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10 CFR 50.90
10 CFR 50.54(q)

RA-17-071

November 10, 2017

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

Oyster Creek Nuclear Generating Station
Renewed Facility Operating License No. DPR-16
NRC Docket Nos. 50-219 and 72-15

Subject: Response to Request for Additional Information (RAI) and Supplemental Information Regarding License Amendment Request - Proposed Changes to the Oyster Creek Emergency Plan for Permanently Defueled Condition

- Reference:
- 1) Letter from Michael P. Gallagher (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – *"License Amendment Request - Proposed Changes to the Oyster Creek Emergency Plan for Permanently Defueled Condition,"* dated February 28, 2017, RA-17-012 (ML17060A289)
 - 2) Letter from Michael P. Gallagher, (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – *"Response to Request for Additional Information (RAI) and Supplemental Information Regarding License Amendment Request - Proposed Changes to the Oyster Creek Emergency Plan for Permanently Defueled Condition,"* dated September 20, 2017 (ML170263A066)
 - 3) U.S. Nuclear Regulatory Commission Electronic Mail Request to David Helker, Exelon Generation Company, LLC - Draft Request for Additional Information – Oyster Creek ERO Staffing Amendment, dated October 11, 2017
 - 4) U.S. Nuclear Regulatory Commission Electronic Mail Request to David Helker (Exelon Generation Company, LLC) – *"Oyster Creek Nuclear Generating Station – Request for Additional Information Regarding License Amendment Request for Emergency Plan Changes to Revise the On-Shift Staffing and the Emergency Response Organization Staffing for a Permanently Defueled Condition (CAC NO. MF9352),"* dated October 16, 2017 (ML17289A790)

U.S. Nuclear Regulatory Commission
Response to Request for Additional Information
and Supplemental Information to OCN GS License Amendment Request
Docket Nos. 50-219 and 72-15
November 10, 2017
Page 2

By letter dated February 28, 2017 (Reference 1), as supplemented by letter dated September 20, 2017 (Reference 2), Exelon Generation Company, LLC (Exelon) submitted a License Amendment Request (LAR) for Oyster Creek Nuclear Generating Station (OCNGS). The proposed amendment would revise the site emergency plan (SEP) for the permanently shutdown and defueled condition.

Subsequently, in an electronic mail request dated October 11, 2017 (Reference 3), the NRC issued a draft Request for Additional Information (RAI) indicating that it had reviewed the information submitted in the Reference 2 letter, and that additional clarifying information was needed to support its continued review. The draft RAI in Reference 3 was further discussed during a teleconference on October 16, 2017, between Exelon and NRC representatives. As a result of the discussions, it was determined that no modification to the draft RAI was needed and the NRC issued a formal RAI on October 16, 2017 (Reference 4), and requested a response by November 15, 2017.

Accordingly, Attachment 1 of this letter provides Exelon's response to the NRC's RAI and includes supplemental information in support of this amendment request. Attachment 2 includes the revised marked-up and clean-typed pages to the proposed OCNGS Emergency Plan "Table OCNGS B-1: Minimum Staffing Requirements," (replace pages B-38 through B-40).

Exelon has reviewed the information supporting a finding of No Significant Hazards Consideration and the Environmental Consideration provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the previously stated bases in Reference 1 for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

The proposed changes are being submitted to the NRC for approval prior to implementation, as required under 10 CFR 50.54(q)(4).

There are no regulatory commitments contained in this submittal.

If you have any questions concerning this submittal, please contact Paul Bonnett at (610) 765-5264.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10th day of November 2017.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael P. Gallagher", with a long horizontal flourish extending to the right.

Michael P. Gallagher
Vice President, License Renewal & Decommissioning
Exelon Generation Company, LLC

U.S. Nuclear Regulatory Commission
Response to Request for Additional Information
and Supplemental Information to OCNGS License Amendment Request
Docket Nos. 50-219 and 72-15
November 10, 2017
Page 3

Attachments: 1. Response to NRC's Request for Additional Information
2. Revised Marked-Up and Clean-typed Pages for OCNGS Emergency Plan
"Table OCNGS B-1: Minimum Staffing Requirements"

cc: w/Attachment

Regional Administrator - NRC Region I
NRC Senior Resident Inspector - Oyster Creek Nuclear Generating Station
NRC Project Manager, NRR - Oyster Creek Nuclear Generating Station
Director, Bureau of Nuclear Engineering - New Jersey Department of Environmental
Protection
Mayor of Lacey Township, Forked River, NJ

