

Attachment 2

Dresden Station

**TABULAR SUMMARY OF PROPOSED CHANGES TO SITE
EMERGENCY PLAN**

Attachment 2
TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Note: Regarding the format of this table, deleted text is indicated by ~~strike-through~~; added text is indicated by **Bold** font.

EP-DR 1000

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
EP-DR-1000	<p>Note: This table provides a summary of changes to documents comprising the Dresden Emergency Plan: EP-DR-1000.</p> <p>Besides the changes associated with the permanent shutdown evaluated below, there are multiple editorial changes that are proposed in this license amendment request, i.e., they do not change the intent of the document. They do not impact the ability to comply with Regulatory Guidance or level of commitments made in the Emergency Plan. These changes are marked with revision bars within the Emergency Plan (except changes to step numbers); however, they are not specifically evaluated in the change assessment, since they are editorial. These include:</p> <ul style="list-style-type: none"> • Changes in step numbers as a result of information which has been relocated or deleted. • Page number changes within the Table of Contents • Changes in the Table of Contents which reflect changes made within the Plan • Changes in Revision numbering and Revision History 		
EP-DR-1000 Part II Section A.2.a <u>Dresden Nuclear Emergency Response Organization</u>	IEMA Technical has both the command authority for radiological aspects of a nuclear incident and the responsibility for performing various radiological functions. These functions include milk, water and food control, radiation exposure control for state emergency workers, and confirmatory accident assessment. During an emergency situation, IEMA Technical shall make protective action recommendations to the Governor.	IEMA Technical has both the command authority for radiological aspects of a nuclear incident and the responsibility for performing various radiological functions. These functions include milk, water and food control, radiation exposure control for state emergency workers, and confirmatory accident assessment. During an emergency situation, IEMA Technical shall make protective action recommendations to the Governor.	The revision replaces the reference to the IEMA Technical branch. The change was made at the request of IEMA based on changes to their Organization Structure. The IEMA Technical group no longer exists.
EP-DR-1000 Part II Section A, Fig. A-2 <u>Dresden Nuclear Emergency Response Organization</u>	<p><u>Figure A-2: Agency Response Organization Interrelationships</u></p> <p>Dept of Safety / Rad Protection</p>	<p><u>Figure A-2: Agency Response Organization Interrelationships</u></p> <p>Dept of Safety / Rad Protection</p>	The revision deletes the reference to the Dept of Safety / Rad Protection group. The change was made at the request of IEMA based on changes to their Organization Structure. The Dept

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			of Safety / Rad Protection group no longer exists.
EP-DR-1000 Part II Section B <u>Dresden Nuclear Emergency Response Organization</u>	<u>Section B: Exelon Nuclear Emergency Response Organization</u> This section describes the Exelon Nuclear Emergency Response Organization (ERO), its key positions and associated responsibilities. <...>	<u>Section B: Dresden Nuclear Emergency Response Organization</u> This section describes the Dresden Nuclear Emergency Response Organization (ERO), its key positions and associated responsibilities. <...>.	The revision replaces Exelon with Dresden as it pertains to Nuclear Response Organization. EP functions for the Dresden Emergency Response Organization will continue to be maintained.
EP-DR-1000 Part II Section B.1 On Shift Emergency Response Organization Assignments	1. On Shift Emergency Response Organization Assignments The normal plant personnel complement is established with the Station Vice President having overall authority for station operations. The Station Vice President directs the site organization in the management of the various departments while the Shift Manager retains the responsibility for actual operation of plant systems. <...>	1. On Shift Emergency Response Organization Assignments The normal plant personnel complement is established with the Station Vice President Plant Manager having overall authority for station operations. The Station Vice President Plant Manager directs the site organization in the management of the various departments while the Shift Manager retains the responsibility for actual operation of plant systems. <...>	The revision replaces the Station Vice President with the Plant Manager as having overall authority and directing the site organization. This change is in alignment with the site staffing changes being made in the Dresden Technical Specifications (TS), Administrative Controls, License Amendment Request (LAR) ¹ .
EP-DR-1000 Part II Section B.1 <u>On Shift Personnel</u>	<u>Shift Technical Advisor (STA):</u> During normal plant operations, the Senior Reactor Operators report to the Shift Manager and directly supervise the licensed Reactor Operators and all activities in the Control Room. During an abnormal condition, the Shift Manager assumes direct supervision of personnel and all activities in the Control Room while a qualified individual steps back and assumes an overview role as an STA with the specific responsibility of monitoring the maintenance of core	<u>Shift Technical Advisor (STA):</u> During normal plant operations, the Senior Reactor Operators report to the Shift Manager and directly supervise the licensed Reactor Operators and all activities in the Control Room. During an abnormal condition, the Shift Manager assumes direct supervision of personnel and all activities in the Control Room while a qualified individual steps back and assumes an overview role as an STA with the specific responsibility of monitoring the maintenance of	The revision deletes reference to Shift Technical Advisor and aligns with staffing changes in Dresden TS, Administrative Controls LAR ² . Dresden will no longer be an operating nuclear power plant. The STA function for a permanently shutdown reactor is no longer required. EP functional

¹ Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Changed to Unit 1 Technical Specification Section 6.1, "Responsibility," and Technical Specifications 1.1, "Definitions," and 5.0, "Administrative Controls," for Permanently Defueled Condition," dated September 24, 2020 (NRC Accession No. ML20269A404)

² Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Changed to Unit 1 Technical Specification Section 6.1, "Responsibility," and Technical Specifications 1.1, "Definitions," and 5.0, "Administrative Controls," for Permanently Defueled Condition," dated September 24, 2020 (NRC Accession No. ML20269A404)

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	cooling and containment integrity. An individual assigned the duty as the STA shall be available to the Control Room at all times.	core cooling and containment integrity. An individual assigned the duty as the STA shall be available to the Control Room at all times.	requirements for Technical Support will be performed by Shift Manager / Certified Fuel Handler (CFH). Refer to Attachment 1, Section 5.3.7 for further discussion of the STA.
EP-DR-1000 Part II Section B.5.a Station Emergency Response Organization	a. Station Emergency Response Organization <...> When plant conditions warrant entry into the Severe Accident Management Guidelines (SAMGs), On-shift staff or TSC Minimum staff ERO may assume the roles of Decision-Maker and Evaluators as directed by station procedures.	a. Station Emergency Response Organization <...> When plant conditions warrant entry into the Severe Accident Management Guidelines (SAMGs), On-shift staff or TSC Minimum staff ERO may assume the roles of Decision-Maker and Evaluators as directed by station procedures.	The revision removes reference to SAMGs. SAMG scenarios are no longer applicable or required in the permanently defueled condition.
EP-DR-1000 Part II Section B.5.a.1 Shift Manager (Shift Emergency Director) Control Room	1) <u>Shift Manager (Shift Emergency Director) - Control Room</u> <...> The Shift Manager's responsibilities, when not in Command and Control, are described below: <ul style="list-style-type: none"> • The authority and responsibility to shut down the reactor when determined that the safety of the reactor is in jeopardy or when operating parameters exceed any of the reactor protection circuit set-points and automatic shutdown does not occur; • To ensure a review has been completed to determine the circumstance, cause, and limits under which operations can safely proceed before the reactor is returned to power following a trip or an unscheduled or unexplained power reduction; • The responsibility to be present at the plant and to provide direction for returning the reactor to power following a trip or an unscheduled or unexplained power reduction; <...>	1) <u>Shift Manager (Shift Emergency Director) - Control Room</u> <...> The Shift Manager's responsibilities, when not in Command and Control, are described below: <ul style="list-style-type: none"> • The authority and responsibility to shut down the reactor when determined that the safety of the reactor is in jeopardy or when operating parameters exceed any of the reactor protection circuit set-points and automatic shutdown does not occur; • To ensure a review has been completed to determine the circumstance, cause, and limits under which operations can safely proceed before the reactor is returned to power following a trip or an unscheduled or unexplained power reduction; • The responsibility to be present at the plant and to provide direction for returning the reactor to power following a trip or an unscheduled or unexplained power reduction; <...>	The revision reflects that the duties of the Shift Manager no longer include shutting down the reactor or review prior to returning to power. The permanent shutdown of the Dresden reactors and defueled status makes these responsibilities unnecessary within the Emergency Plan.

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EP-DR-1000 Part II Section B.5.a.5 Technical Support Staff - TSC	5) <u>Technical Support Staff</u> TSC The TSC Technical Support Staff consists of the following minimum staff engineering positions: - Electrical Engineer - Mechanical Engineer - Core/Thermal Hydraulic Engineer - serves as Core Damage Assessment Methodology (CDAM) Evaluator, as applicable. In addition, station Engineering support will be augmented on an as needed basis to support accident assessment and mitigation activities.	5) <u>Technical Support Staff</u> TSC The TSC Technical Support Staff consists of the following minimum staff engineering positions: -TSC-Electrical Engineer -Mechanical Engineer -Core/Thermal Hydraulic Engineer - serves as Core Damage Assessment Methodology (CDAM) Evaluator, as applicable. In addition, station Engineering support will be augmented on an as needed basis to support accident assessment and mitigation activities.	The TSC discipline specific Engineering positions are being combined into the TSC Engineer position. This revision is further discussed in Attachment 1, Section 5.3.7, Evaluation of Proposed Changes. Evaluation of this ERO position's responsibilities is performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned.
EP-DR-1000 Part II Section B.5.a.8 Operations Support Center Director OSC	8) <u>Operations Support Center Director</u> OSC The OSC Director reports to the Emergency Director and supervises the activities of OSC personnel. Responsibilities include: <ul style="list-style-type: none"> • Assign tasks to designated Leads as available: <ul style="list-style-type: none"> - I&C Maintenance - Mechanical Maintenance - Electrical Maintenance - Radiation Protection <...>	8) <u>Operations Support Center Director</u> OSC The OSC Director reports to the Emergency Director and supervises the activities of OSC personnel. Responsibilities include: <ul style="list-style-type: none"> • Assign tasks to designated Leads as available: <ul style="list-style-type: none"> - I&C Maintenance - Mechanical Maintenance - Electrical Maintenance - Radiation Protection <...>	The revision deletes the OSC I&C, Mechanical Maintenance and Electrical Maintenance Lead positions. These OSC technicians will be supervised by the OSC Director. The pooled positions will consist of Mechanical, Electrical, and I&C Technicians. Radiation Protection (RP) Technicians will be supervised by the RP Supervisor/Lead. This revision is further discussed in Attachment 1, Section 5.3.10, Evaluation of Proposed Changes.
EP-DR-1000 Part II Section B.5.a.9 OSC Leads OSC	9) <u>OSC Leads</u> OSC OSC Leads report to the OSC Director and are assigned from the following station departments: <ul style="list-style-type: none"> • Mechanical Maintenance • Electrical Maintenance • Instrument and Control 	9) <u>OSC RP Leads</u> OSC OSC Leads and report to the OSC Director and are assigned from the following station departments: <ul style="list-style-type: none"> • Mechanical Maintenance • Electrical Maintenance • Instrument and Control 	Evaluation of these ERO position's responsibilities are performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned.

