



## **POLICY ISSUE** **(Notation Vote)**

March 25, 2019

SECY-19-0031

FOR: The Commissioners

FROM: Margaret M. Doane  
Executive Director for Operations

SUBJECT: EXELON GENERATION COMPANY, LLC, REQUEST FOR  
EMERGENCY OPERATIONS FACILITY CONSOLIDATION

### PURPOSE:

The purpose of this paper is to request Commission approval of the license amendment request submitted by the Exelon Generation Company, LLC (Exelon) to relocate and consolidate the emergency operations facility (EOF) for Calvert Cliffs Nuclear Power Plant (CCNPP) with the existing Exelon joint EOF located in Coatesville, Pennsylvania (Coatesville EOF). Prior Commission approval is required because the Coatesville EOF is more than 25 miles from the CCNPP site. It is located approximately 115 air (straight line) miles from the CCNPP site.

This paper does not address any new commitments or resource implications.

### BACKGROUND:

An EOF provides a facility from which the licensee can manage the overall licensee emergency response during an event, including coordinating radiological and environmental assessments, determining protective actions, and communicating and coordinating with Federal, State and local agencies. This facility complements other licensee emergency response facilities, such as the technical support center, which is located onsite at each respective site and from which the licensee staff provides plant management and technical support to plant operations personnel during emergency conditions.

A list of existing EOFs (primary and backup), located more than 25 miles from their respective nuclear power reactor sites, is provided in Enclosure 1, "Commission-Approved Emergency Operations Facilities Located More Than 25 Miles From Respective Nuclear Power Reactor Site(s)."

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If a licensee desires to locate an EOF more than 25 miles from a nuclear power reactor site, prior Commission approval is required under paragraph IV.E.8.b of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities."

#### DISCUSSION:

##### Request to Relocate and Consolidate the CCNPP EOF

The existing Coatesville EOF is currently used jointly by Limerick Generating Station - Units 1 and 2 (LGS), Peach Bottom Atomic Power Station - Units 2 and 3 (PBAPS), and Three Mile Island Nuclear Station - Unit 1 (TMI). The Commission approved the use of a consolidated facility for LGS and PBAPS located at Coatesville, Pennsylvania, in the Staff Requirements Memoranda (SRM) for SECY-90-072, "Location of the Combined Emergency Operations Facility for Peach Bottom and Limerick Nuclear Power Stations," dated March 21, 1990 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML010170102). Subsequently, the Commission approved the relocation and consolidation of the EOF for TMI with the Coatesville EOF in SRM-SECY-03-0033, "Revised AmerGen's Request to Consolidate Three Mile Island Unit 1 Emergency Operations Facility (EOF) into Combined EOF for Peach Bottom Atomic Power Station (PBAPS) & Limerick Generating Station (LGS)," dated March 18, 2003 (ADAMS Accession No. ML030780051). By letter dated August 30, 2018 (ADAMS Accession No. ML18242A067), Exelon requested U.S. Nuclear Regulatory Commission (NRC) approval to relocate and consolidate the CCNPP EOF with the Coatesville EOF.

##### Staff Consideration

In its evaluation of Exelon's request to relocate the CCNPP EOF and consolidate it with the Coatesville EOF, the staff followed all relevant requirements and guidance. A detailed discussion of the requirements and guidance, as well as the staff's evaluation, is provided in Enclosure 2, "Evaluation of Exelon Generation Company, LLC, Request for Emergency Operations Facility Relocation and Consolidation."

##### *Requirements and Guidance*

The regulations for evaluating a request to consolidate an EOF are contained in 10 CFR 50.47(b) and Appendix E to Part 50. The requirements include the following provisions and capabilities that must be met when a site is located more than 25 miles from the EOF:

- (1) Space for members of an NRC site team and Federal, State, and local responders;
- (2) Additional space for conducting briefings with emergency response personnel;
- (3) Communication with other licensee and offsite emergency response facilities;
- (4) Access to plant data and radiological information;
- (5) Access to copying equipment and office supplies;

- (6) The capability for obtaining and displaying plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves;
- (7) The capability to analyze plant technical information and provide technical briefings on event conditions and prognosis to licensee and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves; and
- (8) The capability to support response to events occurring simultaneously at more than one nuclear power reactor site if the emergency operations facility serves more than one site.

Relevant guidance provides criteria that the staff evaluates during its review, which ensures that the review considers the following aspects of the EOF:

- functions;
- location, structure, and habitability;
- staffing and training;
- size;
- radiological monitoring;
- communications;
- instrumentation, data system equipment, and power supplies;
- technical data and data system; and
- records availability and management.

#### *Staff Evaluation*

The NRC staff's evaluation analyzed whether the licensee complied with the regulations and followed the applicable guidance to demonstrate the ability of the proposed facility to perform the key functions of the EOF at an emergency declaration requiring EOF activation for at least two nuclear power reactor sites. In addition, the staff's evaluation considered concurrence by affected State and local entities in support of the proposed consolidation, and the Federal Emergency Management Agency's review of impacts of the proposed consolidation on existing State and local radiological emergency response plans. The staff's evaluation consisted of a review of proposed emergency plan changes and supporting documents. The staff also considered that the Coatesville EOF is an existing facility supporting the LGS, PBAPS and TMI sites, with a demonstrated ability to support emergencies declared at multiple sites based on previous drills and exercises.

#### CONCLUSION:

On the basis of its evaluation, the staff concludes that the proposed relocation of the CCNPP EOF, and consolidation with the existing Coatesville EOF, would fulfill necessary emergency response functions and meet applicable regulations in 10 CFR 50.47 and Appendix E of 10 CFR Part 50, and the criteria as set forth in applicable guidance. Given the technological capabilities of the Coatesville EOF, its existing capacity to address multi-site events, and the staffing of an emergency response organization comprised of experienced and diverse personnel from the Exelon corporate offices, the relocation of the CCNPP EOF to the existing Coatesville EOF would not impact the ability of the facility to continue to effectively support



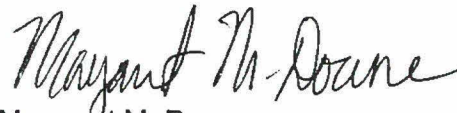
Exelon's emergency response at all of the sites that the facility serves. As such, the NRC would have reasonable assurance that protective measures can and will be implemented in the event of a radiological emergency at any of the sites that the Coatesville EOF serves.

RECOMMENDATIONS:

The staff recommends Commission approval of the proposed relocation of the CCNPP EOF and consolidation into the existing Coatesville EOF. Commission approval by May 10, 2019, would support the licensee's requested approval date for the CCNPP EOF relocation and consolidation.

COORDINATION:

The Office of the General Counsel reviewed this package and has no legal objection.

A handwritten signature in black ink, appearing to read "Margaret M. Doane", is written over the printed name.

Margaret M. Doane  
Executive Director  
for Operations

Enclosures:  
As stated

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**DATE:** March 25, 2019

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ADAMS Accession No: ML18331A245 (Package); ML18331A235 (SECY Paper);  
ML18331A236 (Enclosure 1); ML18331A241 (Enclosure 2)

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