Attachment 1

Response to NRC's Request for Additional Information

SUMMARY

By letter dated February 28, 2017 (ML17060A289) (Reference 1), as supplemented by letter dated September 20, 2017 (ML17263A066) (Reference 2), Exelon Generation Company, LLC (Exelon), requested prior U.S. Nuclear Regulatory Commission (NRC) approval of an amendment to the Oyster Creek Nuclear Generating Station (OCNGS) Site Emergency Plan (SEP) in support of Exelon's intent to permanently cease power operations at OCNGS no later than December 31, 2019. The proposed amendment to the OCNGS SEP would revise the OCNGS Emergency Response Organization (ERO) on-shift and augmented staffing, based on the certifications for permanent cessation of power operations and permanent removal of fuel from the reactor vessel to the NRC in accordance with 10 CFR 50.82(a)(1)(i) and (ii).

Subsequently, in an electronic mail request dated October 11, 2017 (Reference 3), the NRC issued a draft Request for Additional Information (RAI) indicating that it had reviewed the information submitted in the Reference 2 letter, and that additional clarifying information was needed to support its continued review. The draft RAI in Reference 3 was further discussed during a teleconference on October 16, 2017, between Exelon and NRC representatives. As a result of the discussions, it was determined that no modification to the draft RAI was needed and the NRC issued a formal RAI on October 16, 2017 (Reference 4), and requested a response by November 15, 2017.

Accordingly, this attachment provides Exelon's response to the NRC's RAI contained in the Reference 2 electronic mail request. The specific question is followed by Exelon's response. Exelon is providing information to supplement the amendment request as contained in the Attachments 2 of this submittal. Attachment 2 includes the revised marked-up and clean-typed pages to the proposed OCNGS SEP "Table OCNGS B-1: Minimum Staffing Requirements," (replaces pages B-38 through B-40). The revisions reflected with clouds represent changes from the original submittal (Reference 1). The redline and strikeout reflects the changes between the current operating SEP and the proposed Table OCNGS B-1. The SEP pages being submitted in this letter supersede in entirety those submitted in Reference 1 and Reference 2.

RESPONSE TO RAI QUESTION

RAI

In a letter from Michael P. Gallagher, Exelon Generation Company, LLC (Exelon), dated September 20, 2017, containing Exelon's Response to NRC's Request for Additional Information and Supplemental Information, Exelon states in the response to RAI-OCNGS-3:

Exelon has revised the proposed LAR (Reference 1) Table B-1, as provided in Attachment 2 to this submittal. This change restores the two RP Technicians (Item 4, In-Plant Surveys) (increased from one in the proposed LAR (Reference 1)) and the two Maintenance Personnel (Item 5, Repair and Corrective Actions) that are in the current OCNGS SEP. Additionally, "Note (c)" is being removed from the two designated shift Maintenance Personnel to indicate that they will not have any additional responsibilities and therefore will constitute part of the "Minimum Shift Size" compliment.

Note (l) which states, "One position is filled by a Senior Maintenance Technician, the other position may be filled by an equipment operator" was deleted in the original submittal. It was reinstated as part of the RAI response.

It is unclear if the two Maintenance Personnel identified in the RAI response are specifically qualified to perform the duties of the required augmenting Electrical Maintenance and Mechanical Maintenance functions. The functions of the Electrical Maintenance and Mechanical Maintenance augmented responders need to be addressed per the guidance in NUREG-0654, Table B-1, "Repair and Corrective Actions," not by using the guidance in NEI 10-05, which is for onshift staffing.

Additionally, there is no evaluation in the RAI response that two RP Technicians provide sufficient staffing and resources to mitigate an event with emergency classification levels up to and including a General Emergency. Previous NRC observations of other licensee's drills have indicated that the reduced RP staffing did impact the performance of the emergency response organization's ability to implement mitigation actions.

Exelon's Response to RAI

Exelon understands the NRC's concerns with the proposed staffing levels with respect to the Maintenance and Radiation Protection (RP) personnel that will be available to respond to an event after the facility has permanently shutdown. As described below, Exelon is proposing the following changes to the staffing levels with regards to these positions.

