



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

October 29, 2019

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT — ISSUANCE OF AMENDMENT
NO. 134 TO REVISE THE EMERGENCY RESPONSE ORGANIZATION
STAFFING REQUIREMENTS (EPID L-2019-LLA-0053)

Dear Mr. Hanson:

The U.S. Nuclear Regulatory Commission (NRC or the Commission) has issued the enclosed Amendment No. 134 to Renewed Facility Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Plant. This amendment is in response to your application dated January 15, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19017A136), as supplemented by letter dated May 23, 2019 (ADAMS Accession No. ML19143A200).

The amendment revises the emergency plans by changing the emergency response organization staffing requirements for this facility.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

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

V. Sreenivas, Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosures:

1. Amendment No. 134 to DPR-18
2. Safety Evaluation

cc: Listserv



UNITED STATES
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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-244

R. E. GINNA NUCLEAR POWER PLANT

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 134
Renewed License No. DPR-18

1. The U.S. Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (Exelon, the licensee) dated January 15, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by a revision to the emergency plan as set forth in the licensee's application dated January 15, 2019, as supplemented by letter dated May 23, 2019, and evaluated in the NRC staff's safety evaluation for this amendment.

3. This license amendment is effective as of the date of its issuance and shall be implemented on or before December 31, 2019.

FOR THE NUCLEAR REGULATORY COMMISSION

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Ho K. Nieh, Director
Office of Nuclear Reactor Regulation

Date of Issuance: October 29, 2019



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 134

TO RENEWED FACILITY LICENSE NO. DPR-18

EXELON GENERATION COMPANY, LLC

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

By application dated January 15, 2019 (Reference 1), as supplemented by letter dated May 23, 2019 (Reference 2), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) for R. E. Ginna Nuclear Power Plant (Ginna). The proposed changes would revise the emergency response organization (ERO) staffing composition and increase staff augmentation times from 60 minutes to 90 minutes for certain ERO positions from the time of declaration of an Alert or higher classification level.

The emergency plans for the licensee's facilities consist of the Exelon Nuclear Standardized Radiological Emergency Plan (EP-AA-1000) and site-specific emergency plan annexes. The Exelon Standardized Radiological Emergency Plan contains plan information that is common across the Exelon fleet, and the annexes contain plan information specific to a respective site. The licensee has requested similar changes to its emergency plans for most of its fleet. However, this review only considers the changes proposed in the licensee's application dated January 15, 2019, related to the Ginna Radiological Emergency Plan Annex (EP-AA-1012), hereafter referred to as the Ginna Emergency Plan.

Enclosure 1, "Evaluation of Proposed Changes," of the licensee's application dated January 15, 2019, provided an evaluation of its proposed changes, and a marked-up and clean copies of the proposed Ginna Emergency Plan. Attachment 3A, "Assessment of R. E. Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed," to Enclosure 1 provided an ERO task analysis. Enclosure 2, "Summary of Regulatory Commitments," provided a summary of regulatory commitments. Enclosure 3, "Information Related to Review of Proposed Changes by the State and Counties," provided information regarding reviews of the proposed changes by the State of New York, Monroe County, and Wayne County.

The supplemental letter dated May 23, 2019, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, nor change the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* (FR) on April 23, 2019 (84 FR 16894).

2.0 REGULATORY EVALUATION

2.1 Description of Proposed Changes

The proposed changes would revise the ERO staffing composition and increase the staff augmentation times for certain ERO positions from 60 minutes to 90 minutes following the declaration of an Alert or higher classification level. Additionally, the licensee proposed to relocate the listing of the ERO minimum staffing requirements from the Ginna Emergency Plan to the Exelon Standardized Radiological Emergency Plan. Some positions will also be relocated to emergency plan implementing procedures (EPIPs) as positions for full-augmentation rather than required minimum staffing positions. The licensee considers full-augmented staff as those ERO positions that provide support for the minimum staff in response to an emergency. Tables 1, 2, and 3 below provide a summary of the changes to the ERO on-shift staff positions, minimum staff positions, and full-augmentation staff positions, respectively.

Table 1: Summary of Changes to ERO On-Shift Staff Positions

Emergency Plan Function	Current On-Shift Staff Positions	Proposed On-Shift Staff Positions
Command and Control	(1) Shift Emergency Director	(1) Shift Emergency Director
Communications	(1) Shift Communicator	(1) Shift Communicator
Radiation Protection (RP)	(2) RP Technician	(2) RP Personnel
Supervision of RP Staff	Not Applicable (N/A)	(1) Shift Emergency Director
Dose Assessment	(1) Shift Dose Assessor (collateral duty)	(1) Shift Dose Assessor (collateral duty)
Emergency Classifications	N/A	(1) Emergency Classification Advisor (collateral duty)
Engineering	(1) Shift Technical Advisor (STA) (collateral duty)	(1) STA (collateral duty)
Security	Per the security plan	Per the security plan
Fire Fighting/Fire Brigade	Fire Brigade and Lead	N/A
First Aid/Rescue Operations	(3) Fire Brigade members (collateral duty)	N/A
Radiation Accident Assessment (Chemistry/Radio Chemistry)	(1) Shift Chemistry Technician	N/A

Table 2: Summary of Changes to ERO Minimum Staff Positions

Current ERO Minimum Staff Positions	Proposed ERO Minimum Staff Positions (response times are 60 minutes unless otherwise noted)
Technical Support Center (TSC)	
Station Emergency Director	Station Emergency Director
Operations Manager	Operations Manager (Emergency Classification Advisor)
Emergency Notification System (ENS) Communicator	ENS Communicator

Current ERO Minimum Staff Positions	Proposed ERO Minimum Staff Positions (response times are 60 minutes unless otherwise noted)
Radiation Protection Manager	Radiation Protection Manager
Core Thermal/Hydraulic Engineer	Core Thermal/Hydraulic Engineer
Mechanical Engineer	Mechanical Engineer
Electrical Engineer	Electrical Engineer
Technical Manager	Relocated to EPIP as Full Augmentation
Maintenance Manager	Relocated to EPIP as Full Augmentation
TSC Director	Relocated to EPIP as Full Augmentation
N/A	Added Security Coordinator
Emergency Operations Facility (EOF)	
Corporate Emergency Director	Corporate Emergency Director
State / Local Communicator	State / Local Communicator
Radiation Protection Manager	Radiation Protection Manager
EOF Director	Relocated to EPIP as Full Augmentation
Environmental Coordinator	Relocated to EPIP as Full Augmentation
N/A	Added Dose Assessment Coordinator
N/A	Added Computer Specialist (@ 90 minutes)
Offsite Field Team #1 Personnel	Offsite Field Team #1 Personnel
Offsite Field Team #1 Driver	Offsite Field Team #1 Driver
Offsite Field Team #2 Personnel	Offsite Field Team Personnel (@ 90 minutes)
Offsite Field Team #2 Driver	Offsite Field Team Driver (@ 90 minutes)
Joint Information Center (JIC)	
Corporate Spokesperson	Corporate Spokesperson (@ 90 minutes)
JIC Manager	JIC Director (@ 90 minutes)
N/A	Added Public Information Director (@ 90 minutes)
Media Monitor / Rumor Control Coordinator	Relocated to EPIP as Full Augmentation
Logistics Manager JIC	Relocated to EPIP as Full Augmentation
Technical Advisor JIC	Relocated to EPIP as Full Augmentation
Operations Support Center (OSC)	
OSC Director	OSC Director
RP Technician #1 (Onsite Surveys)	RP Personnel #1
RP Technician #2 (Onsite Surveys)	RP Personnel #2
Onsite Monitoring Team Member #1	Onsite Monitoring Team Member #1
Onsite Monitoring Team Member #2	N/A
RP Personnel #1 (In-Plant Surveys)	RP Personnel #3
RP Personnel #2 (In-Plant Protective Actions)	RP Personnel #4 (@ 90 minutes)
N/A	Add RP Personnel (@ 90 minutes)
N/A	Add RP Personnel (@ 90 minutes)
Instrument and Controls (I&C) Maintenance #1	I&C Maintenance #1
Electrical Maintenance #1	Electrical Maintenance #1
Mechanical Maintenance #1	Mechanical Maintenance #1
N/A	Added Group Lead - Electrical Maintenance (@ 90 minutes)
N/A	Added Group Lead - Mechanical Maintenance (@ 90 minutes)
N/A	Added Group Lead - I&C (@ 90 minutes)

