

RS-18-143

November 29, 2018

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456, STN 50-457, and 72-73

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. 50-454, 50-455, and 72-68

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461 and 72-1046

Dresden Nuclear Power Station, Units 1, 2 and 3
Facility Operating License No. DPR-2
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-010, 50-237, 50-249, and 72-37

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373, 50-374, and 72-70

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352, 50-353, and 72-65

Peach Bottom Atomic Power Station, Units 1, 2, and 3
Facility Operating [Possession Only] License No. DPR-12
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-171, 50-277, 50-278 and 72-79

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254, 50-265, and 72-53

Subject: Supplemental Information Supporting License Amendment Requests for Approval of Changes to Emergency Plan Staffing Requirements

- References:
- 1) Letter from James Barstow, Exelon Generation Company, LLC to U.S. Nuclear Regulatory Commission – *"License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements,"* dated January 31, 2018 (ML18053A159)
 - 2) Letter from James Barstow, Exelon Generation Company, LLC to U.S. Nuclear Regulatory Commission – *"License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements,"* dated May 10, 2018 (ML18149A290)
 - 3) Letter from James Barstow, Exelon Generation Company, LLC to U.S. Nuclear Regulatory Commission – *"Response to Request for Additional Information and Supplemental Information - License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements,"* dated July 27, 2018 (ML18208A405)
 - 4) Letter from David P. Helker, Exelon Generation Company, LLC to U.S. Nuclear Regulatory Commission – *"Response to Request for Additional Information - License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements,"* dated November 1, 2018 (ML18305B270)

By letters dated January 31, 2018, and May 10, 2018 (References 1 and 2), Exelon Generation Company, LLC (Exelon) submitted License Amendment Requests (LARs) to support changes to the Emergency Plans for the facilities listed in order to revise certain Emergency Response Organization (ERO) positions. The proposed ERO staffing changes are being made in accordance with guidance specified in the *"Alternative Guidance for Licensee Emergency Response Organizations,"* finalized in a letter from the U.S. Nuclear Regulatory Commission (NRC) to Nuclear Energy Institute (NEI), dated June 12, 2018. The NRC proposes to include this guidance in Revision 2 of NUREG-0654/FEMA-REP-1, *"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."*

By letter dated July 27, 2018 (Reference 3), Exelon responded to an NRC Request for Additional Information (RAI) dated June 28, 2018 (ML18180A077) in support of the Reference 1 LAR submitted for the Exelon Midwest sites (Braidwood, Byron, Clinton, Dresden, LaSalle, and Quad Cities). Additionally, in a letter dated November 1, 2018 (Reference 4), Exelon responded to an NRC RAI dated October 2, 2018 (ML18276A020) associated with the Reference 2 LAR submitted for Exelon Mid-Atlantic sites (Limerick and Peach Bottom).

Exelon is providing this supplemental information to update the "redline" and "clean" versions of the Exelon Nuclear Standardized Radiological Emergency Plan (EP-AA-1000) previously provided, as well as updating committed actions in support of the ERO staffing change LAR for the Midwest sites (Reference 1).

Since the initial submittal of the LARs for the Midwest and Mid-Atlantic sites (References 1 and 2), the NRC issued updated ERO staffing guidance as noted in its June 12, 2018, letter to the NEI, *"Alternative Guidance for Licensee Emergency Response Organizations."* Exelon is updating the EP-AA-1000, Appendix 5, Table 5-1 for the Midwest and Mid-Atlantic sites' LARs (References 1 and 2) to align with the June 12, 2018, updated guidance. Specifically, the specified staffing for the On-Shift Repair Team and the On-Shift Repair Team Supervisor functions are annotated as N/A. Exelon's "redline" and "clean" versions for those functions are updated and annotated as "N/A."

In addition, based on reviews that were performed in support of the development of the LAR for the Exelon Northeast sites (Calvert Cliffs, FitzPatrick, and Nine Mile Point) submitted on August 31, 2018 (ML18249A096), other minor changes were made that impacted the "redline" and "clean" versions of EP-AA-1000 submitted in the Reference 1 and Reference 2 LARs. These additional changes are consistent with the proposed ERO staffing changes discussed in the LARs and pertain to redistribution of responsibilities, removal of references to Full-Augmentation personnel, and reflection of revised Joint Information Center (JIC) activation criteria as discussed in the LARs. Attachment 1 includes a listing of the changes and the supporting enclosures contain the updated pages of the "redline" and "clean" versions of EP-AA-1000, which supersede those pages previously submitted in References 1 and 2.

The "redline" and "clean" versions of EP-AA-1000 presented in the LAR for the Northeast sites (ML18249A096) had essentially addressed these issues. Resubmitting the "redline" and "clean" versions of EP-AA-1000 in support of the LARs for the Midwest and Mid-Atlantic sites (References 1 and 2) will ensure that the information provided is fundamentally aligned across the Exelon fleet.

Supplemental information is also being provided to update the committed actions in support of the Reference 1 LAR for the Midwest sites. In Reference 4, Exelon responded to an NRC RAI in which updated commitments were made related to the Reference 2 LAR involving the need to perform drills during eight-year drill cycles. The commitments in the Reference 4 submittal for the Exelon MA sites have not changed. Attachment 2 of this submittal updates the commitments that were made in the Reference 1 LAR to reflect the addition of performing drills during eight-year drill cycles. Exelon did provide a discussion about performing drills during eight-year cycles in its Reference 3 letter; however, we did not identify the actions as a specific commitment.

As noted above, Attachment 2 of this letter includes a summary of the updated commitments for the Exelon MW sites which supersede those commitments previously made in the Reference 1 letter.

Exelon has reviewed the information supporting a finding of No Significant Hazards Consideration and the Environmental Consideration provided to the NRC in the Reference 1 and 2 submittals. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendments do not involve a significant hazards consideration. Furthermore, the additional information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendments.

In accordance with 10 CFR 50.91, "*Notice for public comment; State consultation,*" paragraph (b), Exelon is notifying the State of Illinois, State of Maryland, and Commonwealth of Pennsylvania by transmitting a copy of this letter and the supporting attachments to the designated State Officials.

If you have any questions concerning this submittal, please contact Richard Gropp at (610) 765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of November 2018.

Respectfully,



David P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

- Attachments: 1) Summary of Changes to Standardized Emergency Plan EP-AA-1000
- Enclosure A – "Redline" Version of Updated Standardized Emergency Plan Pages
 - Enclosure B – "Clean" Version of Updated Standardized Emergency Plan Pages
- 2) Updated Summary of Regulatory Commitments

U.S. Nuclear Regulatory Commission
License Amendment Request
Supplemental Information for ERO Staffing Changes
November 29, 2018
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cc: w/ Attachments (including supporting Enclosures)
Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Project Manager, NRR - Braidwood Station
NRC Project Manager, NRR - Byron Station
NRC Project Manager, NRR - Clinton Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station
NRC Project Manager, NRR - LaSalle County Station
NRC Project Manager, NRR - Limerick Generating Station
NRC Project Manager, NRR - Peach Bottom Atomic Power Station
NRC Project Manager, NRR - Quad Cities Nuclear Power Station
Illinois Emergency Management Agency - Division of Nuclear Safety
Director, Bureau of Radiation Protection - Pennsylvania Department
of Environmental Protection
R. R. Janati, Pennsylvania Bureau of Radiation Protection
D. A. Tancabel, State of Maryland

ATTACHMENT 1

SUMMARY OF CHANGES TO STANDARIZED EMERGENCY PLAN EP-AA-1000

Supporting Enclosures

- **Enclosure A – "Redline" Version of Updated Standardized Emergency Plan Pages**
- **Enclosure B – "Clean" Version of Updated Standardized Emergency Plan Pages**

SUMMARY OF CHANGES TO STANDARDIZED EMERGENCY PLAN EP-AA-1000

By letters dated January 31, 2018, and May 10, 2018 (References 1 and 2), Exelon Generation Company, LLC (Exelon) submitted License Amendment Requests (LARs) to support changes to the Emergency Plans for the facilities listed in order to revise certain Emergency Response Organization (ERO) positions. The proposed ERO staffing changes are being made in accordance with guidance specified in the *"Alternative Guidance for Licensee Emergency Response Organizations,"* finalized in a letter from the U.S. Nuclear Regulatory Commission (NRC) to Nuclear Energy Institute (NEI), dated June 12, 2018. The NRC proposes to include this guidance in Revision 2 of NUREG-0654/FEMA-REP-1, *"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."*

By letter dated July 27, 2018 (Reference 3), Exelon responded to an NRC Request for Additional Information (RAI) dated June 28, 2018 (ML18180A077) in support of the Reference 1 LAR submitted for the Exelon Midwest sites (Braidwood, Byron, Clinton, Dresden, LaSalle, and Quad Cities). Additionally, in a letter dated November 1, 2018 (Reference 4), Exelon responded to an NRC RAI dated October 2, 2018 (ML18276A020) associated with the Reference 2 LAR submitted for Exelon Mid-Atlantic sites (Limerick and Peach Bottom).

Exelon is providing this supplemental information to update the "redline" and "clean" versions of the Exelon Nuclear Standardized Radiological Emergency Plan (EP-AA-1000) previously provided in support of the ERO staffing change LARs (References 1 and 2).

Since the initial submittal of the LARs for the Midwest and Mid-Atlantic sites (References 1 and 2), the NRC issued updated ERO staffing guidance as noted in its June 12, 2018, letter to the NEI, *"Alternative Guidance for Licensee Emergency Response Organizations."* Exelon is updating the EP-AA-1000, Appendix 5, Table 5-1 for the Midwest and Mid-Atlantic sites' LARs (References 1 and 2) to align with the June 12, 2018, updated guidance. Specifically, the specified staffing for the On-Shift Repair Team and the On-Shift Repair Team Supervisor functions are annotated as N/A. Exelon's "redline" and "clean" versions for those functions are updated and annotated as "N/A."

In addition, based on reviews that were performed in support of the development of the LAR for the Exelon Northeast sites (Calvert Cliffs, FitzPatrick, and Nine Mile Point) submitted on August 31, 2018 (ML18249A096), other minor changes were made that impacted the "redline" and "clean" versions of EP-AA-1000 submitted in the Reference 1 and Reference 2 LARs. These additional changes are consistent with the proposed ERO staffing changes discussed in the LARs and pertain to redistribution of responsibilities, removal of references to Full-Augmentation personnel, and reflection of revised activation criteria as discussed in the LARs. A listing of the changes being incorporated is provided below.

1. Section B.1 - Deleted paragraph describing Chemistry Personnel who have been removed from the ERO Staffing Table.
2. Section B.3 - Clarified Command and Control discussion to more clearly state the transfer of responsibilities between the Shift, Station and Corporate Emergency Directors.

3. Section B.5 - Corrected an editorial error in which "Attachment" should be annotated as "Appendix."
4. Section B.5 - Station Emergency Director - removed the reference to the Station Emergency Director being in Command and Control. While the Station Emergency Director may take non-delegable responsibilities, Command and Control of the Emergency will pass directly from the Shift Emergency Director to the Corporate Emergency Director.
5. Section B.5 - Station Emergency Director - added an additional responsibility to activate the Technical Support Center (TSC) facility consistent with responsibilities originally contained in the Northeast sites' Emergency Plans.
6. Section B.5 - Station Radiation Protection Manager (RPM) - removed the responsibility to evaluate Protective Action Recommendations (PARs). PARs will be evaluated at the EOF under the proposed staffing changes.
7. Section B.5 - Operations Support Center (OSC) Director - revised the reference to Operations Lead to be just Operations. The Operations Lead is no longer a position under the proposed staffing.
8. Section B.5 - Corporate Emergency Director - added the responsibility to activate the Emergency Operations Facility (EOF) to the Corporate Emergency Director consistent with responsibilities originally contained in the Northeast sites' Emergency Plans.
9. Section B.5 - EOF RPM - removed the reference to EOF Director. The EOF Director is no longer a Minimum Staff position under the proposed changes.
10. Section B.5 - Dose Assessment Coordinator - added the responsibility to coordinate Field Monitoring Teams (transferred from the EOF Coordinator) and cleaned up references to deleted positions.
11. Section B.5 - Computer Specialist - added reporting responsibility to the Minimum Staff Emergency Director instead of the Administrative Coordinator.
12. Section B.7 - The step was revised to add the words "or higher" with respect to the Joint Information Center (JIC) activation at the "Alert" emergency classification level.
13. Section F, Figure 1 - This step was revised to delete reference to EOF Emergency Notification System (ENS) Communicator, since the ENS communicator is no longer staffed at the EOF under the proposed ERO staffing changes.
14. Section H.4 - The step was revised to add the words "or higher" with respect to JIC activation at the "Alert" emergency classification level.
15. Section O.4 - deleted reference to Chemistry personnel craft as Minimum Staff.
16. Appendix 5, Table 5-1 - The following changes were made to more closely align with approved NRC guidance:
 - a. Repair Team activities for On-Shift personnel are not applicable,
 - b. Repair Team supervisor function for On-Shift personnel is not applicable.

The "redline" and "clean" versions of the EP-AA-1000 pages presented in the LAR submitted for the Northeast sites (Calvert Cliffs, FitzPatrick, and Nine Mile Point) had essentially addressed these issues. However, resubmitting the "redline" and "clean" pages of EP-AA-1000 will ensure that the information provided is fundamentally aligned for the three (3) LARs.

Therefore, the updated "redline" and "clean" pages of EP-AA-1000 provided in Enclosures A and B of this submittal supersede the affected pages previously submitted in the two (2) LARs (References 1 and 2).

References:

- 1) Letter from James Barstow, Exelon Generation Company, LLC to U.S Nuclear Regulatory Commission – *"License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements,"* dated January 31, 2018 (ML18053A159)
- 2) Letter from James Barstow, Exelon Generation Company, LLC to U.S Nuclear Regulatory Commission – "License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements," dated May 10, 2018 (ML18149A290)
- 3) Letter from James Barstow, Exelon Generation Company, LLC to U.S Nuclear Regulatory Commission – "Response to Request for Additional Information and Supplemental Information - License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements," dated July 27, 2018 (ML18208A405)
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Enclosure A

"Redline" Version of Updated Standardized Emergency Plan Pages

EXELON NUCLEAR

STANDARDIZED RADIOLOGICAL EMERGENCY PLAN

Shift Technical Advisor (STA): During normal plant operations, the Senior Reactor Operators report to the Shift Manager and directly supervise the licensed Reactor Operators and all activities in the Control Room. During an abnormal condition, the Shift Manager assumes direct supervision of personnel and all activities in the Control Room while a qualified individual steps back and assumes an overview role as an STA with the specific responsibility of monitoring the maintenance of core cooling and containment integrity. An individual assigned the duty as the STA shall be available to the Control Room at all times.

Radiation Protection: The Station Radiation Protection personnel are responsible for the handling and monitoring of radioactive materials. Included in this organization are Health Physicists, Radiation Protection Supervisors and Technicians.

~~Chemistry: The Station Chemistry personnel are responsible for sampling of system effluents, and the chemical and radio-analytical analysis of those samples. Included in this organization are Chemists, Chemistry Supervisors and Technicians.~~

Security: The Station Security personnel are responsible for the physical security of the site. Included in this organization are Security Supervisors and Security Guards.

2. Authority Over the Emergency Response Organization

The Emergency Director in Command and Control is the designated Exelon Nuclear individual who has overall authority and responsibility, management ability, and technical knowledge for coordinating all emergency response activities at the nuclear power station.

- Control Room: Shift Emergency Director (Shift Manager)
- TSC: Station Emergency Director
- EOF: Corporate Emergency Director

3. Criteria for Assuming Command and Control (Succession)

Emergency personnel assume responsibility for their positions upon receiving notification to activate. The responsibility for initial assessment of and response to an emergency rests with the Shift Manager. The Shift Manager is the Shift Emergency Director and has the Station ~~and Corporate~~ Emergency Director's responsibilities and authority until relieved ~~by a qualified Station Emergency Director~~. The ~~Station-Corporate~~ Emergency Director, once having relieved the Shift Manager of the Emergency Director responsibilities, is responsible for continued assessment of the severity of the emergency and for the necessary functions as described in the E-Plan, the Station Annex, and the emergency implementing procedures. ~~Final succession is achieved when the Corporate Emergency Director assumes overall Command and Control, and directs Exelon Nuclear's Emergency Response activities.~~

The Shift Emergency Director is relieved of Command and Control as soon as possible after the declaration of an Alert (or higher classification if Alert not declared). ~~Command and Control may be transferred directly to the Corporate Emergency Director, or transferred to the Station Emergency Director on an interim basis.~~ Following the Command and Control turnover, the Corporate Emergency Director shall have overall Command and Control of the Emergency Response. Note that the Station Emergency Director takes responsibility for onsite Non-Delegable Responsibilities including Classification and Emergency Exposure Control. The Corporate Emergency Director takes responsibility for offsite Non-Delegable Responsibilities including Protective Action Recommendations and State/local Notifications. Command and Control does not transfer until the following criteria have been met:

- Adequate staff levels are present in support of the non-delegable responsibilities.
- The staff has been fully briefed as to the status of the event and the currently proposed plan of action.
- A turnover between the Emergency Director relinquishing Command and Control and the Emergency Director assuming Command and Control has been made.

Although Exelon Nuclear's ERO fulfills all regulatory requirements for emergency response, it may be altered by the Emergency Director. This type of alteration will be based upon identified needs within the ERO, event dependent criteria, and identified needs of the company as a whole.

4. Non-Delegable Responsibilities

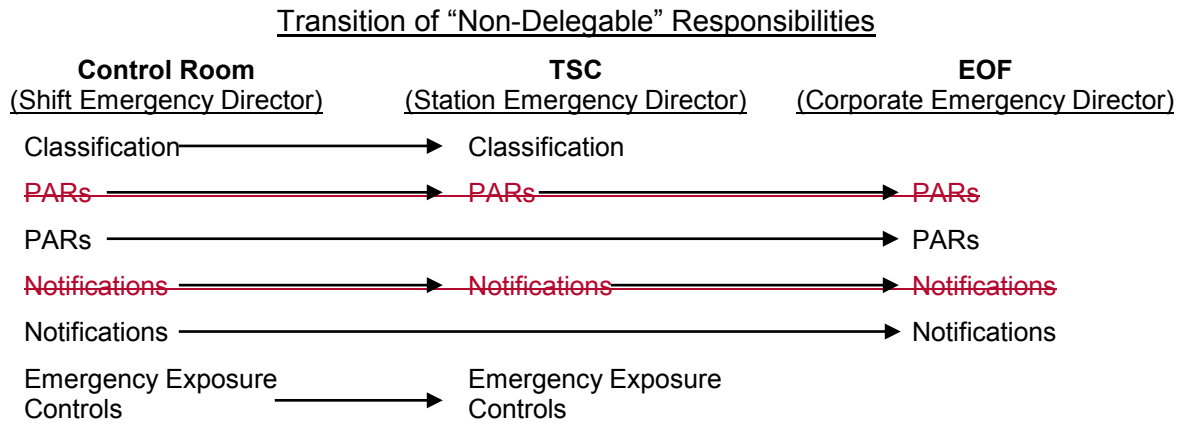
Non-delegable responsibilities include the following functions:

- Event classification.
- Protective Action Recommendations (PARs) for the general public.
- Notification of offsite authorities (approval of state/local and NRC notifications).
- Authorization of emergency exposure controls in excess of 5 Rem TEDE and the issuance of potassium iodide (KI), for Exelon Nuclear emergency workers per EPA-400.