Exelon is proposing to revise the staffing levels for the Maintenance and the RP personnel consistent with the levels described in the current OCGS operating SEP. This provides assurance that the RP positions will be appropriately staffed by qualified technicians and the Maintenance positions will be filled by qualified Maintenance personnel. This effectively returns the staffing regarding the RP and Maintenance personnel to what is in the current operating SEP. The revisions to the current SEP Table OCGS 2-1 are reflected below as shown by the relocation of notes and strikeouts.

Functional Area	Major Tasks	Emergency Position	Minimum Shift Size	^(a) 60 Minute Augmentation	Full Augmentation
4. Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Plant RP Personnel	1 ^(e)		
	Onsite Surveys In-plant / Onsite Surveys	RP Personnel RP Technicians ^(d)	2		(d) (d)
6. In-Plant Protective Actions	Radiation Protection	RP Personnel ^(d)	3 ^(c)		(d)
5. Plant Systems Engineering and Corrective Actions	Repair and Corrective Actions	Maintenance Personnel ^{(4)(d)} (OSC)	2 ^(e)		(d)
Notes: (a) Response time is based on optimum travel conditions. (c) May be provided by personnel assigned other functions. Personnel can fulfill multiple functions. (d) Personnel numbers depend on the type and extent of the Emergency, (f) —One position is filled by a Senior Maintenance Technician, the other position maybe filled by an equipment operator.					

The above table reflects that Note (d) in the Full Augmentation column (proposed for deletion in the LAR submittal (Reference 1)), has been relocated to the Emergency Position column. Note (d) provides for calling in additional personnel to perform these functions dependent on the type and extent of the emergency.

Maintenance Functions

Exelon is proposing to remove the cited Notes (c) and (l) from the "Plant Systems Engineering and Corrective Actions" Functional Area to reflect that both the individuals assigned the Maintenance "Repair and Corrective Actions" functions, will be dedicated qualified Maintenance personnel (removing the allowance that one may be an Operator). These changes are reflected as shown above and in the revised OCNCS Table B-1 in Attachment 2 to this RAI response.

The Maintenance personnel who will be designated to perform the "Repair and Corrective Actions" functions will be dedicated Maintenance personnel who will be qualified to perform both the Electrical Maintenance and Mechanical Maintenance functions of the augmented Maintenance responders addressed in the guidance in NUREG-0654, Table B-1, "Repair and Corrective Actions."

RP Functions

As proposed in Reference 1, Attachment 1, Section 5.2.3, "Offsite Dose Assessment" (Item 4, Table B-1) will be performed by plant personnel. This permits an Operations person to perform this function if the third RP technician is performing other RP-related functions. The RP technicians and Operations Supervisors/Certified Fuel Handlers who will perform the Dose Assessment function, will be trained and qualified to perform Dose Assessment, commensurate with the current level of training received by the RP individual(s). This function is augmented by Emergency Operations Facility (EOF) personnel within 60 minutes of notification who will assume the Offsite Dose Assessment function once the EOF is activated.

As proposed in Reference 2, "Offsite Surveys" will be performed by the four dedicated Field Monitoring Team personnel who will report to the EOF RP Manager through the EOF Dose Assessment Coordinator and Field Team Communicator.

OCNCS is proposing to return the RP personnel levels for "In-Plant and Onsite Surveys" (Item 4, Table B-1) and "In-Plant Protective Actions" (Item 6, Table B-1) to the level in the current operating SEP. Their activities will be coordinated through the Operational Support Center (OSC) Director. Additional RP technicians may be called in as reflected by Note (d).

For a permanently shutdown and defueled condition, the evaluated Design Basis Accidents are limited to the Spent Fuel Pool (SFP) area where a single Radiation Protection technician(s) can provide adequate response and access control. OCNCS will normally staff three RP technicians on site to support the "Radiological Accident Assessment" and "In-Plant Protective Actions" functions. Additionally, worker access control is automated because RP work processes are computerized. Radiation Work Permit (RWP) access control and electronic dosimeter computer systems work together to provide a fully integrated system, allowing workers to sign-in on their RWP and to self-issue electronic dosimeters. The electronic dosimeter provides the worker with a continuous status of dose received and work area dose rates, and will alarm at preset dose and dose rate alarms. An annual RWP dedicated for SEP response will be written and available on

the first day of each year, which will preauthorize access for Emergency Response Organization (ERO) personnel in accordance with SEP implementing procedures. These functions have been successfully demonstrated during ERO drills that go beyond DBAs for the operating plant with the same level of RP technicians.

