

NRR-DMPSPeM Resource

From: Poole, Justin
Sent: Tuesday, July 31, 2018 10:30 AM
To: Bonnett, Frederick Paul:(GenCo-Nuc)
Cc: Mascitelli, Francis J:(GenCo-Nuc); Danna, James
Subject: Request for Additional Information Related to Amendment Regarding Decommissioning ERO Staffing Changes
Attachments: L-208-LLA-0073 Requests for Additional Information.pdf

Paul,

By letter dated March 19, 2018, Exelon Generation Company, LLC (Exelon), submitted changes to the emergency plan for the Three Mile Island Nuclear Station (TMI) for NRC review and prior approval, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(q). The proposed changes would revise the emergency plan to change the staffing for certain emergency response organization (ERO) positions, based on receipt by the NRC of certification under 10 CFR 50.82(a)(2) that the TMI, Unit 1, reactor has permanently ceased operations and permanently removed fuel from the reactor vessel. Upon docketing of these certifications, the 10 CFR Part 50 licensee for TMI Unit 1 will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel. In reviewing Exelon's application, the NRC staff had developed a DRAFT request for additional information (RAI).

On July 24, 2018, 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 July 25, 2018, you called to say that the questions were understandable and that Exelon did not have a need for a clarification call with the NRC staff. During the call, Exelon requested a 30-days from the date of this email to respond. The NRC staff informed Exelon that the timeframe was acceptable. The attached contains the final version of the RAIs. These RAIs will be put in ADAMS as a publicly available document.

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U.S. Nuclear Regulatory Commission
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From: Poole, Justin

Created By: Justin.Poole@nrc.gov

Recipients:

"Mascitelli, Francis J:(GenCo-Nuc)" <Francis.Mascitelli@exeloncorp.com>

Tracking Status: None

"Danna, James" <James.Danna@nrc.gov>

Tracking Status: None

"Bonnett, Frederick Paul:(GenCo-Nuc)" <Frederick.Bonnett@exeloncorp.com>

Tracking Status: None

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REQUESTS FOR ADDITIONAL INFORMATION
RELATED TO LICENSE AMENDMENT REQUEST REGARDING
PROPOSED CHANGES TO THE THREE MILE ISLAND EMERGENCY PLAN FOR
POST-SHUTDOWN AND PERMANENTLY DEFUELED CONDITION
EXELON GENERATION COMPANY, LLC
THREE MILE ISLAND NUCLEAR STATION UNIT 1 AND 2

By letter dated March 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML18078A578), Exelon Generation Company, LLC (Exelon), submitted changes to the emergency plan for the Three Mile Island Nuclear Station (TMI) for NRC review and prior approval, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(q). The proposed changes would revise the emergency plan to change the staffing for certain emergency response organization (ERO) positions, based on receipt by the NRC of certification under 10 CFR 50.82(a)(2) that the TMI, Unit 1, reactor has permanently ceased operations and permanently removed fuel from the reactor vessel. Upon docketing of these certifications, the 10 CFR Part 50 licensee for TMI Unit1 will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel.

TMI, Unit 2, has a possession only license and is currently maintained in accordance with the NRC approved SAFSTOR condition (method in which a nuclear facility is placed and maintained in a condition that allows it to be safely stored and subsequently de-contaminated) known as Post-Defueling Monitored Storage. Exelon maintains the emergency planning responsibilities for TMI, Unit 2, which is owned by First Energy Corporation, through a service agreement.

The requests for additional information (RAIs) listed below are necessary to facilitate the technical review. A timely and thorough response to these RAIs is requested in order to meet the proposed deadline requested by the licensee.

TMI-RAI-1

Section 5.2.4, "Major Functional Area: Radiological Accident Assessment and Support of Operational Accident Assessment," Item e. "Major Task: Chemistry," of Attachment 1 (pages 25-26), states, in part:

Plant activities that could potentially cause mechanical damage (i.e., fuel moves in the SFP [spent fuel pool]) will require that the radiation monitor as listed in the gaseous effluent EALs [emergency action levels] be in service or that a Chemistry Technician be onsite, thereby alleviating a potential delay in sample analysis to determine EAL applicability. Applicable fuel handling procedures will be revised to incorporate this as a prerequisite prior to fuel handling activities.

Please provide clarification as to why an equivalent statement was not included in Attachment 5, "Summary of Regulatory Commitments," of the TMI license amendment request to capture this commitment.

TMI-RAI-2

Section 5.2.11, “Major Functional Area: Public Information,” Item c. “Major Task: Media Monitoring and Rumor Control,” of Attachment 1 (page 42), states in part:

The Media Monitoring Staff and Rumor Control staff is listed in the TMI SEP [site emergency plan] as full augmentation positions that are **filled on an as needed basis**.

However, in Section 5.3.6, “Joint Information Center (JIC),” of Attachment 1 (pages 54-55), those positions are simply referred to as Non-Minimum Augmented Staff “proposed to be removed from the SEP and will be managed and controlled by EIPs [emergency plan implementing procedures]. The full augmented positions **will still be assigned to ERO teams, be expected to maintain Fitness-for-Duty during assigned duty weeks, and are required to respond to the EOF** [emergency operations facility] **at an Alert or higher classification.**”

Please clarify which of the above highlighted parameters apply to the Media Monitoring Staff and Rumor Control Staff.

TMI-RAI-3

Section 5.3.5, “Emergency Operations Center (EOF),” of Attachment 1 (pages 52-54), lists the Regulatory Liaison and Dose Assessor positions as part of the current EOF ERO “Non-Minimum Augmented Staff.” However, shortly thereafter the following statement is included:

As stated above the proposed change made the following **minimum Staff positions** ERO Non-Minimum Augmented Staff:

- Environmental Coordinator
- Regulatory Liaison
- Dose Assessor

The Environmental Coordinator position is included in Table 5.3 (page 54), “Emergency Response Organization EOF Minimum Staffing Positions” as being “Relocated to EPIP as Full Augmentation.” The other two positions are not referenced as Minimum Staff in the table.

Please provide additional perspective on, what appears to be, contradictory statements.