows the Emergency Preparedness organizations to schedule around planned and emergent outages, operations training cycles, and other emergent station priorities.

#### Impact on Performance Indicators and Drill Participation

The proposed revision to the training frequency would have no impact to NRC Performance Indicators (PIs). The NRC ERO Drill Participation performance indicator tracks the participation of ERO members assigned to fill key positions in performance enhancing experiences and through linkage to the Drill and Exercise Performance (DEP) indicator ensures that the risk significant aspects of classification, notification, and Protective Action Recommendation (PAR) development are evaluated and included in the PI process. This indicator measures the percentage of ERO members assigned to fill key positions who have participated recently in performance-enhancing experiences such as drills, exercises, or in an actual event during the previous eight quarters, as measured on the last calendar day of the quarter.

The proposed revision to the annual training frequency is unrelated to drill participation requirements for the indicator. It does not impact the objective for key ERO members to have a performance-enhancing experience every eight quarters.

The proposed change in the ERO requalification training frequency for Exelon personnel assigned to ERO positions for FitzPatrick would result in consistency the with other Exelon station ERO requalification training requirements as described in References 6.3, 6.4, 6.5, and 6.6. The flexibility to schedule training within the calendar year as described allows the Emergency Preparedness organizations to schedule around planned and emergent outages, operations training cycles, and other emergent station priorities.

## **4.0 REGULATORY EVALUATION**

### **4.1 Applicable Regulatory Requirements/Criteria**

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met.

The criteria in 10 CFR 50.54(q) provide direction to licensees seeking to revise their Emergency Plans. The requirements related to nuclear power plant Emergency Plans are specified in the standards in 10 CFR 50.47, "*Emergency Plans*," and the requirements of 10 CFR 50, Appendix E, "*Emergency Planning and Preparedness for Production and Utilization Facilities*."

Planning Standard 10 CFR 50.47(b)(15) states that: "*Radiological emergency response training is provided to those who may be called on to assist in an emergency.*" This is further discussed



in NUREG-0654, Section II.O, *"Radiological Emergency Response Training,"* which states that: *"Each organization shall assure the training of appropriate individuals."* More specifically, step 5 states: *"Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities."* The proposed change to the Emergency Plan for FitzPatrick reflects a change in frequency in how ERO requalification training is implemented at this affected Exelon facility. Exelon has determined that the proposed change does not require any exemptions or relief from regulatory requirements and does not affect conformance with any 10 CFR 50, Appendix A, *"General Design Criteria for Nuclear Power Plants,"* (GDC) differently than that described in the Final Safety Analysis Report (FSAR) for the affected facility.

NRC Regulatory Issue Summary 2005-02, Revision 1, *"Clarifying the Process for Making Emergency Plan Changes,"* dated April 19, 2011 (Reference 6.1), provides guidance concerning: 1) clarifying the meaning of a "decrease in effectiveness," as stated in 10 CFR 50.54(q); 2) clarifying the process for evaluating proposed changes to emergency plans; 3) providing a method for evaluating proposed changes to emergency plans; and 4) providing clarifying guidance on the appropriate content and format of applications submitted to the NRC for approval prior to implementation.

Regulatory Guide 1.219, Revision 1, *"Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors,"* dated July 2016 (Reference 2), provides guidance acceptable to the NRC for making changes to the licensee's emergency preparedness plans.

#### **4.2     Precedent**

There is current precedent within the Exelon fleet supporting the proposed change. By letter dated October 30, 2013 (Reference 6.3), as supplemented by letter dated June 13, 2014 (Reference 6.4), Exelon submitted an amendment request to revise the ERO requalification training requirements specified in the Emergency Plans for Limerick Generating Station, Oyster Creek Nuclear Generating Station, Peach Bottom Atomic Power Station, and Three Mile Island Nuclear Station to include provisions that the training be conducted *"once per calendar year not to exceed 18 months between training sessions."* By letter dated August 11, 2014 (Reference 6.5), Exelon submitted an amendment request to revise the ERO requalification training requirements specified in the Emergency Plans for Braidwood Station, Byron Station, Clinton Power Station, Dresden Nuclear Power Station, LaSalle County Station, and Quad Cities Nuclear Power Station to include provisions that the training be conducted *"once per calendar year not to exceed 18 months between training sessions."* By letter dated July 29, 2015 (Reference 6.6), Exelon submitted an amendment request to revise the ERO requalification training requirements specified in the Emergency Plans for Calvert Cliffs Nuclear Power Plant, Nine Mile Point Nuclear Station, and R. E. Ginna Nuclear Power Plant to include the same provisions that the training be conducted *"once per calendar year not to exceed 18 months between training sessions."* These license amendment requests were subsequently approved by the NRC as noted in References 6.7, 6.8, and 6.9.

