

From: [Poole, Justin](#)
To: [Holden, Leslie E.:\(Exelon Nuclear\)](#); [Brady, Robert R.:\(Exelon Nuclear\)](#)
Cc: [Danna, James](#)
Subject: Request for Additional Information Related to TMI-1 License Amendment Request to Revise EP and EAL for Defueled Condition (L-2019-LLA-0144)
Date: Friday, January 24, 2020 11:38:00 AM
Attachments: [L-2019-LLA-0144 final RAI.pdf](#)

Leslie/Bob,

By lettered dated July 1, 2019, Exelon Nuclear (the licensee) submitted a license amendment request (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML19182A182), to revise the site emergency plan and emergency action level scheme for the permanently defueled condition at Three Mile Island Nuclear Station, Unit 1. The U.S. Nuclear Regulatory Commission staff has determined that additional information is necessary to complete its review.

On January 14, 2020, the NRC staff sent Exelon the DRAFT RAIs to ensure that the questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the RAI, and to determine if the information was previously docketed. On January 23, 2020, the NRC and Exelon held a clarifying call. During the call, Exelon requested a response date of 30 days from the date of the call. The NRC staff informed Exelon that this timeframe is acceptable. The attached is the final version of the RAIs. These RAIs will be put in ADAMS as a publicly available document.

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REQUEST FOR ADDITIONAL INFORMATION RELATED TO
LICENSE AMENDMENT REQUEST FOR CHANGES
TO THE THREE MILE ISLAND NUCLEAR STATION
PERMANENTLY DEFUELED EMERGENCY PLAN AND
EMERGENCY ACTION LEVEL SCHEME
EXELON GENERATION COMPANY, LLC.
DOCKET NO. 50-289 AND 50-320

By application dated July 1, 2019, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19182A182), Exelon Generation Company, LLC, submitted changes to the Three Mile Island Nuclear Station (TMI) Emergency Plan 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 existing TMI Emergency Plan and Emergency Action Level scheme to reflect a permanently defueled condition.

The staff has reviewed the licensee's submittal and determined that additional information is required to enable the staff to make an independent assessment regarding its technical review.

RAI-TMI-1

Evaluation Criterion E.1 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 establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme.

Section 2.6, "State and Local Government Notification and Response," (Page 5) in Attachment 2 of Exelon's July 1, 2019 letter states in part:

Notification to the Lead State authority (Pennsylvania Emergency Management Agency (PEMA)) is required within 30 minutes after declaring an emergency. PEMA will provide notification to the responsible local government agencies.

Figure 6.1 "Exelon Notification Scheme," (page 19) in Attachment 2 of Exelon's July 1, 2019 letter, also indicates the Commonwealth of Pennsylvania – PEMA [*Pennsylvania Emergency Management Agency*] – will provide notification to "Local Warning Points/EOCs [*Emergency Operations Centers*]."

Please clarify which responsible government agencies (local warning points/EOCs) will be notified by PEMA in the event of an emergency declaration at TMI, and documentation of agreement with these local response organizations on this approach following permanent cessation of power operations.