Current ERO Minimum Staff Positions	Proposed ERO Minimum Staff Positions (response times are 60 minutes unless otherwise noted)
RP Group Lead	RP Supervisor/Lead (@ 90 minutes)
Chemistry Personnel	Relocated to EPIP as Full Augmentation
Chemistry Lead	Relocated to EPIP as Full Augmentation
Assistant OSC Director	Relocated to EPIP as Full Augmentation

For each facility, the description of the full-augmented staff contained in the emergency plan will be relocated to an EPIP. ERO staff in positions designated "as needed" in Table 3 will be qualified for their ERO position; however, these staff will only be notified to respond if conditions warrant, as determined by the Emergency Director or his designee.

Table 3: Summary of Changes to the ERO Full-Augmented Staff Positions

Current ERO Augmented Positions	Proposed Changes
TSC	
Operations Communicators (TSC)	Position relocated to EPIP
Operations Communicators (Main Control Room (MCR))	Position relocated to EPIP
Security Coordinator	Position reclassified as Minimum Staff
Administrative Staff	Position relocated to EPIP
TSC Computer Specialist	Position relocated to EPIP
EOF	
Emergency Operations Center (EOC) Communicator (EOF)	Position relocated to EPIP
Logistics Manager (EOF)	Position relocated to EPIP
Dose Assessor (2)	Position relocated to EPIP
County EOC Liaison (2)	Position relocated to EPIP
State EOC Liaison	Position relocated to EPIP
EOF Operations Communicator	Position relocated to EPIP
Administrative Staff (2)	Position relocated to EPIP
Health Physics Network Communicator	Position relocated to EPIP
EOF Computer Specialist	Position reclassified as Minimum Staff
JIC	
News Writer	Position relocated to EPIP
JIC Security	Position relocated to EPIP
Media Liaison	Position relocated to EPIP
Inquiry Phone Team (2)	Position relocated to EPIP
Media Monitor Team (2)	Position relocated to EPIP
Administrative Staff (2)	Position relocated to EPIP
OSC	
OSC Team Tracker	Position relocated to EPIP
Administrative Staff (2)	Position relocated to EPIP
OSC Operations Communicator	Position relocated to EPIP

2.2 Regulatory Requirements

Under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(q)(2), a holder of an operating license issued under 10 CFR Part 50 shall follow and maintain the effectiveness of an emergency plan that meets the requirements in Appendix E to 10 CFR Part 50, and, for nuclear power reactor licensees, the planning standards of 10 CFR 50.47(b).

Under 10 CFR 50.54(q)(4), changes to a licensee's emergency plan that reduce the effectiveness of the plan as defined in 10 CFR 50.54(q)(1)(iv) (saying "[r]eduction in effectiveness means a change in an emergency plan that results in reducing the licensee's capability to perform an emergency planning function in the event of a radiological emergency") may not be implemented without prior approval, via license amendment, by the NRC. Under 10 CFR 50.92(a), determinations on whether to grant an applied-for license amendment are to be guided by the considerations that govern the issuance of initial licenses or construction permits to the extent applicable and appropriate. Both the common standards for licenses and construction permits in 10 CFR 50.40(a), and those specifically for issuance of operating licenses in 10 CFR 50.57(a)(3), provide that there must be "reasonable assurance" that the activities at issue will not endanger the health and safety of the public.

For this license amendment request, the relevant planning standard in 10 CFR 50.47(b) is the on-shift and augmented ERO staffing in 10 CFR 50.47(b)(2), which states:

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

For this license amendment request, the relevant requirement in Appendix E to 10 CFR Part 50 is Section IV.A, "Organization," which states, in part:

The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization....

2.3 Regulatory Guidance

NRC Regulatory Guide (RG) 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors" (Reference 3), provides guidance on methods that are acceptable to the NRC staff for implementing specific parts of the NRC's regulations; in this case, 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. RG 1.101 endorses Revision 1 to NUREG-0654/FEMA-REP-1 (NUREG-0654), "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (Reference 4), which provides specific evaluation criteria for complying with the standards set forth in 10 CFR 50.47(b). These criteria provide a basis for NRC licensees, and State and local governments to develop acceptable radiological emergency plans and to improve emergency preparedness.

In Section II, "Planning Standards and Evaluation Criteria," to NUREG-0654, Evaluation Criteria B.1 and B.5 address the planning standard 10 CFR 50.47(b)(2).

Evaluation Criterion B.1 states:

Each licensee shall specify the onsite emergency organization of plant staff personnel for all shifts and its relation to the responsibilities and duties of the normal shift complement.

Evaluation Criterion B.5 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. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.

Regulatory Issue Summary 2016-10, "License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation," dated August 5, 2016 (Reference 5), provides examples of the scope and detail of information that should be provided in the LAR for ERO staffing changes to facilitate the NRC staff's review.

By letter dated June 12, 2018 (Reference 6), the NRC staff provided alternative guidance to Evaluation Criterion II.B.5 in NUREG-0654, Revision 1, for minimum ERO on-shift and augmentation staffing. The letter stated, in part:

The NRC has revised Section II.B, Table B-1 of NUREG-0654, based in part on comments received from the public on the draft Revision 2 of NUREG-0654, located at www.regulations.gov under Docket ID FEMA-2012-0026. The revised ERO staffing guidance has been finalized, and the NRC will include it when the entire NUREG-0654, Revision 2, is ready for issuance. Until then, the NRC staff is making available on an interim basis the ERO on-shift and augmentation staffing plan (attached). Regardless of whether a licensee chooses to use the guidance contained in Revision 1 of NUREG-0654, the attached, or an alternative approach, licensees are still required to adhere to 10 CFR 50.54(q) when revising their ERO staffing plans.

"Table B-1: Emergency Response Organization (ERO) Staffing and Augmentation Plan" attached to the June 12, 2018 letter is referred to as "Interim Table B-1" below in this safety evaluation.

3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of the proposed changes to the Ginna Emergency Plan, as described in the application dated January 15, 2019, as supplemented by letter dated May 23, 2019. The staff's review was to determine if the plan, as revised, would continue to meet the requirements in Appendix E to 10 CFR Part 50 and the planning standards of 10 CFR 50.47(b). An evaluation based upon the major functional areas of the Ginna ERO was performed, considering various enhancements to equipment (technology), procedural improvements, training, process improvements, and the

establishment of response times for the Joint Information Center (JIC) minimum staffing. As part of its review, the NRC staff compared the licensee's proposed emergency plan changes to Interim Table B-1.