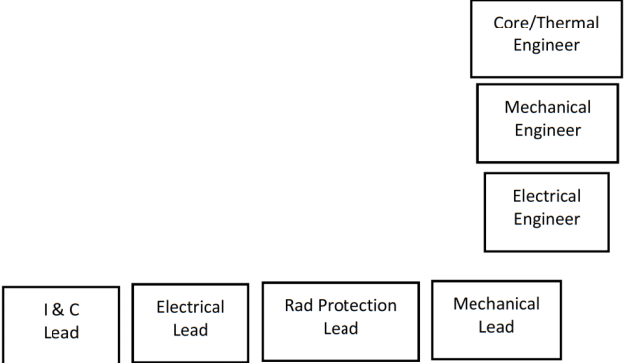
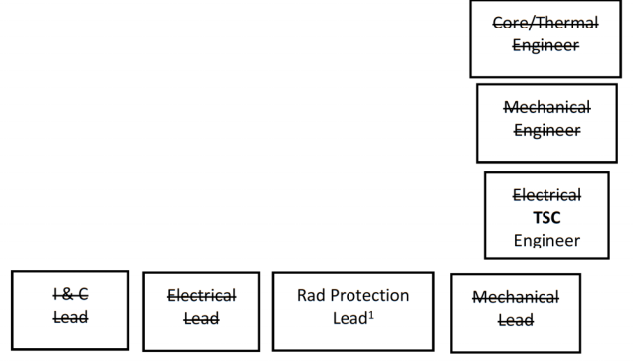
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	<ul style="list-style-type: none"> • Radiation Protection <p>The OSC Lead assigned to an OSC team is responsible at all times for the safety of team personnel and to keep the OSC Director apprised of team status. Specifically, the OSC Leads are responsible for the managing and supervising OSC team personnel, including:</p> <ul style="list-style-type: none"> • Conduct of adequate pre-dispatch briefings. • Ensuring adequate protective equipment and measures have been identified. • Tracking of OSC team activities while dispatched. • Debriefing of team personnel upon return to the OSC. 	<ul style="list-style-type: none"> • Radiation Protection <p>The OSC RP Lead assigned to an OSC team is responsible at all times for the safety of team personnel and to keep the OSC Director apprised of team status. Specifically, the OSC RP Leads are is responsible for the managing and supervising OSC team RP personnel, including:</p> <ul style="list-style-type: none"> • Conduct of adequate pre-dispatch briefings. • Ensuring adequate protective equipment and measures have been identified. • Tracking of OSC team activities while dispatched. • Debriefing of team personnel upon return to the OSC. 	<p>The re-assignment of ERO responsibilities will be further demonstrated through the performance of drills utilizing the revised procedures and staffing (reference Attachment 5 Commitments).</p>
<p>EP-DR-1000 Part II Step B.8.a Industry/Private Support Organizations</p>	<p>a. <u>Institute of Nuclear Power Operations (INPO):</u> Experience has shown that a utility may need resources beyond in-house capabilities for the recovery from a nuclear plant emergency. One of the roles of the Institute of Nuclear Power Operations (INPO) is to assist affected utilities by quickly applying the resources of the nuclear industry to meet the needs of an emergency. INPO has an emergency response plan that enables it to provide the following emergency support functions:</p> <ul style="list-style-type: none"> • Assistance to the affected utility in locating sources of emergency personnel, equipment and operational analysis. • INPO, Electric Power Research Institute (EPRI) and Nuclear Energy Institute (NEI) maintain a coordination agreement on emergency information with their member utilities. 	<p>a. Deleted Institute of Nuclear Power Operations (INPO): Experience has shown that a utility may need resources beyond in-house capabilities for the recovery from a nuclear plant emergency. One of the roles of the Institute of Nuclear Power Operations (INPO) is to assist affected utilities by quickly applying the resources of the nuclear industry to meet the needs of an emergency. INPO has an emergency response plan that enables it to provide the following emergency support functions:</p> <ul style="list-style-type: none"> • Assistance to the affected utility in locating sources of emergency personnel, equipment and operational analysis. • INPO, Electric Power Research Institute (EPRI) and Nuclear Energy Institute (NEI) maintain a coordination agreement on emergency information with their member utilities. 	<p>The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility.</p>

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	<ul style="list-style-type: none"> • INPO provides the "Nuclear Network", or its replacement, electronic communications system to its members, participants, NEI, and EPRI to coordinate the flow of media and technical information about the emergency. • Exelon Nuclear may obtain utility industry information and assistance from any party to this agreement through the coordination of INPO. <p>To support these functions, INPO maintains the following emergency support capabilities:</p> <ul style="list-style-type: none"> • A dedicated emergency call number. • Designated INPO representative(s) who can be quickly dispatched to the utility emergency response organization to coordinate INPO support activities and information flow. • The 24-hour per day operation of an Emergency Response Center at INPO headquarters. <p>Exelon Nuclear will notify INPO (via the designated emergency call number) for all situations involving an Alert, Site Area Emergency, or General Emergency declaration per the Exelon Nuclear Reportability Manual.</p> <p>INPO has coordinated the preparation of a Voluntary Assistance Agreement for Transportation Accidents. Exelon Nuclear has signed this agreement which establishes the rights and responsibilities of electric utilities in requesting or providing assistance for response to a nuclear materials Transportation Accident.</p>	<ul style="list-style-type: none"> • INPO provides the "Nuclear Network", or its replacement, electronic communications system to its members, participants, NEI, and EPRI to coordinate the flow of media and technical information about the emergency. • Exelon Nuclear may obtain utility industry information and assistance from any party to this agreement through the coordination of INPO. <p>To support these functions, INPO maintains the following emergency support capabilities:</p> <ul style="list-style-type: none"> • A dedicated emergency call number. • Designated INPO representative(s) who can be quickly dispatched to the utility emergency response organization to coordinate INPO support activities and information flow. • The 24 hour per day operation of an Emergency Response Center at INPO headquarters. <p>Exelon Nuclear will notify INPO (via the designated emergency call number) for all situations involving an Alert, Site Area Emergency, or General Emergency declaration per the Exelon Nuclear Reportability Manual.</p> <p>INPO has coordinated the preparation of a Voluntary Assistance Agreement for Transportation Accidents. Exelon Nuclear has signed this agreement which establishes the rights and responsibilities of electric utilities in requesting or providing assistance for response to a nuclear materials Transportation Accident.</p>	
EP-DR-1000 Part II Figure B-1a	Figure B-1a: Exelon Overall ERO Command Structure	Figure B-1a: Exelon Dresden Overall ERO Command Structure	The revision replaces Exelon with Dresden as it pertains to the Overall ERO Command Structure. EP functions for the Dresden ERO command structure will continue to be maintained.

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EP-DR-1000 Part II Figure B-1b	<p>Figure B-1b: Emergency Onsite Organization</p> 	<p><i>Figure B-1b: Emergency Onsite Organization</i></p>  <p>1 Rad Protection Lead responsibilities will be performed by a Rad Protection Pool responder as a collateral function.</p>	<p>The TSC Core/Thermal, Mechanical, and Electrical Engineer positions are being deleted from the Dresden ERO and are being replaced by the TSC Engineer. This revision is further discussed in Attachment 1, Section 5.3.7 Evaluation of Proposed Changes.</p> <p>The revision also deletes the OSC I&C, Electrical and Mechanical Lead positions. The pooled positions consist of Mechanical, Electrical, and I&C technicians. The Pooled OSC technicians will be supervised by the OSC Director.</p> <p>The Radiation Protection Supervisor/Lead position will be performed as a collateral function by of one of the Pooled RP Technicians.</p> <p>This revision is further discussed in Attachment 1, Section 5.3.10, Evaluation of Proposed Changes.</p> <p>Evaluation of these ERO position's responsibilities are performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned.</p>
Part II.D.1.b Emergency Classification System - Alert	<p><...></p> <ul style="list-style-type: none"> Notification of INPO and ANI. <p><...></p>	<p><...></p> <ul style="list-style-type: none"> Notification of INPO and ANI. <p><...></p>	<p>The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility.</p>

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Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
Part II.D.1.d Emergency Classification System – General Emergency	d. <u>General Emergency</u> - Event(s) are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area. <...>	d. <u>General Emergency</u> - Event(s) are in process or have occurred which involve actual or imminent substantial core fuel degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area. <...>	This revision removes the potential for core degradation (and replaces it with fuel degradation) and for loss of containment integrity. The permanent shutdown and removal of fuel of the Dresden reactors makes this condition unnecessary within the Emergency Plan. Fuel degradation within the Spent Fuel Pool is considered
Part II.D.1.e Emergency Classification System – Recovery	<...> • INPO and ANI are notified of Recovery classification.	<...> • INPO and ANI are is notified of Recovery classification.	The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility.
Part II.D.2 Emergency Action Level Technical Bases	<...> An emergency is classified after assessing abnormal plant conditions and comparing them to EAL Threshold Values for the appropriate Initiating Conditions. Classifications are based on the evaluation of each unit for multi-reactor sites. Matrix tables organized by recognition categories are used to facilitate the comparison. The matrix tables are used when the unit is in the Technical Specification defined modes of Power Operations, Hot Standby, Hot Shutdown (for classifications purposes, startup evolutions are included in the Power Operations mode) and Cold Shutdown or Refueling (for classification purposes a defueled plant will be considered in the Refueling mode). <...>	<...> An emergency is classified after assessing abnormal plant conditions and comparing them to EAL Threshold Values for the appropriate Initiating Conditions. Classifications are based on the evaluation of each unit for multi-reactor sites. Matrix tables organized by recognition categories are used to facilitate the comparison. The matrix tables are used when the unit is in the Technical Specification defined modes of Power Operations, Hot Standby, Hot Shutdown (for classifications purposes, startup evolutions are included in the Power Operations mode) and Cold Shutdown or Refueling (for classification purposes a defueled plant will be considered in the Refueling mode). <...>	This revision removes matrix tables related to plant operating modes. The permanent shutdown and defueling of the Dresden reactors makes these matrices unnecessary within the Emergency Plan.