As proposed in Reference 1, Attachment 3a, Section B.5, RP Supervision will be performed initially by Operations Shift Management who will transfer responsibilities to the RP Manager (Technical Support Center (TSC)) in coordination with the OSC Director.

References:

1. Letter from Michael P. Gallagher, (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – "License Amendment Request - Proposed Changes to the Oyster Creek Emergency Plan for Permanently Defueled Condition," dated February 28, 2017 (ML17060A289) (CAC NO. MF9352)
2. Letter from Michael P. Gallagher, (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – *"Response to Request for Additional Information (RAI) and Supplemental Information Regarding License Amendment Request - Proposed Changes to the Oyster Creek Emergency Plan for Permanently Defueled Condition,"* dated September 20, 2017 (ML170263A066)
3. U.S. Nuclear Regulatory Commission Electronic Mail Request to David Helker, Exelon Generation Company, LLC - Draft Request for Additional Information – Oyster Creek ERO Staffing Amendment, dated October 11, 2017
4. U.S. Nuclear Regulatory Commission Electronic Mail Request to David Helker (Exelon Generation Company, LLC) – *"Oyster Creek Nuclear Generating Station – Request for Additional Information Regarding License Amendment Request for Emergency Plan Changes to Revise the On-Shift Staffing and the Emergency Response Organization Staffing for a Permanently Defueled Condition (CAC NO. MF9352),"* dated October 16, 2017 (ML17289A790)

Attachment 2

Revised Marked-Up and Clean-typed Pages for OCNGS Emergency Plan “Table OCNGS B-1: Minimum Staffing Requirements”

(Replaces pages B-38 through B-40 in Proposed LAR, Attachment 3)

PART II: Planning Standards And Criteria

Exelon Generation

Table OCN~~GS~~ 2B-1: Minimum Staffing Requirements

Functional Area	Major Tasks	Emergency Positions	Minimum Shift Size	(a) 60 Minute Augmentation	Full Augmentation
1. Plant Operations/Safe Shutdown and Assessment of Operational Aspects	Control Room Staff	Shift Manager (CR) Shift Control Room Supervisor (CR) Non-Certified Reactor Operator (CR) Equipment Operator	1 1 2 1		
2. Emergency Direction and Control	Command and Control Emergency Operations	Shift Emergency Director (CR) Station Emergency Director (TSC) Corporate Emergency Director (EOF)	1 ^(c)	1 1	
3. Notification & Communication	Emergency Communications Plant Status In-Plant Team Control Technical Activities Governmental	Shift Communicator (CR) TSC Director (TSC) EOF Director (EOF) State/Local Communicator ^(g) ENS Communicator HPN Communicator Operations Communicator (CR/TSC) Damage Control Comm. (CR/TSC/OSC) Technical Communicator (TSC) Regulatory Liaison (EOF)	1	1 1 1 (EOF) 1 (TSC) 1 (EOF) 2(c) 2(c) (c) 1 (c)	1 (TSC) ^(g) 1 (EOF) 1 (TSC) 1 (TSC) 1 (e)
4. Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment Offsite Surveys Onsite Surveys In-plant/ Onsite Surveys Chemistry RP Supervisory	Plant RP Personnel RP Group Lead (OSC) Dose Assessment Coordinator (EOF) Dose Assessor (EOF) Radiation Controls Coordinator (TSC) Field Team Communicator (EOF) Off-Site Field Team Personnel ^(h) RP Personnel ^(d) RP Technicians Chemistry Personnel ^(d) Radiation Protection Manager (TSC/EOF)	1 2 +	1 1 1 1 1 4 2	(b) 1 (d) (d) (d) 1

PART II: Planning Standards And Criteria

Exelon Generation

Table OCN~~GS~~ 2B-1: Minimum Staffing Requirements (Cont'd)

