

NRR-DMPSPeM Resource

From: Purnell, Blake
Sent: Tuesday, October 2, 2018 1:40 PM
To: Gropp Jr, Richard W:(GenCo-Nuc)
Cc: Wrona, David; Barstow, James:(GenCo-Nuc); Watson, Bruce
Subject: Exelon Generation Company, LLC - Request for Additional Information Regarding License Amendment Request to Revise Emergency Plan for Limerick and Peach Bottom (EPID L-2018-LLA-0150)
Attachments: Exelon LP ERO Staffing RAI.pdf

Mr. Gropp:

By application dated May 10, 2018 (Agencywide Documents Access and Management System Package Accession No. ML18149A290), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request for Limerick Generating Station, Units 1 and 2, and Peach Bottom Atomic Power Station, Units 1, 2, and 3. The amendments would revise the emergency plans by changing the emergency response organization staffing requirements for each of these facilities.

The NRC staff has reviewed the application and determined that it needs additional information to complete its review. A response to the attached request for additional information is requested to be provided within 30 days from the date of this email. If you have any questions, please contact me at (301) 415-1380.

Sincerely,

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

Docket Nos. 50-352, 50-353, 72-65, 50-171,
50-277, 50-278, and 72-79

OFFICE	NRR/DORL/LPL3/PM	NSIR/DPR/RDB/BC	NRR/DORL/LPL3/BC
NAME	BPurnell	JAnderson	DWrona
DATE	10/2/18	9/27/18	9/27/18

Hearing Identifier: NRR_DMPS
Email Number: 600

Mail Envelope Properties (Blake.Purnell@nrc.gov20181002133900)

Subject: Exelon Generation Company, LLC - Request for Additional Information
Regarding License Amendment Request to Revise Emergency Plan for Limerick and Peach Bottom
(EPID L-2018-LLA-0150)

Sent Date: 10/2/2018 1:39:58 PM

Received Date: 10/2/2018 1:39:00 PM

From: Purnell, Blake

Created By: Blake.Purnell@nrc.gov

Recipients:

"Wrona, David" <David.Wrona@nrc.gov>

Tracking Status: None

"Barstow, James:(GenCo-Nuc)" <James.Barstow@exeloncorp.com>

Tracking Status: None

"Watson, Bruce" <Bruce.Watson@nrc.gov>

Tracking Status: None

"Gropp Jr, Richard W:(GenCo-Nuc)" <Richard.Gropp@exeloncorp.com>

Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	1230	10/2/2018 1:39:00 PM
Exelon LP ERO Staffing RAI.pdf		103319

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO REVISE
EMERGENCY RESPONSE ORGANIZATION STAFFING REQUIREMENTS
LIMERICK GENERATING STATION, UNITS 1 AND 2
PEACH BOTTOM ATOMIC POWER STATION, UNITS 1, 2, AND 3
DOCKET NOS. 50-352, 50-353, 50-171, 50-277, AND 50-278

By application dated May 10, 2018 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML18149A290), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) for Limerick Generating Station (LGS), Units 1 and 2, and Peach Bottom Atomic Power Station (PBAPS), Units 1, 2, and 3. The amendments would revise the emergency plans by changing the emergency response organization (ERO) staffing requirements for each of these facilities.

The U.S. Nuclear Regulatory Commission (NRC) has reviewed the application and determined that the information below is needed to complete its review.

RAI-1

Background

Enclosures 1 and 2 of the application provided separate evaluations of the proposed changes for each site. Section 2.4 of each enclosure states, in part:

Those ERO positions designated as Minimum Staffing in the [site] Emergency Plan are those required to activate their respective Emergency Response Facility (ERF). Specifically, these are the ERO positions that are the absolute minimum needed to implement the Emergency Plan (i.e., if any position or function is not staffed then the Emergency Plan may not be effectively implemented).

The planning standard in paragraph 50.47(b)(14) of Title 10 of the *Code of Federal Regulations* states: "Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected." Section N, "Drill and Exercise Program," of EP-AA-1000, "Exelon Nuclear Standardized Radiological Emergency Plan," Revision 29 (ADAMS Package Accession No. ML18065A168), states that the Drill and Exercise Program will be used to develop, maintain, and evaluate the capabilities of the ERO to respond to emergency conditions and safeguard the health and safety of station personnel and the general public. However, this plan does not address whether these periodic drills or exercises will be used on a continuing basis to specifically evaluate the adequacy of the minimum staffing levels to ensure that they continue to retain the necessary key skills to perform required major functions prior to full augmentation.

Exelon has also submitted similar LARs to change the ERO staffing requirements for its facilities in Illinois, New York, and Maryland (ADAMS Accession Nos. ML18053A159 (package) and

ML18249A096). In its July 27, 2018, supplement for its LAR to revise the ERO staffing for its facilities in Illinois (ADAMS Accession No. ML18208A405), Exelon stated (emphasis added):

Exelon will institute a “Minimum Staff” drill to be conducted once per drill cycle. The drill will include participation from the Minimum Staff of the Emergency Operations Facility (EOF), the Joint Information Center (JIC), the Technical Support Center (TSC), and the Operations Support Center (OSC) **from one of the affected Exelon stations which have implemented the approved ERO staffing changes license amendment.** This will allow Exelon to periodically demonstrate that the Standardized Emergency Plan is effectively implemented to perform the required Emergency Preparedness [EP] functions utilizing only the Minimum Staff defined in the Emergency Plan. Since the ERO Minimum Staff is the same for each station under the Exelon Standardized Emergency Plan, it is not necessary to perform the drill for each station in a drill cycle.

Exelon has several EOFs throughout its fleets, some of which serve multiple sites. The consolidated EOFs include a facility in Coatesville, Pennsylvania, that currently serves LGS, PBAPS, and Three Mile Island Nuclear Station, and a facility in Warrenville, Illinois, that serves all of Exelon’s facilities in Illinois.

Request

- A. Describe how Exelon plans to specifically evaluate the adequacy of the minimum staffing levels to perform required functions until full augmentation, with the proposed ERO staffing changes, to ensure continued effective implementation of the respective emergency plans for each site.
- B. Describe whether Exelon plans to conduct a “Minimum Staff” drill once per drill cycle from its EOF facility in Coatesville, Pennsylvania, with one of the applicable stations it supports (currently, LGS or PBAPS). Clarify whether or not “Minimum Staff” drills conducted at other EOFs would be credited for LGS and PBAPS. Clarify whether or not the statement above from Exelon’s July 27, 2018, supplement for the LAR for its Illinois plants is also intended to apply to the May 10, 2018, LAR for LGS and PBAPS.

RAI-2

Section 2.4 of Enclosure 1 and 2 to the LAR states, in part:

As part of the implementation of these changes, a confirmation of the capabilities of the final Minimum Staff personnel will be performed through an EP drill to demonstrate that no loss of function will result due to the changes in the ERO. The corresponding State(s) are invited to participate in this EP drill. Additionally, the NRC will be invited to observe the drill.

Confirm that the Federal Emergency Management Agency would also be invited to observe the drill, or explain why an invitation is not needed.