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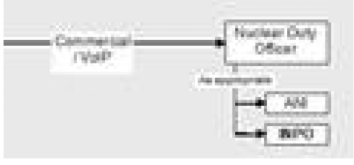
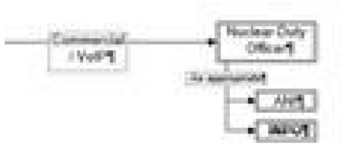
Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
Part II.D.3 Timely Classification of Events	<p><...></p> <p>A qualified EAL assessor means any member of the plant staff who, by training and experience, is qualified to assess the indications or reports for validity and to compare the same to the EALs. A qualified EAL assessor may be, but need not be, a licensed operator or member of the ERO. Qualified EAL assessors may be in the MCR or in another facility where emergency declarations are performed. A qualified EAL assessor does not include personnel such as chemists, radiation protection technicians, craft personnel, security personnel, and others whose positions require they report, rather than assess, abnormal conditions to the MCR.</p> <p><...></p>	<p><...></p> <p>A qualified EAL assessor means any member of the plant staff who, by training and experience, is qualified to assess the indications or reports for validity and to compare the same to the EALs. A qualified EAL assessor may be, but need not be, a licensed operator Certified Fuel Handler, Non-Certified Operator, or member of the ERO. Qualified EAL assessors may be in the MCR or in another facility where emergency declarations are performed. A qualified EAL assessor does not include personnel such as chemists, radiation protection technicians, craft personnel, security personnel, and others whose positions require they report, rather than assess, abnormal conditions to the MCR.</p> <p><...></p>	<p>The revision replaces "licensed operator" with "Certified Fuel Handler, Non-Certified Operator." This change is in alignment with the site staffing changes being made in the Dresden Technical Specifications (TS), Administrative Controls License Amendment Request (LAR).³</p>
Part II.E.2.b.2 Notification and Mobilization of Emergency Response Personnel - Nuclear Regulatory Commission (NRC)	<p><...></p> <p>The computerized data link to the NRC, referred to as the Emergency Response Data System (ERDS), continuously supplies specified plant data to the NRC.</p> <p><...></p>	<p><...></p> <p>The computerized data link to the NRC, referred to as the Emergency Response Data System (ERDS), continuously supplies specified plant data to the NRC.</p> <p><...></p>	<p>This revision removes the computer data link to the NRC (ERDS).</p> <p>The permanent shutdown of the Dresden reactors and defueled status makes ERDS references unnecessary within the Emergency Plan.</p>
Part II.E.2.c Notification and Mobilization of Emergency Response Personnel – Support Organizations	<p><...></p> <ul style="list-style-type: none"> • The Institute of Nuclear Power Operations (INPO) is notified at an Alert or higher classification with requests for assistance as necessary. <p><...></p>	<p><...></p> <ul style="list-style-type: none"> • The Institute of Nuclear Power Operations (INPO) is notified at an Alert or higher classification with requests for assistance as necessary. <p><...></p>	<p>The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility.</p>

³ Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Changed to Unit 1 Technical Specification Section 6.1, "Responsibility," and Technical Specifications 1.1, "Definitions," and 5.0, "Administrative Controls," for Permanently Defueled Condition," dated September 24, 2020 (NRC Accession No. ML20269A404)

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Part II.E.6 Notification of the Public	The ANS is operated by local governmental agencies and maintained by Exelon Nuclear. To assure the ANS is maintained in an operational readiness posture, the local agencies have agreed to test the system (by sounding the sirens) on a periodic basis that meets or exceeds FEMA guidance and to report inoperable equipment to EP designated maintenance personnel. The goal of the testing and maintenance program is to identify inoperable equipment in a timely manner and to restore equipment to a functional status commensurate with FEMA operability requirements as referenced in FEMA-REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants" Section E.6.2.1 . In addition to this routine test and repair program, preventive maintenance of the ANS will be performed on an annual basis.	The ANS is operated by local governmental agencies and maintained by Exelon Nuclear. To assure the ANS is maintained in an operational readiness posture, the local agencies have agreed to test the system (by sounding the sirens) on a periodic basis that meets or exceeds FEMA guidance and to report inoperable equipment to EP designated maintenance personnel. The goal of the testing and maintenance program is to identify inoperable equipment in a timely manner and to restore equipment to a functional status commensurate with FEMA operability requirements as referenced in FEMA-REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants" Section E.6.2.4 . In addition to this routine test and repair program, preventive maintenance of the ANS will be performed on an annual basis.	The revision deletes the reference to FEMA Rep 10 specific Step number E.6.2.1. The procedure has subsequently been revised and the step number is no longer applicable. FEMA Rep 10 is still retained as an appropriate reference.
Part II.F.1.b-d.1 Communications/ Notifications - Emergency Response Data System (ERDS)	1) Nuclear Accident Reporting System (NARS): The NARS is a dedicated communications system that has been installed for the purpose of notifying state and local authorities of declared nuclear emergencies. This system links together the station Control Rooms, the EOF, TSCs and state and local authorities as appropriate. The specific design, operation, and responsibility for maintenance of the NARS systems vary between Exelon Nuclear regions. Note that some stations refer to NARS as Radiological Emergency Communications System (RECS).	1) Nuclear Accident Reporting System (NARS): The NARS is a dedicated communications system that has been installed for the purpose of notifying state and local authorities of declared nuclear emergencies. This system links together the station Control Rooms, the EOF, TSCs and state and local authorities as appropriate. The specific design, operation, and responsibility for maintenance of the NARS systems vary between Exelon Nuclear regions. Note that some stations refer to NARS as Radiological Emergency Communications System (RECS).	The revision removes reference to other station's NARs systems, as well as reference to the North East region's RECS systems. Both references are no longer applicable to the station specific Emergency Plan.
Part II.F.1.b-d.5 Communications/ Notifications - Emergency Response Data System (ERDS)	5) Emergency Response Data System (ERDS): ERDS will continuously supply the NRC with selected plant data points on a near real time basis. The selected data points are transmitted automatically to the NRC at approximately 1-minute intervals.	5) Emergency Response Data System (ERDS): ERDS will continuously supply the NRC with selected plant data points on a near real time basis. The selected data points are transmitted automatically to the NRC at approximately 1 minute intervals.	This revision removes the computer data link to the NRC (ERDS) as communication portal. The permanent shutdown of the Dresden reactors and defueled status makes ERDS references unnecessary within the Emergency Plan.

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Part II, Figure F-1 Exelon Notification Scheme (For Full Augmentation)			The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility
Part II.H.1.a Control Room, Technical Support Center, and Operations Support Center - Station Control Room	<p>a. <u>Station Control Room</u>: The Control Room is the centralized onsite location from which the Nuclear Station's reactors and major plant systems are operated. The Control Room is equipped with instrumentation to supply detailed information on the reactors and major plant systems. The Control Room is continuously staffed with qualified licensed operators. The Control Room is the first onsite facility to become involved with the response to emergency events. Control Room personnel must evaluate and effect control over the emergency and initiate activities necessary for coping with the emergency until such time that support centers can be activated. These activities shall include:</p> <ul style="list-style-type: none"> • Reactor and plant control. <p><...></p>	<p>a. <u>Station Control Room</u>: The Control Room is the centralized onsite location from which the Nuclear Station's reactors and major plant systems reactors and major plant systems necessary to support the spent fuel pool are monitored operated. The Control Room is equipped with instrumentation to supply detailed information on the reactors and major plant systems. The Control Room is continuously staffed with qualified licensed operators. The Control Room is the first onsite facility to become involved with the response to emergency events. Control Room personnel must evaluate and effect control over the emergency and initiate activities necessary for coping with the emergency until such time that support centers can be activated. These activities shall include:</p> <ul style="list-style-type: none"> • Reactor and Plant control. <p><...></p>	<p>This revision removes the reference to the site reactors and major plant equipment.</p> <p>The permanent shutdown of the Dresden reactors and defueled status makes these conditions reference unnecessary within the Emergency Plan.</p>
Part II.H.1.b Control Room, Technical Support Center, and Operations Support Center – Technical Support Center	<p><...></p> <p>The TSC has access to a complete set of as-built drawings and other records, including general arrangement diagrams, P&IDs, and the electrical schematics. The TSC has the capability to record and display vital plant data, in real time, to be used by knowledgeable individuals responsible for engineering and management support of reactor operations, and for implementation of emergency procedures.</p>	<p><...></p> <p>The TSC has access to a complete set of as-built drawings and other records, including general arrangement diagrams, P&IDs, and the electrical schematics. The TSC has the capability to record and display vital plant data, in real time, to be used by knowledgeable individuals responsible for engineering and management support of reactor operations, and for implementation of emergency procedures.</p>	<p>This revision removes the reference to the reactor operation.</p> <p>The permanent shutdown of the Dresden reactors makes this condition unnecessary within the Emergency Plan.</p>

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
Part II.H.5.a.1 Monitoring Equipment Onsite - <u>Meteorological Instrumentation</u>	<...> With regard to Exelon Nuclear's meteorological monitoring program, there has been a quality assurance program adopted from 10 CFR 50, Appendix B. However, since the meteorological facilities are not composed of structures, systems, and components that prevent or mitigate the consequences of postulated accidents and are not "safety related," not all aspects of 10 CFR 50, Appendix B, apply. Those aspects of quality assurance germane to supplying good meteorological information for a nuclear power station were adopted into the meteorological quality assurance program. The meteorological program is also subject to the requirements of the QATR, Section 19, Augmented Quality. <...>	<...> With regard to Exelon Nuclear's meteorological monitoring program, there has been a quality assurance program adopted from 10 CFR 50, Appendix B. However, since the meteorological facilities are not composed of structures, systems, and components that prevent or mitigate the consequences of postulated accidents and are not "safety related," not all aspects of 10 CFR 50, Appendix B, apply. Those aspects of quality assurance germane to supplying good meteorological information for a nuclear power station were adopted into the meteorological quality assurance program. The meteorological program is also subject to the requirements of the Decommissioning Quality Assurance Program QATR, Section 19, Augmented Quality. <...>	This revision changes the quality assurance program reference based on the permanent shutdown of the Dresden reactors. The Station's QATR is replaced by the Decommissioning Quality Assurance Program
Part II.H.5.b.1.c Radiological Monitors and Sampling	<...> c) The accident, or high range, radiation monitoring system monitors radiation levels at various locations within the operating area. These are high range instruments used to track radiation levels under accident or post accident conditions. These instruments include the Containment/Drywell Radiation Monitors. <...>	<...> c) The accident, or high range, radiation monitoring system monitors radiation levels at various locations within the operating area. These are high range instruments used to track radiation levels under accident or post accident conditions. These instruments include the Containment/Drywell Radiation Monitors. <...>	This revision removes the instruments that monitor containment radiation. The permanent shutdown and removal of fuel of the Dresden reactors makes these instrument references unnecessary within the Emergency Plan.
Part II.H.5.b.2 Liquid and Gaseous Sampling Systems:	2) Liquid and Gaseous Sampling Systems: The process sampling system consists of the normal sampling system and additional sampling panels located throughout the plant. Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. The sampling systems use a number of manual sampling techniques to enable reactor coolant and containment sampling operations over a wide range of	2) Liquid and Gaseous Sampling Systems: The process sampling system consists of the normal sampling system and additional sampling panels located throughout the plant. Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. The sampling systems use a number of manual sampling techniques to enable reactor coolant and containment sampling operations over a wide range of	This revision removes sampling requirements for reactor coolant and containment. The permanent shutdown of the Dresden reactors and defueled status makes these sampling references unnecessary within the Emergency Plan.