#### **4.3     No Significant Hazards Consideration**

In accordance with 10 CFR 50.90, *"Application for amendment of license, construction permit, or early site permit,"* Exelon Generation Company, LLC (Exelon) requests amendments to the Renewed Facility Operating License (FOL) and Independent Spent Fuel Storage Installation General Listed listed below for the James A. FitzPatrick Nuclear Power Plant (FitzPatrick).

James A. FitzPatrick Nuclear Power Plant  
Renewed Facility Operating License No. DPR-59  
Docket No. 50-333

James A. FitzPatrick Nuclear Power Plant Independent Spent Fuel Storage Installation  
General License SFGL-12  
Docket No. 72-012

Specifically, the proposed change would revise the Emergency Response Organization (ERO) requalification training frequency for Exelon personnel assigned ERO positions defined in the station Emergency Plan as "annual" to a frequency defined as *"once per calendar year not to exceed 18 months between training sessions."* The Emergency Plan is described in the station's Final Safety Analysis Report (FSAR). In accordance with 10 CFR 50.54, *"Conditions of licenses,"* paragraph (q), *"Emergency plans,"* Exelon requests NRC approval of the proposed changes to the Emergency Plan for FitzPatrick.

The proposed change has been reviewed considering the applicable requirements of 10 CFR 50.47, 10 CFR 50, Appendix E, and other applicable NRC documents. Exelon has evaluated the proposed change to the FitzPatrick Emergency Plan and determined that the change does not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards, set forth in 10 CFR 50.92, *"Issuance of amendment,"* is provided below.

1. *Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?*

Response: No.

The proposed change only affects the administrative aspects of the annual ERO requalification training frequency requirements and not the content of the training. The proposed change does not involve the modification of any plant equipment or affect plant operation. The proposed change will have no impact on any safety-related Structures, Systems, or Components (SSC).

The proposed change would revise the ERO requalification frequency from an annual basis to once per calendar year not to exceed 18 months between training sessions as defined in the FitzPatrick Emergency Plan. The proposed change will support aligning the FitzPatrick training with the rest of the Exelon fleet under one standard regarding the annual requalification training frequency of personnel assigned Exelon ERO positions.

Therefore, the proposed change to the Emergency Plan requalification training frequency for the affected site does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?*

Response: No.

The proposed change has no impact on the design, function, or operation of any plant SSC. The proposed change does not affect plant equipment or accident analyses. The proposed change only affects the administrative aspects related to the annual ERO requalification training frequency requirements. There are no changes in the content of the training being proposed under this submittal. The proposed change will support aligning the FitzPatrick training with the rest of the Exelon fleet under one standard regarding the annual requalification training frequency of personnel assigned Exelon ERO positions.

Therefore, the proposed change to the Emergency Plan requalification training frequency for the affected site does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *Does the proposed amendment involve a significant reduction in a margin of safety?*

Response: No.

The proposed change only affects the administrative aspects of the annual ERO requalification training frequency requirements and does not change the training content. The proposed change does not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analyses. There is no change being made to safety analysis assumptions, safety limits, or limiting safety system settings that would adversely affect plant safety as a result of the proposed change. Margins of safety are unaffected by the proposed change to the frequency in the ERO requalification training requirements.

Therefore, the proposed change to the Emergency Plan requalification training frequency for the affected site does not involve a significant reduction in a margin of safety.

#### **4.4 Conclusions**

In conclusion, based on the considerations discussed above: 1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, 2) such activities will be conducted in compliance with the Commission's regulations, and 3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### **5.0 ENVIRONMENTAL CONSIDERATION**

The proposed change is applicable to emergency planning standards involving ERO requalification training requirements and do not reduce the capability to meet the emergency planning standards established in 10 CFR 50.47 and 10 CFR 50, Appendix E. The proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the

types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. In addition, the proposed change specifically relates to education, training, experience, qualification or other employment suitability requirements. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(3)(iv). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs be prepared in connection with the proposed change.

