

AmerGen

An Exelon/British Energy Company

Clinton Power Station

P.O. Box 678
Clinton, IL 61727
Phone: 217 935-8881

U-603471

April 5, 2001

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Clinton Power Station
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Consolidation of Clinton Power Station Emergency Operations Facility Into the Single Emergency Operations Facility for the Midwest Regional Operating Group of Exelon Generation Company, LLC

- References:
- (1) Letter from S. Richards (U.S. NRC) to O. Kingsley (Commonwealth Edison Company), "Central Emergency Operations Facility – Commonwealth Edison Company," dated February 9, 1999.
 - (2) Letter from R. Krich (Commonwealth Edison Company) to U.S. NRC, "Updated Proposal to Consolidate Near-Site Emergency Operations Facilities into a Single Central Emergency Operations Facility," dated August 7, 1998.

The purpose of this letter is to request NRC approval to incorporate the Clinton Power Station (CPS) Emergency Operations Facility (EOF) into the central EOF currently utilized by Exelon Generation Company (EGC), LLC formerly Commonwealth Edison (ComEd) Company. Since the central EOF is located more than 20 miles from CPS, NRC approval is required in accordance with Supplement 1 to NUREG-0737, "Requirements For Emergency Response Capability." Approval of this request will, however, ultimately allow the CPS Emergency Plan to be integrated into a single EGC Midwest Regional Operating Group emergency planning concept.

In Reference 1, the NRC approved the use of the central EOF for the former ComEd nuclear sites. It was documented in Reference 1 that the central EOF meets all the functional as well as the physical requirements for an EOF as identified in NRC regulations and guidance documents. A significant factor in the NRC approval of the central EOF concept was the fact that the state and local emergency responders operate from their own emergency centers, are not sent to the near-site EOFs, and will not be sent to the central EOF. As a result, there was no change in communication arrangements resulting from the use of the central EOF. We have reviewed the scope and process of the CPS Emergency Plan and have concluded that the same basis provided for approval of a central EOF for the former ComEd sites also applies to CPS. CPS is approximately the same distance as the Quad Cities Nuclear Power Station from the central EOF, which is located in the EGC suburban Chicago offices.

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We have determined that a single emergency planning concept maintained within the State of Illinois is advantageous to the effectiveness of the overall emergency response effort. This single operating philosophy will allow the State and utility emergency responders to function in consistent roles when any nuclear station Emergency Plan is implemented.

Performance of the emergency response organization and facilities for CPS will be enhanced by this change. The same personnel that staff the central EOF, functioning in the same roles for CPS as they do for the five nuclear stations operated by EGC, have demonstrated their capabilities in numerous evaluated exercises. The central EOF personnel are trained in the areas of emergency classification and emergency action level determination. These areas of emergency response for CPS will be very similar to those required for the LaSalle County Station. Therefore, these responsibilities will be within the capabilities of the current central EOF staff. Off-hours augmentation has also been successfully demonstrated. This change will permit CPS to limit its onsite staff to fewer response facilities. CPS is currently maintaining staffing for both the onsite EOF and the onsite Technical Support Center (TSC). Transferring EOF functions to the central EOF will allow us to better focus resources strictly to onsite accident management. This permits a wider selection of resources for the TSC staff.

Incorporation of CPS into the central EOF will not affect the ability of the EOF to be staffed within 60 minutes. This change will reduce the impact on CPS station resources, will have no detrimental effect on State or local agency response activities, and will not reduce the effectiveness of the EOF response functions. As with the EGC nuclear sites, direct face-to-face interactions with State and local counterparts at the EOF have never been a part of emergency response at CPS. State and county emergency response decision-makers have not and do not respond to the CPS EOF. The state agencies only send individuals to perform liaison functions. CPS will maintain an onsite facility for NRC and State liaison responders. Incorporation of CPS into the central EOF will not adversely impact the capabilities of EOF staff to work with State, county, and NRC Site Team responders.

The impact of this change on NRC resources should also be positive. The location of the central EOF, within minutes of NRC Region III offices, will permit the NRC emergency response group to respond in a far more timely manner than the two to three hour response to CPS. NRC resources responding to the TSC or Joint Press Information Center (JPIC) will be unchanged.

We estimate that the incorporation of CPS by the central EOF will result in a net savings. These savings will result primarily from the elimination of the current Back-up EOF, and the consolidation of the onsite TSC and EOF into a single TSC. We anticipate no direct costs to the facility associated with adoption of the central EOF. Technical systems required to enhance communications between CPS and the Exelon Nuclear offices would be initiated for business reasons regardless of adoption of this program. Start-up costs are anticipated to be primarily due to staff retraining.

To further support integration into a single EGC Midwest Regional Operating Group emergency planning concept, CPS will be submitting, under separate cover, additional Emergency Plan changes for NRC review. Included in those changes are the following.

1. Clinton Emergency Response Organization realignment to the standard organization operated by the former ComEd sites.
2. An updated Emergency Action Level Scheme based on Regulatory Guide 1.101, "Emergency Planning for Nuclear Power Plants," Rev. 2, 1981.


The incorporation of the CPS EOF into the central EOF and the planned supporting Emergency Plan changes will be coordinated and adopted coincidentally.

The commitments made in Reference 2, are unchanged by this submittal with respect to the prior agreement and are extended for the application with respect to CPS. Letters of Concurrence from the State of Illinois Emergency Management Agency, Illinois Department of Nuclear Safety and DeWitt County are included as Attachment A, B, and C to this letter.