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	plant conditions. It is capable of providing information relative to post-accident plant conditions to allow operator actions to be taken to mitigate and control the course of an accident. Refer to the specific UFSAR for further detail on sampling capabilities.	plant conditions. It is capable of providing information relative to post-accident plant conditions to allow operator actions to be taken to mitigate and control the course of an accident. Refer to the specific UFSAR for further detail on sampling capabilities.	
Part II.H.5.c Process Monitors	c. Process Monitors: The Control Room and applicable redundant backup locations are equipped with extensive plant process monitors for use in both normal and emergency conditions. These indications include but are not limited to reactor coolant system pressure and temperature, containment pressure and temperature, liquid levels, flow rates, status or lineup of equipment components. This instrumentation provides the basis for initiation of corrective actions.	c. Process Monitors: The Control Room and applicable redundant backup locations are equipped with extensive plant process monitors for use in both normal and emergency conditions. These indications include but are not limited to reactor coolant system pressure and temperature, containment pressure and temperature, liquid levels, flow rates, status or lineup of equipment components. This instrumentation provides the basis for initiation of corrective actions.	This revision removes indications for the reactor coolant system and containment parameters. The permanent shutdown of the Dresden reactors and defueled status makes these indication references unnecessary within the Emergency Plan.
Part II.I.1 Plant Parameters and Corresponding Emergency Classification	<...> The SPDS monitors such parameters as: reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level and effluent monitor readings. The instrumentation and equipment capabilities available for each emergency facility are described in Section H	<...> The SPDS monitors such parameters as: reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level and effluent monitor readings. The instrumentation and equipment capabilities available for each emergency facility are described in Section H	This revision removes indications that SPDS provides for the reactor coolant system and containment parameters. The permanent shutdown of the Dresden reactors and defueled status makes these indications unnecessary within the Emergency Plan.
Part II.I.2 Onsite Accident Assessment Capabilities	2. Onsite Accident Assessment Capabilities The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, Area and Process Radiation Monitoring Systems, and Accident Radiation Monitoring Systems (which includes the high range containment radiation monitors). Descriptions of these systems are given in Section H.5.b.	2. Onsite Accident Assessment Capabilities The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, Area and Process Radiation Monitoring Systems, and Accident Radiation Monitoring Systems (which includes the high range containment radiation monitors) . Descriptions of these systems are given in Section H.5.b.	This revision removes the instruments that monitor containment radiation. The permanent shutdown and removal of fuel of the Dresden reactors and their defueled status makes this accident assessment capability unnecessary within the Emergency Plan.

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Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
<p>Part II.I.3</p> <p>Source Term Determination</p>	<p>3. Source Term Determination</p> <p>Source term (or core damage) estimations serve several roles within the Exelon Emergency Preparedness Program. For planning purposes, core damage considerations are used as the bases for several of the Emergency Action Level (EAL) Initiating Conditions and as the threshold for the declaration of a General Emergency (the definition of a General Emergency specifies conditions which involve ‘substantial’ core degradation or melting as one of the bases for classification).</p> <p>From an implementation perspective, core damage estimations provide a means of realistically differentiating between the four core states (no damage, clad failure, and fuel melt, and vessel melt-through) to:</p> <ul style="list-style-type: none"> • Evaluate the status of the fuel barriers and how their status relates to the risks and possible consequences of the accident. • Provide input on core configuration (coolable or uncoolable) for prioritization of mitigating activities. • Determine the potential quality (type) and/or quantity (%) of source term available for release in support of projected offsite doses and protective action recommendations. • Provide information that quantifies the severity of an accident in terms that can be readily understood and visualized. • Support the determination of radiological protective actions that should be considered for long term recovery activities. <p>The assessment methodologies utilized by Exelon are intended to provide a rapid best estimate of core damage which, when evaluated together, help to develop an overall picture of the extent of core damage. The methods used to estimate the amount or type of</p>	<p>3. Source Term Determination</p> <p>Source term (or core fuel damage) estimations serve several roles within the Exelon Emergency Preparedness Program. For planning purposes, core fuel damage considerations are used as the bases for several of the Emergency Action Level (EAL) Initiating Conditions and as the threshold for the declaration of a General Emergency (the definition of a General Emergency specifies conditions which involve ‘substantial’ core fuel degradation or melting as one of the bases for classification).</p> <p>From an implementation perspective, core fuel damage estimations provide a means of realistically differentiating between the fuel four core states (no damage, clad failure, and fuel melt, and vessel melt-through) to:</p> <ul style="list-style-type: none"> • Evaluate the status of the fuel barriers clad and how their status relates to the risks and possible consequences of the accident. • Provide input on core fuel configuration (coolable or uncoolable) for prioritization of mitigating activities. • Determine the potential quality (type) and/or quantity (%) of source term available for release in support of projected offsite doses and protective action recommendations. • Provide information that quantifies the severity of an accident in terms that can be readily understood and visualized. • Support the determination of radiological protective actions that should be considered for long term recovery activities. <p>The assessment methodologies utilized by Exelon Dresden are intended to provide a rapid best estimate of core fuel damage which, when evaluated together, help to develop an overall picture of the extent of core fuel damage. The methods used to estimate the amount or</p>	<p>This revision removes the possibility of the reactor core as source term and affected assessment methodologies.</p> <p>The permanent shutdown of the Dresden reactors and their defueled status makes the possibility of the reactor core as source term and affected assessment methodologies unnecessary within the Emergency Plan.</p>

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Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	<p>core damage occurring under accident conditions includes the following:</p> <ul style="list-style-type: none"> • <u>Containment Radiation Monitors</u>: An indirect method used to determine the amount of core damage. Applicable to Loss of Coolant Accident (LOCA) scenarios. Based upon an end-of-life source term and static nuclide ratio assumptions yielding a limited accuracy. Valid any time following an accident. • <u>Core Temperatures</u>: Methods such as Core Exit Thermocouple (CET), Peak Core Temperatures and Hot Leg Temperatures provide indirect methods used to indicate the type and/or amount of core damage. Applicable for all types of accidents. Valid any time following an accident. • <u>Core Uncovery</u>: Methods such as Core Uncovery Time, RVLIS Level and Source Range Monitor count rate provide indirect methods used to indicate the type of core damage (clad failure or fuel melt). Applicable for all types of accidents. Provides a relatively accurate estimate of the state of the core early in the event. Valid any time following an accident. • <u>Containment Hydrogen Concentration</u>: An indirect method used to establish the type of core damage. Applicable to LOCA type accidents where all the hydrogen generated by the metal-water reaction is released into containment. Valid any time following an accident. • <u>Sample Analysis - Isotopic Ratio Comparison</u>: A direct method used to establish the type of core damage. Compares expected isotopic ratios with a sample to determine a general core state. Applicable under all types of accidents. Valid any time following an accident. • <u>Sample Analysis - Presence of Abnormal Isotopes</u>: A direct method used to provide a go/no go indication of fuel melt by the presence of unusually high concentrations of the less volatile fission products. 	<p>type of core damage occurring under accident conditions includes the following:</p> <ul style="list-style-type: none"> • <u>Containment Radiation Monitors</u>: An indirect method used to determine the amount of core damage. Applicable to Loss of Coolant Accident (LOCA) scenarios. Based upon an end-of-life source term and static nuclide ratio assumptions yielding a limited accuracy. Valid any time following an accident. • <u>Core Temperatures</u>: Methods such as Core Exit Thermocouple (CET), Peak Core Temperatures and Hot Leg Temperatures provide indirect methods used to indicate the type and/or amount of core damage. Applicable for all types of accidents. Valid any time following an accident. • <u>Core Uncovery</u>: Methods such as Core Uncovery Time, RVLIS Level and Source Range Monitor count rate provide indirect methods used to indicate the type of core damage (clad failure or fuel melt). Applicable for all types of accidents. Provides a relatively accurate estimate of the state of the core early in the event. Valid any time following an accident. • <u>Containment Hydrogen Concentration</u>: An indirect method used to establish the type of core damage. Applicable to LOCA type accidents where all the hydrogen generated by the metal-water reaction is released into containment. Valid any time following an accident. • <u>Sample Analysis - Isotopic Ratio Comparison</u>: A direct method used to establish the type of core damage. Compares expected isotopic ratios with a sample to determine a general core state. Applicable under all types of accidents. Valid any time following an accident. • <u>Sample Analysis - Presence of Abnormal Isotopes</u>: A direct method used to provide a go/no go indication of fuel melt by the presence of unusually high concentrations of the less volatile fission products. 	