## 6.0 REFERENCES

- 6.1 NRC Regulatory Issue Summary 2005-02, Revision 1, *"Clarifying the Process for Making Emergency Plan Changes,"* dated April 19, 2011
- 6.2 Regulatory Guide 1.219, Revision 1, *"Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors,"* dated July 2017.
- 6.3 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 October 30, 2013.
- 6.4 Letter from James Barstow, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission – *Supplemental Response to License Amendment Request to Revise the Emergency Plan Requalification Training Frequency for Emergency Response Organization Personnel,* dated June 13, 2014.
- 6.5 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 August 11, 2014.
- 6.6 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.
- 6.7 Letter from Joel S. Wiebe, U.S. Nuclear Regulatory Commission to Michael J. Pacilio, Exelon Generation Company, LLC – Limerick Generating Station, Units 1 and 2; Oyster Creek Nuclear Generating Station; Peach Bottom Atomic Power Station, Units 1, 2 and 3; and Three Mile Island Nuclear Station, Unit 1 - Issuance of Amendments Regarding the Emergency Plan Definition of Annual Training, dated December 24, 2014 (ML14226A940).
- 6.8 Letter from Joel S. Wiebe, U.S. Nuclear Regulatory Commission to Bryan C. Hanson, Exelon Generation Company, LLC – Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 1, 2, and 3; LaSalle County Station, Units 1 and 2; and Quad Cities Nuclear Power Station, Units 1 and 2 - Issuance of Amendments Regarding the Emergency Plan Definition of Annual Training, dated April 8, 2015 (ML14323A522).

- 6.9 Letter from Blake A. Purnell, U.S. Nuclear Regulatory Commission to Bryan C. Hanson, Exelon Generation Company, LLC – Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plants - Issuance of Amendments Regarding Emergency Plan Requalification Training Frequency for Emergency Response Organization Personnel, dated March 17, 2016 (ML15352A164).

## **ATTACHMENT 2**

### **FitzPatrick Emergency Plan Mark-up**

#### **JAMES A. FITZPATRICK NUCLEAR POWER PLANT EMERGENCY PLAN**

#### **Markup of Emergency Plan Pages**

##### **Pages**

Figure 8.1 (Pages 8-13, 8-14, 8-15, 8-16, and 8-17)



FIGURE 8.1  
EMERGENCY RESPONSE TRAINING

<u>TITLE/FUNCTION</u>	<u>ASSIGNED PERSONNEL</u>	<u>FREQUENCY</u>	<u>TRAINING OBJECTIVE</u>
Emergency Plan Indoctrination for Non-Essential Personnel	Personnel requiring regular access to the site.	Per General Employee Training, EN-TQ-107, Requirements	<p>Ensure Ability to:</p> <ul style="list-style-type: none"> <li>a. Report emergency conditions correctly and expeditiously.</li> <li>b. Recognize and recall the significance of site alarms.</li> <li>c. Evacuate affected areas and the site.</li> <li>d. Locate and assemble in designated assembly areas.</li> <li>e. Facilitate personnel accountability process.</li> <li>f. Rumor Control.</li> <li>g. Overview of JAFNPP Emergency Plan.</li> </ul> <p>The objective of Emergency Plan Indoctrination for Essential Personnel shall be to provide Emergency Response Personnel a more detailed knowledge of the plant Emergency Plan and Procedures to ensure these personnel are familiar with their scope, applicability, and implementation.</p>
Emergency Plan Indoctrination for Essential Personnel	Essential personnel who may be assigned to specific response functions in JAFNPP Emergency Plan.	Before assuming position, <u>annually</u> thereafter.	

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

FIGURE 8.1

**EMERGENCY RESPONSE TRAINING**

(continued)

<u>TITLE/FUNCTION</u>	<u>ASSIGNED PERSONNEL</u>	<u>FREQUENCY</u>	<u>TRAINING OBJECTIVE</u>
Emergency Plan Training for directors, coordinators, and personnel responsible for accident assessment	Designated Primary and Alternates a. Emergency Director b. EOF Manager c. Operations Coordinator*	Before assuming position <b>Annually thereafter</b>	The objective of training for Emergency Directors/Coordinators shall be to ensure the capability for immediate response, assessment and the implementation of measures to prevent or mitigate the consequences of emergencies through effective management of the Emergency Organization.
*Licensed Operator training may be substituted for Emergency Director training.			
Emergency Plan Training for Licensed Operators and Shift Technical Advisors	Any personnel not listed above who are assigned to a position that requires a valid USNRC Operator License, or who are designated as STAs.	Before assuming position <b>Annually thereafter</b>	The objective of Emergency Plan training for Licensed Operators and STAs shall be to ensure the capability for immediate response, assessment, and the implementation of measures to prevent or mitigate the consequences of emergencies.

Once per year not to exceed 18 months between training sessions

FIGURE 8.1

**EMERGENCY RESPONSE TRAINING**

(continued)

<u>TITLE/FUNCTION</u>	<u>ASSIGNED PERSONNEL</u>	<u>FREQUENCY</u>	<u>TRAINING OBJECTIVE</u>
Severe Accident Management Training	Designated Staff	Before assuming position  Once every two years thereafter training or drill	The objective of SAM training shall be to ensure the capabilities for coordination, and assumption of responsibilities of actions associated with Severe Accident Operations Guidelines.
Emergency Plan Training for Non-Licensed Operators	Non-Licensed Operators	Before assuming position <b>Annually--</b> thereafter	The objective of Emergency Plan training for Non-Licensed Operators shall be to ensure the capability for immediate response by conducting measures to prevent or mitigate accident conditions.
Emergency Communications	Designated Primary and Alternates:  a. ENS Communicator b. Offsite Communicators (EOF) c. EOF Communicators	Before assuming position <b>Annually--</b> thereafter	The objective of training for emergency communicators shall be to develop and maintain a group of Emergency Communicators qualified to operate emergency communication systems and effectively transmit emergency information and data to the applicable personnel and/or agencies.