Functional Area	Major Tasks	Emergency Positions	Minimum Shift Size	^(a) 60 Minute Augmentation	Full Augmentation
5. Plant System Engineering, Repair and Corrective Actions	Technical Support	STA / Incident Assessor^(f) (CR)	4		
		Technical Manager (TSC)		1	
		Core/Thermal Hydraulics Engineer (TSC)		4	
		Mechanical Engineer^(f) (TSC)		4	
		Electrical Engineer^(f) (TSC)		4	
		SAMG Decision Maker (TSC)		1 ^(e)	
		SAMG Evaluator (TSC)		2 ^(e)	
		Operations Manager (TSC)		1	
		Radiation Controls Engineer (TSC)		1	
	Repair and Corrective Actions	Maintenance Personnel ^{(l)(d)} (OSC)	2 ^(e)	1	(d)
		Maintenance Manager (TSC)		1	
		OSC Director ^(k) (OSC)	1 ^(e)	1	
6. In-Plant Protective Actions	Accident Analysis	OSC Assistant Director (OSC)			4
		Technical Support Manager (EOF)		1	
		Operations Advisor (EOF)			4
		Technical Advisor (EOF)			4
	Radiation Protection	RP Personnel ^(d)	3 ^(c)		(d)
	Fire Fighting	Fire Brigade ^(f)	(f)		
7. Fire Fighting	First Aid and Rescue Operations	Plant Personnel	2 ^(c)		(d)
	Security & Accountability	Security Team Personnel	(g)	(g)	
		Security Coordinator (TSC)		1	
		JIC Security Access Control (JIC)			4
8. First Aid and Rescue Operations	Logistics / Administration	Logistics Manager (EOF)		1	
		Logistics Coordinator (TSC)			4
		Clerical Staff (TSC/OSC/EOF)			(d)
		Events Recorder (EOF/JIC)			2
		Administrative Coordinator (EOF)			4
		Computer Specialist (TSC)			4
	Site Access Control and Personnel Accountability				

Table OCN~~GS~~ ~~2B~~-1: Minimum Staffing Requirements (Cont'd)

Functional Area	Major Tasks	Emergency Positions	Minimum Shift Size	(a) 60 Minute Augmentation	Full Augmentation
11. Public Information	Media Interface Information Development Media Monitoring and Rumor Control Facility Operation and Control	Corporate Spokesperson (JIC)		1	4
		Technical Advisor / Spokesperson (JIC)		1	4
		Public Information Director (JIC)			4
		News Writer (JIC)		4	
		NJ OEM Conducts Rumor Control (JIC)		1	
		JIC Director (JIC)			4
		JIC Coordinator (JIC)			4
		Administrative Coordinator (JIC)			(d)
		Clerical Support (JIC)			
			Minimum Shift Size	Total Minimum Staff	Total Full Augmentation
TOTAL:			610	3423	20+

- (a) Response time is based on optimum travel conditions.
- (b) ~~Position assumed by the Shift Dose Assessor when relieved by the Radiological Controls Coordinator. Support personnel will be called in as conditions warrant. DELETED~~
- (c) ~~May be provided by personnel assigned other functions. Personnel can fulfill multiple functions.~~
- (d) ~~Additional Ppersonnel numbers may be called in to augment staff depending on the type and extent of the emergency.~~
- (e) ~~Staffing of the County EOC Liaison position is not required based on agreements with offsite agencies; however, every effort will be made to dispatch an Exelon Nuclear representative upon request from County EOC Director.~~
- (f) ~~Fire Brigade per UFSAR / FHARTM, as applicable. The OC Post Shutdown OSSA assumes a Fire Brigade consisting of five (5) persons. Per the assessment, two (2) additional plant personnel are needed to form the fire brigade in conjunction with three (3) Operations staff on shift (who are assigned to the Fire Brigade as a collateral duty). Upon a successful evaluation and approval of an incipient Fire Brigade in accordance with 10 CFR 50.48(f), the Fire Brigade compliment will be reduced to three (3). This is anticipated to occur sometime following shutdown. Until the 50.48(f) Fire Brigade evaluation is completed, the Fire Brigade will consist of five (5) persons.~~
- (g) ~~Function performed by on-shift security personnel.~~
- (h) ~~Each Field Survey Team consists of a Lead and Driver.~~
- (i) ~~Refer to Section 2.1.1 and 2.1.2 for description of on shift STA and Incident Assessor staffing requirements.~~
- (j) ~~State / Local communicator function in TSC assigned as collateral duty to either mechanical or electrical engineer (60 minute staff personnel)~~
- (k) ~~On shift OSC Director assumes role of OSC Operations Group Lead when relieved by ERO OSC Director~~
- (l) ~~One position is filled by a Senior Maintenance Technician, the other position maybe filled by an equipment operator.~~