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Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	<p>Applicable under all types of accidents. Valid any time following an accident.</p> <ul style="list-style-type: none"> • <u>Sample Analysis - Concentration Evaluation</u>: A direct method that yields the most accurate numerical estimations of the amount of core damage. Applicable for all types of accidents. Requires the sampled system(s) be in a steady state that usually prevents its use until the plant is in a stable condition. 	<p>Applicable under all types of accidents. Valid any time following an accident.</p> <ul style="list-style-type: none"> • <u>Sample Analysis - Concentration Evaluation</u>: A direct method that yields the most accurate numerical estimations of the amount of core damage. Applicable for all types of accidents. Requires the sampled system(s) be in a steady state that usually prevents its use until the plant is in a stable condition. 	
<p>Part II.I.4.b Effluent Monitor Data and Dose Projection</p>	<p>B. <u>Containment Leakage/Failure</u> - This method uses a variety of containment failures or leak rates in conjunction with available source term estimations to develop a release rate to the environment. A direct vent of containment can be modeled as a failure to isolate.</p>	<p>B. <u>Containment Leakage/Failure</u> - This method uses a variety of containment failures or leak rates in conjunction with available source term estimations to develop a release rate to the environment. A direct vent of containment can be modeled as a failure to isolate.</p>	<p>This revision removes the containment leakage/failure as an assessment methodology. The permanent shutdown of the Dresden reactors and their defueled status makes this assessment methodology unnecessary within the Emergency Plan.</p>
<p>Part II.J.10.m.1 Plant Based PARs</p>	<p>1) <u>Plant Based PARs</u></p> <p>Station specific PAR Flowcharts have been developed to aid Exelon Nuclear personnel providing PARs based on the above. Station specific PAR Flowcharts with Subarea or Sector tables are documented in the Exelon EP Implementing Procedures, including station-specific requirements regarding PAR determination. These flowcharts and tables provide technically based Protective Action Recommendations based on plant conditions and core damage indicators as applicable to the Exelon site and described within the implementing procedures. Possible plant based PARs issued by Exelon Nuclear, in support of NUREG-0654 Supp. 3, at a General Emergency could include as appropriate for the Station:</p> <ul style="list-style-type: none"> • Response to a Rapidly Progressing Severe Accident. • Utilization of the staged evacuation concept as determined by station ETE's. 	<p>1) <u>Plant Based PARs</u></p> <p>Station specific PAR Flowcharts have been developed to aid Exelon Nuclear personnel providing PARs based on the above. Station specific PAR Flowcharts with Subarea or Sector tables are documented in the Exelon EP Implementing Procedures, including station-specific requirements regarding PAR determination. These flowcharts and tables provide technically based Protective Action Recommendations based on plant conditions and core damage indicators as applicable to the Exelon site and described within the implementing procedures. Possible plant based PARs issued by Exelon Nuclear, in support of NUREG-0654 Supp. 3, at a General Emergency could include as appropriate for the Station:</p> <ul style="list-style-type: none"> • Response to a Rapidly Progressing Severe Accident. • Utilization of the staged evacuation concept as determined by station ETE's. 	<p>This revision removes core damage indications and a controlled containment vent as they related to plant based PARs. The permanent shutdown of the Dresden reactors and their defueled status makes these conditions unnecessary within the Emergency Plan.</p>

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Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	<ul style="list-style-type: none"> • Shelter of the general public in response to but not limited to; a controlled containment vent lasting less than 1 hour in duration less than PAGs, impediments to evacuation, or Hostile Action event. • Evacuation of the general public. <p><...></p>	<ul style="list-style-type: none"> • Shelter of the general public in response to but not limited to; a controlled containment vent lasting less than 1 hour in duration less than PAGs, impediments to evacuation, or Hostile Action event. • Evacuation of the general public. <p><...></p>	
Part II.M.1.b Evaluating Entry into Recovery	<p><...></p> <ul style="list-style-type: none"> • The reactor is in a stable shutdown condition and long-term core cooling is available • The fuel pool damage has been mitigated, or spent fuel damage has been contained and controlled. • Primary and/or secondary containment integrity has been established. <p><...></p>	<p><...></p> <ul style="list-style-type: none"> • The reactor is in a stable shutdown condition and long-term core cooling is available • The fuel pool damage has been mitigated, or spent fuel damage has been contained and controlled. • Primary and/or secondary containment integrity has been established. <p><...></p>	This revision removes reactor conditions and establishment of primary/secondary integrity. The permanent shutdown of the Dresden reactors and their defueled status makes these conditions unnecessary within the Emergency Plan.
Part II.M.2 Recovery Organization	<p>2. Recovery Organization</p> <p><...></p> <ul style="list-style-type: none"> • For events involving major damage to systems required to maintain safe shutdown of the plant and offsite radioactive releases have occurred, (i.e. for Site Area Emergency or General Emergency classifications) the station recovery organization is put in place. <p><...></p>	<p>2. Recovery Organization</p> <p><...></p> <ul style="list-style-type: none"> • For events involving major damage to systems required to maintain safe shutdown of the plant and where offsite radioactive releases have occurred, (i.e. for Site Area Emergency or General Emergency classifications) the station recovery organization is put in place. <p><...></p>	This revision removes systems to maintain the plant shutdown. The permanent shutdown of the Dresden reactors and defueled status makes this condition unnecessary within the Emergency Plan.
Part II.N.2.e Health Physics Drills	<ul style="list-style-type: none"> e. Health Physics Drills: Health Physics Drills involving a response to, and analysis of, simulated airborne and liquid samples and direct radiation measurements within the plant are conducted semi-annually. At least annually, these drills shall include a demonstration of the sampling system capabilities, or the Core Damage Assessment Methodology (CDAM) objectives as applicable. 	<ul style="list-style-type: none"> e. Health Physics Drills: Health Physics Drills involving a response to, and analysis of, simulated airborne and liquid samples and direct radiation measurements within the plant are conducted semi-annually. At least annually, these drills shall include a demonstration of the sampling system capabilities, or the Core Damage Assessment Methodology (CDAM) objectives as applicable. 	This revision removes core damage assessment objectives. The permanent shutdown of the Dresden reactors and defueled status makes reference to core damage assessment objectives unnecessary within the Emergency Plan.

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Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
<p>Part II.O.4.b</p> <p>Personnel Responsible for Accident Assessment</p>	<p>b. Personnel Responsible for Accident Assessment:</p> <p>The skills and knowledge required to perform plant stabilization and mitigation are a normal function of operations specific positions, as identified in Section B of this plan. Power changes and planned and unplanned reactor shutdowns are handled on a normal operation basis. Subsequent plant stabilization and restoration is pursued utilizing normal operating procedures. Licensed Operators receive routine classroom and simulator training to ensure proficiency in this area.</p> <p>1) <u>Active Senior Licensed Control Room Personnel</u> shall have training conducted in accordance with the approved ERO Training Program such that proficiency is maintained on the topics listed below. These subjects shall be covered as a minimum on an annual basis.</p> <p><...></p> <p>To remove peripheral duties from the Operations shift, the following group of positions responsible for accident assessment, corrective actions, protective actions, and related activities receive the training listed below:</p> <p>2) Core Damage Assessment Personnel: During an emergency when core/cladding damage is suspected, a specialized group of trained individuals perform core damage assessment. At a minimum, personnel responsible for core damage assessment receive classroom and hands-on training in the following areas:</p> <ul style="list-style-type: none"> • Available Instrumentation and Equipment 	<p>b. Personnel Responsible for Accident Assessment:</p> <p>The skills and knowledge required to perform plant stabilization and mitigation are a normal function of operations specific positions, as identified in Section B of this plan. Power changes and planned and unplanned reactor shutdowns are handled on a normal operation basis. Subsequent plant stabilization and restoration is pursued utilizing normal operating procedures. Licensed Qualified Operators receive routine classroom and simulator training to ensure proficiency in this area.</p> <p>1) Active Senior Licensed Control Room Personnel Certified Fuel Handlers shall have training conducted in accordance with the approved ERO Training Program such that proficiency is maintained on the topics listed below. These subjects shall be covered as a minimum on an annual basis.</p> <p><...></p> <p>To remove peripheral duties from the Operations shift, the following group of positions responsible for accident assessment, corrective actions, protective actions, and related activities receive the training listed below:</p> <p>2) Core Damage Assessment Personnel: During an emergency when core/cladding damage is suspected, a specialized group of trained individuals perform core damage assessment. At a minimum, personnel responsible for core damage assessment receive classroom and hands-on training in the following areas:</p>	<p>This revision removes the personnel responsibilities of power changes, unplanned shutdowns, and core damage assessment. The permanent shutdown of the Dresden reactors and defueled status makes these responsibilities unnecessary within the Emergency Plan.</p> <p>It also changes designation of responsibilities from active senior licensed to Certified Fuel Handlers. This change is in alignment with the site staffing changes being made in the Dresden TS Administrative Controls LAR⁴.</p>

⁴ Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Changed to Unit 1 Technical Specification Section 6.1, "Responsibility," and Technical Specifications 1.1, "Definitions," and 5.0, "Administrative Controls," for Permanently Defueled Condition," dated September 24, 2020 (NRC Accession No. ML20269A404)

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Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	<ul style="list-style-type: none"> • Isotopic Assessment and Interpretation • Computerized Core Damage Assessment Methodology (CDAM) and/or proceduralized assessment methods. 	<ul style="list-style-type: none"> • Available Instrumentation and Equipment • Isotopic Assessment and Interpretation • Computerized Core Damage Assessment Methodology (CDAM) and/or proceduralized assessment methods. 	
Part II.P.2 Authority for the Emergency Preparedness Effort	<p>2. Authority for the Emergency Preparedness Effort</p> <p>The Site Vice President is responsible for the safe and reliable operation of the generating station. The issuance and control of this plan and the activities associated with emergency preparedness at Dresden shall be the overall responsibility of the Vice President, Fleet Support. This individual is assigned the responsibility for overall implementation of the E-Plan and station Annex.</p>	<p>2. Authority for the Emergency Preparedness Effort</p> <p>The Site Vice President Plant Manager is responsible for the safe and reliable operation of the generating station. The issuance and control of this plan and the activities associated with emergency preparedness at Dresden shall be the overall responsibility of the Vice President, Fleet Support. This individual is assigned the responsibility for overall implementation of the E-Plan and station Annex.</p>	<p>The revision replaces the Station Vice President with the Plant Manager as having overall authority and directing the site organization. This change is in alignment with the site staffing changes being made in the Dresden TS Administrative Controls LAR.⁴</p>
Part II.P.3 Responsibility for Development and Maintenance of the Plan	<p><u>Program Administration</u></p> <p><...></p> <ul style="list-style-type: none"> • Coordinate, document and review Performance Indicator data and reports. • Provide oversight of Drill and Exercise Performance (DEP) evaluations during License Operator Requalification (LOR) Training. • Coordinate and conduct EP Event reviews and reports. <p><...></p>	<p><u>Program Administration</u></p> <p><...></p> <ul style="list-style-type: none"> • Coordinate, document and review Performance Indicator data and reports. • Provide oversight of Drill and Exercise Performance (DEP) evaluations during License Operator Requalification (LOR) Training. • Coordinate and conduct EP Event reviews and reports. <p><...></p>	<p>This revision changes the name of the operator training program. This change is in alignment with the site staffing changes being made in the Dresden TS Administrative Controls LAR.⁵</p>

⁵ Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Changed to Unit 1 Technical Specification Section 6.1, "Responsibility," and Technical Specifications 1.1, "Definitions," and 5.0, "Administrative Controls," for Permanently Defueled Condition," dated September 24, 2020 (NRC Accession No. ML20269A404)

