



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 14, 2017

LICENSEE: EXELON GENERATION COMPANY, LLC

FACILITIES: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; AND QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

SUBJECT: SUMMARY OF DECEMBER 7, 2017, MEETING WITH EXELON GENERATION COMPANY, LLC ON ITS PLANNED FLEET LICENSE AMENDMENT REQUEST TO REVISE THE MINIMUM STAFFING REQUIREMENTS FOR EMERGENCY RESPONSE (EPID L-2017-LRM-0055)

On December 7, 2017, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company, LLC (Exelon, the licensee) via teleconference. The purpose of the meeting was to discuss Exelon's planned fleet license amendment request (LAR) to revise the minimum staffing requirements for emergency response. The meeting notice and agenda, dated November 24, 2017, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML17328A626, and Exelon's handout for the meeting is available under ADAMS Accession No. ML17340A421. A list of attendees is enclosed.

The meeting focused on the LAR Exelon plans to submit for its Midwest stations in January 2018. These stations include Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Clinton Power Station (Clinton), Unit No. 1; Dresden Nuclear Power Station, Units 2, and 3; LaSalle County Station, Units 1 and 2; and Quad Cities Nuclear Power Station, Units 1 and 2. The LAR would revise Exelon's standardized radiological emergency plan and site specific annexes for its Midwest stations. The proposed changes would revise the emergency response organization (ERO) staffing at each station based on guidance in the April 2017 draft Table B-1, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies" (ADAMS Accession No. ML17083A815), for the planned Revision 2 to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (ADAMS Accession No. ML14163A605).

Exelon stated that it wants to align the ERO staffing across its fleet. In March 2018, Exelon plans to submit a similar LAR for Limerick Generating Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; and Three Mile Island Nuclear Station (TMI), Unit 1. In June 2018, Exelon plans to submit a similar LAR for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs), Units 1 and 2; R. E. Ginna Nuclear Power Plant; Nine Mile Point Nuclear Station (Nine Mile Point), Units 1 and 2; and James A. FitzPatrick Nuclear Power Plant (FitzPatrick).

Exelon also stated that it is considering an LAR for a common emergency response facility (EOF) for Nine Mile Point and FitzPatrick, and an LAR to relocate the EOF for Calvert Cliffs. Exelon noted it may also be submitting an LAR for TMI to establish ERO staffing levels following its potential permanent shutdown. Exelon stated it would like to have additional public meetings to discuss these planned LARs for Calvert Cliffs and TMI. The NRC staff and Exelon discussed the need to ensure these additional LARs do not impact the review of the proposed LARs to revise the ERO staffing.

Exelon stated that it would like to implement the changes to the ERO staffing at all its facilities at the same time, so they were proposing an implementation date of August 2019. The NRC staff noted that the facilities in the June 2018 planned LAR would likely be the most complex to review, and any delays could impact Exelon's ability to implement by August 2019. The staff stated that a later implementation date could be requested to avoid impacting the implementation of the other LARs to revise the ERO staffing.

Exelon discussed the content of the LAR for its Midwest stations. The LAR will include six attachments, one for each station, with redline markup and final versions of the changed emergency plan pages. The NRC staff noted that the final changed pages are not required, but may be helpful if there is a significant amount of markup. A single task analysis common to all stations will be provided. Exelon will also include a commitment to perform a single validation drill (not one for each station) as part of the implementation and ERO training. Exelon stated its format would be based on a 2015 LAR for Southern Company. The NRC staff stated that Exelon should also review the associated NRC safety evaluation for the 2015 LAR.

Exelon stated the LAR would focus on the minimum staffing necessary to do the emergency plan functions. They would continue to do the same coordination with the states, but these functions would be part of the implementing procedures rather than in the emergency plan. Exelon stated that the entire ERO would still be notified during an emergency. The NRC stated that Exelon would need to verify that the minimum staff is sufficient to support the functional capability of the emergency response facilities, and the licensee cannot rely on the augmented staff for these capabilities. The staff also stated that it was important for Exelon to discuss the proposed changes with the appropriate state officials.