The Shift Manager is responsible for the initial classification of an event and assumes the position as Shift Emergency Director. In this capacity, the Shift Manager has responsibility for performing the non-delegable responsibilities until relieved.

The Shift Emergency Director is relieved of Command and Control as soon as possible after the declaration of an Alert (or higher classification if Alert not declared). Overall Command and Control is transferred to the ~~Station Emergency Director but may be transferred directly to the~~ Corporate Emergency Director.

~~When the~~ The Station Emergency Director assumes overall authority and responsibility for ~~Classification and Emergency Exposure Control~~ performing all the non-delegable duties from the Shift Manager. The Corporate Emergency Director (EOF) will subsequently relieve the Station Emergency Director (TSC) of overall Command and Control and assumes the non-delegable responsibilities for PAR determination and notifications to offsite authorities.



5. Emergency Response Organization Positional Responsibilities

The Emergency Plan designates two types of augmented ERO responders. Those designated as Minimum Staff are those key ERO needed to relieve the on-shift staff of key EP functions/tasks required in response to the Emergency and are those required to activate their respective Emergency Response Facility (ERF). Specifically, these are the ERO 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). These positions in most cases are required to respond to their respective ERF within 60 minutes of the declaration of an Alert or higher. See Appendix 5, Table 5-1 for the list of On-shift and Minimum Staff positions.

The positions which are considered Full Augmented staff (i.e., non-min staff) are those positions which provide support for the minimum staff in their response to the Emergency. The Full Augmentation positions consist mostly of liaisons, coordinators and additional communicators which help facilitate communication and the emergency response effort over time, but are not directly needed to implement the functions/tasks identified in the Emergency Plan.

ERO staffing tables contained within ~~the station specific Annex~~ this Emergency Plan, outlines ERO positions required to meet minimum staffing ~~and full augmentation~~ of the on-shift complement at an Alert or higher classification, and the major tasks assigned to each position. The full augmentation staffing levels are ~~used as a planning basis to cover a wide range of possible events~~ described in Emergency Preparedness Implementing Procedures (EPIPs). For extended events (one which lasts for more than 24 hours), actual staffing will be established by the Emergency Director based on the event and personnel availability. However, additional staffing or reduced staffing will only occur after discussion concerning the impact on plant operations and emergency response.

In addition to maintaining adequate documentation of the event, responsibilities for each position are as follows:

- a. Station Emergency Response Organization: The Station ERO is the onsite group that is activated during an emergency. It functions under the Station Emergency Director, who is responsible for organizing and coordinating the emergency efforts at and within the immediate vicinity of the station (including carrying out all onsite emergency efforts and the initial offsite environs monitoring efforts necessary to assess plant releases).

The Station ERO consists of station personnel who are involved with emergency response efforts necessary to control the plant during an incident. This organization operates out of the Control Room, the Technical Support Center (TSC) and the Operations Support Center (OSC). Collectively, members of the Station ERO provide for the following activities during an emergency:

- Plant systems operations
- Radiological survey and monitoring (including Environs Monitoring)

- Firefighting
- Rescue operations and First Aid
- Decontamination
- Security of plant and access control
- Repair and damage control
- Personnel protection including Assembly, Accountability and Evacuation
- Communications
- ~~Initial Liaison responsibilities with Federal, state and local authorities~~

When plant conditions warrant entry into the Severe Accident Management Guidelines (SAMGs), the Station Emergency Director or other qualified individual (e.g., Operations Manager) assumes the role of Decision-Maker. ~~The Technical Manager and/or another Other~~ qualified individual(s) assumes the role of Evaluator (at least 2 are required), and the Control Room staff assumes the role of Implementers. Control Room personnel will perform mitigating actions for severe accidents per EOPs prior to TSC activation.

All Station ERO personnel shall have the authority to perform assigned duties in a manner consistent with the objectives of this plan.

1) Shift Manager (Shift Emergency Director) Control Room

A Shift Manager is on duty 24 hours a day and is the Shift Emergency Director in a declared emergency until relieved of this function. While serving in this capacity the Shift Manager is responsible for:

- Activating the ERO (as deemed appropriate or as procedurally required).
- Performing those duties outlined in Section B.5.a.2 for the Station Emergency Director. ~~The responsibilities described for the Station Emergency Director applies to either the Shift Emergency Director or the Station Emergency Director depending on which individual is in Command and Control.~~

The on-duty Shift Manager directs the activities of the operating crew and is responsible for the safe operation of the plant in compliance with the station NRC operating license and the station operating procedures. The Shift Manager, after relinquishing Command and Control, functionally reports to the Operations Manager in the TSC.

The Shift Manager's responsibilities, when not in Command and Control, are described below:

- The authority and responsibility to shutdown the reactor when determined that the safety of the reactor is in jeopardy or when operating parameters exceed any of the reactor protection circuit set-points and automatic shutdown does not occur;
- To ensure a review has been completed to determine the circumstance, cause, and limits under which operations can safely proceed before the reactor is returned to power following a trip or an unscheduled or unexplained power reduction;
- The responsibility to be present at the plant and to provide direction for returning the reactor to power following a trip or an unscheduled or unexplained power reduction;
- The responsibility to adhere to the station Technical Specifications and to review routine operating data to assure safe operation;
- The responsibility to identify applicable EALs and emergency classifications; and
- The responsibility to adhere to plant operating procedures and the requirements for their use. During an emergency, operations personnel may depart from approved procedures where necessary to prevent injury to personnel, including the public, or damage to the facility consistent with the requirements of 10 CFR 50.54(x) and (y).
- Supervise the activities of the Control Room Crew, ~~Operations Communicator and Damage Control Communicator in the Control Room.~~

2) Station Emergency Director TSC

The Station Emergency Director reports to the Corporate Emergency Director and supervises and directs the Station ERO. The Station Emergency Director's responsibilities include organizing and coordinating the onsite emergency efforts. Additionally, the Station Emergency Director has the requisite authority, plant operating experience and qualifications to implement in-plant recovery operations.

a) Station Emergency Director Responsibilities ~~while in Command and Control:~~

- ~~Perform all non-delegable responsibilities as the Emergency Director in Command and Control until relieved by the EOF.~~
- **Activate the Facility**
- Conduct personnel assembly/accountability and evacuation of non-essential personnel at Site Area Emergency, General Emergency or as conditions warrant.

- If the emergency involves a hazardous substance and/or oil discharges, ensure that appropriate notifications and responses have been made.
- Determine if the OSC is to remain activated at the Alert Classification.

~~b) Station Emergency Director Responsibilities while not in Command and Control:~~

- Event classification.
- Emergency exposure controls.
- Protective actions for all onsite personnel.
- Supervision of the Station ERO.
- Inform the Corporate Emergency Director and onsite NRC as to the status of the plant.
- Assist the Corporate Emergency Director in the acquisition of information for the state/local notifications, NRC notifications and offsite agency updates.
- Provide information and recommendations to the Corporate Emergency Director.
- Implement plans, procedures and schedules to meet emergency response objectives as directed by the Corporate Emergency Director.
- Request from the Corporate ERO any additional material, personnel resources or equipment needed to implement response plans and operations.
- Assume the duties and responsibilities of Decision-Maker when a transition to Severe Accident Management Guidelines (SAMGs) is initiated. This responsibility can be delegated to the Operations Manager if qualified.

~~3) TSC Director TSC~~

~~The TSC Director reports to the Station Emergency Director and is responsible for the content of information transmitted from the TSC to other agencies (or facilities) and for documenting information received at the TSC in coordination with the Station Emergency Director. Responsibilities include:~~

- ~~• Verify that qualified individuals are filling Communicator positions in the Control Room, TSC and OSC.~~

- ~~• Supervise the activities of the Logistics Coordinator and state/local Communicator.~~
- ~~• Ensure that communications are established with appropriate parties as directed by the Station Emergency Director.~~
- ~~• Ensure that all required notifications to offsite governmental agencies (state/local and NRC) are timely and accurate.~~
- ~~• Act as the Exelon Nuclear Liaison to any NRC Site Team Representatives.~~
- ~~• Ensure that the NRC Site Team Representatives are directed to their appropriate counterparts.~~
- ~~• Assist the Corporate Emergency Director in the acquisition of information for off-site agency updates.~~
- ~~• Record and relay inquiries to the Station Emergency Director. In addition, record responses to such inquiries prior to transmission.~~
- Assist the Station Emergency Director in maintaining proper records.

4) ENS Communicator CR/TSC/OSC

~~The Communicators are responsible for transmitting/receiving information to and from the TSC, OSC and Control Room. General rResponsibilities assigned to the ENS-all Communicator include:~~

- Establish communications with appropriate parties as directed.
- Transmit information that has been reviewed and/or approved by the responsible Manager or Coordinator.
- Document time, date and information being transmitted or received on appropriate forms.
- Record and relay inquiries and the responses to those inquiries.
- Assist appropriate Managers and Coordinators in maintaining proper records and logs of emergency related activities.
- Gather, record and post appropriate information.

~~a) Specific responsibilities assigned to the State/Local Communicator include:~~

- ~~• Communicate and receive information via the Nuclear Accident Reporting System (NARS) circuit or commercial telephone line with appropriate agencies prior to the EOF accepting Command and Control.~~
- ~~• Monitor NARS communications until released by the TSC Director.~~
- b) ~~Specific responsibilities assigned to the Damage Control Communicator include:~~
 - ~~• Relay requests from the Control Room and TSC for the dispatching of OSC Teams.~~
 - ~~• Apprise the station emergency response facilities of the status of OSC Team activities.~~
- c) ~~Specific responsibilities assigned to the Operations Communicator include:~~
 - ~~• Apprise the TSC and EOF staff of the overall plant condition and significant changes to system and equipment status.~~
 - ~~• Inform the Control Room, TSC, and EOF of significant changes in event status (e.g. changes in classification, command and control, initiation of station assembly, accountability, evacuation, etc.).~~
- d) ~~Specific responsibilities assigned to the TSC Technical Communicator include:~~
 - ~~• Establish and maintain contact with the EOF Technical Advisor.~~
 - ~~• Provide EOF with updates on technical support activities and priorities.~~
- e) ~~Specific responsibilities assigned to the ENS Communicator include:~~
 - Notify the NRC of changes in event classification, ~~prior to the EOF accepting Command and Control~~, and assist ~~the EOF ENS Communicator~~ in completing the NRC Event Notification Worksheet and responding to NRC inquiries.
 - Provide real time updates of significant changes to plant and system status and responses to NRC inquiries.
 - Maintain continuous communications with the NRC, if requested, via the NRC ENS phone or commercial telephone line.

~~f) Specific responsibilities assigned to the HPN Communicator include:~~

- ~~• Maintain continuous communications with the NRC, if requested, via the NRC Health Physics Network (HPN) phone or commercial telephone line.~~
- ~~• Communicate current Health Physics information to NRC representatives, as requested.~~
- ~~• Coordinate the communications of radiological information to the NRC with the EOF HPN Communicator (onsite vs. environmental data).~~

5) Operations Manager

TSC

The Operations Manager reports to the Station Emergency Director. Major functions include determining the extent of station emergencies, initiating corrective actions, and implementing protective actions for onsite personnel. In the event that the Station Emergency Director becomes incapacitated and can no longer fulfill the designated responsibilities, the Operations Manager will normally assume the responsibilities until relieved by another qualified Station Emergency Director. Responsibilities include:

- Coordinate TSC efforts in determining the nature and extent of emergencies pertaining to equipment and plant facilities in support of Control Room actions.
- Initiate immediate corrective actions to limit or contain the emergency invoking the provisions of 10 CFR 50.54(x) if appropriate, and specifically when addressing Severe Accident Management Guidelines (SAMG).
- Recommend equipment operations checks and miscellaneous actions to the Control Room in support of restoration and accident mitigation.
- Approve emergency special procedures, and implement as required under the provisions of 10 CFR 50.54(x).
- Assist ~~the Maintenance Manager~~ in determining the priority assigned to OSC activities.
- Organize and direct medical response efforts for injured personnel.
- Ensure adequate staffing of the Control Room and TSC subordinates.
- Ensure the Shift Manager is informed of OSC staffing utilization and activities.
- Identify steps or procedures that the Operations staff should be utilizing to properly respond to the emergency condition.

- ~~• Assume the duties and responsibilities of an Evaluator when transition to Severe Accident Management Guidelines (SAMG) is initiated and supervise the activities of the SAMG Evaluator Team~~

7) Technical Support Staff TSC

The TSC Technical Support Staff consists of the following minimum staff engineering positions:

- Electrical Engineer
- Mechanical Engineer
- Core/Thermal Hydraulic Engineer - serves as Core Damage Assessment Methodology (CDAM) Evaluator, as applicable.

In addition, station Engineering support will be augmented on an as needed basis to support accident assessment and mitigation activities.

8) ~~Logistics Coordinator~~ ~~TSC~~

~~The Logistics Coordinator reports to the TSC Director and provides administrative services in support of emergency/recovery operations. Responsibilities include:~~

- ~~• Coordinate shift relief and continual staffing of the station.~~
- ~~• Arrange for clerical staff at the TSC, OSC and Control Room.~~
- ~~• Assist the Security Coordinator in coordinating ERO and station activities in support of on-going security contingency, accountability or site/area evacuation efforts.~~
- ~~• Support the processing of special procedures and interim reports during an emergency.~~
- ~~• Ensure that event status and priority logs are being maintained in the TSC.~~
- ~~• Coordinate record keeping efforts at the station.~~
- ~~• Arrange for food, sleeping facilities and other necessary accommodations for onsite emergency workers.~~
- ~~• Arrange for specialized training of Emergency Response personnel as needed.~~

9) Radiation Protection Manager (RPM) TSC

The Radiation Protection Manager reports to the Station Emergency Director ~~and supervises the activities of the Radiation Controls Coordinator and Radiation Controls Engineer~~. The TSC RPM directs a staff in determining the extent and nature of radiological or hazardous material problems onsite. Responsibilities include:

- Accumulate, tabulate and evaluate data on plant conditions such as meteorological and radiological monitoring readings, and other pertinent data.
- Act as the TSC liaison with the appropriate NRC Site Team representative.
- Ensure use of protective clothing, respiratory protection, and access control within the plant as deemed appropriate to control personnel exposures.
- Ensure that appropriate bioassay procedures have been implemented for onsite personnel when a radioactivity incident has occurred.
- Ensure that personnel are decontaminated, if necessary.
- Authorize personnel exposures below 5 Rem TEDE (EPA-400 lower limit).
- Assist the Station Emergency Director in determining if exposures in excess of the 5 Rem TEDE (EPA-400 lower limit) are necessary.
- Advise the Station Emergency Director of situations when the use of KI should be considered.
- ~~Assist the Station Emergency Director in evaluating dose-based PARs (prior to Corporate Emergency Director accepting command and control) and changes in radiological event classification.~~
- Advise the Station Emergency Director and EOF Radiation Protection Manager of changes in radiological release status.
- Assist the Operations Manager in planning rescue operations and provide monitoring services as required, including the transfer of injured and/or contaminated personnel.
- Coordinate with the Security Coordinator to determine the routes to be used for evacuation of non-essential personnel.
- Assure additional radiation protection personnel and/or equipment is arranged for, as necessary.

~~10) Radiation Controls Engineer (RCE) TSC~~

~~The Radiation Controls Engineer reports to the Radiation Protection Manager and coordinates the radiological and chemistry interface between the technical support engineering efforts. Responsibilities include:~~

- ~~• Monitor area and process radiation monitors to identify trends and potential hazards within the station.~~
- ~~• Evaluate plant environmental factors regarding radiological and other hazardous material conditions.~~
- ~~• Evaluate radiological and hazardous material surveys and chemistry sample results as appropriate.~~
- ~~• Direct the performance of sampling activities through coordination with the OSC Chemistry Lead in support of operations and core damage estimates as necessary.~~
- ~~• Coordinate radiological and chemistry information with the Core/Thermal Hydraulic Engineer in support of core damage assessment.~~

~~11) Radiation Controls Coordinator (RCC) TSC~~

~~The Radiation Controls Coordinator reports to the Radiation Protection Manager. The RCC coordinates site and in-plant Radiation Protection response activities through the OSC Radiation Protection Lead. Responsibilities include:~~

- ~~• Support the OSC Radiation Protection Lead in the dispatching of OSC Teams.~~
- ~~• Assist the Operations Manager in planning radiological controls for personnel dispatched from the Control Room.~~
- ~~• Ensure the proper use of protective clothing, respiratory protection, and access controls in the plant as appropriate to control personnel exposure.~~
- ~~• Monitor habitability concerns impacting access to plant and site areas.~~
- ~~• In coordination with the OSC Radiation Protection Lead, assemble and dispatch the Field Monitoring Teams as required.~~
- ~~• Supervise the activities of the HPN Communicator in the TSC.~~
- ~~• Request additional Radiation Protection personnel and/or equipment, as necessary in support of station activities and staff relief.~~

- ~~Prior to EOF Protective Measures Group staffing:~~
 - ~~Perform dose assessments and provide appropriate dose based PARs.~~
 - ~~Coordinate Field Monitoring Team activities.~~
 - ~~Monitor meteorological conditions and remain cognizant of forecast data.~~
- ~~Following EOF Protective Measures Group staffing:~~
 - ~~Transfer control of the Field Monitoring Teams to the EOF Environmental Coordinator when appropriate.~~
 - ~~Transfer responsibility of dose assessment activities to the EOF Dose Assessment Coordinator.~~
 - ~~Assist the EOF Environmental Coordinator in the acquisition of information for the off-site agency updates.~~

~~12) Maintenance Manager~~ ~~TSG~~

~~The Maintenance Manager reports to the Station Emergency Director and directs a staff in providing labor, tools, protective equipment and parts needed for emergency repair, damage control and recovery efforts to place the plant in a safe condition or return the plant to its pre-accident status. Responsibilities include:~~

- ~~Direct the total onsite maintenance and equipment restoration effort.~~
- ~~Request additional equipment in order to expedite recovery and restoration.~~
- ~~Supervise the activities of the OSC Director and the TSG Damage Control Communicator.~~
- ~~Ensure the Operations Manager is informed of OSC staffing utilization and activities.~~
- ~~In coordination with the Operations Manager, determine the priority assigned to OSC activities.~~
- ~~Ensure adequate staffing of the OSC.~~
- ~~Assist in rescue operations.~~
- ~~Identify required procedures that need to be written or implemented in support of the response efforts.~~

13) Security Coordinator TSC

The Security Coordinator reports to the Station Emergency Director and maintains plant security and personnel accountability at the nuclear station. Responsibilities include:

- Maintain plant security and account for all personnel within the protected area.
- Assist the Station Emergency Director in evaluating changes in security related threats and event classifications.
- Identify any non-routine security procedures and/or contingencies that are in effect or that require a response.
- Expedite ingress and egress of emergency response personnel.
- Coordinate with the Radiation Protection Manager in controlling ingress and egress to and from the Protected Area if radiological concerns are present.
- Provide for access control to the Control Room, TSC and OSC, as appropriate.
- Expedite entry into the Protected Area, as necessary, for the NRC Site Team.
- Act as the TSC liaison with the appropriate NRC Site Team representative.
- Assist the Radiation Protection Manager in determining personnel evacuation routes as necessary.
- Coordinate the evacuation of station non-essential personnel with the appropriate Local Law Enforcement Agencies (LLEAs).