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Part II.P.4 E-Plan and Agreement Revisions	<p>4. E-Plan and Agreement Revisions</p> <p><...></p> <p>The E-Plan and its Annex shall be revised as needed and the most current approved revisions shall remain in effect so long as they are certified as current. Revisions to the E-Plan are reviewed by the Station's Plant Operational Review Committee (PORC) prior to approval. Changes to the plan are made without NRC approval only if such changes do not result in a reduction in effectiveness of the plan per 10 CFR 50.54(q), and the plan as changed continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. Proposed changes that reduce or have a potential to reduce the effectiveness of the approved plan are not implemented without prior approval by the NRC.</p> <p><...></p>	<p>4. E-Plan and Agreement Revisions</p> <p><...></p> <p>The E-Plan and its Annex shall be revised as needed and the most current approved revisions shall remain in effect so long as they are certified as current. Revisions to the E-Plan are reviewed by the Station's Plant Operational Review Committee (PORC) prior to approval. Changes to the plan are made without NRC approval only if such changes do not result in a reduction in effectiveness of the plan per 10 CFR 50.54(q), and the plan as changed continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. Proposed changes that reduce or have a potential to reduce the effectiveness of the approved plan are not implemented without prior approval by the NRC.</p> <p><...></p>	Once the plant has permanently defueled and implemented the Defueled Quality Assurance Program the Plant Operational Review Committee is replaced with the Station Review Committee (SRC)
Part II.P.6 Supporting Emergency Response Plans	<p>6. Supporting Emergency Response Plans</p> <p><...></p> <ul style="list-style-type: none"> • <i>INPO Emergency Resources Manual.</i> <p><...></p>	<p>6. Supporting Emergency Response Plans</p> <p><...></p> <ul style="list-style-type: none"> • INPO Emergency Resources Manual. <p><...></p>	The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility.
Part II.P.9 Audit/Assessment of the Emergency Preparedness Program	<p>9. Audit/Assessment of the Emergency Preparedness Program</p> <p><...></p> <p>Results of this audit are submitted for review to Corporate Management and the Station Vice President. The Emergency Preparedness Manager ensures that any findings that deal with offsite interfaces are reviewed with the appropriate agencies.</p>	<p>9. Audit/Assessment of the Emergency Preparedness Program</p> <p><...></p> <p>Results of this audit are submitted for review to Corporate Management and the Station Vice President Plant Manager. The Emergency Preparedness Manager ensures that any findings that deal with offsite interfaces are reviewed with the</p>	The revision replaces the Station Vice President with the Plant Manager as having overall authority and directing the site organization. This change is in alignment with the site staffing changes being made in the Dresden TS Administrative Controls LAR. ⁶

⁶ Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Changed to Unit 1 Technical Specification Section 6.1, "Responsibility," and Technical Specifications 1.1, "Definitions," and 5.0, "Administrative Controls," for Permanently Defueled Condition," dated September 24, 2020 (NRC Accession No. ML20269A404)

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	Written notification will be provided to the state and counties of the performance of the audit and the availability of the audit records for review at Exelon facilities. Records of the audit are maintained for at least five years.	appropriate agencies. Written notification will be provided to the state and counties of the performance of the audit and the availability of the audit records for review at Exelon facilities. Records of the audit are maintained for at least five years.	
Part III App 1 References	<p><...></p> <p>28. Exelon Nuclear Quality Assurance Topical Report (QATR), NO-AA-10</p> <p>29. INPO Emergency Resources Manual</p> <p>30. "Maintaining Emergency Preparedness Manual," dated December, 1996 INPO 96-009</p> <p>31. "Federal Bureau of Investigation and Nuclear Regulatory Commission Memorandum of Understanding for Cooperation Regarding Threat, Theft, or Sabotage in U.S. Nuclear Industry," Federal Register, Vol. 44, p. 75535, December 20, 1979.</p> <p><...></p> <p>39. Letter from William J. Dircks, Executive Director for Operations, NRC, to Dr. Donald F. Knuth, President KMC, Inc. dated October 26, 1981.</p> <p>40. INPO Coordination agreement on emergency information among USCEA, EPRI, INPO, NUMARC and their member utilities, dated April (1988).</p> <p>41. Babcock and Wilcox Company, Post Accident Sample Offsite Analysis Program (1982).</p> <p><...></p>	<p><...></p> <p>28. Exelon Nuclear Decommissioning Decommissioning Quality Assurance Program Topical Report (QATR DQAP), NO-AADC-10</p> <p>29. INPO Emergency Resources Manual</p> <p>30. "Maintaining Emergency Preparedness Manual," dated December, 1996 INPO 96-009</p> <p>31. "Federal Bureau of Investigation and Nuclear Regulatory Commission Memorandum of Understanding for Cooperation Regarding Threat, Theft, or Sabotage in U.S. Nuclear Industry," Federal Register, Vol. 44, p. 75535, December 20, 1979.</p> <p><...></p> <p>39. Letter from William J. Dircks, Executive Director for Operations, NRC, to Dr. Donald F. Knuth, President KMC, Inc. dated October 26, 1981.</p> <p>40. INPO Coordination agreement on emergency information among USCEA, EPRI, INPO, NUMARC and their member utilities, dated April (1988).</p> <p>41. Babcock and Wilcox Company, Post Accident Sample Offsite Analysis Program (1982).</p> <p><...></p>	<p>Exelon has a previously NRC approved Decommissioning Quality Assurance Program (DQAP).⁷ Dresden will be added to the DQAP under 50.54(a) upon submittal of the certifications required by 10 CFR50.82(a).</p> <p>The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility.</p>

⁷ Letter from U.S. Nuclear Regulatory Commission to Bryan C. Hanson (Exelon Generation Company, LLC), "Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation - Review and Acceptance of Changes RE: Decommissioning Quality Assurance Program (EPID L-2017-LLQ-0003)," dated June 27, 2018 (ADAMS Accession No. ML18165A136)

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
Part III App 3 List of Corporate Letters of Agreements	<p><u>Appendix 3: List of Corporate Letters of Agreements</u></p> <p><...></p> <p>INPO (Letter on File) Emergency Event Support</p> <p><...></p>	<p><u>Appendix 3: List of Corporate Letters of Agreements</u></p> <p><...></p> <p>INPO (Letter on File) Emergency Event Support</p> <p><...></p>	<p>The revision reflects deletion of INPO because INPO's oversight would not apply to a permanently shutdown facility.</p>
Part III App 4 Glossary of Terms and Acronyms	<p><u>Appendix 4: Glossary of Terms and Acronyms</u></p> <p>Accident Assessment Accident assessment consists of a variety of actions taken to determine the nature, effects and severity of an accident and includes evaluation of reactor operator status reports, damage assessment reports, meteorological observations, seismic observations, fire reports, radiological dose projections, in plant radiological monitoring, and environmental monitoring.</p> <p><...></p> <p>Emergency Operating Procedures (EOPs) EOPs are step by step procedures for direct actions taken by licensed reactor operators to mitigate and/or correct an off normal plant condition through the control of plant systems.</p> <p><...></p> <p>Emergency Response Data System (ERDS) ERDS is a continuous direct near real-time electronic data link between the licensee's onsite computer system and the NRC Operations Center that provides for the automated transmission of a limited data set of selected parameters.</p> <p><...></p> <p>Fission Product Barrier The fuel cladding, reactor coolant system boundary, or the containment boundary.</p> <p><...></p>	<p><u>Appendix 4: Glossary of Terms and Acronyms</u></p> <p>Accident Assessment Accident assessment consists of a variety of actions taken to determine the nature, effects and severity of an accident and includes evaluation of reactor operator status reports, damage assessment reports, meteorological observations, seismic observations, fire reports, radiological dose projections, in plant radiological monitoring, and environmental monitoring.</p> <p><...></p> <p>Emergency Operating Procedures (EOPs) EOPs are step by step procedures for direct actions taken by licensed reactor qualified operators to mitigate and/or correct an off normal plant condition through the control of plant systems.</p> <p><...></p> <p>Emergency Response Data System (ERDS) ERDS is a continuous direct near real-time electronic data link between the licensee's onsite computer system and the NRC Operations Center that provides for the automated transmission of a limited data set of selected parameters.</p> <p><...></p> <p>Fission Product Barrier The fuel cladding, reactor coolant system boundary, or the containment boundary.</p> <p><...></p>	<p>These revisions modify terms related to reactor operator status reports, source term, Technical Support Center, and vital areas.</p> <p>The revisions also remove terms related to ERDS, fission product barrier, high radiation sampling and puff release.</p> <p>The permanent shutdown of the Dresden reactors and their defueled status makes these terms unnecessary within the Emergency Plan.</p>

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	<p>High Radiation Sampling System Post-accident sampling capability to obtain and perform radioisotopic and chemical analyses of reactor coolant and containment atmosphere samples.</p> <p><...></p> <p>Puff Release A controlled containment vent that will be terminated prior to exceeding 60 minutes in duration and is less than the limit as defined in the Station Annexes.</p> <p><...></p> <p>Source Term Radioisotope inventory of the reactor core, or amount of radioisotope released to the environment, often as a function of time.</p> <p>Technical Support Center (TSC) A center outside of the Control Room in which information is supplied on the status of the plant to those individuals who are knowledgeable or responsible for engineering and management support of reactor operations in the event of an emergency, and to those persons who are responsible for management of the on site emergency response.</p> <p><...></p> <p>Vital Areas Areas within the station security fence which contain vital equipment. Examples include Control Rooms, Containment/Reactor Buildings, Turbine Buildings and Electrical Equipment Rooms.</p>	<p>High Radiation Sampling System Post-accident sampling capability to obtain and perform radioisotopic and chemical analyses of reactor coolant and containment atmosphere samples.</p> <p><...></p> <p>Puff Release A controlled containment vent that will be terminated prior to exceeding 60 minutes in duration and is less than the limit as defined in the Station Annexes.</p> <p><...></p> <p>Source Term Radioisotope inventory of the reactor core, or amount of radioisotope released to the environment, often as a function of time.</p> <p>Technical Support Center (TSC) A center outside of the Control Room in which information is supplied on the status of the plant to those individuals who are knowledgeable or responsible for engineering and management support of reactor site operations in the event of an emergency, and to those persons who are responsible for management of the on site emergency response.</p> <p><...></p> <p>Vital Areas Areas within the station security fence which contain vital equipment. Examples include Control Rooms, Containment/Reactor Buildings, Turbine Buildings and Electrical Equipment Rooms.</p>	
<p>Part III Appendices</p> <p><u>ACRONYMS</u></p>	<p><u>ACRONYMS</u></p> <p><...></p> <p>CHRMS Containment High Range Monitoring System</p> <p>CHRRMS Containment High Range Radiation Monitoring System</p> <p><...></p>	<p><u>ACRONYMS</u></p> <p><...></p> <p>CHRMS Containment High Range Monitoring System</p> <p>CHRRMS Containment High Range Radiation Monitoring System</p> <p><...></p>	<p>This revision removes acronyms related to Containment, INPO, loss of coolant accident, PASS and STA. This revision replaced the QATR with the DQAP.</p> <p>The permanent shutdown of the Dresden reactors and defueled status makes these acronyms</p>

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	INPO Institute of Nuclear Power Operations <...> LOCA Loss of Coolant Accident <...> PASS Post Accident Sampling System <...> QATR Quality Assurance Topical Report <...> STA Shift Technical Advisor <...> WEM Wisconsin Emergency Management	DQAP Decommissioning Quality Assurance Program <...> INPO Institute of Nuclear Power Operations <...> LOCA Loss of Coolant Accident <...> PASS Post Accident Sampling System QATR Quality Assurance Topical Report <...> STA Shift Technical Advisor <...> WEM Wisconsin Emergency Management	unnecessary within the Emergency Plan.

