



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

April 24, 2013

Mr. Michael J. Pacilio
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION BASELINE EMERGENCY PREPAREDNESS
BIENNIAL EXERCISE INSPECTION REPORT 05000461/2013503

Dear Mr. Pacilio:

On March 29, 2013, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Clinton Power Station. The enclosed report documents the results of this inspection, which were discussed on March 29, 2013, with Mr. B. Taber, and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings were identified during this inspection.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Joseph Maynen, Acting Chief
Plant Support Branch
Division of Reactor Safety

Docket No. 50-461
License No. NPF-62

Enclosure: Inspection Report 05000461/2013503;
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ™

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-461
License No: NPF-62

Report No: 05000461/2013503

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station

Location: Clinton, IL

Dates: March 25 through 29, 2013

Inspectors: R. Jickling, Senior Emergency Preparedness Inspector
J. Beavers, Emergency Preparedness Inspector
R. Ruiz, Senior Resident Inspector
N. Valos, Senior Reactor Analyst

Approved by: J. Maynen, Acting Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000461/2012503; 03/25/2013 – 03/29/2013; Clinton Power Station; Baseline Emergency Preparedness Biennial Exercise Inspection.

This report covers a one week period of announced baseline inspection by two regional inspectors, one reactor analyst, and one resident inspector. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Emergency Preparedness

No findings were identified.

B. Licensee-Identified Violations

No violations were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

.1 Exercise Evaluation

a. Inspection Scope

The inspectors reviewed the March 26, 2013, biennial emergency preparedness exercise objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan and to verify that the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement its plan. The inspectors also reviewed records of other drills and exercises conducted in 2011, 2012, and 2013, to verify that those drills' scenarios were sufficiently different from the scenario used in the March 26, 2013, exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk-significant activities of emergency classification, notification, and protective action decision making, implementation of accident mitigation strategies, and correction of past exercise weaknesses in the following emergency response facilities:

- Control Room Simulator (CRS);
- Technical Support Center (TSC);
- Operations Support Center (OSC); and
- Emergency Operations Facility (EOF).

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the CRS, TSC, OSC, and EOF to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators and managers to obtain the licensee's findings and assessments of its exercise participants' performances. These self-assessments were then compared with the inspectors' independent observations and assessments to assess the licensee's ability to adequately critique its exercise performance. Documents reviewed are listed in the Attachment to this report.

This exercise evaluation inspection constituted one sample as defined in Inspection Procedure (IP) 71114.01-06.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

Cornerstone: Emergency Preparedness

4OA1 Performance Indicator Verification (71151)

.1 Drill/Exercise Performance

a. Inspection Scope

The inspectors sampled licensee submittals for the Drill/Exercise Performance Indicator (PI) for the period from the third quarter 2012 through fourth quarter 2012. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the Nuclear Energy Institute (NEI) Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, was used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI, assessments of PI opportunities during pre-designated control room simulator training sessions, and performance during other drills. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one Drill/Exercise Performance sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.2 Emergency Response Organization Drill Participation

a. Inspection Scope

The inspectors sampled licensee submittals for the Emergency Response Organization (ERO) Drill Participation PI for the period from the third quarter 2012 through fourth quarter 2012. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, was used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI, performance during the 2012 drills, and revisions of the roster of personnel assigned to key ERO positions. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ERO Drill Participation sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspectors sampled licensee submittals for the Alert and Notification System (ANS) PI for the period from the third quarter 2012 through fourth quarter 2012. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, was used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI Guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI and results of periodic scheduled ANS operability tests. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ANS sample as defined in IP 71151-05.

b. Findings

No findings were identified.

4OA6 Management Meetings

.1 Exit Meeting Summary

On March 29, 2013, the inspectors presented the biennial exercise inspection results to Mr. B. Taber and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

B. Taber, Plant Manager
K. Baker, Regulatory Assurance Manager
D. Bond, Emergency Preparedness Manager
J. Cunningham, Operations Director
S. Kowalski, Senior Manager Design Engineering
M. Mayer, Security
S. O'Riley, Emergency Preparedness Coordinator
W. Paggent, On-Line Work Manager
P. Quealy, Senior Drill and Exercise Specialist
C. Rocha, Nuclear Oversight Manager
T. Stoner, Maintenance Director
J. Stovall, Chemistry Manager
J. Waddel, Safety and Human Performance Manager

Nuclear Regulatory Commission

B. Kemker, Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened, Closed, and Discussed

None

LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1EP1 Exercise Evaluation

- Clinton Station 2013 Ingestion Pathway NRC Graded Exercise; March 22, 2013
- CPS 4305.01; Security Threat/Intrusion; Revision 7
- EP-AA-111; Emergency Classification and Protective Action Recommendation; Revision 18
- EP-AA-113; Personnel Protective Actions; Revision 11
- EP-AA-114; Notifications; Revision 11
- AR 01493441; Exercise-JIC News Release Was Identified As Including Several Problems; March 27, 2013
- AR 01493436; Exercise-JIC First Press Conference Reported Several Inaccurate Statements; March 27, 2013
- AR 01493433; Exercise-Performance Weaknesses Were Identified for Control Room and OSC Repair Team Request, Dispatch, and Tracking; March 27, 2013
- AR 01493430; Exercise-EOF Protective Measures Group Incorrectly Reported Two Radiation Release Paths and One Correctly; March 27, 2013
- AR 01493418; Exercise-TSC Failed to Provide the Correct Radiation Release Path For Dose Assessment-No Impact to PARs For This Scenario; March 27, 2013
- AR 01493414; Exercise-Equipment Operators Minimum Staffing Was Not Demonstrated; March 27, 2013

4OA1 Performance Indicator Verification

- Clinton Power Monthly Siren Availability Report; July – December 2012
- EP-AA-125-1002; DEP Monthly Data; July – December 2012
- EP-AA-1003; Key ERO Participation and Stability Monthly Data; September – December 2012
- LS-AA-2110; Monthly Data Elements for NRC ERO Drill Participation; September – December 2012
- LS-AA-2120; Monthly Data Elements for NRC DEP; July – December 2012
- LS-AA-2130; Monthly Data Elements for NRC ANS Reliability; July – December 2012

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access Management System
ANS	Alert and Notification System
AR	Action Request
CFR	Code of Federal Regulations
CRS	Control Room Simulator
DEP	Drill and Exercise Performance
DRS	Division of Reactor Safety
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
IP	Inspection Procedure
IR	Inspection Report
JIC	Joint Information Center
NEI	Nuclear Energy Institute
NRC	U.S. Nuclear Regulatory Commission
OSC	Operations Support Center
PAR	Protective Action Recommendation
PARS	Publicly Available Records System
PI	Performance Indicator
SDP	Significance Determination Process
TSC	Technical Support Center

April 24, 2013

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Senior Vice President, Exelon Generation Company, LLC
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Letter to Mr. Michael J. Pacilio from Mr. Joseph Maynen dated April 24, 2013.

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BIENNIAL EXERCISE INSPECTION REPORT 05000461/2013503

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