14) Operations Support Center Director OSC

The OSC Director reports to the ~~Maintenance Manager~~ Emergency Director and supervises the activities of OSC personnel. Responsibilities include:

- Assign tasks to designated Leads as available:
 - ~~Operations~~ I&C Maintenance
 - Mechanical Maintenance
 - Electrical/~~H&G~~ Maintenance
 - Radiation Protection

- Chemistry

- Coordinate with ~~the OSC~~ Operations Lead in the dispatch of Operations personnel to support Control Room and OSC Team activities.
- Notify the Control Room and TSC prior to dispatch of any OSC teams into the plant.
- Maintain OSC resources including personnel, material, and equipment.
- Maintain accountability for all individuals dispatched from the OSC.
- Conduct periodic briefings on the overall plant status, emergency response activities, and station priorities.
- Assemble and dispatch the Field Monitoring Teams as required.

15) ~~Assistant Operations Support Center Director~~ _____ ~~OSC~~

~~The Assistant OSC Director reports to the OSC Director and supports the OSC Director in supervising the activities of personnel reporting to the OSC. The Assistant OSC Director may be filled by an OSC Lead, normally the Radiation Protection Lead. Responsibilities include:~~

- ~~• Assist the OSC Director in supervising personnel assigned to the OSC.~~
- ~~• Assist in formation of Field Monitoring Teams as directed by the TSC.~~
- ~~• Assist in formation of sampling teams.~~
- ~~• Ensure that records of in-plant survey information and radiochemistry results are maintained.~~
- ~~• Ensure that accumulated exposure records for all essential onsite personnel are maintained.~~
- ~~• Coordinate with the OSC Leads to organize in-plant teams to support station priorities.~~
- ~~• Ensure that in-plant team dispatch briefings include expected activities and radiological hazards.~~
- Ensure that periodic facility briefings are conducted on plant radiological conditions.

16) OSC Leads _____ OSC

OSC Leads report to the OSC Director and are assigned from the following station departments:

- Mechanical Maintenance
- Electrical Maintenance
- Instrument and Control
- Radiation Protection
- ~~• Chemistry~~
- Operations (on-shift Supervising Operator or designated Operations representative)

The OSC Lead assigned to an OSC team is responsible at all times for the safety of team personnel and to keep the OSC Director apprised of team status. Specifically, the OSC Leads are responsible for the managing and supervising OSC team personnel, including:

- Conduct of adequate pre-dispatch briefings.
- Ensuring adequate protective equipment and measures have been identified.
- Tracking of OSC team activities while dispatched.
- Debriefing of team personnel upon return to the OSC.

b. Corporate Emergency Response Organization

~~1) Nuclear Duty Officer (NDO)~~

~~The NDO is the Exelon Nuclear individual who acts as the initial Corporate contact for declared events. Responsibilities include:~~

~~a) Actions for all classified events:~~

- ~~• Contact the affected station to verify and obtain updated information concerning emergency response actions and event status.~~
- ~~• Notify Exelon Nuclear Executives of event.~~
- ~~• Provide information on the event to State Duty Officers, if requested.~~
- ~~• Notify the on-call Exelon Communications and Public Affairs Representative.~~
- ~~• Prior to EOF activation, review any news releases for accuracy.~~

~~b) Actions for Alert classifications and above:~~

- ~~• Complete all actions as listed above.~~
- ~~Notify American Nuclear Insurers (ANI) prior to being transferred to the EOF.~~

2) Corporate Emergency Director EOF

a) When the Station Emergency Director has Command and Control, the ongoing responsibilities include:

- Coordinate all Exelon Nuclear activities involved with the emergency response.
- Ensure off-site agency updates are periodically communicated as required/requested.
- Coordinate Exelon Nuclear press releases with the Nuclear Duty Officer and Exelon Communications and Public Affairs.
- Request assistance from non-Exelon Nuclear emergency response organizations, as necessary.
- **Direct and coordinate the activation of the EOF.**

b) Following assumption of Command and Control, the additional responsibilities assigned to the Corporate Emergency Director include:

- Assumes overall Command and Control of emergency response activities and the non-delegable responsibilities for PAR determination and the notification of offsite authorities.
- Ensure that Federal, state and local authorities and industry support agencies remain cognizant of the status of the emergency situation. If requested, dispatch informed individuals to offsite governmental Emergency Operation Centers (EOCs).
- Approve the technical content of Exelon Nuclear press releases prior to their being released to the media.

~~3) EOF Director _____ EOF~~

~~The EOF Director reports to the Corporate Emergency Director and has the authority, management ability and technical knowledge to assist the Corporate Emergency Director in the management of Exelon Nuclear's offsite ERO.~~

~~In the event that the Corporate Emergency Director becomes incapacitated, the EOF Director shall assume the responsibilities of the Corporate Emergency Director until a transfer of Command and Control can be effected either back to the station or to another qualified Corporate Emergency Director. Responsibilities include:~~

- ~~• Direct and coordinate the activation and response efforts of the EOF staff in support of the Corporate Emergency Director.~~
- ~~• Evaluate the need to augment the EOF staff based on events in progress.~~
- ~~• Assess the effectiveness of ongoing EOF working relationships.~~
- ~~• Monitor information flow within the EOF to ensure that facility activities remain coordinated.~~
- ~~• Prepare state/local notification forms with the assistance of the EOF Radiation Protection Manager and the Technical Support Manager.~~
- ~~• Coordinate services as necessary to support EOF operations.~~
- ~~• Coordinate with the Administrative Coordinator for continual shift staffing requirements.~~
- ~~• Assist in the conduct of Corporate Emergency Director duties.~~
- ~~• Act as the designated alternate for approval of the technical content of Exelon Nuclear Press Releases and information released to the News Media.~~
- Act as purchasing agent in support of the TSC for contract negotiation/administration.

~~4) Technical Support Manager _____ EOF~~

~~The Technical Support Manager reports to the EOF Director and directs the activities of the Technical Support Group. Responsibilities include:~~

- ~~• Assist the Corporate Emergency Director in monitoring changes in event classification.~~
- ~~• Assist the Corporate Emergency Director in determining plant based PARs when necessary.~~

- ~~• Provide information to the EOF Director for completing the state/local notification form.~~
- ~~• Provide the Corporate Emergency Director information concerning the status of plant operations, and recommendations for mitigating the consequences of the accident.~~
- ~~• Coordinate the overall Exelon Nuclear engineering support from corporate staff and unaffected stations.~~
- ~~• Interface with Industry and contractor engineering support organizations.~~
- ~~• Ensure that the EOF Radiation Protection Manager is informed of changes in plant status that impacts or potentially impacts the offsite environment or PARs.~~
- ~~• Provide technical information on facility and system design.~~
- Assist in the development of post accident recovery measures.

5) Operations Advisor EOF

The Operations Advisor reports to the Technical Support Manager, directs the ENS Communicator, and is responsible for obtaining and analyzing plant status information and ensuring that it is disseminated. Specific responsibilities include:

- ~~• Monitor the Operations Status Line to keep apprised of:
 - ~~— Control Room activities including progress on Emergency Operating Procedures.~~
 - ~~— Significant changes in plant system/equipment status and critical parameters.~~
 - ~~— Possible changes in event classification.~~~~
- ~~• Identify and track critical parameters for the identification and trending of current plant status information.~~
- ~~• Assist the station in identifying Operations resources from corporate staff or unaffected stations for direct support of plant shift operations personnel.~~
- ~~• Assist the ENS Communicator in the completion of the NRC Event Notification Worksheet and in responding to NRC inquiries.~~
- Ensure that the EOF Radiation Protection Manager is informed of changes in plant status that impact or potentially impact the offsite environment or PARs.

~~6) ENS Communicator~~ ~~EOF~~

~~The ENS Communicator reports to the Operations Advisor. Specific responsibilities include:~~

- ~~• Notify the NRC of changes in event classification. Generally, the TSC ENS Communicator focuses on real time plant operations and the EOF ENS Communicator focuses on notifications following changes in event classification and overall changes in event response or status.~~
- ~~• Establish and maintain continuous communications with the NRC, if requested, via the NRC-ENS phone or commercial telephone line.~~
- Coordinate NRC communications with the ENS Communicator in the TSC.

~~7) Technical Advisor~~ ~~EOF~~

~~The Technical Advisor reports to the Technical Support Manager and is responsible for obtaining and analyzing technical support information, accident mitigating activities and priorities and ensuring that it is disseminated. Responsibilities include:~~

- ~~• Monitor the Technical Conference Line to remain aware of TSC technical support activities, strategies and priorities.~~
- ~~• Assist the Dose Assessment Coordinator in acquiring technical information pertaining to release pathway and core damage assessment.~~
- ~~• Supervise the activities of the Events Recorder.~~

~~8) Events Recorder~~ ~~EOF~~

~~The Events Recorder reports to the Technical Advisor. Responsibilities include:~~

- ~~• Gather/record approved information on status boards as requested.~~
- Maintain an event chronology/status log.

9) Radiation Protection Manager ~~EOF~~

The Radiation Protection Manager ~~reports to the EOF Director and~~ directs the activities of the EOF Radiation Protection staff. Specific responsibilities include:

- Recommend changes in event classification and PARs based upon effluent releases or dose projections.
- Assist the ~~EOF Corporate Emergency~~ Director in the evaluation of the significance of an emergency with respect to the public.

- Notify the ~~EOF~~ Corporate Emergency Director of meteorological changes that may impact identification of downwind areas.
- Advise the Corporate Emergency Director of protective actions taken by the station for plant personnel.
- Assist the TSC in the planning and coordination of activities associated with the evacuation of non-essential personnel.
- Advise the Corporate Emergency Director on the need for emergency exposures or for issuance of KI to the Field Monitoring Teams or Exelon personnel required to enter the plume.
- Determine the need for and contact Occupational Health/Industrial Safety Services personnel for assistance.
- Monitor plant radiological conditions and advise the TSC Radiation Protection Manager of any adverse trends or potential release pathways that may impact existing event classification.
- Assist in the completion and review of the state/local notification form.
- Maintain cognizance of environmental sampling activities.
- Ensure state authorities are provided information pertaining to Exelon Field Monitoring Team activities and sample results.
- Assist the affected station in the following areas:
 - Planning and coordination of activities associated with the evacuation of non-essential personnel.
 - Acquisition of additional instrumentation, dosimetry, protective equipment and radiological support personnel.
- Assist and interface with the EOF Technical Support Group and the station in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.
- Upon request, provide in-plant health physics data to Emergency Public Information personnel ~~and the HPN Communicator~~.
- **Coordinate Field Monitoring Team activities.**
- **Determine needs of the Dose Assessment Coordinator and the ENS Communicator for updates on Field Monitoring Team data and ensure distribution of new data to them in accordance with those needs.**

- Promptly report new environmental or Field Monitoring Team exposure data to the Dose Assessment Coordinator.

~~10) Environmental Coordinator _____ EOF~~

~~The Environmental Coordinator reports to the EOF Radiation Protection Manager and directs the Field Team Communicator, Field Monitoring Teams and the State Environs Communicator. Responsibilities include:~~

- ~~• Coordinate the transfer of control of the Field Monitoring Teams if initially under the direction of the TSC Radiological Controls Coordinator.~~
- ~~• Ensure communications are established with the TSC to obtain information on the accident conditions, meteorological conditions and estimates of radioactive material releases.~~
- ~~• Maintain cognizance of Field Monitoring Team exposure. When warranted, ask the Dose Assessment Coordinator to initiate an evaluation of the need for administering KI to Exelon nuclear workers.~~
- ~~• Determine needs of the Dose Assessment Coordinator, the Dose Assessor, the HPN Communicator and the State Environs Communicator(s) for updates on Field Monitoring Team data and ensure distribution of new data to them in accordance with those needs.~~
- ~~• Upon request, provide environmental data to Emergency Public Information personnel.~~
- ~~• Evaluate and coordinate additional equipment and personnel as necessary from unaffected stations to augment and/or relieve station Field Monitoring Teams.~~

~~11) State Environs Communicator _____ EOF~~

~~The State Environs Communicator is staffed as requested by the applicable state agencies. The State Environs Communicator reports to the Environmental Coordinator. Responsibilities include:~~

- ~~• As needed, obtain release and dose assessment data from the Dose Assessment Coordinator and Field Monitoring Team data from the Environmental Coordinator.~~
- ~~• Coordinate activities and information flow between the EOF Protective Measures Group and the affected state(s) environmental authorities, including periodic updates on meteorological conditions, Field Monitoring Team activities and survey/sample results.~~
- ~~• Ensure that the Environmental Coordinator is aware of state environmental activities and sample results.~~

~~12) Field Team Communicator EOF~~

~~The Field Team Communicator reports to the Environmental Coordinator. Responsibilities include:~~

- ~~• Establish and maintain contact with the dispatched Field Monitoring Teams.~~
- ~~• Document the Environmental Coordinator's instructions and then relay this information to the Field Monitoring Teams.~~
- ~~• Document environmental data reported by the Field Monitoring Teams.~~
- ~~• Periodically obtain and document information on Field Monitoring Team radiological exposure.~~
- ~~• Promptly report new environmental or Field Monitoring Team exposure data to the Environmental Coordinator.~~
- ~~• Document questions and answers directed to and received from the Field Monitoring Teams. Ensure the Environmental Coordinator is cognizant of these information requests and relay replies to these requests.~~

13) Dose Assessment Coordinator EOF

The Dose Assessment Coordinator reports to the EOF Radiation Protection Manager ~~and directs the activities of the Dose Assessor and the HPN Communicator.~~ Responsibilities include:

- Interpret radiological data and provide PARs based upon dose projections to the EOF Radiation Protection Manager.
- Advise the EOF Radiation Protection Manager of changes in event classification based on effluent releases or dose projections.
- Initiate evaluation of the need for administering KI to Exelon nuclear workers ~~when requested by the Environmental Coordinator.~~
- Remain cognizant of forecast and meteorological data and ensure the status is updated periodically.
- Notify the EOF Radiation Protection Manager of meteorological changes that may impact identification of downwind areas.
- Upon request, provide release and dose assessment data to Emergency Public Information personnel, ~~the HPN Communicator, and the State Environs Communicators.~~

~~14) Dose Assessor _____ EOF~~

~~The Dose Assessor reports to the Dose Assessment Coordinator. Responsibilities include:~~

- ~~• Perform dose projections using the Dose Assessment computer models as directed by the Dose Assessment Coordinator.~~
- ~~• Monitor meteorological and plant effluent conditions.~~
- ~~• Notify the Dose Assessment Coordinator of meteorological changes that may impact identification of downwind areas.~~
- ~~• Evaluate the need for administering KI to Exelon nuclear workers when requested by the Dose Assessment Coordinator.~~
- ~~• Coordinate Field Monitoring Team activities.~~

~~15) HPN Communicator _____ EOF~~

~~The HPN Communicator reports to the Environmental Coordinator. Responsibilities include:~~

- ~~• Provide updates and respond to inquiries from the NRC on offsite environmental data, release status, dose projections and changes to PARs for the general public.~~
- ~~• Obtain release and dose assessment data from the Dose Assessment Coordinator and Field Monitoring Team data from the Environmental Coordinator.~~
- ~~• Maintain continuous communications with the NRC, if requested, via the NRC HPN phone or commercial telephone line.~~
- ~~• Communicate current Health Physics information to NRC representatives, as requested.~~

~~16) Logistics Manager _____ EOF~~

~~The Logistics Manager reports to the EOF Director and directs the activities of the administrative, security and liaison personnel. Responsibilities include:~~

- ~~• Ensure contact is made and communications are maintained with appropriate Non-Exelon Nuclear personnel whose assistance may be required to terminate the emergency conditions and to expedite the recovery.~~
- ~~• Advise the EOF Director concerning the status of activities relating to governmental interfaces.~~

- ~~Obtain support from Human Resources, the Comptroller's Office, the Legal Department, Accounting Department and others as required.~~
- ~~Coordinate with the Nuclear Duty Officer to maintain communications with ANI and INPO.~~
- ~~Ensure that access to the EOF is limited to Emergency Responders and authorize admittance to non-Exelon personnel.~~
- ~~Implement the Exelon Nuclear Fitness for Duty Program.~~
- ~~Ensure that NRC Site Team Representatives are directed to the Regulatory Liaison upon arrival at the EOF.~~
- ~~Ensure that updates and information are provided to the EOC Liaisons and to offsite officials present in the EOF.~~
- ~~Assist in obtaining and coordinating additional equipment/materials and /or technical expertise to support station requests, including Exelon Corporate staff, unaffected stations and vendor/contractors.~~
- ~~Coordinate maintenance of EOF equipment as necessary.~~
- ~~Ensure shift relief and continual staffing for the EOF.~~

17) Administrative Coordinator EOF

The ~~Administrative Coordinator~~ reports to the ~~Logistics Manager~~. Responsibilities include:

- ~~Direct the activities of the Computer Specialist.~~
- ~~Direct the clerical staff and ensure the clerical requirements for the other EOF and JIC staff are met.~~
- ~~Obtain clerical support for the EOF and JIC.~~
- ~~Coordinate shift relief and continual staffing for the EOF.~~
- ~~Obtain services as appropriate to support operation of the EOF.~~

18) Computer Specialist EOF

The Computer Specialist reports to the ~~Administrative Coordinator~~ ~~Emergency Director~~. Responsibilities include:

- Assist any personnel in logging in, initializing or using a desired computer program.

- Investigate and repair problems encountered with communications equipment and computer equipment/applications.

~~19) Security Coordinator _____ EOF~~

~~The Security Coordinator reports to the Logistics Manager. Responsibilities include:~~

- ~~• Provide and interpret information on security events.~~
- ~~• Assist with access control activities at the EOF and JIG.~~
- ~~• Perform the following in support of the TSC Security Coordinator:~~
 - ~~— Provide assistance in resolving security events.~~
 - ~~— Assist as a liaison for local, state and federal law enforcement agencies during security related events.~~
 - ~~— Serve as the primary contact to the security force for additional support, if necessary, during a security event.~~
- ~~• Obtain additional resources to support access control measures needed at the EOF and JIG.~~

20) State/Local Communicator _____ EOF

The State/Local Communicator reports to the ~~Logistics Manager~~Emergency Director. Responsibilities include:

- Communicate and receive information via the Nuclear Accident Reporting System (NARS) circuit or commercial telephone line with appropriate state and county agencies.
- Prepare state/local notification forms with the assistance of the Corporate Emergency Director.
- ~~• Ensure that the Logistics Manager is made aware of issues and questions raised by offsite agencies and then relay the replies to these requests.~~

~~21) EOC Communicator _____ EOF~~

~~The EOC Communicator reports to the Logistics Manager. Responsibilities include:~~

- ~~• Coordinate and dispatch EOC Liaisons as needed or requested.~~
- ~~• Establish and maintain periodic contact with each location where Exelon Nuclear EOC Liaisons have been dispatched.~~
- ~~• Ensure EOC Liaisons are provided event information and notifications.~~

- ~~Ensure that the Logistics Manager is made aware of issues and questions raised by offsite agencies and then relay the replies to these requests.~~

~~22) County EOC Liaison(s) _____ County EOCs~~

~~The County EOC Liaison(s) will be dispatched to County Emergency Operations Centers (EOCs) based on established agreements with the counties. The County EOC Liaisons use the EOC Communicator as their contact at the EOF. Responsibilities include:~~

- ~~Monitor and report County EOC activities to the EOF.~~
- ~~Conduct briefings and answer questions.~~
- ~~Provide simplified explanations to EOC personnel of technical details distributed through approved channels.~~
- ~~Assist with confirmation/verification of information distributed through approved channels.~~
- ~~Provide media at the EOC with approved Exelon Nuclear press releases.~~
- ~~Assist Emergency Public Information personnel in rumor control and media monitoring.~~

~~23) State EOC Liaison(s) _____ State EOCs~~

~~At the request of state officials and/or at the discretion of the Corporate Emergency Director, Exelon Nuclear will provide Liaison personnel to state Emergency Operation Centers (EOCs). The state EOC Liaisons use the EOC Communicator as their contact at the EOF. Responsibilities include:~~

- ~~Monitor and report state EOC activities to the EOF.~~
- ~~Conduct briefings and answer questions as requested.~~
- ~~Assist Emergency Public Information personnel in rumor control and media monitoring.~~

~~24) Regulatory Liaison _____ EOF~~

~~The Regulatory Liaison reports to the Logistics Manager. Responsibilities include:~~

- ~~Coordinate interfaces between Exelon Nuclear personnel and governmental agencies within the EOF.~~
- ~~Obtain necessary equipment and supplies to support activities of governmental agencies located in the EOF.~~
- ~~Act as the Exelon Nuclear Liaison to the NRC Site Team representatives.~~

c. Public Information Emergency Response Organization1) Corporate Spokesperson JIC

The Corporate Spokesperson reports to the Corporate Emergency Director and is responsible for directing the Exelon Emergency Public Information Organization and providing news information to the media. Responsibilities include:

- Maintain command and control of the Joint Information Center.
- Coordinate with Federal, state and local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.
- Conduct periodic briefings with the news media.
- Interface with the Public Information Director.
- Coordinate and direct responses to media inquiries.
- Ensure that the composition and timeliness of Exelon News Releases are adequate.
- Provide for timely exchange of information between other spokespersons.