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

EP-DR-1000, Part II, Appendix 5, Table DRESDEN B-1: Emergency Response Organization (ERO) Staffing and Augmentation Plan

The following tables identify the changes made to Table DRESDEN B-1. The table format is revised to more clearly present the changes within the Table.

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
<p>Current Wording EP-DR-1000, Part III Appendix 5, Table 5-1</p>	<p><i>Radiation Protection</i></p> <ul style="list-style-type: none"> • <i>Provide qualified radiation protection coverage for responders accessing potentially unknown radiological environments during emergency conditions.</i> • <i>Provide in-plant surveys.</i> • <i>Control dosimetry and radiologically controlled area access.</i> 	(2) Radiation Protection Personnel	(3) Additional Radiation Protection Personnel [In addition to personnel on-shift] (OSC)	(3) Additional Radiation Protection Personnel [In addition to personnel on-shift and those responding within 60 min.] (OSC)	Not applicable
<p>Proposed Wording EP-DR-1000, Part III Appendix 5, Table 5-1</p>	<p>Radiation Protection</p> <ul style="list-style-type: none"> • Provide qualified radiation protection coverage for responders accessing potentially unknown radiological environments during emergency conditions. • Provide in-plant surveys. • Control dosimetry and radiologically controlled area access. 	(2 1) Radiation Protection Personnel	(3 2) Additional Radiation Protection Personnel [In addition to personnel on-shift] (OSC)	(3) Additional Radiation Protection Personnel [In addition to personnel on-shift and those responding within 60 min.] (OSC) As needed	Not applicable

**Attachment 2
TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN**

Reason for Change - Changes to Table B-1 reflect the changes to the Dresden ERO discussed in this Attachment. Evaluation of this ERO position's responsibilities is performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned. This revision is further discussed in Attachment 1, Section 5.3.3, Evaluation of Proposed Changes. The reassignment of ERO responsibilities will be further demonstrated through the performance of drills utilizing the revised procedures and staffing (reference Attachment 5 Commitments).

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
Current Wording EP-DR-1000, Part III Appendix 5, Table 5-1	Emergency Classifications Evaluate plant conditions and recommend emergency classifications, until relieved.	Emergency Classification Advisor ¹	(1) Operations Manager (TSC)	Not applicable	Not applicable
Proposed Wording EP-DR-1000, Part III Appendix 5, Table 5-1	Emergency Classifications Evaluate plant conditions and recommend emergency classifications, until relieved.	Emergency Classification Advisor¹ Not applicable	(1) Operations Manager (TSC)	Not applicable	Not applicable

Reason for Change - Changes to Table B-1 reflect the changes to the Dresden ERO discussed in this Attachment. Evaluation of this ERO position's responsibilities is performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned. This revision is further discussed in Attachment 1, Section 5.3.6, Evaluation of Proposed Changes. The reassignment of ERO responsibilities will be further demonstrated through the performance of drills utilizing the revised procedures and staffing (reference Attachment 5 Commitments).

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
<p>Current Wording EP-BY-1000, Part III Appendix 5, Table 5-1</p>	Engineering <ul style="list-style-type: none"> Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved. 	(1) Core/ Thermal Hydraulics Engineer - STA ¹ <ul style="list-style-type: none"> Evaluate reactor conditions 	TSC Engineering Staff <ul style="list-style-type: none"> (1) Electrical/ Instrumentation and Control (I&C): Provide engineering coverage for the ERO related to electrical or I&C equipment. (1) Mechanical: Provide engineering coverage for the ERO related to mechanical equipment. (1) Core/Thermal Hydraulics: Evaluate reactor conditions. 	<i>As Needed</i>	<i>Not Applicable</i>
<p>Proposed Wording EP-BY-1000, Part III Appendix 5, Table 5-1</p>	Engineering <ul style="list-style-type: none"> Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved. 	(1) Core/ Thermal Hydraulics Engineer - STA¹ <ul style="list-style-type: none"> Evaluate reactor conditions <p style="text-align: center;">Not applicable</p>	<p>(1) TSC Engineer: Provide engineering coverage for the ERO</p> <p>Additional staff as needed</p> TSC Engineering Staff <ul style="list-style-type: none"> (1) Electrical/ Instrumentation and 	As needed	Not applicable

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN**

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
			Control (I&C): Provide engineering coverage for the ERO related to electrical or I&C equipment. (1) Mechanical: Provide engineering coverage for the ERO related to mechanical equipment. (1) Core/Thermal Hydraulics: Evaluate reactor conditions		
<p>Reason for Change - The revision deletes the Core/ Thermal Hydraulics Engineer - STA position. The Core/ Thermal Hydraulics Engineer - STA function for a permanently shutdown reactor is no longer required. EP functional requirements for Technical Support will be performed by Shift Supervisor/ Certified Fuel Handler (CFH). Refer to Attachment 1, Section 5.3.7 for further discussion of the Core/ Thermal Hydraulics Engineer - STA. This change is in alignment with the site staffing changes being made in the Dresden TS Administrative Controls LAR.⁸</p> <p>Additionally, changes to Table 5-1 reflect the changes to the Dresden Engineering positions. Evaluation of the Engineering ERO position's responsibilities is performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned. This revision is further discussed in Attachment 1, Section 5.3.7, Evaluation of Proposed Changes. The reassignment of ERO responsibilities will be further demonstrated through the performance of drills utilizing the revised procedures and staffing (reference Attachment 5 Commitments).</p>					

⁸ Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Changed to Unit 1 Technical Specification Section 6.1, "Responsibility," and Technical Specifications 1.1, "Definitions," and 5.0, "Administrative Controls," for Permanently Defueled Condition," dated September 24, 2020 (NRC Accession No. ML20269A404)

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
Current Wording EP-DR-1000, Part III Appendix 5, Table 5-1	Repair Team Activities	Not Applicable	Maintenance Personnel (OSC) <ul style="list-style-type: none"> • (1) Electrical Maintenance Technician: Provide electrical support for ECCS equipment, event mitigation, and equipment repair. • (1) Mechanical Maintenance Technician: Provide mechanical support for ECCS equipment, event mitigation, and equipment repair. 	Maintenance Personnel (OSC) <ul style="list-style-type: none"> • (1) I&C Technician: Provide assistance with logic manipulation, support for event mitigation and equipment repair, and support of digital I&C if applicable. Additional I&C staff may be called out if needed. • Electrical Maintenance Technicians – As needed. • Mechanical Maintenance Technicians – As needed. 	<i>Not applicable</i>

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN**

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
<p>Proposed Wording EP-DR-1000, Part III Appendix 5, Table 5-1</p>	<p><i>Repair Team Activities</i></p>	<p>Not Applicable</p>	<p><i>Maintenance Personnel (OSC)</i></p> <ul style="list-style-type: none"> • (1) <i>Electrical Maintenance Technician: Provide electrical support for ECCS equipment, event mitigation, and equipment repair.</i> • (1) <i>Mechanical Maintenance Technician: Provide mechanical support for ECCS equipment, event mitigation, and equipment repair.</i> 	<p>Maintenance Personnel (OSC)</p> <ul style="list-style-type: none"> • (1) I&C Technician: Provide assistance with logic manipulation, support for event mitigation and equipment repair, and support of digital I&C if applicable. Additional I&C staff may be called out if needed. • Electrical Maintenance Technicians – As needed. • Mechanical Maintenance Technicians – As needed. 	<p><i>Not applicable</i></p>
<p>Reason for Change - Changes to Table B-1 reflect the changes to the Dresden ERO discussed in this Attachment. The reference to ECCS equipment is removed since the equipment is no longer required to support a permanently shutdown reactor with all fuel moved to the Fuel Pool. The revision of ERO responsibilities will be further demonstrated through the performance of drills utilizing the revised procedures and staffing (reference Attachment 5 Commitments).</p>					

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN**

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
Current Wording EP-DR-1000, Part III Appendix 5, Table 5-1	<i>Supervision of Repair Team Activities</i>	Not Applicable	(1) OSC Director <ul style="list-style-type: none"> Supervise OSC activities as directed by Emergency Coordinator. 	OSC Supervisors <ul style="list-style-type: none"> Electrical Maintenance Supervisor /Lead: Supervise OSC activities related to electrical equipment. Mechanical Maintenance Supervisor / Lead: Supervise OSC activities related to mechanical equipment. I&C Supervisor / Lead: Supervise OSC activities related to I&C equipment. May be combined with Electrical Supervisor. (1) Radiation Protection Supervisor / Lead: Supervise OSC activities related to radiation protection. 	<i>Not applicable</i>

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
<p>Proposed Wording EP-DR-1000, Part III Appendix 5, Table 5-1</p>	Supervision of Repair Team Activities	Not Applicable	(1) OSC Director <ul style="list-style-type: none"> • Supervise OSC activities as directed by Emergency Coordinator. 	OSC Supervisor(s) <ul style="list-style-type: none"> • Electrical Maintenance Supervisor /Lead: Supervise OSC activities related to electrical equipment. • Mechanical Maintenance Supervisor / Lead: Supervise OSC activities related to mechanical equipment. • I&C Supervisor / Lead: Supervise OSC activities related to I&C equipment. May be combined with Electrical Supervisor. <p style="text-align: center;">As needed</p> <ul style="list-style-type: none"> • (1) Radiation Protection Supervisor / Lead¹: Supervise OSC activities related to radiation protection. 	Not applicable