3.1 Enhancements

The NRC staff considered the overall enhancements in technology, information availability, and training described in Section 3.1, "Technical Advancements and Support," of Enclosure 1 of the LAR, as summarized below. These enhancements enable the Main Control Room (MCR) staff to perform major functions and tasks more efficiently and thus support the proposed change in ERO staffing levels and response times.

Plant Process Computer (PPC)

The licensee stated that the PPC system provides for the Safety Parameter Display System (SPDS) functions, as well as data collection and processing, accounting, alarming and logging functions. An auxiliary function of the PPC is to transmit plant data to remote locations, including the Technical Support Center (TSC) and the Emergency Operations Facility (EOF).

The PPC is a single operating platform incorporating the PPC and the SPDS, as well as the Process Computer System, Meteorological Data Acquisition System, Sequence of Events Recorder, and radiation monitoring.

The PPC and SPDS provide a concise display of critical plant variables to the MCR personnel to aid them in rapidly and reliably determining the safety status of the plant. These display systems are operated during abnormal and emergency conditions to aid the MCR personnel in determining the safety status of the plant. Parameters displayed by the PPC and SPDS are quantitative and qualitative measures to indicate the accomplishment or maintenance of critical safety functions. Information needed to assess the status of the plant safety parameters is obtained by the measurement of key plant variables, to include:

- Reactivity control,
- Reactor core cooling and heat removal,
- Reactor coolant system integrity,
- Containment conditions, and
- Radiation control.

Benefits of the PPC cited by the licensee include:

- Improved plant monitoring capability by the Shift Manager to support the Emergency Director function;
- Data manipulation functions, such as plotting information graphically or recovering historical data, require fewer key strokes and are more easily performed;
- The Sequence of Events Report function is immediately available rather than being only available via printer after the event;
- Much of the PPC functionality can be made available to any desktop computer through the plant's site-wide intranet; and
- Increased capabilities of PPC have enhanced timeliness of monitoring and assessing plant conditions.

As a result, these improvements support the proposed change in the ERO staffing by ensuring that major functions and tasks are completed more easily with less burden on the MCR staff.

Dose Assessment

The licensee provided that radiological dose assessment has benefited from technological advances that make this function simpler and less time consuming to perform. In 2014, the Unified RASCAL Interface (URI), a Visual Basic.net program was implemented at Ginna. The licensee stated that URI is a more efficient program than the previous computer-based method for performing dose assessment. URI uses menus and toolbars with most of inputs on a single screen making the program more user-friendly. Redundant dose assessment computers have been installed as part of the cyber security requirements, and the Ginna facility has an individual plant data screen dedicated to the needs of the dose assessment inputs.

These improvements in technology and information availability, enable the licensee's on-shift staff to assess plant conditions quickly and efficiently. The licensee also provided that the computing power of the modern computer processors has allowed for the more rapid calculation of dose projections.

Automated ERO Call-Out Systems

The licensee provided that the enhancements in automated call-out and paging systems have streamlined processes for activation of the ERO, which now can occur through a Web-based or phone-based system to initiate rapid notification of ERO members. The system includes a primary activation system, as well as back-up capability, to ensure uninterrupted operation.

Procedure Improvements

The licensee provided that the plant Emergency Operating Procedure (EOPs) have subsequently improved through industry initiatives and generally demand less assessment and interpretation of plant condition by the MCR staff based on their symptom-based approach, better human-factoring and improved layout. In addition, the PPC system is capable of graphically displaying plant conditions to assist in the EOF execution.

Plant Abnormal Operating Procedures (AOPs) also contain directional steps for when a review of the classification procedure is required to determine potential classifiable conditions, prompting the user to identify applicable emergency action levels (EALs).

The licensee also provided that the EALs have been revised to incorporate the latest NRC-endorsed guidance, which has simplified the emergency classification process. This includes the use of an overview matrix of emergency action level initiating conditions and threshold values, which streamlines the process of evaluating emergency action levels against plant conditions.

Training

The licensee provided that the operations training is used to strategically drive and sustain improved performance at Ginna through the application of the systematic approach to training. This approach ensures that training is conducted to the industry-accepted standards required to achieve and maintain accreditation by the National Academy for Nuclear Training. In addition, the license operator requalification training program addresses the realistic integration of

emergency response into performance evaluations to ensure that the additional challenges which the emergency plan responsibilities add to the operator's ability to manage an event, are realistically represented.

Training for the Shift Technical Advisor (STA) includes performance of independent assessments of plant operating concerns, technical support, appropriate corrective actions, analysis of events and their effects, effectiveness of response(s) to emergency conditions, classification of emergencies, and other actions related to critical safety functions and plant safety during abnormal and emergency situations.

Radiation Protection Improvements

The licensee provided that significant improvements have been made in radiation protection (RP) technology/tools associated with in-plant protective action, which include:

- Electronically controlled access to the Radiologically Controlled Area (RCA), which allows access without interfacing with a RP Technician;
- Automated whole-body monitors for contamination monitoring without RP Technician interface, and
- Use of self-alarming dosimeters.

3.2 Major Functional Areas

The licensee provided justification (Section 3.2, "Functional Analysis," Enclosure 1 of the LAR) for the proposed changes to the Ginna Emergency Plan that included a detailed review of each major functional area and task described Interim Table B-1. The NRC staff's review of the proposed changes to the Ginna Emergency Plan, based on major functional areas and tasks, is described below.

3.2.1 Command and Control

The purpose of the command and control function is to: (1) provide overall ERO command and control, until relieved; (2) approve EAL classifications and/or protective action recommendations (PARs) until relieved, and (3) authorize personnel dose extensions, until relieved.

The proposed staffing for command and control is consistent with Interim Table B-1 with one difference. Specifically, the EOF Emergency Director position will be staffed within 60 minutes of the declaration of an Alert or higher classification level, while Interim Table B-1 has this position staffing within 60 minutes of the declaration of a Site Area Emergency or General Emergency classification level. The NRC staff considers this difference to be an enhancement because it will ensure that the EOF ERO will be mobilized and available, should an Alert classification escalate to a Site Area Emergency or General Emergency. By mobilizing the EOF at the declaration of an Alert classification level, certain emergency plan functions (e.g., dose assessment, State and local communications) can be established at the EOF. The NRC staff agrees that these functions do not need to be duplicated at the TSC.

As discussed in Section 3.4.1, "Command and Control Turnover," of Enclosure 1 of the LAR, the licensee also proposed to revise the description of the turnover process in the Exelon Standardized Radiological Emergency Plan to include the transfer of non-delegable duties for PARs and State/local notifications directly from the MCR to the EOF. Under the current Exelon Standardized Radiological Emergency Plan, the MCR has the option to transfer PAR and

State/local notification responsibilities directly to the EOF or to the TSC on an interim basis should the EOF be unavailable. The Exelon Standardized Radiological Emergency Plan is being revised to no longer describe the capability to transfer PARs and State/local notifications to the TSC on an interim basis. The licensee stated that this revision will have no impact on timeliness or resources, since the EOF and TSC are both staffed within 60 minutes of declaration of an Alert or higher classification level and will continue to have the licensee's staff available to perform these functions. The turnover of command and control of emergency plan functions will occur through a conference line between the MCR, TSC, and EOF simultaneously, resulting in the prompt transfer of the emergency plan functions from the MCR. Based on this, the NRC found the proposed change to the turnover description acceptable.