~~2) Technical Spokesperson JIC~~

~~The Technical Spokesperson reports to the Corporate Spokesperson. Responsibilities include:~~

- ~~• Assist in development of technical and plant status information for use in news releases and media briefings.~~
- ~~• Assist the Events Recorder in the preparation of a chronological event description log.~~
- ~~• Prepare briefing papers which contain additional detail and background not found in the news releases.~~
- ~~• Provide answers as soon as possible to media questions.~~
- ~~• Provide a follow-up explanation that corrects misinformation as soon as practicable.~~

~~3) Radiation Protection Spokesperson JIC~~

~~The Radiation Protection Spokesperson reports to the Corporate Spokesperson. Responsibilities include.~~

- ~~• Assist in development of environmental and health physics information for use in news releases and media briefings.~~
- ~~• Assist the Events Recorder in the preparation of a chronological event description log.~~
- ~~• Prepare briefing papers which contain additional detail and background not found in the news releases.~~
- ~~• Provide answers as soon as possible to media questions.~~
- ~~• Provide a follow-up explanation that corrects misinformation as soon as practicable.~~

4) JIC Director JIC

The JIC Director reports the Corporate Spokesperson to ensure the operability of and to supervise the activities in the JIC. Responsibilities include:

- Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.
- Coordinate with Federal, state and local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.
- Participate, as needed, in rumor control activities.
- Ensure that adequate information flow between the EOF and the JIC is coordinated through the Public Information Director.
- Authorize admittance of non-Exelon Nuclear officials to the JIC.
- ~~• Until the JIC is fully staffed, work with Corporate Communications to compose draft news releases.~~
- ~~• Provide the drafted news releases to the Corporate Emergency Director for technical review prior to Public Information Director approval.~~
- ~~• Until the JIC is fully staffed, work with Corporate Communications to ensure that rumors are reviewed, documented and responded to by Exelon Nuclear personnel as deemed appropriate.~~
- ~~• Until the JIC is fully staffed, work with Corporate Communications to document and respond to rumors as quickly as possible, through the Exelon Communications and Public Affairs.~~

- Until the JIC is fully staffed, work with Corporate Communications to ensure that the media is being monitored and that Exelon Nuclear personnel review the information detailed or contained in media releases.

5) ~~JIC Coordinator~~ ~~JIC~~

~~The JIC Coordinator reports to the JIC Director and supervises the facilities support staff. Responsibilities include:~~

- ~~• Ensure the JIC is activated and operational. This includes the availability of communications and visual aids.~~
- ~~• Ensure that access to the JIC areas occupied by Exelon personnel is controlled.~~
- ~~• Establish a minimum frequency for addressing news media/public representatives and ensure that some form of communication occurs within that time frame (i.e., an update at least hourly.)~~
- ~~• Ensure that approved News Releases and Chronological Event Description Logs are made available in the JIC.~~
- ~~• Document unanswered questions and serious public misinformation issues. Follow up on these questions and issues to ensure that they are being adequately addressed.~~
- Coordinate the interface between Exelon Nuclear and the news media/public, including, as necessary, briefings, news conferences, interviews and responses to information requests.

7) ~~Administrative Coordinator~~ ~~JIC~~

~~The Administrative Coordinator reports to the JIC Director. Responsibilities include:~~

- ~~• Coordinate with the EOF Administrative Coordinator to ensure the clerical requirements for the other JIC staff are met.~~
- ~~• Coordinate shift relief and continual staffing for the JIC.~~
- ~~• Obtain services as appropriate to support operation of the JIC.~~

~~8) Access Controller JIC~~

~~The Access Controller reports to the JIC Director and is responsible for controlling facility access and obtaining authorization prior to admitting non-Exelon Nuclear officials into the JIC.~~

9) Public Information Director (PID) JIC

When the Emergency Public Information Organization is activated, the Public Information Director reports to the Corporate Spokesperson and is responsible for all emergency event related information intended to be conveyed from Exelon Nuclear to the news media/public. ~~The Public Information Director may perform this function at remote locations. The Public Information Director supervises the activities of the, News Writer, Events Recorder and media monitoring and rumor control personnel.~~ Responsibilities include:

- Provide the Corporate Emergency Director with an overview of the public and media impacts resulting from the Exelon Nuclear and governmental activities.
- Participate with the Corporate Emergency Director regarding information to be released to the public.
- Authorize the issuance of news releases.
- Interface with the Corporate Spokesperson at the JIC.
- Act as a liaison between the ERO and Exelon Nuclear's corporate executives.
- Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.
- Coordinate information flow between the EOF and the JIC.
- ~~Coordinate with the Media Monitoring Staff to r~~Review and access media coverage of the emergency event.

~~10) News Writer JIC~~

~~The News Writer reports to the Public Information Director. Responsibilities include:~~

- ~~Compose draft news releases with assistance from the Technical Spokesperson and the Radiation Protection Spokesperson.~~
- ~~Provide the drafted news releases to the Corporate Emergency Director for technical review prior to Public Information Director approval.~~

~~11) Events Recorder _____ JIC~~

~~The Events Recorder reports to the Public Information Director. Responsibilities include:~~

- ~~• Develop a chronological event description log.~~

~~12) Media Monitoring Staff _____ JIC~~

~~The Media Monitor reports to the Public Information Director. Responsibilities include:~~

- ~~• Ensure that the media is being monitored and that Exelon Nuclear personnel review the information detailed or contained in media releases.~~
- ~~• Inform the Public Information Director of all media reports and of actions taken to correct any misinformation or rumors.~~
- ~~• Direct the activities of the Rumor Control Staff with respect to the function of monitoring rumors from sources other than the media.~~

~~13) Rumor Control Staff _____ JIC~~

~~The Rumor Control Staff reports to the Public Information Director and acts in support of the Media Monitors. Responsibilities include:~~

- ~~• Ensure that rumors are reviewed, documented and responded to by Exelon Nuclear personnel as deemed appropriate.~~
- ~~• Until the JIC is fully activated, document and respond to rumors as quickly as possible, through the Exelon Communications and Public Affairs.~~
- ~~• Inform the Media Monitors when rumors representing serious misinformation are encountered.~~

6. Exelon Emergency Response Organization Block Diagram

ERO staffing tables contained ~~within the station specific Annexin Appendix 5~~, lists the key positions of the ERO ~~and the supporting positions assigned to interface with federal, state, and county authorities~~. Figures B-1a through B-1d illustrates the overall emergency response organization. Section B.5 discusses specific responsibilities and the interrelationships for key positions.

7. Exelon Corporate Emergency Response Organization

The Corporate ERO consists of the EOF Organization and the Emergency Public Information Organization. Personnel staffing these corporate organizations are covered in detail in Section B.5 of this plan.

The Corporate Emergency Response Organization is staffed by Exelon personnel, and operates out of the Emergency Operations Facility (EOF) and the Joint Information Center (JIC). The Corporate ERO is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, the Corporate ERO has long term liaison responsibilities with federal, state, and local authorities. **These positions are further described in the EPIPs.**

The Emergency News Center (ENC) function is responsible for the collection and analysis of event information and status, and development of Company news statements. This information is then communicated to the JIC **Corporate Spokespersons**. The ENC function may be located at either the EOF or the JIC.

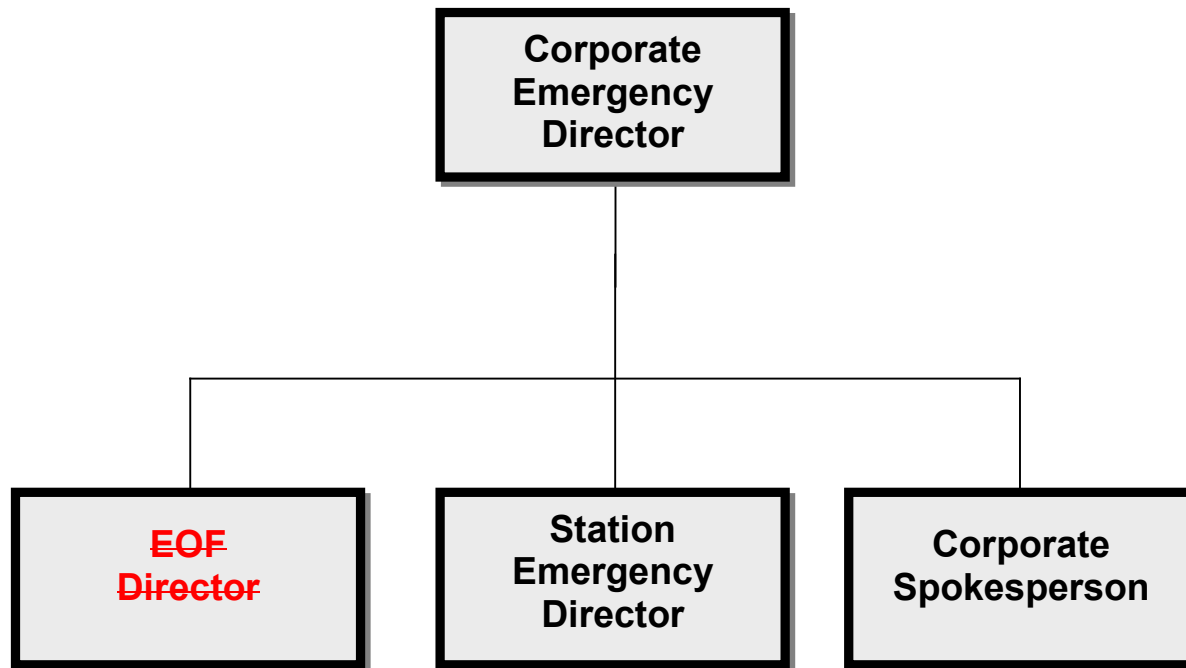
The ~~Corporate ERO EOF~~ is activated at an Alert. The EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. Within the EOF, the Corporate Emergency Director shall assume Command and Control from the ~~Station Shift~~ Emergency Director when classification escalates to an Alert or higher, unless the EOF capabilities are limited such that the overall control and responsibility for PARs and offsite notifications cannot be assumed. ~~The EOF may also function in a supporting role to the station when the Station Emergency Director maintains Command and Control.~~ The JIC is activated within 90 minutes of an Alert or higher. Some JIC functions may continue to be performed by the Exelon Communications organization until transferred to the JIC.

8. Industry/Private Support Organizations

Exelon Nuclear retains contractors to provide supporting services to nuclear generating stations. A contract/purchase order with a private contractor is acceptable in lieu of an agreement letter for the specified duration of the contract. Among services currently provided are the following:

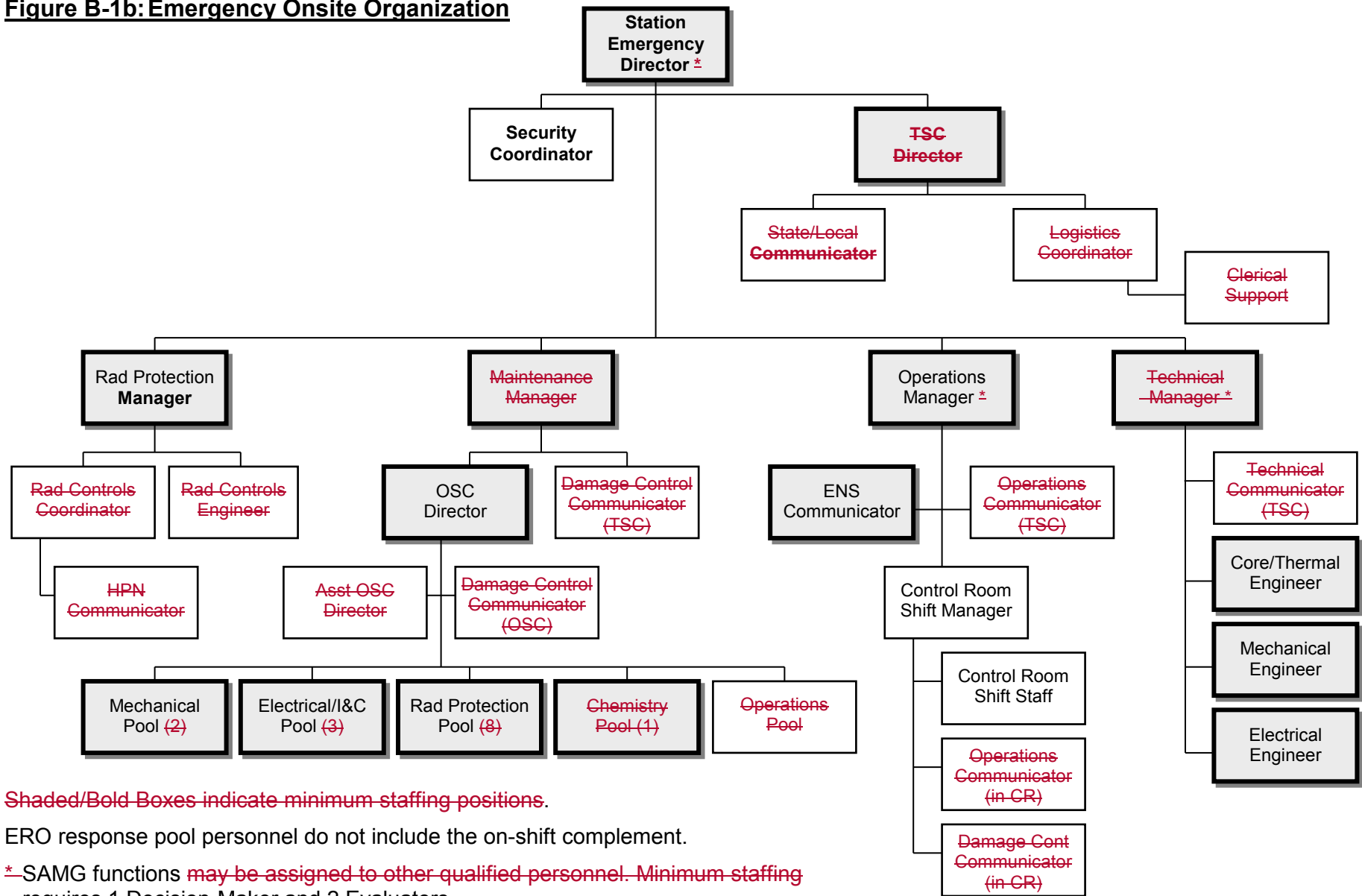
- a. Institute of Nuclear Power Operations (INPO): Experience has shown that a utility may need resources beyond in-house capabilities for the recovery from a nuclear plant emergency. One of the roles of the Institute of Nuclear Power Operations (INPO) is to assist affected utilities by quickly applying the resources of the nuclear industry to meet the needs of an emergency. INPO has an emergency response plan that enables it to provide the following emergency support functions:
 - Assistance to the affected utility in locating sources of emergency personnel, equipment and operational analysis.
 - INPO, Electric Power Research Institute (EPRI) and Nuclear Energy Institute (NEI) maintain a coordination agreement on emergency information with their member utilities.
 - INPO provides the "Nuclear Network", or its replacement, electronic communications system to its members, participants, NEI, and EPRI to coordinate the flow of media and technical information about the emergency.

Figure B-1a: Exelon Overall ERO Command Structure



Shaded/Bold Boxes indicate minimum staffing positions.

Figure B-1b: Emergency Onsite Organization

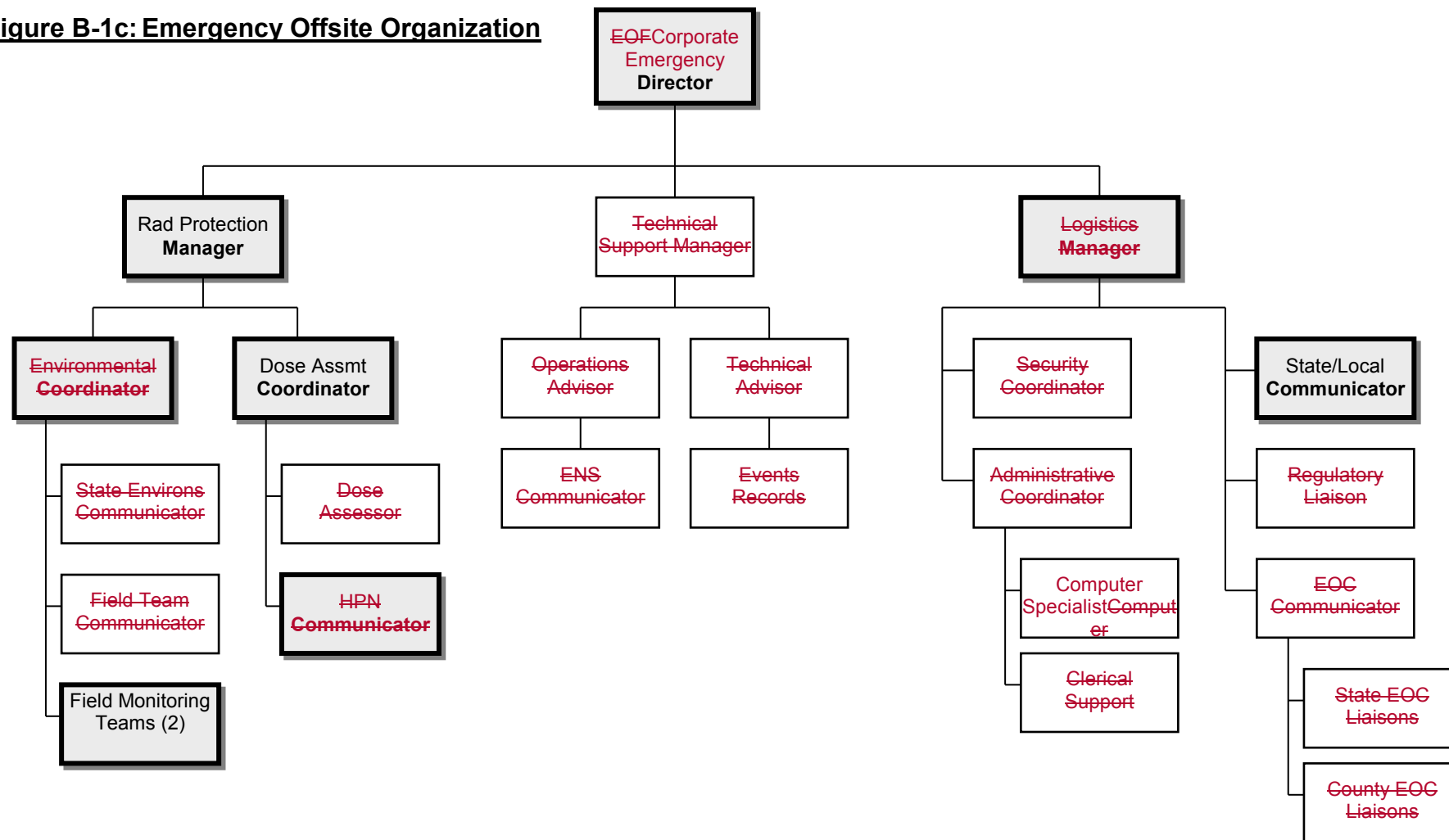


Shaded/Bold Boxes indicate minimum staffing positions.