Once per year not to exceed 18 months between training sessions

FIGURE 8.1

**EMERGENCY RESPONSE TRAINING**

(continued)

<u>TITLE/FUNCTION</u>	<u>ASSIGNED PERSONNEL</u>	<u>FREQUENCY</u>	<u>TRAINING OBJECTIVE</u>
Radiological Assessment	Designated Primary and Alternates: a. Radiological Assessment Coordinator (EOF) b. Offsite Team Coordinator (EOF) c. Dose Assessor (EOF) d. Dose Assessor Support (EOF)	Before assuming position <b>Annually</b> thereafter	The objective of training for radiological assessment personnel shall be to develop and maintain a group of personnel qualified to assess real or potential radiological hazards during emergencies in order to provide the Emergency Director with the necessary information and advice to make offsite protective action recommendations and mitigate radiological consequences.
Radiological Controls and Surveys during Emergencies	Designated Primary and Alternates: a) In-Plant Radiological Controls and Downwind Survey Teams b) RP Technicians c) Chemistry Technicians d) Radiation Protection / Chemistry Coordinator e) Offsite Monitoring Team	Before assuming position <b>Annually</b> thereafter	The objective of training for radiological controls personnel shall be to develop and maintain a group of personnel qualified to measure real or assess potential radiological conditions during emergencies in order to provide radiological assessment personnel with the necessary information to assess or project radiological hazards both on and offsite.
Emergency Access Control, Evacuation and Accountability	Designated Primary and Alternates	Before assuming position	The objective of training in Emergency Access Control/ Evacuation and Accountability is to develop and

Once per year not to exceed 18 months between training sessions

FIGURE 8.1

**EMERGENCY RESPONSE TRAINING**

(continued)

<u>TITLE/FUNCTION</u>	<u>ASSIGNED PERSONNEL</u>	<u>FREQUENCY</u>	<u>TRAINING OBJECTIVE</u>
	a. Plant Security Force b. Security Coordinator c. Security Shift Supervisor d. Nuclear Security Guards.	<del>Annually</del> thereafter	maintain the station security force's ability to maintain personnel accountability, and ensure effective coordination of personnel movements, onsite, and during an emergency.
Search and Rescue/First Aid Response	Plant Fire Brigade members.	Before assuming position <del>Annually</del> thereafter	The objective of training fire brigade members in Search and Rescue/First Aid Response is to assure that prompt medical attention is provided to contaminated, injured or ill personnel and to provide effective search and rescue capabilities for missing, trapped or injured personnel in an emergency situation.
Emergency Repair/Corrective Actions Training	Designated Primary and Alternates: a. TSC Maintenance Coord. b. OSC Manager c. Mechanics d. Electricians e. Instrument and Control Technicians f. Electrical/I & C Coordinator g. Mechanical Coordinator	Before assuming position <del>Annually</del> thereafter	The objective of Emergency Repair/Corrective Action is to develop and maintain a group of personnel capable of assessing and performing emergency repair or corrective action operations in-plant in an emergency situation.
			Once per year not to exceed 18 months between training sessions
Onsite	a. Fire Brigade	<del>Annually</del>	Develop well-trained fire brigade whose

FIGURE 8.1

**EMERGENCY RESPONSE TRAINING**

(continued)

<u>TITLE/FUNCTION</u>	<u>ASSIGNED PERSONNEL</u>	<u>FREQUENCY</u>	<u>TRAINING OBJECTIVE</u>
Fire Fighting Personnel	members and Supervisors as specified in the Fire Protection Procedures Manual		actions minimize injuries, property loss and damage and lost generation time.
Medical Support Personnel	a. Oswego Hospital Personnel b. Ambulance Drivers and Attendants c. University Hospital Personnel	Annually	Ensure a high state of emergency preparedness and medical awareness of handling of contaminated injuries that may occur at a nuclear facility.
Offsite Fire Fighting Personnel	Designated personnel from those fire agencies which will most likely respond to a request for aid through Oswego County E-911.	Annually	The objective of training for fire fighting personnel is to ensure that offsite individuals who may be called upon in an emergency to access the JAFNPP will be knowledgeable in applicable procedures and intended roles.