The NRC staff reviewed the licensee's proposed changes to the command and control function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be generally consistent with Interim Table B-1. The licensee provided adequate justification for proposed changes which differed from Interim Table B-1. In addition, the NRC staff found the proposed changes to the description of the turnover process in the Exelon Standardized Radiological Emergency Plan to be acceptable. Based on this review, the NRC staff has determined that the Ginna Emergency Plan will continue to meet the planning standard under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50, in regard to effective and timely command and control of licensee emergency response.

3.2.2 Communications

The purpose of the communications function is to communicate EAL classifications and PARs to offsite response organizations (OROs), including the NRC, until relieved. The licensee provided its analysis of the communications function in Section 3.2.2 of Enclosure 1 of the LAR.

Although Interim Table B-1 includes a note regarding collateral duties for the on-shift communicator, the licensee stated that this note is not needed, since no collateral duties are assigned to its on-shift communicators.

Interim Table B-1 recommends that following the declaration of an Alert or higher classification level, the TSC should be staffed with two communicators within 60 minutes and an additional communicator, as needed, within 90 minutes. In addition, Interim Table B-1 recommends the staffing of one communicator in the EOF within 60 minutes of declaring a Site Area Emergency or General Emergency classification level. Ginna will maintain the Emergency Notification System communicator position in the TSC and the State/local Communicator position in the EOF, and both positions will be staffed within 60 minutes of the declaration of an Alert or higher classification level.

Interim Table B 1 also states that a second communicator should be located in the TSC as part of the minimum staffing for communicating with OROs. However, the licensee stated, and the NRC staff agrees, that locating the State/local Communicator in the EOF is acceptable, since the EOF will be activated upon the declaration of an Alert or higher classification level simultaneously with the TSC. As such, continuity will not be lost in the transfer of communications with State and local response organizations. Communications with the NRC via the Emergency Notification System circuit will remain in the TSC and not transfer to the EOF.

Currently, the TSC Director and the EOF Director are identified as minimum staff. Since these positions are not designated as minimum staff positions in Interim Table B-1, the licensee is proposing to re-categorize these positions as full-augmentation staff and relocate these positions to the Ginna EIPs.

The licensee stated that the TSC Director and the EOF Director positions do not directly perform actions necessary to accomplish emergency preparedness functions, but rather support other ERO positions performing required functions and overall facility operations. The licensee stated that these positions, as currently defined in its emergency plan, would not be considered as part of the ERO minimum staff needed to implement the emergency plan. Based on the information provided by the licensee, the NRC staff finds the re-categorization of the TSC Director and EOF Director as full-augmentation staff positions, to be acceptable.

A statement is being added to the staffing tables that additional communicators will be staffed in the TSC and EOF, as needed. This ensures that if required, additional communicators can be augmented, as necessary, to support communications between the licensee and OROs, including the NRC.

The NRC staff reviewed the licensee's proposed changes to the communications function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be generally consistent Interim Table B-1. The licensee provided adequate justification for the proposed changes which differed from Interim Table B-1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan continues to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 in regard to maintaining timely and effective communications with the NRC staff and designated ORO points of contact.

3.2.3 Radiation Protection

The purpose of the RP function is to: (1) provide qualified RP coverage for responders accessing potentially unknown radiological environments during emergency conditions; (2) provide in-plant surveys, and (3) control dosimetry and RCA access. The licensee provided its analysis of the RP function in Section 3.2.3, "EP Function: Radiation Protection," of Enclosure 1 of the LAR.

The licensee stated that this function is currently staffed by two RP Technicians on-shift. The licensee will maintain two RP Personnel on-shift to perform the RP functions and tasks for protection coverage for responders, in-plant surveys, dosimetry, and RCA access control. Consistent with Interim Table B-1, the licensee proposed to only list the two RP Personnel on-shift for this function without providing a specific breakdown of the assigned tasks. Therefore, a note clarifying that the in-plant protective actions may be performed by persons assigned to other functions is no longer needed. Based on this, the NRC staff found the proposed changes to the on-shift RP function to be acceptable.

In addition to RP Personnel on-shift, Interim Table B-1 identifies three RP Technicians staffing the OSC within 60 minutes of the declaration of an Alert or higher classification level. Interim Table B-1 also lists an additional three RP Personnel staffing the OSC within 90 minutes of the declaration of an Alert or higher classification level. Currently, the Ginna Emergency Plan designates three minimum staff RP Technicians as required to augment and support the emergency plan major tasks of in-plant surveys and in-plant protective actions within 60 minutes. The licensee proposed that the augmentation for this function occur in two stages.

Consistent with Interim Table B-1, three RP Personnel will arrive within 60 minutes and an additional three RP Personnel will arrive within 90 minutes. Therefore, a total of eight qualified RP Personnel will be available for ERO support considering both the on-shift and augmented staff. The licensee stated that technological advances in protection coverage for responders, in-plant surveys, dosimetry, and radiologically controlled area access, as described in Section 3.2.3 of Enclosure 1 of the LAR, which supports the additional time proposed. Based on this, the NRC staff found the proposed changes to the minimum staff for the RP function to be acceptable.

The licensee also proposed to remove chemistry personnel from the on-shift and minimum staffing list for the RP function based on an on-shift staffing analyses performed in accordance with Section IV.9 of 10 CFR Part 50, Appendix E, Section IV.A, to ensure that the chemistry major task is not required per station procedures prior to augmentation. No chemistry sampling tasks were identified as time critical in any of the analyzed events. A Chemistry/Radiation Chemistry function is not included in Interim Table B-1. The licensee further stated that the need for immediate reactor coolant sampling has been reduced due to the variety of available plant indications of fuel damage available at its plants. Specifically, early indications of fuel damage can be identified through containment radiation monitors, core exit thermocouples, or effluent radiation monitors, all of which are available in the MCR. Based on this, the NRC staff found the removal of the chemistry personnel from the on-shift and minimum staffing list for the RP function to be acceptable.

The NRC staff reviewed the licensee's proposed changes to the RP function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plans will be consistent with Interim Table B1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan continues to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50, with respect to the timely and effective performance of RP functions.

3.2.4 Supervision of Radiation Protection Staff and Site Radiation Protection

The purpose of the supervision of RP staff and site RP functions is to: (1) evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs, until relieved; (2) recommend onsite and offsite PARs to the applicable decision-maker, until relieved; (3) direct all RP activities, including field monitoring team (FMT) direction, until relieved, and (4) provide relevant information to applicable communicators who are communicating offsite PARs to OROs, until relieved. The licensee provided its analysis of the supervision of RP function in Section 3.2.4, "EP Function: Supervision of Radiation Protection Staff and Site Radiation Protection," of Enclosure 1 of the LAR.

Interim Table B-1 identifies an Operations Shift Manager to perform the supervision of RP function on-shift, until relieved. The current Ginna Emergency Plan does not specifically identify this function on-shift, but the licensee has proposed to assign this function to the Shift Emergency Director, until relieved by the augmented staff. The NRC staff found this proposed change acceptable because it aligns with Interim Table B-1.