ERO response pool personnel do not include the on-shift complement.

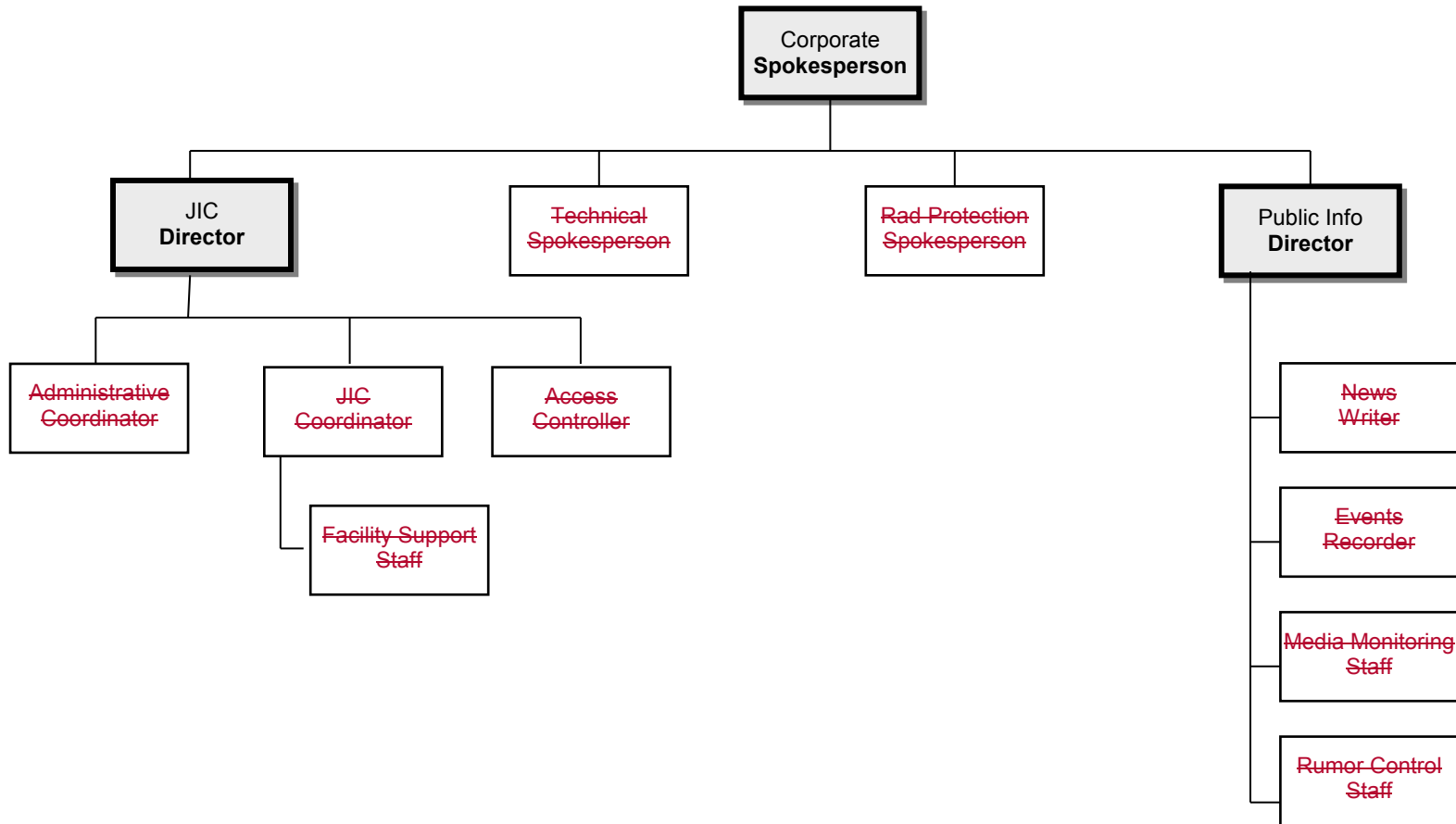
*-SAMG functions may be assigned to other qualified personnel. Minimum staffing requires 1 Decision-Maker and 2 Evaluators.

Figure B-1c: Emergency Offsite Organization



Shaded/Bolded Boxes indicate minimum staffing positions.

Figure B-1d: Emergency Public Information Organization



Shaded/Bolded Boxes indicate minimum staffing positions.

9) Field Monitoring Team (FMT) Communications: A separate communications system has been installed to allow coordinated environmental monitoring and assessment during an emergency. This system consists of the necessary hardware to allow communication between the Control Room, TSC, EOF, and mobile units in Exelon Nuclear vehicles. Though direct communications between the Control Room and the FMTs is not required per the prescribed methods of FMT coordination, the FMTs can be contacted from equipment in the Control Room if required. Commercial cell phones or other means are available as back up to the primary field team communications system.

In addition, station communication links exist to ensure appropriate information transfer capabilities during an emergency. The station may also utilize its Public Address System, station radios and notification devices to augment its emergency communications.

e. ERO Notification System: Exelon Nuclear utilizes an automated ERO Notification System to rapidly notify members of the ERO. The system consists of a network of physical infrastructure capable of initiating and receiving contact via multiple notification devices. When activated, the system contacts the notification devices (e.g., through commercial and cellular phone, email, text message) belonging to members of the ERO. The System includes redundant activation methods via the internet, call-centers, or direct telephone activation, as well as redundant, geographically separated call centers and data centers, with redundant power sources. Implementing procedures specify the course of action to be taken if the primary ERO Notification System activation path fails to respond. The ERO Notification System provides primary and back-up notification functions. For the Exelon North East sites, the ERO notification system description is contained in the Station Annex and EP implementing procedures.

f. NRC Communications (ENS ~~and HPN~~)

Communications with the NRC Operations Center will be performed via the NRC ENS ~~and HPN~~ circuits or commercial telephone line. Information is normally communicated from an approved NRC Event Notification Worksheet prior to establishing an open ENS ~~and/or HPN line~~.

The actual configuration of these systems may vary from station to station. Installation and use of these NRC telephones is under the direction of the NRC (see Figure F-3).

Emergency Notification System (ENS): Dedicated telephone equipment is in place between each nuclear station's Control Room and the NRC, with an extension of that line in the TSC. A separate line is available in the EOF with the capability of being patched with the station through the NRC. This line is used for NRC event notifications and status updates.

~~Health Physics Network (HPN): There also exists a separate dedicated telephone between the NRC, the TSC, and EOF for conveying health physics information to the NRC as requested or as an open line.~~

Figure F-1: Exelon Notification Scheme (For Full Augmentation)

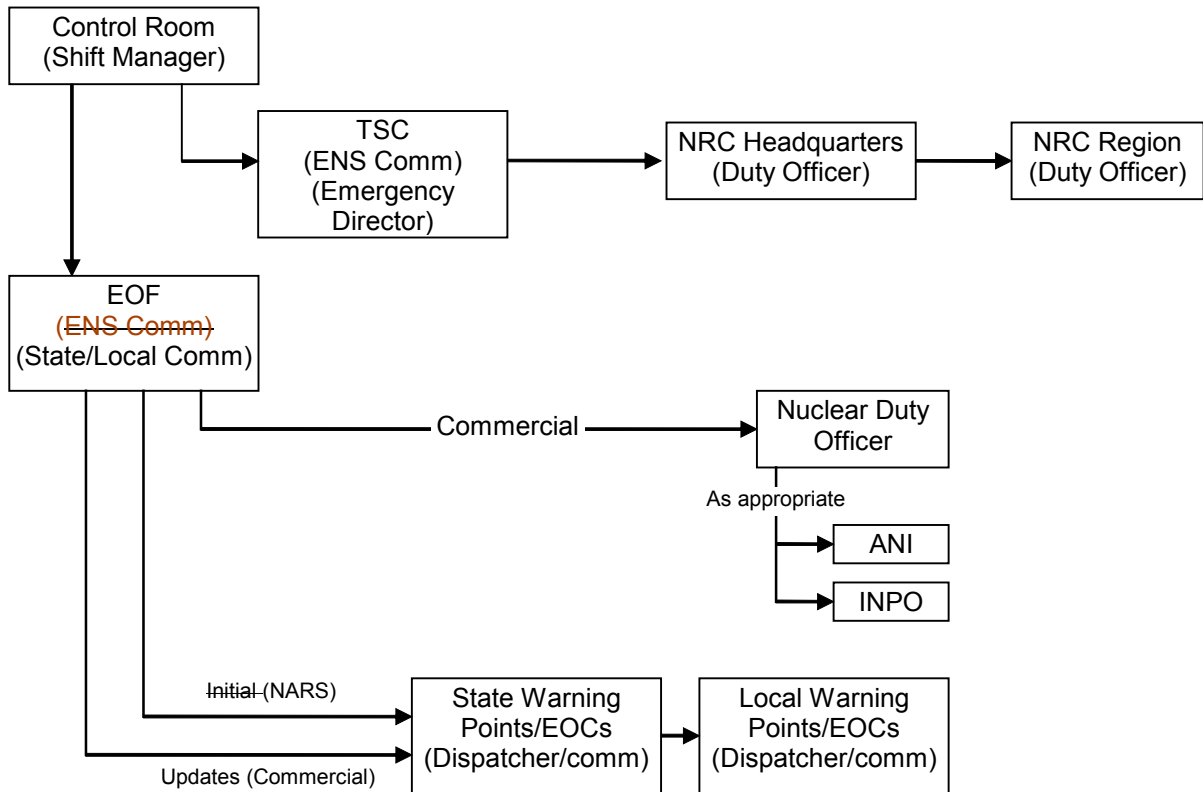
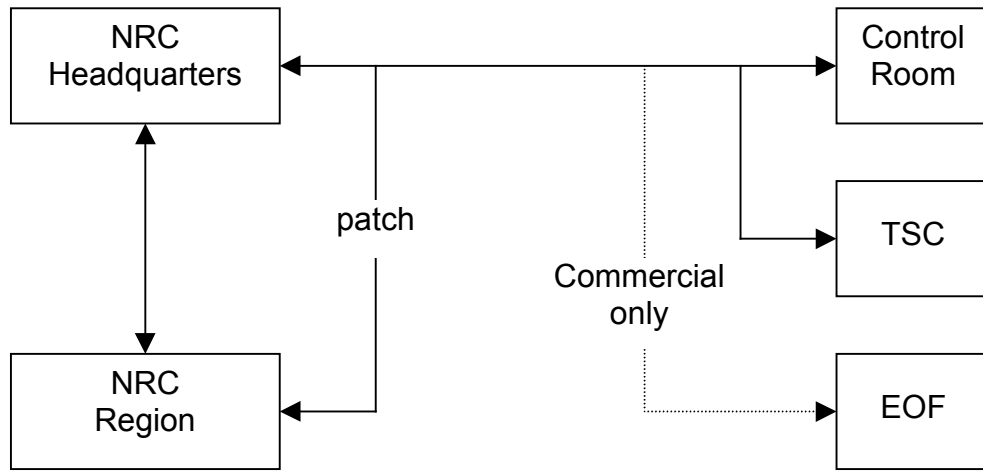


Figure F-3: NRC Communications for Nuclear Response



NOTE: ENS and HPN circuits may use the Federally maintained system, company tie lines or PBX as dedicated primary communications systems and have commercial backups.

The primary purpose of the Emergency Public Information Organization is to disseminate information from Exelon Nuclear's ERO about the emergency events to the public, via the news media. However, the authority for issuance of news releases for the classification of an Unusual Event or prior to ERO activation will always reside with the Exelon Communications and Public Affairs Department. Upon activation, the Emergency Public Information Organization has the responsibility and authority for issuance of news releases to the public.

The Emergency Public Information Organization is comprised of senior managers from Exelon Nuclear who will function as spokespersons, and other Exelon Nuclear individuals including personnel from the Governmental Affairs and Human Relations areas. Exelon Nuclear's spokespersons disseminate information to the news media/public concerning the emergency events out of a Joint Information Center (JIC).

- 2) The Joint Information Center (JIC): The JIC is the facility in which media personnel gather to receive information related to the emergency event. The JIC is the location where approved news releases will be provided to the media for dissemination to the public. News releases are coordinated between the EOF and JIC personnel and state and/or Federal representatives in the JIC. Exelon public information personnel operate from the EOF and the JIC, which is under the direction of the Corporate Spokesperson and functions as the single point contact to interface with Federal, state, and local authorities who are responsible for disseminating information to the public.

Each station has a designated JIC. Each JIC is equipped with appropriate seating, lighting and visual aids to allow for public announcements and briefings to be given to the news media. Additionally, JICs are equipped with commercial telephone lines for making outgoing calls. The Emergency Public Information Organization functions from the JIC and EOF in preparing and releasing utility information about the emergency event. The JIC is activated at the declaration of an Alert or higher classification. **Some JIC personnel may perform functions remotely from alternate locations while remaining in contact with personnel in the JIC facility (e.g., media monitoring, rumor control, news writers, issuance of press releases). The JIC Director and Corporate Spokesperson will ensure communication and coordination of these functions with the EOF and JIC staff.** Functions of the JIC include:

- Serving as the primary location for accumulating accurate and current information regarding the emergency conditions and writing news releases.
- Providing work space and phones for public information personnel from the state, counties, NRC, FEMA, and industry-related organizations.
- Providing telephones for use by the news media personnel.

- Providing responses to media inquiries through ~~Media Monitoring Staff~~ telephones that the media can call for information about an emergency.

b. The news media is not permitted into the EOF during an emergency.

4. Coordination of Public Information

- a. The JIC is staffed by Exelon and government public information representatives who will be the source of public information during an emergency at the station. The Corporate Spokesperson is the primary spokesperson for Exelon Nuclear. The Corporate Spokesperson has direct access to all necessary information (see Section B.5).
- b. The JIC is staffed by federal, state, county, and utility personnel to assure timely, periodic exchange and coordination of information. Representatives coordinate information prior to conducting news briefings.
- c. Rumors or misinformation are identified during an emergency by the ~~media/rumor control monitors~~JIC Staff. They respond to public and news media calls and monitor media reports.
- d. The common MW Region JIC is located west of Chicago, in Warrenville IL, in the Exelon Nuclear Cantera facility. This facility supports the Braidwood, Byron, Clinton, Dresden, LaSalle and Quad Cities stations.

The JIC for the MA Region Three Mile Island, Limerick and Peach Bottom Stations is co-located with the EOF at 175 North Caln Road, Coatesville, Pennsylvania.

The JIC for Calvert Cliffs Station is co-located with the EOF about twelve miles from the site, in Calvert Industrial Park, Skipjack Road at Hallowing Point Road.

The JIC for the Ginna Station is located at 1255 Research Forest, Macedon, NY.

The JIC for the Nine Mile Point Station is located near the Oswego County Airport, on County Route 176 in the Town of Volney, New York approximately 12 miles from the site.

5. Media Orientation

Emergency Preparedness, in conjunction with Exelon Communications and Public Affairs Department, offers training (at least annually) to acquaint news media with the E-Plan, information concerning radiation, and points of contact for release of public information in an emergency. Training is provided for those media agencies that accept the training offer.

Personnel in the TSC shall be protected from radiological hazards, including direct radiation and airborne contaminants under accident conditions with similar radiological habitability as Control Room personnel. To ensure adequate radiological protection, permanent radiation monitoring systems have been installed in the TSC and/or periodic radiation surveys are conducted. These systems indicate radiation dose rates and airborne radioactivity inside the TSC while in use. In addition, protective breathing apparatus (full-face air purifying respirators) and KI are available for use as required.

The TSC has access to a complete set of as-built drawings and other records, including general arrangement diagrams, P&IDs, and the electrical schematics. The TSC has the capability to record and display vital plant data, in real time, to be used by knowledgeable individuals responsible for engineering and management support of reactor operations, and for implementation of emergency procedures.

- c. Operations Support Center (OSC): Each nuclear generating station has established an OSC. The OSC is the onsite location to where station support personnel report during an emergency and from which they will be dispatched for assignments or duties in support of emergency operations. The OSC shall be activated whenever the TSC is activated, but need not remain activated at the Alert level if its use is judged unnecessary by the Station Emergency Director. At the Site Area and General Emergency levels, the OSC or an alternate OSC shall be activated at all times. The OSC is not activated for a HOSTILE ACTION when the Alternative Facility is implemented. Activation for other events is optional. Station disciplines reporting to the OSC include, but are not limited to:
- Operating personnel not assigned to the Control Room,
 - Radiation Protection Personnel,
 - ~~Chemistry Personnel,~~
 - Maintenance Personnel (mechanical, electrical and I&C).

Figure B-1b illustrates the staffing and organization for the OSC.

Each OSC is equipped with communication links to the Control Room, the TSC and the EOF (see Section F). A limited inventory of supplies will be kept for the OSC. This inventory will include respirators, protective clothing, flashlights and portable survey instruments.

2. Emergency Operations Facility (EOF)

The EOF is the location where the Corporate Emergency Director will direct a staff in evaluating and coordinating the overall company activities involved with an emergency. Activation of the EOF is mandatory upon declaration of an Alert or higher classification. The EOF provides for:

- Management of overall emergency response.

3. Emergency Operations Centers

EOCs operated by the state and local communities have been established to perform direction and control of emergency response functions.

The respective state EOCs are capable of continuous (24-hour) operations for a protracted period. These centers contain sufficient communications (radio, telephone and teletype) equipment, maps, emergency plans, and status boards to provide the necessary interfaces with other federal, state, county, and Exelon emergency facilities.

The county EOCs serve as Command and Control headquarters for local emergency response activities as well as a center for the coordination of communications to field units and to the state EOCs. These EOCs have the equipment necessary, (such as facsimile machines, telecommunications equipment, radio gear, photocopiers, wall maps, etc.) to carry out their emergency responsibilities.

4. Activation

NOTE: NUREG-0654 Criterion II.B.5 states that the “licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency”. It further defines that short period as 30 and 60 minutes. The time frames for rapid augmentation of a nuclear power plant staff in the event of an emergency are not rigid inviolate requirements but rather goals. It is Exelon Nuclear’s intent to expend its best efforts to meet the augmentation criteria goals regarding staffing Emergency Response Facilities with sufficiently skilled individuals capable of handling an emergency. Both the NRC and Exelon Nuclear realize that due to diversity of normal residential patterns for the stations’ staff, possible adverse weather conditions, road congestion and site access restrictions, these time frames might be exceeded.

