

## Briefing Notes for NRC Pre-Submittal Call

1. Status of Exelon's License Amendment Request (LAR)
  - a. Six (6) Midwest stations planned for January 2018 submittal
    - i. Braidwood, Byron, Clinton, Dresden, LaSalle, and Quad Cities
  - b. Three (3) Mid-Atlantic stations - March 2018
    - i. Limerick, Peach Bottom, and Three Mile Island
  - c. Four (4) Northeast stations - June 2018
    - i. Calvert Cliffs, Ginna, Nine Mile Point, and FitzPatrick
  - d. Nine Mile Point / FitzPatrick Emergency Operations Facility (EOF)
  - e. Calvert Cliffs EOF
  
2. Midwest LAR Content
  - a. Format
    - i. Common cover letter
    - ii. Six attachments (one for each station)
      1. Redline mark-ups of Emergency Plan revised pages
      2. Final version of Emergency Plan change pages
    - iii. Task Analysis Attachment - common for all stations
    - iv. Commitments - Validation Drill will be part of implementation / Emergency Response Organization (ERO) training
      1. Proposed commitment included in LAR
  - b. LAR based on April 2017 version of draft NUREG-0654 Table B-1 and NRC's Technical Basis document
  - c. Format informed by Southern Company's 2015 Augmentation LAR
  - d. LAR Evaluation discusses
    - i. Technical Changes (Process Computer, Rad Pro advancements, Operations Training, Emergency Operating Procedures, etc.)
    - ii. History of Emergency Plan
    - iii. Functional Analysis
      1. NRC Technical Basis
      2. Discussion of changes to current Emergency Plan
      3. Discussion of how it compares to NRC draft NUREG-0654 guidance
    - iv. Task Analysis Attachment (common to all stations)

### 3. Proposed Exceptions from Draft NUREG-0654 Guidance

- a. Exelon EOF activated at Alert level
- b. No Dose Assessment at Technical Support Center (TSC) since function done at EOF at Alert level
- c. NRC / Offsite Response Organization (ORO) Communicators will be positioned at the EOF at the Alert level
- d. Operations Support Center (OSC) Lead Technicians (Rad Pro, Mechanical Maintenance, Electrical Maintenance, Instrumentation & Controls) proposed as an option in place of Supervisors
- e. On-site Field Team Driver
- f. EOF/Joint Information Center (JIC) and TSC Information Technology (IT) support proposed as Full-Augmentation rather than Minimum Staff
- g. On-shift Dose Assessment collateral duty for on-shift Rad Pro technician

### 4. Clarification regarding Draft NUREG-0654 Guidance

- a. **Status of Guidance** - Discuss whether the Technical Basis document will be endorsed prior to the LAR submittal and if there is any issue with submitting based on existing draft guidance.
- b. **Submittal** - Redline mark-ups will be provided only for pages revised. Discuss whether final versions of the pages will be needed with submittal.
- c. **Communicators** - For the Communications function, the NUREG guidance provides for a TSC NRC communicator and an TSC ORO Communicator. Discuss the purpose for the 3rd EOF Communicator (i.e., ORO, NRC or Health Physics Network (HPN)). Exelon intends to staff the ENS Communicator at TSC and ORO Communicator in the EOF upon activation. Discuss what the third communicator in the guidance should be trained to do (e.g., ENS, ORO, HPN).
- d. **Classification** - Regarding the Classification Advisor; is this position intended to be the Emergency Director (on- shift or TSC).
- e. **SAMG** - Exelon currently identifies SAMG Evaluators and Decision Makers in the Table. Discuss how that should be managed going forward (e.g., Emergency Plan Implementing Procedure (EPIP)). SAMG commitment will be retained in Emergency Plan, but not in the Table.
- f. **JIC** - JIC is staffed at a Site Area Emergency (SAE). Some positions will be filled by Exelon Communications remotely (i.e., Public Information Director, Corporate Spokesman). JIC Director will still be at JIC to interface.
- g. **On-Shift Maintenance** - Clinton has an I&C technician on shift to support EOPs. At some point that may transition to an Operations skill/collateral duty. Discuss how to reflect this aspect in Table B-1 without the need for another LAR.