Interim Table B-1 recommends that the supervision of RP function be augmented by a Site RP Coordinator in the TSC within 60 minutes of the declaration of an Alert or higher classification level, and by a RP Manager in the EOF within 60 minutes of the declaration of a Site Area Emergency or General Emergency classification level. Currently, the licensee staffs both the

TSC and EOF RP Manager positions within 60 minutes of the declaration of an Alert or higher classification level. The licensee is not proposing any changes for this function.

In addition, the licensee stated that the TSC RP Manager will perform site-related duties, which include actions to recommend onsite protective actions, direct all RP activities at the site, and support evaluations of plant radiological data in the development of onsite protective actions. The TSC RP Manager will also provide relevant information to applicable communicators who are transmitting offsite PARs to offsite response organizations. The EOF RP Manager will perform duties, which include actions to evaluate and assess offsite radiological data in the development of onsite protective actions and offsite PARs, and to direct FMTs at an Alert or higher classification level. The assigned major tasks are consistent with those stated in the revised NUREG-0654 Table B-1.

The NRC staff reviewed the licensee's proposed changes to the supervision of RP function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be generally consistent with Interim Table B-1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan continues to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 in regard to the effective supervision of the on-shift and augmented ERO RP functions.

3.2.5 Dose Assessments/Projections

The purpose of this function is to perform dose assessments and projections and provide input to the applicable ERO PAR decision-maker, until relieved. For each site, the licensee provided its analysis of the dose assessment and projections function in Section 3.2.5, "EP Function: Dose Assessments/Projections," of Enclosure 1 of the LAR.

Interim Table B-1 identifies a dose assessment/projection staff member as performing this function on-shift and clarifies that: "Other personnel may be assigned this function if no collateral duties are assigned to an individual that are beyond the capability of that individual to perform at any given time." Currently, Ginna uses the on-shift Chemistry Technician personnel to perform this function prior to augmentation. The licensee proposed to designate a Shift Dose Assessor, and add the clarification note from Interim Table B-1 for this position. The NRC staff finds the proposed change to be acceptable because it is consistent with Interim Table B-1.

Interim Table B-1 recommends one dose assessment position to be staffed at the TSC within 60 minutes of the declaration of an Alert or higher classification level, and another dose assessment position to be staffed at the EOF within 60 minutes of the declaration of a Site Area Emergency or General Emergency classification level. Currently, the licensee staffs one dose assessment position at the EOF within 60 minutes of the declaration of an Alert or higher classification level. The licensee is not proposing any changes for this function.

The EOF Dose Assessment Coordinator will perform duties, which include actions to perform dose assessments/projections and provide input to the applicable ERO PAR decision-maker. Since the EOF is mobilized simultaneously with the TSC, and responsibility for dose assessment is transferred directly from the MCR to the EOF, the licensee stated, and the NRC staff agrees, that staffing of the dose assessment position in the TSC is redundant and, therefore, not required.

The NRC staff reviewed the licensee's proposed changes to the dose assessment and projections function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be generally consistent with Interim Table B-1. The licensee provided adequate justification for proposed changes which differed from Interim Table B-1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 regarding the timely and effective performance of radiological dose assessments and projections.

3.2.6 Emergency Classifications

The purpose of the emergency classification function is to evaluate plant conditions and recommend emergency classification, until relieved. The licensee provided its analysis of the emergency classification function in Section 3.2.6, EP Function: Emergency Classifications," of Enclosure 1 of the LAR.

Interim Table B-1 recommends an Emergency Classification Advisor to perform this function on-shift and clarifies that: "Other personnel may be assigned this function if no collateral duties are assigned to an individual that are beyond the capability of that individual to perform at any given time." Currently, the Ginna Emergency Plan does not specify a separate emergency classification function for the on-shift or augmenting minimum staff. The licensee proposed to assign this function to a pre-existing on-shift staff member (e.g., Shift Technical Advisor (STA) as a collateral duty. The NRC staff finds the proposed change to be acceptable because it is consistent with Interim Table B-1.

Interim Table B-1 recommends that the on-shift Emergency Classification Advisor be augmented by a second Emergency Classification Advisor in the TSC within 60 minutes of the declaration of an Alert or higher classification level. The licensee proposed to assign the TSC Emergency Classification Advisor function to the TSC Operations Manager, with the Shift Emergency Director and Station Emergency Director continuing to have the non-delegable command and control responsibility for emergency classification decisions. As such, the STA and TSC Operations Manager positions will advise the Shift Emergency Director and Station Emergency Director, respectively. Based on this, the NRC staff found the proposed change to be acceptable.

The NRC staff reviewed the licensee's proposed changes to the emergency classification function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be generally consistent with Interim Table B-1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 regarding the timely and accurate classification of emergency events.

3.2.7 Engineering

The purpose of the engineering function is to provide engineering coverage related to core/thermal hydraulics, electrical equipment and I&C, and mechanical equipment, until relieved. The licensee provided its analysis of the engineering function in Section 3.2.7, "EP Function: Engineering," of Enclosure 1 of the LAR.

Interim Table B-1 recommends a Core/Thermal Hydraulics Engineer to evaluate reactor conditions for the on-shift engineering function and clarifies that: "Other personnel may be assigned this function if no collateral duties are assigned to an individual that are beyond the capability of that individual to perform at any given time." Currently, Ginna has the STA satisfy the on-shift responsibilities for the plant system engineering, repair, and corrective actions function, which is re-categorized as the engineering function in Interim Table B-1. The licensee proposed to revise the Ginna Emergency Plan to identify the engineering function as a collateral duty satisfied by the STA on-shift. The NRC staff finds this proposed change acceptable because it is consistent with Interim Table B-1.

Interim Table B-1 recommends the TSC minimum staff for the engineering function consist of one Core/Thermal Hydraulics Engineer to support the evaluation of reactor conditions; one Mechanical Engineer for coverage of ERO-related mechanical equipment, and one Electrical/I&C Engineer for coverage of ERO-related electrical and I&C equipment. Currently, the Ginna Emergency Plan identifies the following positions as the minimum staff for the engineering function: one Core/Thermal Hydraulics Engineer, one Mechanical Engineer, one Electrical Engineer, one EOF Technical Advisor, one TSC Operations Manager, and one TSC Technical Manager. The licensee proposed to retain the Core Thermal/Hydraulics Engineer, the Mechanical Engineer, and the Electrical Engineer as the minimum staff for the engineering function, which will be staffed within 60 minutes from the declaration of an Alert or higher classification level. In addition, the licensee proposed to re-categorize the remaining positions as full-augmented staff that will be included in an EPIP.

The licensee stated that the TSC Technical Manager and the EOF Technical Advisor do not directly perform actions necessary to accomplish emergency plan functions but does support other ERO personnel in the TSC. As such, these positions, as currently defined in the Ginna Emergency Plan, would not be considered as part of the ERO minimum staff needed to implement the emergency plan. The NRC staff finds that re-categorizing these positions as full-augmentation positions, to be acceptable because it is consistent with Interim Table B-1.

The NRC staff reviewed the licensee's proposed changes to the engineering function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be generally consistent with Interim Table B1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 regarding the engineering function.

3.2.8 Security

The licensee provided its analysis of the security function in Section 3.2.8, "EP Function: Security," of Enclosure 1 of the LAR.

