

NRR-DMPSPeM Resource

From: Lamb, John
Sent: Friday, January 12, 2018 9:29 AM
To: 'david.helker@exeloncorp.com'; Richard.Gropp@exeloncorp.com; Bonnett, Frederick Paul:(GenCo-Nuc)
Cc: Anderson, Joseph; Arce, Jeannette; Norris, Michael; Kinard, Richard
Subject: For Your Review - DRAFT RAI for Oyster Creek Permanently Defueled EP and EAL Scheme LAR (CAC No. MG0160; EPID: L-2017-LLA-0307)

Importance: High

Dave, Richard, and Paul,

Below, for your review, is a DRAFT Request for Additional Information (RAI) regarding Oyster Creek Permanently Defueled Emergency Plan (EP) and Emergency Action Level (EAL) Scheme License Amendment Request (LAR) (CAC No. MG0160; EPID: L-2017-LLA-0307). Please review to ensure that the questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the draft RAI, and to determine if the information was previously docketed. Please also let me know if Exelon wishes to have a clarifying phone call and how much time Exelon needs to respond to the RAI.

Thanks.
John

DRAFT RAI

REQUEST FOR ADDITIONAL INFORMATION
RELATED TO LICENSE AMENDMENT REQUEST FOR
CHANGES TO THE OYSTER CREEK NUCLEAR GENERATING STATION
PERMANENTLY DEFUELED EMERGENCY PLAN
AND EMERGENCY ACTION LEVEL SCHEME
EXELON GENERATION COMPANY, LLC
OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-219

By application dated August 29, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17241A065), Exelon Generation Company, LLC. (Exelon) submitted changes to the site emergency plan (SEP) and emergency action level (EAL) scheme for the Oyster Creek Nuclear Generating Station (OCNGS) for Commission review and prior approval pursuant to Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR). The proposed changes would revise the SEP and EAL scheme to reflect a permanently defueled condition.

The NRC staff has reviewed Exelon's submittal and determined that additional information is required to enable the U.S. Nuclear Regulatory Commission (NRC) staff to make an independent assessment regarding its technical review.

RAI-OC-1

Evaluation Criterion B.5 in Attachment 1 to NSIR/DPR-ISG-02, "Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants" (ADAMS Accession No. ML14106A057), states, in part:

Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity.

Exelon's response to RAI OCNGS-02 dated December 6, 2017 (ADAMS Accession No. ML17340A708), related to the post-shutdown emergency response organization (ERO) changes, stated, in part:

The OCNGS Staffing Timeline Integrated Review documented in the FLEX Integrated Plan (OP-OC-118-1001, "Oyster Creek FLEX Validation Plan," Attachment 4), shows that two (2) trained on shift individuals can implement the established FLEX procedures to remove debris, route hoses, and establish an operating FLEX diesel pump to supply makeup water to the SFP within 4 hours. As a redundant strategy, the EDMG procedures also provide the guidance necessary to establish makeup to the SFP in under 4 hours by using the EDMG portable diesel pump with two (2) trained on-shift individuals. ***The above tasks would be performed by two (2) on-shift individuals who do not have other assigned required emergency preparedness (EP) tasks.*** Direction and selection of these tasks will continue to be directed by the Certified Fuel Handler and Non-Certified Fuel Handler.

However, the list of on-shift and augmented staff provided in Table 7.1, "Minimum On-Shift and ERO Staffing Requirements," contained in Attachment 2 of Exelon's August 29, 2017 letter, did not indicate what trained on-shift staff positions are designated to perform mitigation strategies and whether it would continue to be the expectation that "the above tasks would be performed by two (2) on-shift individuals who do not have other assigned required emergency preparedness (EP) tasks."

Please clarify what trained on-shift staff positions are designated to perform mitigation strategies and whether it would continue to be the expectation that these tasks would be performed by two (2) on-shift individuals who do not have other assigned required EP tasks.