Exelon Nuclear has put into place plans and procedures to ensure timely activation of its emergency response facilities. The Shift Manager (as Shift Emergency Director) will initiate a call-out in accordance with the implementing procedures. The ERO augmentation process identifies individuals who are capable of fulfilling the specific response functions that are listed in ERO staffing tables contained within the station specific Annex. This table was developed based on the functions listed in NUREG-0654, Table B-1.

Although the response time will vary due to factors such as weather and traffic conditions, a goal of 60 minutes for minimum staffing, following the declaration of an Alert or higher emergency classification, has been established for the ERO personnel responding to the station emergency facilities and the EOF. Additionally, plans have been developed to ensure timely functional activation and staffing of the JIC **within 90 minutes of** when the classification of Alert **or higher** is declared.

It is the goal of the organization to be capable of activating the applicable Emergency Response Facility upon achieving minimum staffing. The facility can be declared activated when the following conditions are met:

- a. Minimum staffing has been achieved.
- b. The facility is functional.

~~Although the minimum staffing criteria applies to the JIC, the activation time is not applicable. Public Information personnel must first coordinate the decision to activate the JIC with the appropriate offsite authorities.~~

The Director in charge may elect to activate their facility without meeting minimum staffing; if it has been determined that sufficient personnel are available to fully respond to the specific event (this would not constitute a successful minimum staff response).

5. Monitoring Equipment Onsite

Each nuclear station is equipped with instrumentation for seismic monitoring, radiation monitoring, fire protection and meteorological monitoring. Instrumentation for the detection or analysis of emergency conditions is maintained in accordance with station Technical Specifications, if applicable, or commitments made to the NRC. The actual instrumentation varies somewhat from site to site and thus will not be described in detail in this plan. Descriptions of the equipment will appear in each Station Annex. This equipment includes but is not limited to the following:

a. Geophysical Monitors

- 1) Meteorological Instrumentation: A permanent meteorological monitoring station is located near each station for display and recording of wind speed, wind direction, and ambient and differential temperature for use in making offsite dose projections. Meteorological information is presented in the CR, TSC, and EOF by means of the plant computer system. This information is remotely interrogated using a computer or other data access terminal.

With regard to Exelon Nuclear's meteorological monitoring program, there has been a quality assurance program adopted from 10 CFR 50, Appendix B. However, since the meteorological facilities are not composed of structures, systems, and components that prevent or mitigate the consequences of postulated accidents and are not "safety related," not all aspects of 10 CFR 50, Appendix B, apply. Those aspects of quality assurance germane to supplying good meteorological information for a nuclear power station were adopted into the meteorological quality assurance program. The meteorological program is also subject to the requirements of the QATR, Section 19, Augmented Quality.

Radiation Protection personnel are trained to assess the radiological hazards associated with equipment repair and instruct personnel as to the appropriate protective clothing requirements, respiratory protection requirements, stay times, and other protective actions specific to the conditions present.

At least 50% of personnel from those departments, who are potential responders to the OSC as Damage Control Team members, are required to be qualified in the use of respiratory protection equipment. This includes in-plant supervision and craft/technicians for the following departments:

- Operations
- Radiation Protection
- ~~Chemistry~~
- Maintenance (mechanical, electrical and I&C)

- f. First Aid and Rescue Personnel: First aid and rescue team members receive training as outlined in Part 3 of this section.
- g. Local Support Service Personnel: Local support service personnel providing assistance during an emergency are invited to receive training as outline in Parts 1.a and 1.b of this section.
- h. Medical Support Personnel: Onsite medical personnel receive specialized training in the handling of contaminated victims and hospital interface. Offsite ambulance and hospital personnel are offered annual training in accordance with a program provided by Emergency Preparedness.
- i. Public Information Personnel: Corporate and station personnel responsible for disseminating emergency public information and responding to media and public information requests receive specialized public information training.
- j. Communications Personnel: ERO personnel receive training on communications protocol as a part of the initial Emergency Response Overview Course. Personnel using specialized communications equipment that is not part of their normal daily function receive initial and requalification training on the equipment. Personnel involved in notifications to offsite agencies receive specialized training in the notification process.

5. General, Initial, and Requalification Training Program Maintenance

- a. Station Departments and Emergency Preparedness share the responsibility for ensuring that the ERO receives all necessary training and retraining. In order to carry this out, responsibilities are assigned as follows:

Corporate Responsibilities for Corporate ERO Personnel

- Scheduling and conducting initial, retraining, and make-up classes.

Appendix 5

Table 5-1: Emergency Response Organization (ERO) Staffing and Augmentation Plan

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
<p>Command and Control</p> <ul style="list-style-type: none"> • Provide overall ERO command and control, until relieved. • Approve emergency action level (EAL) and/ or protective action recommendation (PAR) classifications, until relieved. • Authorize personnel dose extensions, until relieved. 	(1) Shift Emergency Director	(1) Station Emergency Director	Not applicable	(1) Corporate Emergency Director
<p>Communications³</p> <ul style="list-style-type: none"> • Communicate EAL and PAR classifications to offsite response organizations (OROs), including the NRC, until relieved. 	Shift Communicator ¹	(1) ENS Communicator (TSC)	Not applicable	(1) State / Local Communicator
<p>Radiation Protection</p> <ul style="list-style-type: none"> • Provide qualified radiation protection coverage for responders accessing potentially unknown radiological environments during emergency conditions. • Provide in-plant surveys. • Control dosimetry and radiologically controlled area access. 	(2) Radiation Protection Personnel	(3) Additional Radiation Protection Personnel [In addition to personnel on-shift] (OSC)	(3) Additional Radiation Protection Personnel [In addition to personnel on-shift and those responding within 60 min.] (OSC)	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
<p>Supervision of Radiation Protection Staff and Site Radiation Protection</p> <ul style="list-style-type: none"> Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs, until relieved. Recommend onsite protective actions and offsite PARs to the applicable decision- maker, until relieved. Direct all radiation protection activities, including field monitoring team (FMT) direction, until relieved. Provide relevant information to applicable communicators who are communicating offsite PARs to OROs, until relieved. 	(1) Shift Emergency Director	(1) TSC Radiation Protection Manager (RPM) (TSC)	Not applicable	(1) EOF Radiation Protection Manager (EOF)
<p>Dose Assessments/ Projections</p> <ul style="list-style-type: none"> Perform dose assessments/projections and provide input to applicable PAR decision- maker, until relieved. 	(1) Shift Dose Assessor ¹	Not applicable	Not applicable	(1) Dose Assessment Coordinator (EOF)

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Emergency Classifications <ul style="list-style-type: none"> Evaluate plant conditions and recommend emergency classifications, until relieved. 	Emergency Classification Advisor ¹	(1) Operations Manager (TSC)	Not applicable	Not applicable
Engineering <ul style="list-style-type: none"> Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved. 	(1) Core/Thermal Hydraulics Engineer - STA ¹ <ul style="list-style-type: none"> Evaluate reactor conditions. 	TSC Engineering Staff <ul style="list-style-type: none"> (1) Electrical/Instrumentation and Control (I&C): Provide engineering coverage for the ERO related to electrical or I&C equipment. (1) Mechanical: Provide engineering coverage for the ERO related to mechanical equipment. (1) Core/Thermal Hydraulics: Evaluate reactor conditions. 	As needed	Not applicable
Security	Security staffing per the site-specific security plan.	(1) Security Coordinator (TSC) <ul style="list-style-type: none"> Coordinate security- related activities and information with the Emergency Coordinator. 	Not applicable	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Repair Team Activities	Not applicable ⁴	Maintenance Personnel (OSC) <ul style="list-style-type: none"> (1) Electrical Maintenance Technician: Provide electrical support for ECCS equipment, event mitigation, and equipment repair. (1) Mechanical Maintenance Technician: Provide mechanical support for ECCS equipment, event mitigation, and equipment repair. 	Maintenance Personnel (OSC) <ul style="list-style-type: none"> (1) I&C Technician: Provide assistance with logic manipulation, support for event mitigation and equipment repair, and support of digital I&C if applicable. Additional I&C staff may be called out if needed. Electrical Maintenance Technicians – As needed. Mechanical Maintenance Technicians – As needed. 	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Supervision of Repair Team Activities	Not applicable	<p>(1) OSC Director</p> <ul style="list-style-type: none"> Supervise OSC activities as directed by Emergency Coordinator. 	<p>OSC Supervisors</p> <ul style="list-style-type: none"> (1) Electrical Maintenance Supervisor /Lead: Supervise OSC activities related to electrical equipment. (1) Mechanical Maintenance Supervisor / Lead: Supervise OSC activities related to mechanical equipment. (1) I&C Supervisor / Lead: Supervise OSC activities related to I&C equipment. May be combined with Electrical Supervisor. (1) Radiation Protection Supervisor / Lead: Supervise OSC activities related to radiation protection. 	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Field Monitoring Teams (FMTs)	Not applicable	<p>Onsite FM Individual</p> <ul style="list-style-type: none"> • (1) Qualified individual to assess the protected area for radiation and contamination and provide input to the TSC RPM. Responsible for radiation protection coverage for the FMT as directed by TSC RPM or EOF RPM. <p>Offsite FMT A</p> <ul style="list-style-type: none"> • (1) Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control of, the EOF DAC or RPM. Responsible for the radiation protection coverage of the FMT as directed by EOF RPM. • (1) Driver to provide transportation. 	<p>Offsite FMT B</p> <ul style="list-style-type: none"> • (1) Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control of, the EOF DAC or RPM. Responsible for the radiation protection coverage of the FMT as directed by EOF RPM. • (1) Driver to provide transportation. 	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF/JIC - Alert or Greater ²
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 90 min.
Media Information <ul style="list-style-type: none"> • Manage and coordinate media information related to the event. 	Not applicable	Not applicable	Not applicable	<ul style="list-style-type: none"> • Corporate Spokesperson • JIC Director • Public Information Director

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF/JIC - Alert or Greater ²
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 90
JIC/EOF Information Technology (IT)	Not applicable	Not applicable	Not applicable	<ul style="list-style-type: none"> (1) EOF/JIC Computer Specialist (@ 90 min from Alert or higher)¹

Notes:

1. 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.
2. Exelon’s Communication Department will perform necessary JIC functions at the Unusual Event declaration and initially upon a higher initial EAL declaration. The JIC facility will be activated within 90 minutes of an Alert declaration; however, some functions may continue to be performed by the Exelon Communications Department. Some JIC functions such as Public Information Director, New Writer, Media Monitor, Rumor Control may be performed remotely by Exelon’s Communication Department.
3. Additional Communications will be staffed at the EOF or TSC if needed.
4. At Clinton, one (1) Repair Team Activity position is filled by a station IMD person. The IMD person is annotated in this table to support performance of specific EOP activities such as lifting leads and installing jumpers. The IMD person is required on shift until such time that operators are trained and qualified to perform these tasks.

Enclosure B

"Clean" Version of Updated Standardized Emergency Plan Pages

EXELON NUCLEAR

STANDARDIZED RADIOLOGICAL EMERGENCY PLAN

Shift Technical Advisor (STA): During normal plant operations, the Senior Reactor Operators report to the Shift Manager and directly supervise the licensed Reactor Operators and all activities in the Control Room. During an abnormal condition, the Shift Manager assumes direct supervision of personnel and all activities in the Control Room while a qualified individual steps back and assumes an overview role as an STA with the specific responsibility of monitoring the maintenance of core cooling and containment integrity. An individual assigned the duty as the STA shall be available to the Control Room at all times.

Radiation Protection: The Station Radiation Protection personnel are responsible for the handling and monitoring of radioactive materials. Included in this organization are Health Physicists, Radiation Protection Supervisors and Technicians.

Security: The Station Security personnel are responsible for the physical security of the site. Included in this organization are Security Supervisors and Security Guards.

2. Authority Over the Emergency Response Organization

The Emergency Director in Command and Control is the designated Exelon Nuclear individual who has overall authority and responsibility, management ability, and technical knowledge for coordinating all emergency response activities at the nuclear power station.

- Control Room: Shift Emergency Director (Shift Manager)
- TSC: Station Emergency Director
- EOF: Corporate Emergency Director

3. Criteria for Assuming Command and Control (Succession)

Emergency personnel assume responsibility for their positions upon receiving notification to activate. The responsibility for initial assessment of and response to an emergency rests with the Shift Manager. The Shift Manager is the Shift Emergency Director and has the Station and Corporate Emergency Director's responsibilities and authority until relieved. The Corporate Emergency Director, once having relieved the Shift Manager of the Emergency Director responsibilities, is responsible for continued assessment of the severity of the emergency and for the necessary functions as described in the E-Plan, the Station Annex, and the emergency implementing procedures.

The Shift Emergency Director is relieved of Command and Control as soon as possible after the declaration of an Alert (or higher classification if Alert not declared). Following the Command and Control turnover, the Corporate Emergency Director shall have overall Command and Control of the Emergency Response. Note that the Station Emergency Director takes responsibility for onsite Non-Delegable Responsibilities including Classification and Emergency Exposure Control. The Corporate Emergency Director takes responsibility for offsite Non-Delegable Responsibilities including Protective Action Recommendations and State/local Notifications. Command and Control does not transfer until the following criteria have been met:

- Adequate staff levels are present in support of the non-delegable responsibilities.
- The staff has been fully briefed as to the status of the event and the currently proposed plan of action.
- A turnover between the Emergency Director relinquishing Command and Control and the Emergency Director assuming Command and Control has been made.

Although Exelon Nuclear's ERO fulfills all regulatory requirements for emergency response, it may be altered by the Emergency Director. This type of alteration will be based upon identified needs within the ERO, event dependent criteria, and identified needs of the company as a whole.

4. Non-Delegable Responsibilities

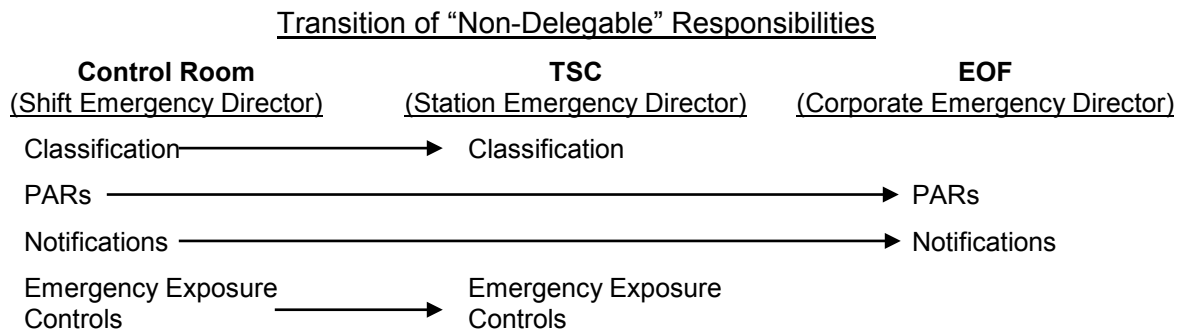
Non-delegable responsibilities include the following functions:

- Event classification.
- Protective Action Recommendations (PARs) for the general public.
- Notification of offsite authorities (approval of state/local and NRC notifications).
- Authorization of emergency exposure controls in excess of 5 Rem TEDE and the issuance of potassium iodide (KI), for Exelon Nuclear emergency workers per EPA-400.

The Shift Manager is responsible for the initial classification of an event and assumes the position as Shift Emergency Director. In this capacity, the Shift Manager has responsibility for performing the non-delegable responsibilities until relieved.

The Shift Emergency Director is relieved of Command and Control as soon as possible after the declaration of an Alert (or higher classification if Alert not declared). Overall Command and Control is transferred to the Corporate Emergency Director.

The Station Emergency Director assumes overall authority and responsibility for Classification and Emergency Exposure Control. The Corporate Emergency Director (EOF) assumes the non-delegable responsibilities for PAR determination and notifications to offsite authorities.



5. Emergency Response Organization Positional Responsibilities

The Emergency Plan designates two types of augmented ERO responders. Those designated as Minimum Staff are those key ERO needed to relieve the on-shift staff of key EP functions/tasks required in response to the Emergency and are those required to activate their respective Emergency Response Facility (ERF). Specifically, these are the ERO 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). These positions in most cases are required to respond to their respective ERF within 60 minutes of the declaration of an Alert or higher. See Appendix 5, Table 5-1 for the list of On-shift and Minimum Staff positions.

The positions which are considered Full Augmented staff (i.e., non-min staff) are those positions which provide support for the minimum staff in their response to the Emergency. The Full Augmentation positions consist mostly of liaisons, coordinators and additional communicators which help facilitate communication and the emergency response effort over time, but are not directly needed to implement the functions/tasks identified in the Emergency Plan.

ERO staffing tables contained within [this Emergency Plan](#), outlines ERO positions required to meet minimum staffing of the on-shift complement at an Alert or higher classification, and the major tasks assigned to each position. The full augmentation staffing levels are [described in Emergency Preparedness Implementing Procedures \(EPIPs\)](#). For extended events (one which lasts for more than 24 hours), actual staffing will be established by the Emergency Director based on the event and personnel availability. However, additional staffing or reduced staffing will only occur after discussion concerning the impact on plant operations and emergency response.

In addition to maintaining adequate documentation of the event, responsibilities for each position are as follows:

- a. Station Emergency Response Organization: The Station ERO is the onsite group that is activated during an emergency. It functions under the Station Emergency Director, who is responsible for organizing and coordinating the emergency efforts at and within the immediate vicinity of the station (including carrying out all onsite emergency efforts and the initial offsite environs monitoring efforts necessary to assess plant releases).

The Station ERO consists of station personnel who are involved with emergency response efforts necessary to control the plant during an incident. This organization operates out of the Control Room, the Technical Support Center (TSC) and the Operations Support Center (OSC). Collectively, members of the Station ERO provide for the following activities during an emergency:

- Plant systems operations
- Radiological survey and monitoring (including Environs Monitoring)
- Firefighting
- Rescue operations and First Aid
- Decontamination
- Security of plant and access control
- Repair and damage control
- Personnel protection including Assembly, Accountability and Evacuation
- Communications

When plant conditions warrant entry into the Severe Accident Management Guidelines (SAMGs), the Station Emergency Director or other qualified individual (e.g., Operations Manager) assumes the role of Decision-Maker. **Other** qualified individual(s) assumes the role of Evaluator (at least 2 are required), and the Control Room staff assumes the role of Implementers. Control Room personnel will perform mitigating actions for severe accidents per EOPs prior to TSC activation.

All Station ERO personnel shall have the authority to perform assigned duties in a manner consistent with the objectives of this plan.

1) Shift Manager (Shift Emergency Director) Control Room

A Shift Manager is on duty 24 hours a day and is the Shift Emergency Director in a declared emergency until relieved of this function. While serving in this capacity the Shift Manager is responsible for:

- Activating the ERO (as deemed appropriate or as procedurally required).

- Performing those duties outlined in Section B.5.a.2 for the Station Emergency Director.

The on-duty Shift Manager directs the activities of the operating crew and is responsible for the safe operation of the plant in compliance with the station NRC operating license and the station operating procedures. The Shift Manager, after relinquishing Command and Control, functionally reports to the Operations Manager in the TSC.

The Shift Manager's responsibilities, when not in Command and Control, are described below:

- The authority and responsibility to shutdown the reactor when determined that the safety of the reactor is in jeopardy or when operating parameters exceed any of the reactor protection circuit set-points and automatic shutdown does not occur;
- To ensure a review has been completed to determine the circumstance, cause, and limits under which operations can safely proceed before the reactor is returned to power following a trip or an unscheduled or unexplained power reduction;
- The responsibility to be present at the plant and to provide direction for returning the reactor to power following a trip or an unscheduled or unexplained power reduction;
- The responsibility to adhere to the station Technical Specifications and to review routine operating data to assure safe operation;
- The responsibility to identify applicable EALs and emergency classifications; and
- The responsibility to adhere to plant operating procedures and the requirements for their use. During an emergency, operations personnel may depart from approved procedures where necessary to prevent injury to personnel, including the public, or damage to the facility consistent with the requirements of 10 CFR 50.54(x) and (y).
- Supervise the activities of the Control Room Crew.