Interim Table B-1 recommends the on-shift security function to be provided by security staffing per the Site Security Plan. For the on-shift security function, the Ginna Emergency Plan is currently consistent with Interim Table B-1; therefore, the licensee is not proposing any changes.

Interim Table B-1 recommends that the on-shift security staffing should be augmented by a Security Coordinator in the TSC within 60 minutes of the declaration of an Alert or higher classification level, to coordinate security-related activities.

The licensee proposed to re-categorize the TSC Security Coordinator, which is currently listed as a full-augmentation position, to a minimum staff position, and staff the position within 60 minutes from the declaration of an Alert or higher classification level. This will ensure timely and effective coordination between the security force and the ERO, particularly for events where offsite resources are necessary, as well as for security-related events and site personnel accountability. Based on this, the NRC staff finds the proposed change, to be acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50, regarding the security function.

3.2.9 Repair Team Activities

The licensee provided its analysis of the repair team function in Section 3.2.9, "EP Function: Repair Team Activities," of Enclosure 1 of the LAR.

Interim Table B-1 identifies that the following maintenance personnel should respond to the OSC to support repair team activities:

- One electrician and one mechanic within 60 minutes of the declaration of an Alert or higher classification level to provide support for emergency core cooling system equipment, event mitigation, and equipment repair.
- One I&C technician within 90 minutes of the declaration of an Alert or higher classification level to provide assistance with logic manipulation, support for event mitigation and equipment repair, and support of digital I&C, if applicable.

Currently, the Ginna Emergency Plan identifies one mechanical maintenance technician, one electrical technician, and one instrument and control technician to staff the OSC within 60 minutes from the declaration of an Alert or higher classification level. The licensee proposed to revise the minimum staff repair team response to the OSC consistent with Interim Table B-1 as described above. The NRC staff finds these changes to be acceptable because they are consistent with Interim Table B-1.

The NRC staff reviewed the licensee's proposed changes to the repair team activities and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be consistent with Interim Table B1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 in regard to repair team activities.

3.2.10 Supervision of Repair Team Activities

The licensee provided its analysis of the supervision of repair team activities in Section 3.2.10, "EP Function: Supervision of Repair Team Activities," of Enclosure 1 of the LAR.

Interim Table B-1 indicates that an on-shift Repair Team Supervisor is not needed to support the emergency plan. Currently, the licensee does not have a designated on-shift Repair Team Supervisor. As such, the licensee is not proposing any changes related to an on-shift Repair Team Supervisor.

Interim Table B-1 also recommends a lead OSC Supervisor to staff the OSC within 60 minutes and four supervisors staffing the OSC within 90 minutes from the declaration of an Alert or higher classification level. The OSC supervisors responding within 90 minutes would oversee electrical, mechanical, I&C, and health physics activities.

Currently, the Ginna Emergency Plan identifies the OSC Director and TSC Maintenance Manager as supervisory positions for repair and corrective actions, with the OSC Director effectively managing maintenance resources upon activation of the OSC. The licensee proposed to re-categorize the TSC Maintenance Manager position as full-augmented staff under an EPIP, while adding supervisors/lead technicians for electrical maintenance, mechanical maintenance, I&C, and RP as OSC minimum staff positions to be staffed within 90 minutes from the declaration of an Alert or higher classification level.

The licensee stated that its lead technicians under its maintenance and RP program are qualified, experienced craft technicians who successfully demonstrate the day-to-day leadership of the technician work force and act as leads on back shifts. Duties and responsibilities of lead technicians include training and development of other employees in performing preventive maintenance and routine equipment service activities. Basic qualifications for a lead technician include demonstrated reliability and responsibility and the ability to make quick and effective technical decisions, as well as demonstrated situational leadership, and environmental and safety stewardship. The licensee stated, and the NRC staff agrees, that the experience and qualification of the lead technicians for maintenance and RP would satisfy the requirements and the needs of the OSC for the supervision of repair team activities.

In addition, the licensee stated that the Assistant OSC Director and the TSC Maintenance Manager does not directly perform actions necessary to accomplish emergency plan functions, but rather supports other ERO personnel at the OSC and TSC respectively. The licensee stated that these positions, as currently defined in its emergency plan, would not be considered as part of the ERO minimum staffing needed to implement the emergency plan. Based on this, the NRC staff finds that the re-categorization of the Assistant OSC Director and the TSC Maintenance Manager as full-augmentation positions to be acceptable.

The NRC staff reviewed the licensee's proposed changes to the supervision of repair team activities and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plan will be generally consistent with Interim Table B-1. The licensee provided adequate justification for proposed changes which differed from Interim Table B-1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan continues to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50, in regard to the supervision of repair team activities.

3.2.11 Field Monitoring Teams

The licensee provided its analysis of the FMTs in Section 3.2.11, "EP Function: Field Monitoring Teams," of Enclosure 1 of the LAR.

Interim Table B-1 recommends one onsite FMT and two offsite FMTs as minimum staff. Each FMT would consist of a driver and one qualified individual (i.e., a field monitor) to assess the area for radiation and contamination. Each field monitor will also provide RP coverage for the team as directed by the TSC RP Manager or EOF RP Manager. The field monitors for the offsite FMTs would also provide radioactive plume tracking. The onsite FMT and one offsite

FMT are recommended to be staffed within 60 minutes and the second offsite FMT is recommended to be staffed within 90 minutes from the declaration of Alert or higher classification level.

Currently, Ginna has two RP personnel designated as minimum staff to perform onsite surveys. The licensee proposed to perform onsite field monitoring with just one onsite field monitor responsible for radiological monitoring of the site's protected area. The onsite field monitor will be staffed within 60 minutes from the declaration of an Alert or higher classification level. The licensee also stated that a driver for the onsite FMT is not needed due to the size and configuration of the protected area, as the protected area is easily traversed without the use of a vehicle. The onsite field monitor will be under the direct supervision of the RP Manager in the TSC. The NRC staff finds the licensee's proposal to have one onsite FMT to be acceptable because it is consistent with Interim Table B-1. In addition, the licensee has provided adequate justification for not including a driver as part of the onsite FMT.

Currently, Ginna has two offsite FMTs, each consisting of a driver and a field monitor which are staffed at 60 minutes following the declaration of an Alert or higher classification level. The licensee proposed to revise the staffing time to 60 minutes for one offsite FMT and 90 minutes for the other offsite FMT following the declaration of an Alert or higher classification level, which is consistent with Interim Table B-1. The offsite FMTs will be under the control of senior RP staff in the TSC or EOF. Based on this, the NRC staff finds the proposed changes to the offsite FMTs, to be acceptable.

The licensee stated that the field monitors will be qualified to assess radiation and contamination levels, but will not necessarily be qualified as RP technicians in accordance with the American National Standards Institute (ANSI) standards as long as they are under the direct supervision of senior RP staff in the TSC or EOF, which is consistent with the guidance in Regulatory Issue Summary 2016-10, and, therefore, is acceptable to the NRC staff. The NRC staff reviewed the licensee's proposed changes to the FMTs and found them to be acceptable based on the information discussed above.

The licensee also proposed to re-categorize the EOF Environmental Coordinator from minimum staff to full-augmentation staff under an EPIP, since this position does not directly perform actions necessary to accomplish emergency preparedness functions, but rather support other ERO personnel. As such, this position, as currently defined in its emergency plans, would not be needed to implement the emergency plan. Based on this, the NRC staff finds that the re-categorization of the EOF environmental coordinator as a full-augmentation position to be acceptable.