Table OCNGS B-1: Minimum Staffing Requirements

Functional Area	Major Tasks	Emergency Positions	Minimum Shift Size	^(a) 60 Minute Augmentation
1. Plant Operations/Safe Shutdown and Assessment of Operational Aspects	Control Room Staff	Shift Manager (CR) Shift Supervisor (CR) Non-Certified Operator (CR)	1 1 2	
2. Emergency Direction and Control	Command and Control Emergency Operations	Shift Emergency Director (CR) Station Emergency Director (TSC) Corporate Emergency Director (EOF)	1 ^(c)	1 1
3. Notification & Communication	Emergency Communications Plant Status In-Plant Team Control Technical Activities Governmental	Shift Communicator (CR) State/Local Communicator ENS Communicator HPN Communicator	1	1 (EOF) 1 (TSC) 1 (EOF) (c) (c) (c) (c)
4. Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment Offsite Surveys In-plant/Onsite Surveys Chemistry RP Supervisory	Plant Personnel Dose Assessment Coordinator (EOF) Field Team Communicator (EOF) Off-Site Field Team Personnel ^(h) RP Technicians Chemistry Personnel ^(d) Radiation Protection Manager(TSC/EOF)	1 2	1 1 4 2

Table OCNGS B-1: Minimum Staffing Requirements (Cont'd)

Functional Area	Major Tasks	Emergency Positions	Minimum Shift Size	^(a) 60 Minute Augmentation
5. Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Manager (TSC)	2	1
		Operations Manager (TSC)		1
	Repair and Corrective Actions	Maintenance Personnel ^(d) (OSC) Maintenance Manager (TSC) OSC Director (OSC)		1 1
	Accident Analysis	Technical Support Manager (EOF)		1
6. In-Plant Protective Actions	Radiation Protection	RP Personnel ^(d)	3 ^(c)	
7. Fire Fighting	--	Fire Brigade	(f)	
8. First Aid and Rescue Operations	--	Plant Personnel	2 ^(c)	
9. Site Access Control and Personnel Accountability	Security & Accountability	Security Team Personnel Security Coordinator (TSC)	(g)	(g) 1
10. Resource Allocation and Administration	Logistics / Administration	Logistics Manager (EOF)		1

Table OCNGS B-1: Minimum Staffing Requirements (Cont'd)

Functional Area	Major Tasks	Emergency Positions	Minimum Shift Size	(a)60 Minute Augmentation
11. Public Information	Media Interface Information Development Media Monitoring and Rumor Control Facility Operation and Control	Corporate Spokesperson (JIC)		1
		Technical Advisor / Spokesperson (JIC)		1
		NJ OEM Conducts Rumor Control (JIC) JIC Director (JIC)		1
			Minimum Shift Size	Total Minimum Staff
TOTAL:			10	23

- (a) Response time is based on optimum travel conditions.
- (b) DELETED
- (c) May be provided by personnel assigned other functions. Personnel can fulfill multiple functions.
- (d) Additional personnel may be called in to augment staff depending on the type and extent of the emergency.
- (e) Staffing of the County EOC Liaison position is not required based on agreements with offsite agencies; however, every effort will be made to dispatch an Exelon Nuclear representative upon request from County EOC Director.
- (f) Fire Brigade per UFSAR / FHAR, as applicable. The OC Post Shutdown OSSA assumes a Fire Brigade consisting of five (5) persons. *Per the assessment, two (2) additional plant personnel are needed to form the fire brigade in conjunction with three (3) Operations staff on shift (who are assigned to the Fire Brigade as a collateral duty).* Upon a successful evaluation and approval of an incipient Fire Brigade in accordance with 10 CFR 50.48(f), the Fire Brigade compliment will be reduced to three (3). This is anticipated to occur sometime following shutdown. Until the 50.48(f) Fire Brigade evaluation is completed, the Fire Brigade will consist of five (5) persons.
- (g) Function performed by on-shift security personnel.
- (h) Each Field Survey Team consists of a Lead and Driver.