2) Station Emergency Director TSC

The Station Emergency Director reports to the Corporate Emergency Director and supervises and directs the Station ERO. The Station Emergency Director's responsibilities include organizing and coordinating the onsite emergency efforts. Additionally, the Station Emergency Director has the requisite authority, plant operating experience and qualifications to implement in-plant recovery operations.

a) Station Emergency Director Responsibilities

- **Activate the Facility**
- Conduct personnel assembly/accountability and evacuation of non-essential personnel at Site Area Emergency, General Emergency or as conditions warrant.
- If the emergency involves a hazardous substance and/or oil discharges, ensure that appropriate notifications and responses have been made.
- Determine if the OSC is to remain activated at the Alert Classification.
- Event classification.
- Emergency exposure controls.
- Protective actions for all onsite personnel.
- Supervision of the Station ERO.
- Inform the Corporate Emergency Director and onsite NRC as to the status of the plant.
- Assist the Corporate Emergency Director in the acquisition of information for the state/local notifications, NRC notifications and offsite agency updates.
- Provide information and recommendations to the Corporate Emergency Director.
- Implement plans, procedures and schedules to meet emergency response objectives as directed by the Corporate Emergency Director.
- Request from the Corporate ERO any additional material, personnel resources or equipment needed to implement response plans and operations.
- Assume the duties and responsibilities of Decision-Maker when a transition to Severe Accident Management Guidelines (SAMGs) is initiated. This responsibility can be delegated to the Operations Manager if qualified.

3) ENS Communicator TSC

Responsibilities assigned to the ENS Communicator include:

- Establish communications with appropriate parties as directed.
- Transmit information that has been reviewed and/or approved by the responsible Manager or Coordinator.
- Document time, date and information being transmitted or received on appropriate forms.
- Record and relay inquiries and the responses to those inquiries.
- Assist appropriate Managers and Coordinators in maintaining proper records and logs of emergency related activities.
- Gather, record and post appropriate information.
 - Notify the NRC of changes in event classification and assist in completing the NRC Event Notification Worksheet and responding to NRC inquiries.
 - Provide real time updates of significant changes to plant and system status and responses to NRC inquiries.
 - Maintain continuous communications with the NRC, if requested, via the NRC ENS phone or commercial telephone line.

4) Operations Manager TSC

The Operations Manager reports to the Station Emergency Director. Major functions include determining the extent of station emergencies, initiating corrective actions, and implementing protective actions for onsite personnel. In the event that the Station Emergency Director becomes incapacitated and can no longer fulfill the designated responsibilities, the Operations Manager will normally assume the responsibilities until relieved by another qualified Station Emergency Director. Responsibilities include:

- Coordinate TSC efforts in determining the nature and extent of emergencies pertaining to equipment and plant facilities in support of Control Room actions.
- Initiate immediate corrective actions to limit or contain the emergency invoking the provisions of 10 CFR 50.54(x) if appropriate, and specifically when addressing Severe Accident Management Guidelines (SAMG).
- Recommend equipment operations checks and miscellaneous actions to the Control Room in support of restoration and accident mitigation.

- Approve emergency special procedures, and implement as required under the provisions of 10 CFR 50.54(x).
- Assist in determining the priority assigned to OSC activities.
- Organize and direct medical response efforts for injured personnel.
- Ensure adequate staffing of the Control Room and TSC subordinates.
- Ensure the Shift Manager is informed of OSC staffing utilization and activities.
- Identify steps or procedures that the Operations staff should be utilizing to properly respond to the emergency condition.
- Assist the Station Emergency Director in evaluating changes in event classification.
- Supervise the activities of the ENS Communicator in the TSC.
- Act as the TSC liaison with the appropriate NRC Site Team Representative.
- At the direction of the Station Emergency Director, assume the duties and responsibilities of the Evaluator, or Decision-Maker if qualified, when transition to Severe Accident Management Guidelines (SAMG) is initiated.

5) Technical Support Staff TSC

The TSC Technical Support Staff consists of the following minimum staff engineering positions:

- Electrical Engineer
- Mechanical Engineer
- Core/Thermal Hydraulic Engineer - serves as Core Damage Assessment Methodology (CDAM) Evaluator, as applicable.

In addition, station Engineering support will be augmented on an as needed basis to support accident assessment and mitigation activities.

6) Radiation Protection Manager (RPM) TSC

The Radiation Protection Manager reports to the Station Emergency Director. The TSC RPM directs staff in determining the extent and nature of radiological or hazardous material problems onsite. Responsibilities include:

- Accumulate, tabulate and evaluate data on plant conditions such as meteorological and radiological monitoring readings, and other pertinent data.
- Act as the TSC liaison with the appropriate NRC Site Team representative.
- Ensure use of protective clothing, respiratory protection, and access control within the plant as deemed appropriate to control personnel exposures.
- Ensure that appropriate bioassay procedures have been implemented for onsite personnel when a radioactivity incident has occurred.
- Ensure that personnel are decontaminated, if necessary.
- Authorize personnel exposures below 5 Rem TEDE (EPA-400 lower limit).
- Assist the Station Emergency Director in determining if exposures in excess of the 5 Rem TEDE (EPA-400 lower limit) are necessary.
- Advise the Station Emergency Director of situations when the use of KI should be considered.
- Advise the Station Emergency Director and EOF Radiation Protection Manager of changes in radiological release status.
- Assist the Operations Manager in planning rescue operations and provide monitoring services as required, including the transfer of injured and/or contaminated personnel.
- Coordinate with the Security Coordinator to determine the routes to be used for evacuation of non-essential personnel.
- Assure additional radiation protection personnel and/or equipment is arranged for, as necessary.

7) Security Coordinator TSC

The Security Coordinator reports to the Station Emergency Director and maintains plant security and personnel accountability at the nuclear station. Responsibilities include:

- Maintain plant security and account for all personnel within the protected area.
- Assist the Station Emergency Director in evaluating changes in security related threats and event classifications.
- Identify any non-routine security procedures and/or contingencies that are in effect or that require a response.
- Expedite ingress and egress of emergency response personnel.
- Coordinate with the Radiation Protection Manager in controlling ingress and egress to and from the Protected Area if radiological concerns are present.
- Provide for access control to the Control Room, TSC and OSC, as appropriate.
- Expedite entry into the Protected Area, as necessary, for the NRC Site Team.
- Act as the TSC liaison with the appropriate NRC Site Team representative.
- Assist the Radiation Protection Manager in determining personnel evacuation routes as necessary.
- Coordinate the evacuation of station non-essential personnel with the appropriate Local Law Enforcement Agencies (LLEAs).

8) Operations Support Center Director OSC

The OSC Director reports to the **Emergency Director** and supervises the activities of OSC personnel. Responsibilities include:

- Assign tasks to designated Leads as available:
 - **I&C Maintenance**
 - Mechanical Maintenance
 - Electrical Maintenance
 - Radiation Protection
- Coordinate with Operations in the dispatch of Operations personnel to support Control Room and OSC Team activities.
- Notify the Control Room and TSC prior to dispatch of any OSC teams into the plant.

- Maintain OSC resources including personnel, material, and equipment.
- Maintain accountability for all individuals dispatched from the OSC.
- Conduct periodic briefings on the overall plant status, emergency response activities, and station priorities.
- Assemble and dispatch the Field Monitoring Teams as required.

9) OSC Leads OSC

OSC Leads report to the OSC Director and are assigned from the following station departments:

- Mechanical Maintenance
- Electrical Maintenance
- Instrument and Control
- Radiation Protection

The OSC Lead assigned to an OSC team is responsible at all times for the safety of team personnel and to keep the OSC Director apprised of team status. Specifically, the OSC Leads are responsible for the managing and supervising OSC team personnel, including:

- Conduct of adequate pre-dispatch briefings.
- Ensuring adequate protective equipment and measures have been identified.
- Tracking of OSC team activities while dispatched.
- Debriefing of team personnel upon return to the OSC.

b. Corporate Emergency Response Organization

1) Corporate Emergency Director EOF

a) When the Station Emergency Director has Command and Control, the ongoing responsibilities include:

- Coordinate all Exelon Nuclear activities involved with the emergency response.
- Ensure off-site agency updates are periodically communicated as required/requested.
- Coordinate Exelon Nuclear press releases with the Nuclear Duty Officer and Exelon Communications and Public Affairs.

- Request assistance from non-Exelon Nuclear emergency response organizations, as necessary.
 - **Direct and coordinate the activation of the EOF.**
- b) Following assumption of Command and Control, the additional responsibilities assigned to the Corporate Emergency Director include:
- Assumes overall Command and Control of emergency response activities and the non-delegable responsibilities for PAR determination and the notification of offsite authorities.
 - Ensure that Federal, state and local authorities and industry support agencies remain cognizant of the status of the emergency situation. If requested, dispatch informed individuals to offsite governmental Emergency Operation Centers (EOCs).
 - Approve the technical content of Exelon Nuclear press releases prior to their being released to the media.

2) Radiation Protection Manager EOF

The Radiation Protection Manager directs the activities of the EOF Radiation Protection staff. Specific responsibilities include:

- Recommend changes in event classification and PARs based upon effluent releases or dose projections.
- Assist the **Corporate Emergency** Director in the evaluation of the significance of an emergency with respect to the public.
- Notify the **Corporate Emergency** Director of meteorological changes that may impact identification of downwind areas.
- Advise the Corporate Emergency Director of protective actions taken by the station for plant personnel.
- Assist the TSC in the planning and coordination of activities associated with the evacuation of non-essential personnel.
- Advise the Corporate Emergency Director on the need for emergency exposures or for issuance of KI to the Field Monitoring Teams or Exelon personnel required to enter the plume.
- Determine the need for and contact Occupational Health/Industrial Safety Services personnel for assistance.
- Monitor plant radiological conditions and advise the TSC Radiation Protection Manager of any adverse trends or potential release pathways that may impact existing event classification.

- Assist in the completion and review of the state/local notification form.
- Maintain cognizance of environmental sampling activities.
- Ensure state authorities are provided information pertaining to Exelon Field Monitoring Team activities and sample results.
- Assist the affected station in the following areas:
 - Planning and coordination of activities associated with the evacuation of non-essential personnel.
 - Acquisition of additional instrumentation, dosimetry, protective equipment and radiological support personnel.
- Assist and interface with the EOF Technical Support Group and the station in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.
- Upon request, provide in-plant health physics data to Emergency Public Information personnel.
- **Coordinate Field Monitoring Team activities.**
- **Determine needs of the Dose Assessment Coordinator and the ENS Communicator for updates on Field Monitoring Team data and ensure distribution of new data to them in accordance with those needs.**
- **Promptly report new environmental or Field Monitoring Team exposure data to the Dose Assessment Coordinator.**

3) Dose Assessment Coordinator EOF

The Dose Assessment Coordinator reports to the EOF Radiation Protection Manager. Responsibilities include:

- Interpret radiological data and provide PARs based upon dose projections to the EOF Radiation Protection Manager.
- Advise the EOF Radiation Protection Manager of changes in event classification based on effluent releases or dose projections.
- Initiate evaluation of the need for administering KI to Exelon nuclear workers.
- Remain cognizant of forecast and meteorological data and ensure the status is updated periodically.

- Notify the EOF Radiation Protection Manager of meteorological changes that may impact identification of downwind areas.
- Upon request, provide release and dose assessment data to Emergency Public Information personnel, .
- Perform dose projections using the Dose Assessment computer models.
- Monitor meteorological and plant effluent conditions.
- Evaluate the need for administering KI to Exelon nuclear workers.
- **Coordinate Field Monitoring Team activities**

4) Computer Specialist EOF

The Computer Specialist reports to the **Emergency Director**. Responsibilities include:

- Assist any personnel in logging in, initializing or using a desired computer program.
- Investigate and repair problems encountered with communications equipment and computer equipment/applications.

5) State/Local Communicator EOF

The State/Local Communicator reports to the **Emergency Director**. Responsibilities include:

- Communicate and receive information via the Nuclear Accident Reporting System (NARS) circuit or commercial telephone line with appropriate state and county agencies.
- Prepare state/local notification forms with the assistance of the Corporate Emergency Director.

c. Public Information Emergency Response Organization

1) Corporate Spokesperson JIC

The Corporate Spokesperson reports to the Corporate Emergency Director and is responsible for directing the Exelon Emergency Public Information Organization and providing news information to the media. Responsibilities include:

- Maintain command and control of the Joint Information Center.
- Coordinate with Federal, state and local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.

- Conduct periodic briefings with the news media.
- Interface with the Public Information Director.
- Coordinate and direct responses to media inquiries.
- Ensure that the composition and timeliness of Exelon News Releases are adequate.
- Provide for timely exchange of information between other spokespersons.

2) JIC Director JIC

The JIC Director reports the Corporate Spokesperson to ensure the operability of and to supervise the activities in the JIC. Responsibilities include:

- Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.
- Coordinate with Federal, state and local agencies, as well as with other organizations involved in the emergency response, to maintain factual consistency of information to be conveyed to the news media/public.
- Participate, as needed, in rumor control activities.
- Ensure that adequate information flow between the EOF and the JIC is coordinated through the Public Information Director.
- Authorize admittance of non-Exelon Nuclear officials to the JIC.
- Until the JIC is fully staffed, work with Corporate Communications to compose draft news releases.
- Provide the drafted news releases to the Corporate Emergency Director for technical review prior to Public Information Director approval.
- Until the JIC is fully staffed, work with Corporate Communications to ensure that rumors are reviewed, documented and responded to by Exelon Nuclear personnel as deemed appropriate.
- Until the JIC is fully staffed, work with Corporate Communications to document and respond to rumors as quickly as possible, through the Exelon Communications and Public Affairs.
- Until the JIC is fully staffed, work with Corporate Communications to ensure that the media is being monitored and that Exelon Nuclear personnel review the information detailed or contained in media releases.

3) Public Information Director (PID) JIC

When the Emergency Public Information Organization is activated, the Public Information Director reports to the Corporate Spokesperson and is responsible for all emergency event related information intended to be conveyed from Exelon Nuclear to the news media/public. **The Public Information Director may perform this function at remote locations.** Responsibilities include:

- Provide the Corporate Emergency Director with an overview of the public and media impacts resulting from the Exelon Nuclear and governmental activities.
- Participate with the Corporate Emergency Director regarding information to be released to the public.
- Authorize the issuance of news releases.
- Interface with the Corporate Spokesperson at the JIC.
- Act as a liaison between the ERO and Exelon Nuclear's corporate executives.
- Maintain cognizance of conditions of the plant and environment, and the actions of Exelon Nuclear and governmental support personnel.
- Coordinate information flow between the EOF and the JIC.
- **Review and access media coverage of the emergency event.**

6. Exelon Emergency Response Organization Block Diagram

ERO staffing tables contained in **Appendix 5**, lists the key positions of the ERO. Figures B-1a through B-1d illustrates the overall emergency response organization. Section B.5 discusses specific responsibilities and the interrelationships for key positions.

7. Exelon Corporate Emergency Response Organization

The Corporate ERO consists of the EOF Organization and the Emergency Public Information Organization. Personnel staffing these corporate organizations are covered in detail in Section B.5 of this plan.

The Corporate Emergency Response Organization is staffed by Exelon personnel, and operates out of the Emergency Operations Facility (EOF) and the Joint Information Center (JIC). The Corporate ERO is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, the Corporate ERO has long term liaison responsibilities with federal, state, and local authorities. **These positions are further described in the EPIPs.**

The Emergency News Center (ENC) function is responsible for the collection and analysis of event information and status, and development of Company news statements. This information is then communicated to the JIC Corporate Spokesperson. The ENC function may be located at either the EOF or the JIC.

The EOF is activated at an Alert. The EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. Within the EOF, the Corporate Emergency Director shall assume Command and Control from the Shift Emergency Director when classification escalates to an Alert or higher, unless the EOF capabilities are limited such that the overall control and responsibility for PARs and offsite notifications cannot be assumed. **The JIC is activated within 90 minutes of an Alert or higher. Some JIC functions may continue to be performed by the Exelon Communications organization until transferred to the JIC.**

8. Industry/Private Support Organizations

Exelon Nuclear retains contractors to provide supporting services to nuclear generating stations. A contract/purchase order with a private contractor is acceptable in lieu of an agreement letter for the specified duration of the contract. Among services currently provided are the following:

- a. Institute of Nuclear Power Operations (INPO): Experience has shown that a utility may need resources beyond in-house capabilities for the recovery from a nuclear plant emergency. One of the roles of the Institute of Nuclear Power Operations (INPO) is to assist affected utilities by quickly applying the resources of the nuclear industry to meet the needs of an emergency. INPO has an emergency response plan that enables it to provide the following emergency support functions:
 - Assistance to the affected utility in locating sources of emergency personnel, equipment and operational analysis.
 - INPO, Electric Power Research Institute (EPRI) and Nuclear Energy Institute (NEI) maintain a coordination agreement on emergency information with their member utilities.
 - INPO provides the "Nuclear Network", or its replacement, electronic communications system to its members, participants, NEI, and EPRI to coordinate the flow of media and technical information about the emergency.
 - Exelon Nuclear may obtain utility industry information and assistance from any party to this agreement through the coordination of INPO.

To support these functions, INPO maintains the following emergency support capabilities:

- A dedicated emergency call number.