With the proposed changes, the licensee's emergency plans will be generally consistent with Interim Table B-1. The licensee provided adequate justification for proposed changes which differed from Interim Table B-1. Based on an evaluation of the above changes, the NRC staff has determined that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 in regard to radiological environmental monitoring.

3.2.12 Media Information

The purpose of the media information function is to manage, and coordinate media information related to the event. The licensee provided its analysis of the media information function in Section 3.2.12, "EP Function: Media Information," of Enclosure 1 of the LAR.

The Exelon Communications Department currently always supports Ginna in responding to media inquiries for any emergency. The Exelon Communications Department coordinates responses with the licensee's management and respective emergency response facilities, and issues press releases, as appropriate.

Interim Table B-1 recommends that JIC staff to address media inquiries within 60 minutes of the declaration of an Alert or higher classification level but notes that this function does not need to be performed at the TSC or OSC. Interim Table B1 further recommends additional staff to perform JIC functions within 60 minutes of the declaration of a Site Area Emergency or General Emergency classification level. For the JIC, Interim Table B1 notes: "Emergency response facility activation timing is not the concern; it is whether the facility staff is performing the stated function(s) within the time specified." Interim Table B1 does not specify an on-shift capability and does not identify specific staff positions for the minimum staff.

Currently, the Ginna Emergency Plan identifies the Company Spokesperson, JIC Manager, Media Monitor/Rumor Control Coordinator, JIC Technical Advisor, and the JIC Logistics Manager as minimum staff positions that report to the JIC following the declaration of an Alert or higher classification level. However, no specific response time is currently designated for these positions. The licensee proposed to change the Ginna Emergency Plan to identify three minimum staff positions that will be established within 90 minutes of an Alert or higher classification level. The positions consist of the Corporate Spokesman, Public Information Director, and the JIC Director. The Exelon Communications Department will continue to provide the JIC functions until the JIC is activated and turnover of responsibilities occurs and may continue to provide some JIC functions after the JIC is activated.

The licensee stated that the Corporate Spokesperson will staff the JIC to maintain command and control of the facility and conduct periodic briefings with the news media. The JIC Director will also staff the JIC to coordinate with the State, local and Federal agencies to maintain factual consistency of information conveyed. In addition, the Public Information Director will oversee the issuance of news releases and media monitoring/rumor control; however, this function may be performed remotely by taking advantage of advances in communications technology. The NRC staff finds it acceptable to perform the Public Information Director position remotely, because the licensee will have the capability to perform the function within 90 minutes of the declaration of an Alert or greater ECL.

Based on the information above, the NRC staff determined that the Corporate Spokesperson, JIC Director, and Public Information Director are sufficient to manage, and coordinate media information related to the event. The staff finds that the 90-minute response time for the Corporate Spokesperson, JIC Director, and Public Information Director positions to be acceptable because the Exelon Communication Department will maintain the ability to respond to media inquiries at all times. The staff also finds it acceptable to perform the Public Information Director position remotely, because the licensee will have the capability to perform the function within 90 minutes of the declaration of an Alert or higher classification level. In addition, the staff finds the re-categorization of Media/Rumor Control Coordinator, Logistics Manager, and Technical Advisor positions as a full-augmentation position to be acceptable.

The NRC staff reviewed the licensee's proposed changes to the media information function and found them to be acceptable based on the information discussed above. With the proposed changes, the licensee's emergency plans will be consistent with Interim Table B-1. The licensee provided adequate justification for proposed changes which differed from Interim Table B-1. Based on an evaluation of the above changes, the NRC staff has determined that

the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 in regard to the media information function.

3.2.13 Information Technology

The purpose of the information technology (IT) function is to provide support for computer-based equipment if relied upon to perform emergency plan functions. The licensee provided its analysis of the IT function in Section 3.2.13, "EP Function: Information Technology," of Enclosure 1 of the LAR.

The revised NUREG 0654, Table B-1 states that IT staff is only required to be described in the emergency plan if critical digital assets are identified per 10 CFR 73.54, "Protection of digital computer and communications systems and networks." As such, Interim Table B-1 recommends that an IT lead should staff the TSC within 90 minutes of the declaration of an Alert or higher classification level, and that another IT lead should staff the EOF/JIC within 60 minutes of the declaration of a Site Area Emergency or General Emergency classification level. Consistent with Interim Table B-1, the licensee stated that there are no on-shift staff assigned to the IT function; the licensee's IT department always maintains a helpdesk available to assist users with IT-related issues.

Currently, the licensee maintains a Computer Specialist position at the EOF as a full-augmentation position. The licensee proposed to reassign the computer specialist as EOF/JIC minimum staff that will be available within 90 minutes from the declaration of an Alert or higher classification level. The licensee also stated that an IT lead position is not needed as minimum staff for the TSC because of acceptable performance of digital equipment during drills and exercises and built-in redundancy of communication systems and digital emergency plan assets. The licensee stated that the EOF and TSC contain multiple computers and programs in the facility, which are used during training and periodically tested. If issues are identified during testing, they are promptly addressed. In addition, many computer issues can be addressed remotely by the IT helpdesk. If additional help is needed at the TSC, the EOF IT specialist will be available to support resolution of the issue.

Although there is a difference between the proposed staffing of the IT function and Interim Table B-1, the NRC staff determined that the licensee will provide for an effective IT system, through multiple IT resources. Therefore, the NRC staff concludes that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50 for the IT function.

3.2.14 First Aid and Rescue Operations

Note viii to Interim Table B-1 states: "The number of operations staff, security force staff, or fire brigade staff on-shift is controlled by the site-specific Technical Specifications or other licensing documents." Currently, Ginna has three on-shift staff assigned for first aid and rescue operations as collateral duties. The licensee stated in Section 3.2.14, "EP Function: First Aid and Rescue Operations," of Enclosure 1 of the LAR, that it will continue to maintain qualified first aid and rescue personnel on-shift, but the personnel resources will no longer be listed in the emergency plan. Since first aid and rescue is no longer identified as an emergency plan function under Interim Table B-1, and the licensee will continue to maintain qualified first aid and rescue personnel on-shift in accordance with Interim Table B-1 note (cited above), the NRC staff determined the proposed change to be acceptable.

3.2.15 Fire Brigade

Note viii to Interim Table B-1 states: "The number of operations staff, security force staff, or fire brigade staff on-shift is controlled by the site-specific Technical Specifications or other licensing documents."

The licensee stated in Section 2.1.2, "On-Shift Revision Summary," of Enclosure 1 of the LAR, that the designated number of Fire Brigade personnel will be removed, and the firefighting function will be controlled per the site Fire Protection Plan. The NRC staff determined the proposed change to be acceptable because the firefighting function will continue to be controlled under the NRC-approved fire protection program.

3.3 Full-Augmentation Staffing

Full-augmentation positions are not described in either of NUREG-0654, Table B-1, Revision 1, or Interim Table B-1. Interim Table B-1 only addresses the required minimum staffing to perform the designated major functional areas, as compared to other staff not critical to the effective implementation of the emergency plan. Note iii of Interim Table B-1, as quoted below, describes the distinction between ERO minimum staffing and ERO members who serve in a supporting capacity.

