

## NRR-DMPSPeM Resource

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**From:** Purnell, Blake  
**Sent:** Thursday, January 24, 2019 1:18 PM  
**To:** Gropp Jr, Richard W:(GenCo-Nuc)  
**Cc:** Wrona, David; Gudger, David T:(GenCo-Nuc)  
**Subject:** Calvert Cliffs, FitzPatrick, and Nine Mile Point - Request for Additional Information Regarding License Amendment Request to Revise Emergency Response Organization Staffing (EPID L-2018-LLA-0240)  
**Attachments:** Exelon NE ERO Staffing RAI.pdf

Mr. Gropp:

By application dated August 31, 2018 (Agencywide Documents Access and Management System Accession No. ML18249A096), Exelon Generation Company, LLC submitted a license amendment request for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2; James A. FitzPatrick Nuclear Power Plant; and the Nine Mile Point Nuclear Station, Units 1 and 2. The amendments would revise the emergency plans by changing the emergency response organization staffing requirements for each of these facilities.

The NRC staff has reviewed the application and determined that it needs additional information to complete its review. A response to the attached request for additional information is requested to be provided within 30 days from the date of this email. If you have any questions, please contact me at (301) 415-1380.

Sincerely,

Blake Purnell, Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission

Docket Nos. 50-317, 50-318, 72-8, 50-333, 72-012, 50-220, 50-410, and 72-1036

OFFICE	NRR/DORL/LPL3/PM	NSIR/DPR/RDB/BC	NRR/DORL/LPL3/BC
NAME	BPurnell	JAnderson (MNorris for)	DWrona
DATE	1/24/19	1/18/19	1/18/19

**Hearing Identifier:** NRR\_DMPS  
**Email Number:** 775

**Mail Envelope Properties** (Blake.Purnell@nrc.gov20190124131801)

**Subject:** Calvert Cliffs, FitzPatrick, and Nine Mile Point - Request for Additional Information Regarding License Amendment Request to Revise Emergency Response Organization Staffing (EPID L-2018-LLA-0240)

**Sent Date:** 1/24/2019 1:18:01 PM

**Received Date:** 1/24/2019 1:18:01 PM

**From:** Purnell, Blake

**Created By:** Blake.Purnell@nrc.gov

**Recipients:**

"Wrona, David" <David.Wrona@nrc.gov>

Tracking Status: None

"Gudger, David T:(GenCo-Nuc)" <David.Gudger@exeloncorp.com>

Tracking Status: None

"Gropp Jr, Richard W:(GenCo-Nuc)" <Richard.Gropp@exeloncorp.com>

Tracking Status: None

**Post Office:**

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MESSAGE	1273	1/24/2019 1:18:01 PM
Exelon NE ERO Staffing RAI.pdf		74214

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

REQUEST FOR ADDITIONAL INFORMATION  
LICENSE AMENDMENT REQUEST TO REVISE  
EMERGENCY RESPONSE ORGANIZATION STAFFING REQUIREMENTS  
CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2,  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT, AND  
NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-317, 50-318, 72-8, 50-333, 72-012, 50-220, 50-410, AND 72-1036

By application dated August 31, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18249A096), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2 (Calvert Cliffs); James A. FitzPatrick Nuclear Power Plant (FitzPatrick); and the Nine Mile Point Nuclear Station, Units 1 and 2 (NMP). The amendments would revise the emergency plans by changing the emergency response organization (ERO) staffing requirements for each of these facilities.

The U.S. Nuclear Regulatory Commission (NRC) has reviewed the application and determined that the information below is needed to complete its review.

**RAI-1**

Enclosures 1, 2, and 3 of the application provided separate evaluations of the proposed changes for each site. Section 2.4 of each enclosure states, in part, that:

Those ERO positions designated as Minimum Staffing in the [site] Emergency Plan are those required to activate their respective Emergency Response Facility (ERF). Specifically, these are the ERO positions that are the absolute minimum needed to implement the Emergency Plan (i.e., if any position or function is not staffed then the Emergency Plan may not be effectively implemented).

Section 2.6 of each enclosure states, in part, that:

In addition, Exelon will institute a "Minimum Staff" drill to be conducted once per drill cycle. The drill will include participation from the Minimum Staff of the Emergency Operations Facility (EOF), the Joint Information Center (JIC), the Technical Support Center (TSC), and the Operations Support Center (OSC) from one of the affected Exelon stations which have implemented the approved ERO staffing change license amendment. This will allow Exelon to periodically demonstrate that the Standardized Emergency Plan continues to effectively implement the required Emergency Preparedness functions utilizing only the Minimum Staff defined in the Emergency Plan. Since the ERO Minimum Staff is the same for each station under the Exelon Standardized Emergency Plan, it is not necessary to perform the drill for each station in a drill cycle. The stations would select one station to demonstrate the effectiveness of the minimum staff

ERO. Credit for the "Minimum Staff" drill will be given to all of the affected stations.

Exelon has also submitted similar license amendment requests to change the ERO staffing requirements for its facilities in Illinois and Pennsylvania (ADAMS Package Accession Nos. ML18053A159 and ML18149A290). In a November 1, 2018 (ADAMS Accession No. ML18305B270), supplement to its license amendment request for its Pennsylvania facilities, Exelon stated, in part, that:

Exelon will perform a Minimum Staff Drill for each Emergency Operations Facility once per drill cycle. Specifically, one site which utilizes the EOF will perform the drill and the other sites which share the EOF will take credit for the performance for that drill cycle. For example, if Limerick performs the Minimum Staff drill for the first drill cycle, then PBAPS would be able to take credit, but Exelon stations in Illinois or New York would not be able to credit the drill.

Describe how Exelon plans to specifically evaluate the adequacy of the minimum staffing levels to perform required functions until full augmentation, with the proposed ERO staffing changes, to ensure continued effective implementation of the respective emergency plans for each site. Confirm that for Calvert Cliffs, FitzPatrick, and NMP that the minimum staffing drill will be performed at each EOF once per drill cycle, and that a site would not credit a drill conducted at another EOF.

## **RAI-2**

Section 2.6 of Enclosure 1, 2, and 3 to the application states, in part:

As part of the implementation of these changes, a confirmation of the capabilities of the final Minimum Staff personnel will be performed through an EP drill to demonstrate that no loss of function will result due to the changes in the ERO. Additionally, the NRC will be invited to observe the drill.

Confirm that the corresponding States and the Federal Emergency Management Agency will be invited to observe the drill, or explain why an invitation is not needed.