

10 CFR 50.54(q)

RS-01-073

April 16, 2001

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Request for NRC Approval of Changes to the Emergency Plan

Reference: (1) Letter from J. M. Heffley (AmerGen) to U.S. NRC, "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," dated April 5, 2001.

In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (q), AmerGen Energy Company, LLC (i.e., AmerGen) requests NRC approval of a proposed change to the Clinton Power Station (CPS) Emergency Plan. We are revising the CPS Emergency Plan to be consistent with the standardized Emergency Plan and annexes in use at other Exelon Generation Company (EGC), LLC, generating stations in the Midwest Regional Operating Group (MWROG). The revised Plan would continue to meet the performance requirements of 10 CFR 50.47, "Emergency plans," and 10 CFR 50 Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities." These proposed changes will ultimately allow the CPS Emergency Plan to be integrated into a single EGC MWROG emergency planning concept. One of the proposed changes to the current CPS Emergency Plan, specifically a reduction in on-shift staffing, may be considered to be a decrease in effectiveness of the currently approved Emergency Plan; however, we have concluded that the revised Plan will continue to be effective and to meet the performance requirements of 10 CFR 50.47 and 10 CFR 50 Appendix E.

As a result of staff augmentation problems during an Alert on February 13, 1998, we increased the minimum on shift staffing in excess of that recommended by Table B-1, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies," of NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1. Specifically, in order to ensure a 30-minute response, the minimum number of personnel on-shift was increased to 15 as documented in Table 2-1, "Clinton Power Station Minimum Staffing," of the current CPS Emergency Plan. The proposed change to the Emergency Plan

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will reduce the number of on-shift personnel to 10 and establish a 60-minute staff augmentation for the remaining NUREG-0654, Table B-1 functions consistent with the EGC emergency response organization (ERO).

The five on-shift positions being affected are as follows.

- Currently one radiation protection person is assigned to perform in-plant surveys and two radiation protection personnel are assigned to provide protective actions in the plant. These radiological support functions in the proposed Emergency Plan revision would be assigned to the on-shift radiation protection technician and the on-shift qualified radiochemistry technician. The level of staffing, as proposed in the revised Emergency Plan, represents the minimum staffing level in Table B-1 of NUREG-0654 and is consistent with that currently used at the other EGC facilities in the MWROG. This change would require radiochemistry technicians at CPS to be trained to the same level of qualification as the radiochemistry technicians at the other EGC MWROG facilities before existing shift personnel could fulfill the function.
- Currently, one electrician/Instrumentation & Controls (I&C) technician is assigned to electrical damage control repair and corrective action function. In the proposed Emergency Plan revision, this function would be assigned to a qualified non-licensed operator. This level of staffing, as proposed in the revised Emergency Plan, represents the minimum staffing level in Table B-1 of NUREG-0654 and is consistent with that currently required at other EGC MWROG facilities. This change would require non-licensed operators at CPS to be trained to the same level of qualification as non-licensed operators at other EGC MWROG facilities before existing shift personnel could fulfill the function for on-shift repair and corrective actions.
- The current CPS Emergency Plan requires one extra on-shift non-licensed operator to be assigned to the mechanical damage control repair and corrective action function. This function in the proposed revision to the CPS Emergency Plan would be assigned to an existing non-licensed operator. This proposed level of staffing represents the minimum staffing level in Table B-1 of NUREG-0654 and is consistent with that currently used at other EGC MWROG facilities.

As stated above, we have evaluated the proposed reduction in minimum on-shift staffing from 15 to 10 and have determined that while this may be considered a decrease in effectiveness of the previously approved CPS Emergency Plan, the revised Plan still meets the performance requirements of 10 CFR 50.47 and 10 CFR 50 Appendix E as described below and therefore remains fully effective.

A number of other changes have also been proposed which will compensate for the reduction in on-shift staffing. These changes include the following.

- The 60-minute minimum staffing requirements for the CPS emergency response facilities have been increased. The proposed revision to the CPS Emergency Plan increases the number of minimum staff positions in the Technical Support Center (TSC) from 5 to 10 and exceeds the criteria specified in NUREG-0654.
- The Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC) will be required to be fully staffed and activated at the Alert classification. Currently, a full staffing of the EOF is not required until the Site Area Emergency classification. This change increases the early activation of the EOF at an Alert level and will offset any potential decrease in effectiveness that may result from the proposed reduction in on-shift staffing.

- A central EOF has been established for all the other EGC MWROG facilities. In Reference (1), we requested NRC approval to incorporate the CPS EOF into the central EOF currently utilized by EGC. This will replace the existing CPS EOF and allow for elimination of the backup EOF, since the central EOF is located in the EGC suburban Chicago offices outside the 20 mile radius around CPS. Performance of the ERO and facilities for CPS will be enhanced by this change. Since we are currently maintaining staffing for both the onsite EOF and Technical Support Center (TSC), transferring the on-site EOF functions to the central EOF will permit a wider selection of resources for the TSC staff and better focus of resources to onsite accident management.
- We are adopting the EGC standardized on-shift, station and corporate ERO staffing and staff augmentation requirements. These requirements are consistent with the goals outlined in Table B-1 of NUREG-0654. This new ERO includes realignment and retitling of CPS EOF and public information ERO positions to eliminate redundancy between TSC and EOF positions, especially in the areas of dose assessment and core damage assessment.

Should you have an questions concerning this letter, please contact Ms. Marcia Lesniak at (630)663-6484 or Mr. Tim Byam at (630)663-7266.

Respectfully,



R. M. Krich
Director-Licensing

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