The minimum ERO staffing plan is that which is required to effectively implement the site- specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should describe the minimum ERO staffing plan, while supporting implementing procedures can describe any other staff response desired by the licensee as long as this staff is not critical to effective emergency plan implementation[.] The augmentation times listed are intended to provide a model for applicants and licensees to consider in the development of their site-specific emergency plan.

The licensee stated in Section 3.3, "Full-Augmentation Staff Assessment," of Enclosure 1 of the LAR, that the emergency plan will describe the absolute minimum ERO staff needed to implement the emergency plan (i.e., if any position or function is not staffed, then the emergency plan cannot be effectively implemented). The licensee considers full-augmented staff as those ERO positions that provide support for the minimum staff in response to an emergency. For each facility, the description of the full-augmented positions, currently contained in the emergency plan, will be relocated to an EPIP. Section 2.1 of this safety evaluation identifies the summary of changes to the ERO minimum staff positions (Table 2) and the summary of changes to the full-augmented positions (Table 3). The NRC staff finds it acceptable to relocate the full-augmented staff positions from the emergency plan to EIPs because these positions are not needed to implement the emergency plan.

The licensee stated that it will use additional full-augmentation ERO staff that are trained and qualified. Most full-augmentation staff will still be assigned to ERO teams, be expected to maintain fitness-for-duty during duty weeks and be notified to respond to their emergency response facility. The full-augmentation staff performs support functions such as intra-facility communications, organization liaisons, and expert advisors. As such, the emergency plans shall be effectively implemented using the minimum staff positions. Full-augmentation staff will not be required to activate a respective emergency response facility and are not directly needed to implement the functions and tasks identified in the revised emergency plans.

Enclosure 2 to the licensee's January 15, 2019, application stated that prior to implementation of the approved license amendment:

Exelon will conduct a confirmation Emergency Preparedness Drill at one of Exelon's stations demonstrate that no loss of EP function will result due to the proposed changes in the ERO. The drill will include each of the Emergency Response Facilities described in the Emergency Plan (i.e., MCR (Simulator), TSC, OSC, EOF and JIC).

The licensee further stated, in part:

Exelon will institute a "Minimum Staff" drill to be conducted as part of the drill cycle for its nuclear stations. 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 is effectively implemented to perform the required Emergency Preparedness functions utilizing only the Minimum Staff defined in the Emergency Plan.

In addition, in order to ensure that minimum ERO staff remain proficient in skills required to perform emergency plan functions as outlined in revised NUREG-0654, Table B-1, the licensee uses the ERO Performance Indicator (PI) under the Emergency Preparedness Cornerstone in the Reactor Oversight Process (ROP), which allows the licensee and the NRC staff to verify the licensee's ability to adequately cope with an emergency at any of the licensee's sites. The PI tracks the participation of ERO members assigned to fill key positions in performance enhancing experiences and ensures that the risk-significant aspects of classification, notification, and PAR development are evaluated and included in the PI process.

The NRC staff determined that the minimum staff drill and the ROP PI process will provide assurance that the licensee's staff identified in the emergency plan can perform their designated functions without reliance on the full-augmentation staff.

As discussed above, the NRC staff determined that the relocation of full-augmentation staff positions from the emergency plan to the EIPs is acceptable. The revised emergency plan will continue to include those positions necessary for effective implementation of the emergency plan, which will be demonstrated by periodic drills. Therefore, the NRC staff concludes that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50.

3.4 Removal of Requirement to Augment Certain ERO Positions at an Unusual Event

The Ginna Emergency Plan currently provides for the activation of certain ERO personnel at the declaration of a Notification of Unusual Event (Unusual Event) in anticipation of an escalation of the emergency classification level. The licensee proposed to remove the activation of certain ERO personnel at an Unusual Event from the Ginna Emergency Plan. NUREG-0654 provides that Unusual Event conditions indicate a potential degradation of the level of the safety of the plant and that licensee actions include augmentation on-shift resources as needed. Considering that Ginna will continue to notify the ERO at an Unusual Event and that station personnel will be available to support the emergency response as needed, the NRC staff finds it

acceptable to remove the activation of certain ERO positions from the Ginna Emergency Plan at an Unusual Event classification.

As discussed above, the NRC staff determined that the removal of certain ERO personnel at an Unusual Event from the Ginna Emergency Plan is acceptable. The revised emergency plan will continue to provide augmentation as-needed in response to an Unusual Event. Therefore, the NRC staff concludes that the Ginna Emergency Plan will continue to meet the planning standards under 10 CFR 50.47(b)(2) and the requirements of Appendix E, Section IV.A, to 10 CFR Part 50.

3.5 Potential Impact of ERO Changes on Off-Site Emergency Response Operational Interfaces

As discussed in Section 3.5.1 of Enclosure 1 of its January 15, 2019, application, the licensee provided a draft copy of the LAR to representatives of Wayne County Emergency Management Office, Monroe County Office of Emergency Management, and the New York State Office of Emergency Management. Enclosure 3 of the licensee's January 15, 2019, application contains correspondence from the Wayne County, Monroe County, and the State of New York. Each Office stated that the office did not have any concerns at this time.

3.6 Summary

The NRC staff performed a technical and regulatory review of the proposed changes to the Ginna Emergency Plan as described in the licensee's January 15, 2019, application and as supplemented by letter dated May 23, 2019. The NRC staff finds that, with the proposed changes, the Ginna Emergency Plan will continue to meet the standards under 10 CFR 50.47(b)(2) and the requirements in Appendix E, Section IV.A, to 10 CFR Part 50, and that adequate protective measures can and will be taken in the event of a radiological emergency. Therefore, the NRC staff concludes that the proposed changes to the Ginna Emergency Plan are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment on September 11, 2019. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 10 CFR 51.32, and 10 CFR 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on April 23, 2019 (84 FR 16894). Accordingly, based upon the environmental assessment, the Commission has determined that the issuance of these amendments will not have a significant effect on the quality of the human environment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the

amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. Exelon Generating Company, LLC, letter to U.S. Nuclear Regulatory Commission, "R. E. Ginna Nuclear Power Plant - License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements," dated January 15, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19017A136).
2. Exelon Generating Company, LLC, letter to U.S. Nuclear Regulatory Commission, "R. E. Ginna Nuclear Power Plant - Response to Request for Additional Information - License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements," dated May 23, 2019 (ADAMS Accession No. ML19143A200).
3. NRC Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," dated October 1981 (ADAMS Accession No. ML090440294).
4. NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," dated November 1980 (ADAMS Accession No. ML040420012).
5. Regulatory Information Summary 2016-10, "Licensing Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation," dated August 5, 2016 (ADAMS Accession No. ML16124A002).
6. U.S. Nuclear Regulatory Commission, letter to Susan Perkins-Grew, Nuclear Energy Institute, "Alternative Guidance for Licensee Emergency Response Organizations," dated June 12, 2018 (ADAMS Accession No. ML18022A352).

Principal Contributor: R. Hoffman, NSIR

Date: October 29, 2019

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT — ISSUANCE OF AMENDMENT
NO. 134 TO REVISE THE EMERGENCY RESPONSE ORGANIZATION
STAFFING REQUIREMENTS (EPID L-2019-LLA-0053) DATED OCTOBER 29,
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*by e-mail **by memo

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