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
<p>Reason for Change - Changes to Table B-1 reflect the changes to the Dresden ERO discussed in this Attachment. The Electrical, Mechanical and I&C Supervisor/Lead positions have been deleted. Additionally, the RP Supervisor/Lead position has been identified as a collateral responsibility for a responding RP Tech. Evaluation of this ERO position's responsibilities is performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned. This revision is further discussed in Attachment 1, Section 5.3.10, Evaluation of Proposed Changes. The reassignment of ERO responsibilities will be further demonstrated through the performance of drills utilizing the revised procedures and staffing (reference Attachment 5 Commitments).</p>					

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
<p>Current Wording EP-DR-1000, Part III Appendix 5, Table 5-1</p>	Field Monitoring Teams (FMTs)	Not Applicable	<p>Onsite FM Individual</p> <ul style="list-style-type: none"> • (1) Qualified individual RP Personnel to assess the protected area for radiation and contamination and provide input to the TSC RPM. Responsible for radiation protection coverage for the FMT as directed 	<p>Offsite FMT B</p> <ul style="list-style-type: none"> ▪ Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control 	Not applicable

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN**

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
			<p>by TSC RPM or EOF RPM.</p> <p>Offsite FMT A</p> <ul style="list-style-type: none"> •(1) Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control of, the EOF DAC or RPM. Responsible for the radiation protection coverage of the FMT as directed by EOF RPM. <ul style="list-style-type: none"> •(1) Driver to provide transportation. 	<p>of, the EOF DAC or RPM. Responsible for the radiation protection coverage of the FMT as directed by EOF RPM.</p> <ul style="list-style-type: none"> • (1) Driver to provide transportation. 	
Proposed Wording EP-DR-1000, Part III Appendix 5, Table 5-1	Supervision of Repair Team Activities	Not Applicable	<p>Onsite FM Individual</p> <ul style="list-style-type: none"> •(1) Qualified 		Not applicable

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN**

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
			<p>individual RP Personnel to assess the protected area for radiation and contamination and provide input to the TSC RPM. Responsible for radiation protection coverage for the FMT as directed by TSC RPM or EOF RPM.</p> <p>Offsite FMT A</p> <ul style="list-style-type: none"> • (1) Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control of, the EOF DAC or RPM. Responsible for 	<p>Offsite FMT B</p> <ul style="list-style-type: none"> ▪ Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control of, the EOF DAC or RPM. Responsible for the radiation protection coverage of the FMT as directed by EOF RPM. • (1) Driver to provide transportation. 	

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

	Emergency Preparedness (EP) Functions	On Shift	TSC / OSC		EOF – Alert or Greater Augment w/in 60 min.
			Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
			the radiation protection coverage of the FMT as directed by EOF RPM. • (1) Driver to provide transportation.		
<p>Reason for Change - Changes to Table B-1 reflect the changes to the Dresden ERO discussed in this Attachment. The On Site Field Monitoring Team Member has been revised from a Qualified Individual to one (1) RP Personnel. Evaluation of this ERO position's responsibilities is performed in Attachment 4, ERO Task Analysis, including an evaluation of which responsibilities can be deleted and which can be reassigned. This revision is further discussed in Attachment 1, Section 5.3.11, Evaluation of Proposed Changes. The reassignment of ERO responsibilities will be further demonstrated through the performance of drills utilizing the revised procedures and staffing (reference Attachment 5 Commitments).</p>					

Attachment 2
TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Summary of Changes to Dresden Emergency Plan

EP-AA-1004 – Radiological Emergency Plan Annex for Dresden Station

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
EP-AA-1004	Note: This table provides a summary of changes to EP-AA-1004, Radiological Emergency Plan Annex for Dresden Station.		
EP-AA-1004 Annex	<p>Besides the changes associated with the permanent shutdown evaluated below, there are multiple editorial changes that are proposed in this license amendment request, i.e., they do not change the intent of the document. They do not impact the ability to comply with Regulatory Guidance or level of commitments made in the Emergency Plan. These changes are marked with revision bars within the Emergency Plan (except changes to step numbers); however, they are not specifically evaluated in the change assessment, since they are editorial. These include:</p> <ul style="list-style-type: none"> • Changes in step numbers as a result of information which has been relocated or deleted. • Page number changes within the Table of Contents • Correction of spelling errors • Changes in Revision numbering and Revision History 		
EP-AA-1004 Annex Section 1.1; Facility Description	<p>1.1 Facility Description</p> <p>Dresden Station, Units 1, 2 and 3, is located in the Goose Lake Township of Grundy County in northeastern Illinois. Unit 1 is in permanent shutdown (see Figure 1-1).</p> <p>The plant consists of three Boiling Water Reactor (BWR) Nuclear Steam Supply Systems (NSSS) and turbine generators provided by General Electric Company. Unit 1 is a dual cycle boiling water reactor designed for a power output of 700 MWt and has officially been retired as of August 31, 1984. Units 2 and 3 are equipped with nuclear steam supply systems (NSSS) designed for a power output of 2957 MWt.</p> <p>The station property consists of a 953-acre tract of land with boundaries generally following the Illinois River to the north, the Kankakee River on the south and east and the Elgin, Joliet and Eastern Railway right-of-way on the west. Exelon is the sole owner of the 953-acre tract subject only to an easement of the U.S. Government for an access road to Dresden Island Lock and Dam maintained and operated by the U.S. Corps. of</p>	<p>1.1 Facility Description</p> <p>Dresden Station, Units 1, 2 and 3, is located in the Goose Lake Township of Grundy County in northeastern Illinois. Unit 1 is in permanent shutdown (see Figure 1-1).</p> <p>The plant consists consisted of three Boiling Water Reactor (BWR) Nuclear Steam Supply Systems (NSSS) and turbine generators provided by General Electric Company. Unit 1 is a dual cycle boiling water reactor designed for a power output of 700 MWt and has officially been retired as of August 31, 1984. Units 2 and 3 are equipped with nuclear steam supply systems (NSSS) designed for a power output of 2957 MWt permanently defueled.</p> <p>The station property consists of a 953-acre tract of land with boundaries generally following the Illinois River to the north, the Kankakee River on the south and east and the Elgin, Joliet and Eastern Railway right-of-way on the west. Exelon is the sole owner of the 953-acre tract subject only to an easement of the U.S. Government for an access road to Dresden Island Lock and Dam maintained and</p>	<p>This revision recognizes the permanently defueled condition for Dresden.</p>

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TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
	<p>Engineers. This road traverses the site from north to south ~ 0.8 mile west of the plant.</p> <p>In addition to ownership of the 953-acre tract, Exelon Nuclear also leases approximately 17 acres in two narrow strips of river frontage located near the northeast corner of the site from the State of Illinois. The terms of the lease provide that these "buffer" strips shall remain idle.</p> <p>For more specific site location information, refer to the Station UFSAR.</p>	<p>operated by the U.S. Corps. of Engineers. This road traverses the site from north to south ~ 0.8 mile west of the plant.</p> <p>In addition to ownership of the 953-acre tract, Exelon Nuclear also leases approximately 17 acres in two narrow strips of river frontage located near the northeast corner of the site from the State of Illinois. The terms of the lease provide that these "buffer" strips shall remain idle.</p> <p>For more specific site location information, refer to the Station UFSAR.</p>	
<p>EP-AA-1004 Annex Section 4.2 Assessment Actions</p>	<p>4.2 Assessment Actions</p> <p>Throughout each emergency situation, continuing assessment will occur. Assessment actions at Dresden Station may include an evaluation of plant conditions; in-plant, onsite, and initial offsite radiological measurements; and initial estimates of offsite doses. Core damage information is used to refine dose assessments and confirm or extend initial protective action recommendations. Dresden Station utilizes NEDC-33045P-A, Revision 0, (2001) as the basis for the methodology for post-accident core damage assessment. This methodology utilizes real-time plant indications. In addition, Dresden Station may use samples of plant fluids and atmospheres as inputs to the CDAM (Core Damage Assessment Methodology) program for core damage estimation.</p>	<p>4.2 Assessment Actions</p> <p>Throughout each emergency situation, continuing assessment will occur. Assessment actions at Dresden Station may include an evaluation of plant conditions; in-plant, onsite, and initial offsite radiological measurements; and initial estimates of offsite doses. Core damage information is used to refine dose assessments and confirm or extend initial protective action recommendations. Dresden Station utilizes NEDC-33045P-A, Revision 0, (2001) as the basis for the methodology for post-accident core damage assessment. This methodology utilizes real-time plant indications. In addition, Dresden Station may use samples of plant fluids and atmospheres as inputs to the CDAM (Core Damage Assessment Methodology) program for core damage estimation.</p>	<p>This revision deletes reference to Core Damage Assessment personnel and CDAM.</p> <p>The permanent shutdown of the Dresden reactors and defueled status makes the reference to CDAM unnecessary within the Emergency Plan.</p>

Attachment 2
TABULAR SUMMARY OF CHANGES TO DRESDEN EMERGENCY PLAN

Emergency Plan Section	Current Wording	Proposed Wording	Reason for Change
EP-AA-1004 Annex Section 5 5.2.2.4 High Range Containment Radiation Monitors	5.2.2.4 <u>High Range Containment Radiation Monitors</u> Two high range containment radiation monitors are installed on each of Dresden's units. The range of these monitors is from 1 R/hr to 10 ⁸ R/hr.	5.2.2.4 <u>High Range Containment Radiation Monitors</u> Two high range containment radiation monitors are installed on each of Dresden's units. The range of these monitors is from 1 R/hr to 10⁸ R/hr.	This revision deletes high range containment radiation monitors. The permanent shutdown of the Dresden reactors and defueled status makes the reference to high range containment radiation monitors unnecessary within the Emergency Plan
EP-AA-1004 Annex Section 5 5.2.3 Onsite Process Monitors	5.2.3 <u>Onsite Process Monitors</u> Adequate monitoring capability exists to properly assess the plant status for the modes of operation. The operability of the post-accident instrumentation ensures information is available on selected plant parameters to monitor and assess important variables following an accident. Instrumentation is available to monitor the parameters and ranges given in the Dresden Station Technical Specifications. Station procedures have been developed which would aid personnel in recognizing inadequate core cooling using applicable instrumentation.	5.2.3 <u>Onsite Process Monitors</u> Adequate monitoring capability exists to properly assess the plant status for the modes of operation. The operability of the post-accident instrumentation ensures information is available on selected plant parameters to monitor and assess important variables following an accident. Instrumentation is available to monitor the parameters and ranges given in the Dresden Station Technical Specifications. Station procedures have been developed which would aid personnel in recognizing inadequate core cooling using applicable instrumentation.	This revision removes modes of operation and reference to inadequate core cooling. The permanent shutdown of the Dresden reactors and defueled status makes the reference to modes of operation and core cooling unnecessary within the Emergency Plan