Exelon stated the LAR would discuss the technical changes, the history of emergency planning, and the functional analysis. For the functional analysis, Exelon would discuss the NRC technical basis, describe the changes to the current emergency plan, and discuss how the changes compare to the draft NUREG-0654, Revision 2, guidance. The NRC staff noted that it is acceptable to refer to the draft guidance and draft NRC technical basis, but Exelon would need to provide its own evaluation demonstrating that the changes are acceptable. Exelon stated it would provide its basis and not just cite the draft guidance and draft NRC technical basis document.

Exelon discussed several exceptions it will take with respect to the draft NUREG-0654, Revision 2, guidance. Many of these exceptions are to maintain the current emergency plan requirements. The complete list of exceptions discussed is included in Item 3 of Exelon's handout. The discussion of these exceptions included:

- Exelon stated it would not include an onsite field team driver as part of its minimum ERO staff, and agreed to provide justification for this in the LAR.

- Exelon will propose using operations support center lead technicians as an alternative to supervisors. The NRC staff noted that this has been accepted in some cases in the past.
- Exelon will propose having its information technology staff at full-augmentation, rather than listed as minimum ERO staff for its EOFs joint information centers (JIC) and technical support centers. The NRC and Exelon staff discussed the need to demonstrate that information technology can be adequately maintained to support this change. An official from the Commonwealth of Pennsylvania expressed concern regarding this change. The NRC staff stated that Exelon would need to justify this change based on performance.
- Exelon will propose the on-shift dose assessment as a collateral duty for the on-shift radiation protection technician. The NRC staff stated the licensee must demonstrate that the technicians can adequately perform this duty without interfering with their other duties.

Exelon discussed the communications functions listed in the draft NUREG-0654, Revision 2, guidance. The NRC staff noted that licensees are not required to have a dedicated health physics network communicator. The staff also stated that the classification advisor in the current guidance is not intended to be the emergency director.

Exelon stated that it currently lists its severe accident mitigation guidelines (SAMG) evaluators and decision-makers as part of its minimum ERO staffing. Exelon plans to maintain its SAMG commitments, but these positions will be included in implementing procedures rather than in the emergency plan ERO staffing table. The NRC staff noted that Exelon is the only licensee that currently includes the SAMG positions in their emergency plan.

Exelon stated its JIC are staffed at a site area emergency. The JIC director will still be at the JIC, but Exelon is proposing to fill some positions remotely. Exelon stated it will still perform the support functions at the JIC, but support staff may be at other sites. The NRC staff stated that Exelon would need to demonstrate this works, and consider how it impacts state emergency plans.

Exelon stated that Clinton currently has an instrumentation and controls technician on shift to support the emergency operating procedures. Exelon is considering transitioning this function to the operations staff as a collateral duty. However, Exelon wants to ensure that the proposed LAR would permit both options to avoid submitting a second LAR in the future. The NRC staff noted that if the proposed LAR described both options they would be reviewed by staff.

State officials for Illinois and Pennsylvania provided comments at the end of the meeting. The Illinois official stated that if Exelon provides a clear description of the changes then changes to the state procedures should not be a problem. Exelon agreed to continue to discuss the proposed changes with the appropriate states.

Public meeting feedback forms were not received. Please direct any inquiries to me at 301-415-1380, or Blake.Purnell@nrc.gov.

A handwritten signature in black ink, appearing to read 'B. Purnell', is positioned above the typed name.

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-456, STN 50-457,
STN 50-454, STN 50-455,
50-461, 50-237, 50-249,
50-373, 50-374, 50-254,
and 50-265

Enclosure:
List of Attendees

cc w/encl: Listserv

LIST OF ATTENDEES
DECEMBER 7, 2017, MEETING WITH
EXELON GENERATION COMPANY, LLC
PLANNED FLEET LICENSE AMENDMENT REQUEST TO REVISE THE
MINIMUM STAFFING LEVELS FOR EMERGENCY RESPONSE

Name	Affiliation
Blake Purnell	NRC
Joe Anderson	NRC
Michael Norris	NRC
Raymond Hoffman	NRC
Kim Aleshire	Exelon
Doug Walker	Exelon
Rachel Luebbe	Exelon
Paul Bonnett	Exelon
Richard Gropp	Exelon
Gregory Richardson	Engineering Planning and Management, Inc.

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ADAMS Accession No. Meeting Notice ML17328A626 Meeting Summary ML17347B102

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	BPurnell	SRohrer	DWrona	BPurnell
DATE	12/14/2017	12/14/2017	12/14/2017	12/14/2017

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