RAI-OC-2

Evaluation Criterion B.9 in Attachment 1 to NSIR/DPR-ISG-02 states, in part:

Each licensee shall identify the services to be provided by local agencies for handling emergencies, e.g., police, ambulance, medical, hospital, and fire-fighting organizations.

Section 7.2.3.1, "Local Services," (page 23) in Attachment 2 of Exelon's August 29, 2017 letter, states, in part:

Arrangements have been made for the extension of the ERO's capability to address emergencies.

Please explain why the specific ambulance service providers are not listed in subsection 1 as was done in subsections 2 – 4 for the other services provided to support the site.

RAI-OC-3

Evaluation Criterion E.1 in Attachment 1 to NSIR/DPR-ISG-02 states, in part:

Each licensee shall establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme.

Section 10.1, "Emergency Condition Recognition and Classification," (page 38) in Attachment 2 of Exelon's August 29, 2017 letter, states, in part:

The Shift Manager is responsible for the notification of an emergency declaration to the State of New Jersey. Notification is made within 60 minutes after the availability of indications to operators that an EAL threshold has been reached.

In addition, Figure 6.1, "Exelon Notification Scheme," (page 19) in Attachment 2 of Exelon's August 29, 2017 letter, appears to indicate that the State of New Jersey will provides notification to "Local Warning Points/EOCs [*emergency operations centers*]."

Please clarify which organization local warning points/EOCs will be notified by the State of New Jersey in the event of an emergency declaration at OCNCS, and whether there is agreement with these local response organizations, specifically Ocean County, on this approach.

RAI-OC-4

Evaluation Criterion E.4 in Attachment 1 to NSIR/DPR-ISG-02 provides guidance on the contents of emergency messages based on the permanently shutdown and defueled condition of the facility, and includes that licensee will communicate a "[m.] request for any needed onsite support by offsite organizations." However, the content of messages, as described in Section 10.1, "Emergency Condition Recognition and Classification," to Attachment 2 of Exelon's August 29, 2017 letter, does not appear to address this criterion.

Please describe the method being used by licensee for requesting any needed onsite support by offsite organizations, or basis for not addressing this criterion in emergency message content.

RAI-OC-5

Evaluation Criterion F.2 in Attachment 1 to NSIR/DPR-ISG-02 states:

Each licensee shall ensure that a coordinated communication link for medical support exists.

Please describe provision for a communications link for prompt ambulance transport of persons with injuries to designated hospitals as identified in Section 9.4.4, "Emergency Transportation," to Attachment 2 of Exelon's August 29, 2017 letter.

RAI-OC-6

Evaluation Criteria N.1.a and b in Attachment 1 to NSIR/DPR-ISG-02 state:

- a. An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. Exercises shall be conducted as set forth in 10 CFR 50, as exempted, and in accordance with applicable portion to Section IV.G (Challenging Drills and Exercises) to NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants."
- b. The licensee shall provide for a critique of the exercise. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested.

Please explain why there is no provision in Section 11.1, "Drills and Exercises," to Attachment 2 of Exelon's August 29, 2017 letter for exercises and drills being conducted as set forth in 10 CFR 50, as in proposed

exemption, and in accordance with applicable portion to Section IV.G to NSIR/DPR-ISG-01, for the scenario to vary from year to year.

RAI-OC-7

Evaluation Criterion O.3 in Attachment 1 to NSIR/DPR-ISG-02 states:

Training for individuals assigned to licensee first aid teams shall include courses equivalent to Red Cross First Aid, CPR, or AED for Lay Responders or equivalent.

Section 11.2.2, "Emergency Response Organization Training," (page 42) to Attachment 2 of Exelon's August 29, 2017 letter states, in part:

Personnel assigned the responsibility of on-shift first aid shall attend first aid training.

Please provide information regarding the level of training to be provided to individuals assigned to licensee first aid teams based on Evaluation Criterion O.3 in Attachment 1 to NSIR/DPR-ISG-02.

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Mail Envelope Properties (John.Lamb@nrc.gov20180112092800)

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MESSAGE	8709	1/12/2018 9:28:00 AM

Options

Priority:	High
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