The central EOF employed by EGC has proven, since its May 1999 implementation, to be an effective facility for implementation of the integrated Emergency Plan for the multiple stations operated by EGC. Approval of this proposal extends that philosophy to a single emergency response concept at all nuclear stations located within the State of Illinois.

Should you have any questions concerning this letter, please contact Ms. Marcia Lesniak at (630) 663-6484 or Mr. Terry Simpkin at (630) 663-3019.

Respectfully,


J. M. Heffley
Vice President
Clinton Power Station

Attachments:

Attachment A:	Letter of Concurrence - State of Illinois Emergency Management Agency
Attachment B:	Letter of Concurrence - Illinois Department of Nuclear Safety
Attachment C:	Letter of Concurrence - DeWitt County


**cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector-Clinton Power Station**

STATE OF ILLINOIS)
COUNTY OF DEWITT)
IN THE MATTER OF)
AMERGEN ENERGY COMPANY, LLC) Docket Number
CLINTON POWER STATION, UNIT 1) 50-461

SUBJECT: Consolidation of Clinton Power Station Emergency Operations Facility Into the Single Emergency Operations Facility for the Midwest Regional Operating Group of Exelon Generation Company, LLC

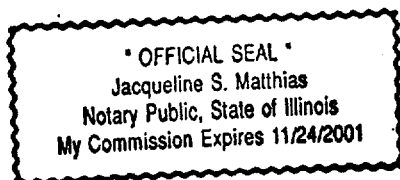
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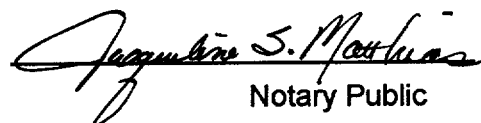
I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



J. M. Heffley
Vice President
Clinton Power Station

Subscribed and sworn to before me, a Notary Public in and
for the State above named, this 5th day of
April, 2001.





Notary Public

Attachment A

Letter of Concurrence
State of Illinois Emergency Management Agency

ILLINOIS EMERGENCY MANAGEMENT AGENCY



GEORGE H. RYAN, GOVERNOR
MICHAEL CHAMNESS, DIRECTOR

March 26, 2001

Mr. Martin J. Vonk
Exelon Nuclear Emergency
Preparedness Manager
1400 Opus Place
Downers Grove, IL 60515-5701

Dear Mr. Vonk:

I have reviewed your letter of March 12, 2001, and the attachment. I concur with the changes that are being made to incorporate Clinton Station into the Midwest Regional Operating Group Central EOF.

If you have any questions or need additional information, please call Jana Fairow at 217/782-6594.

Sincerely,

David L. Smith, Chief
Disaster Assistance & Preparedness

Attachment B

**Letter of Concurrence
Illinois Department of Nuclear Safety**

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

1035 OUTER PARK DRIVE • SPRINGFIELD, ILLINOIS 62704
217-785-9900 • 217-782-6133 (TDD)

George H. Ryan
Governor

Thomas W. Ortziger
Director

March 21, 2001

Martin J. Vonk
Emergency Preparedness Manager
Exelon Nuclear Generating Corporation
1400 Opus Place
Downers Grove, IL 60515-5701

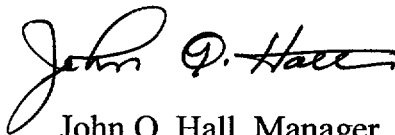
Subject: CPS-Corporate EOF

Dear Mr. Vonk:

Exelon Nuclear's proposal to incorporate the Clinton Power Station (CPS) Emergency Operations Facility (EOF) and its associated activities under the single "Corporate EOF" concept adopted previously for the former Commonwealth Edison nuclear generating facilities in Illinois has been reviewed by this Department.

The EOF consolidation should have no adverse effect on the ability of CPS to interact appropriately with this Department as required under emergency conditions and the procedures embodied in the Illinois Plan for Radiological Accidents. We, therefore, concur with your proposal to the U.S. Nuclear Regulatory Commission.

Sincerely,

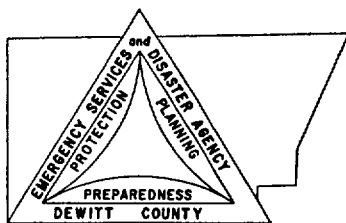


John Q. Hall, Manager
Office of Mitigation and Response

JQH:as

Attachment C

Letter of Concurrence
DeWitt County



DeWitt County / Clinton Emergency Services and Disaster Agency

Marilyn Strain, Coordinator
Office 217 - 935-9596 (24 Hours)
Home 217 - 935-3413

DeWitt County Building
201 West Washington
P. O. Box 439
Clinton, Illinois 61727-0439

February 13, 2001

Mr. Ken Evans V-922
Clinton Power Station
Box 678
Rte 54 East
Clinton, IL 61727

Dear Ken:

I have read Mr. Vonk's letter regarding approval for the incorporation of Clinton into the Midwest Regional Operating Group (ROG) Central EOF that is currently maintained at Execelon Nuclear Midwest ROG Headquarters. After reviewing the request to the NRC I cannot for see any problems that this might create should we need to respond to an accident at Clinton Power Station.

If the personnel at Clinton Power Station feel that this is an advisable change, then I have no problem with this action.

Yours truly,

Marilyn J. Strain