Figure B-1a: Exelon Overall ERO Command Structure

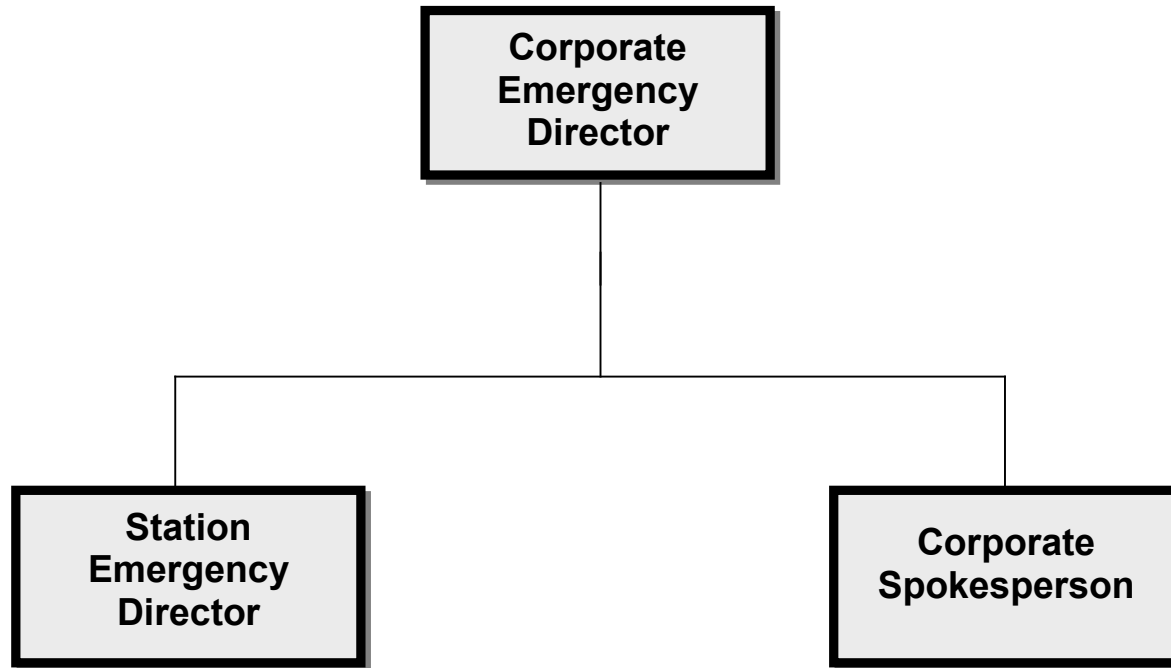
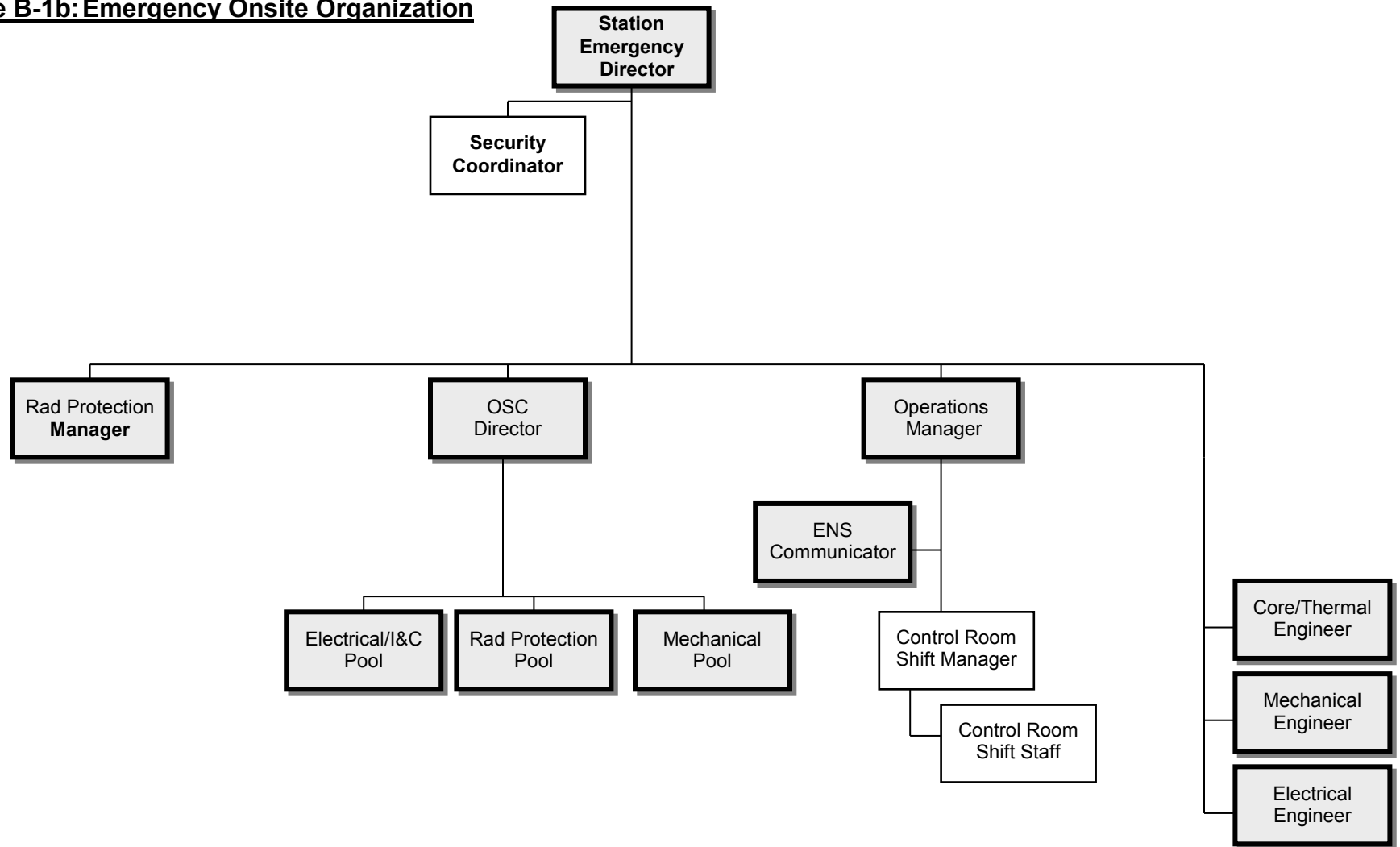


Figure B-1b: Emergency Onsite Organization



ERO response pool personnel do not include the on-shift complement.

SAMG functions requires 1 Decision-Maker and 2 Evaluators.

Figure B-1c: Emergency Offsite Organization

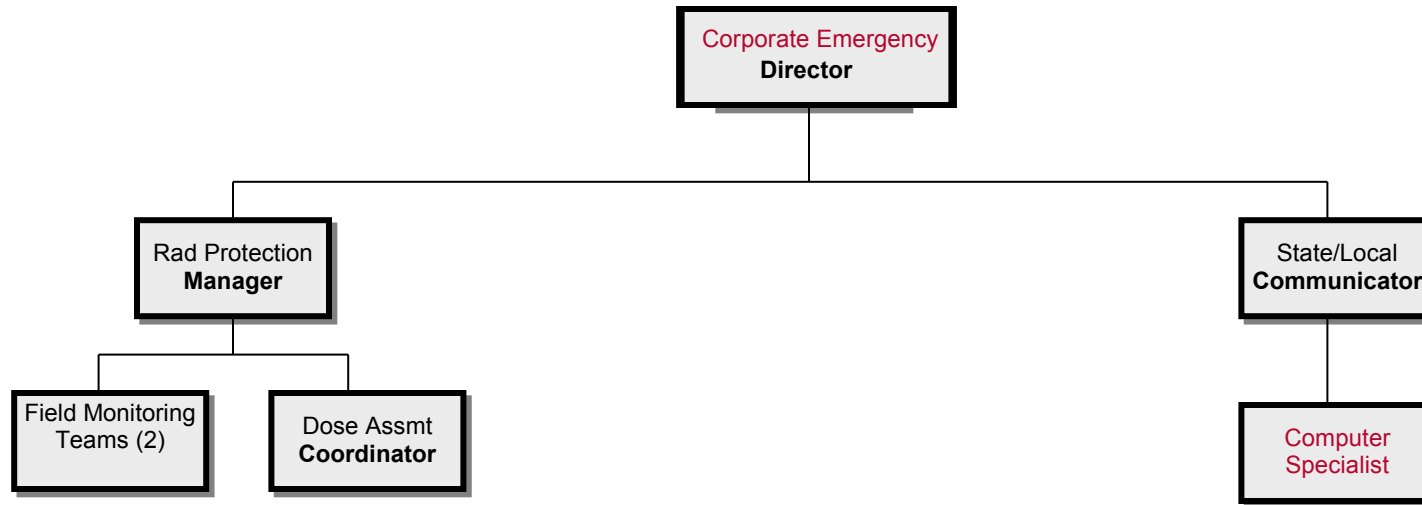
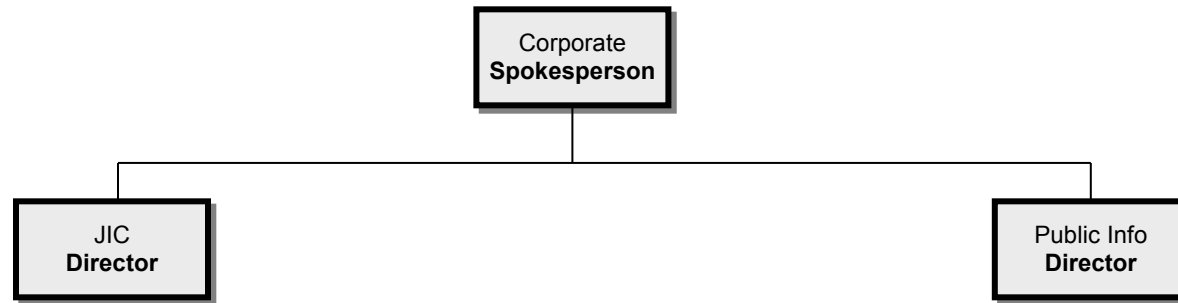


Figure B-1d: Emergency Public Information Organization



9) Field Monitoring Team (FMT) Communications: A separate communications system has been installed to allow coordinated environmental monitoring and assessment during an emergency. This system consists of the necessary hardware to allow communication between the Control Room, TSC, EOF, and mobile units in Exelon Nuclear vehicles. Though direct communications between the Control Room and the FMTs is not required per the prescribed methods of FMT coordination, the FMTs can be contacted from equipment in the Control Room if required. Commercial cell phones or other means are available as back up to the primary field team communications system.

In addition, station communication links exist to ensure appropriate information transfer capabilities during an emergency. The station may also utilize its Public Address System, station radios and notification devices to augment its emergency communications.

e. ERO Notification System: Exelon Nuclear utilizes an automated ERO Notification System to rapidly notify members of the ERO. The system consists of a network of physical infrastructure capable of initiating and receiving contact via multiple notification devices. When activated, the system contacts the notification devices (e.g., through commercial and cellular phone, email, text message) belonging to members of the ERO. The System includes redundant activation methods via the internet, call-centers, or direct telephone activation, as well as redundant, geographically separated call centers and data centers, with redundant power sources. Implementing procedures specify the course of action to be taken if the primary ERO Notification System activation path fails to respond. The ERO Notification System provides primary and back-up notification functions. For the Exelon North East sites, the ERO notification system description is contained in the Station Annex and EP implementing procedures.

f. NRC Communications (ENS)

Communications with the NRC Operations Center will be performed via the NRC ENS circuits or commercial telephone line. Information is normally communicated from an approved NRC Event Notification Worksheet prior to establishing an open ENS.

The actual configuration of these systems may vary from station to station. Installation and use of these NRC telephones is under the direction of the NRC (see Figure F-3).

Emergency Notification System (ENS): Dedicated telephone equipment is in place between each nuclear station's Control Room and the NRC, with an extension of that line in the TSC. A separate line is available in the EOF with the capability of being patched with the station through the NRC. This line is used for NRC event notifications and status updates.

Figure F-1: Exelon Notification Scheme (For Full Augmentation)

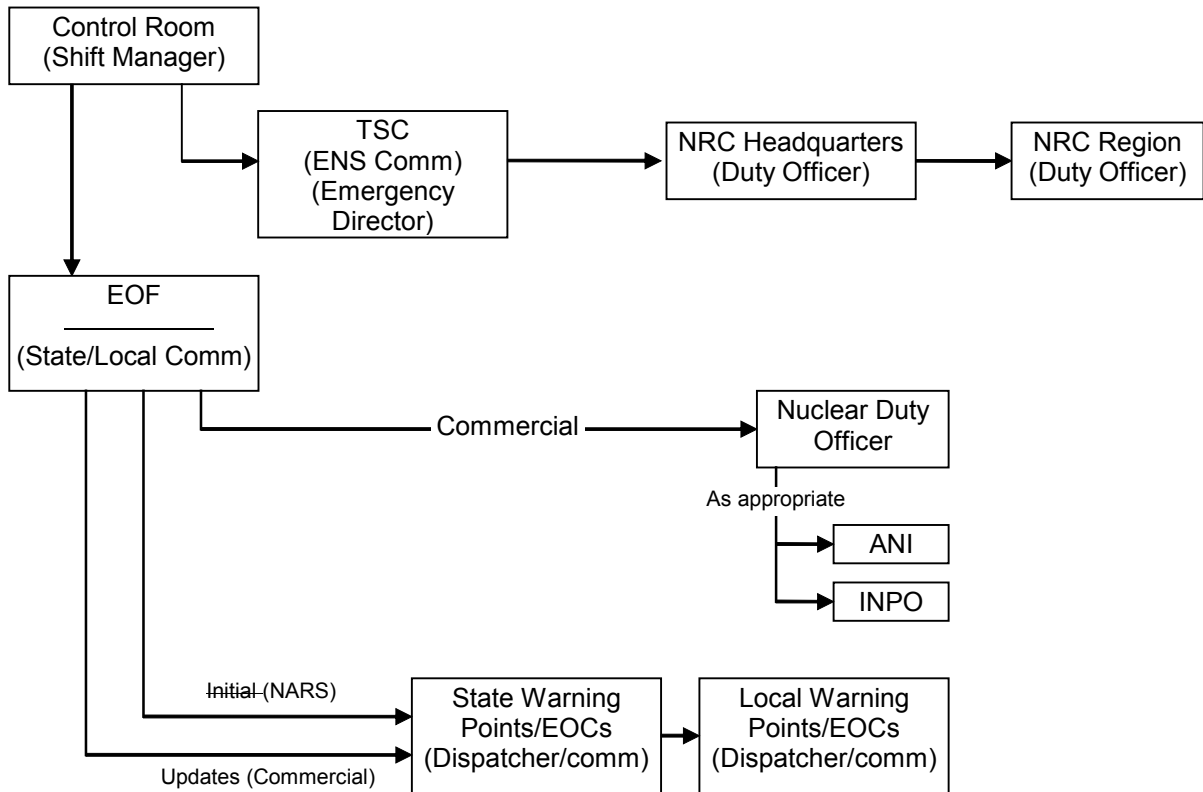
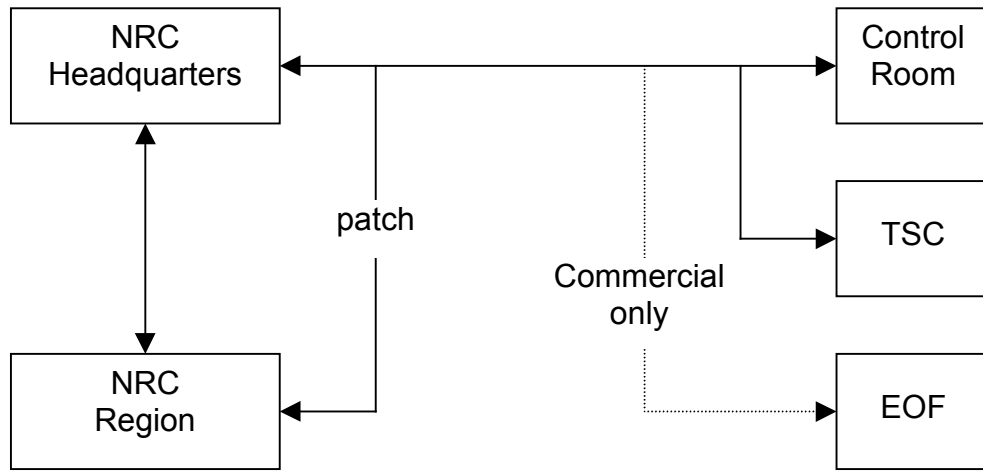


Figure F-3: NRC Communications for Nuclear Response



NOTE: ENS circuits may use the Federally maintained system, company tie lines or PBX as dedicated primary communications systems and have commercial backups.

The primary purpose of the Emergency Public Information Organization is to disseminate information from Exelon Nuclear's ERO about the emergency events to the public, via the news media. However, the authority for issuance of news releases for the classification of an Unusual Event or prior to ERO activation will always reside with the Exelon Communications and Public Affairs Department. Upon activation, the Emergency Public Information Organization has the responsibility and authority for issuance of news releases to the public.

The Emergency Public Information Organization is comprised of senior managers from Exelon Nuclear who will function as spokespersons, and other Exelon Nuclear individuals including personnel from the Governmental Affairs and Human Relations areas. Exelon Nuclear's spokespersons disseminate information to the news media/public concerning the emergency events out of a Joint Information Center (JIC).

- 2) The Joint Information Center (JIC): The JIC is the facility in which media personnel gather to receive information related to the emergency event. The JIC is the location where approved news releases will be provided to the media for dissemination to the public. News releases are coordinated between the EOF and JIC personnel and state and/or Federal representatives in the JIC. Exelon public information personnel operate from the EOF and the JIC, which is under the direction of the Corporate Spokesperson and functions as the single point contact to interface with Federal, state, and local authorities who are responsible for disseminating information to the public.

Each station has a designated JIC. Each JIC is equipped with appropriate seating, lighting and visual aids to allow for public announcements and briefings to be given to the news media. Additionally, JICs are equipped with commercial telephone lines for making outgoing calls. The Emergency Public Information Organization functions from the JIC and EOF in preparing and releasing utility information about the emergency event. The JIC is activated at the declaration of an Alert or higher classification. **Some JIC personnel may perform functions remotely from alternate locations while remaining in contact with personnel in the JIC facility (e.g., media monitoring, rumor control, news writers, issuance of press releases). The JIC Director and Corporate Spokesperson will ensure communication and coordination of these functions with the EOF and JIC staff.** Functions of the JIC include:

- Serving as the primary location for accumulating accurate and current information regarding the emergency conditions and writing news releases.
- Providing work space and phones for public information personnel from the state, counties, NRC, FEMA, and industry-related organizations.
- Providing telephones for use by the news media personnel.

- Providing responses to media inquiries through telephones that the media can call for information about an emergency.

b. The news media is not permitted into the EOF during an emergency.

4. Coordination of Public Information

- a. The JIC is staffed by Exelon and government public information representatives who will be the source of public information during an emergency at the station. The Corporate Spokesperson is the primary spokesperson for Exelon Nuclear. The Corporate Spokesperson has direct access to all necessary information (see Section B.5).
- b. The JIC is staffed by federal, state, county, and utility personnel to assure timely, periodic exchange and coordination of information. Representatives coordinate information prior to conducting news briefings.
- c. Rumors or misinformation are identified during an emergency by the **JIC Staff**. They respond to public and news media calls and monitor media reports.
- d. The common MW Region JIC is located west of Chicago, in Warrenville IL, in the Exelon Nuclear Cantera facility. This facility supports the Braidwood, Byron, Clinton, Dresden, LaSalle and Quad Cities stations.

The JIC for the MA Region Three Mile Island, Limerick and Peach Bottom Stations is co-located with the EOF at 175 North Caln Road, Coatesville, Pennsylvania.

The JIC for Calvert Cliffs Station is co-located with the EOF about twelve miles from the site, in Calvert Industrial Park, Skipjack Road at Hallowing Point Road.

The JIC for the Ginna Station is located at 1255 Research Forest, Macedon, NY.

The JIC for the Nine Mile Point Station is located near the Oswego County Airport, on County Route 176 in the Town of Volney, New York approximately 12 miles from the site.

5. Media Orientation

Emergency Preparedness, in conjunction with Exelon Communications and Public Affairs Department, offers training (at least annually) to acquaint news media with the E-Plan, information concerning radiation, and points of contact for release of public information in an emergency. Training is provided for those media agencies that accept the training offer.

Personnel in the TSC shall be protected from radiological hazards, including direct radiation and airborne contaminants under accident conditions with similar radiological habitability as Control Room personnel. To ensure adequate radiological protection, permanent radiation monitoring systems have been installed in the TSC and/or periodic radiation surveys are conducted. These systems indicate radiation dose rates and airborne radioactivity inside the TSC while in use. In addition, protective breathing apparatus (full-face air purifying respirators) and KI are available for use as required.

The TSC has access to a complete set of as-built drawings and other records, including general arrangement diagrams, P&IDs, and the electrical schematics. The TSC has the capability to record and display vital plant data, in real time, to be used by knowledgeable individuals responsible for engineering and management support of reactor operations, and for implementation of emergency procedures.

- c. Operations Support Center (OSC): Each nuclear generating station has established an OSC. The OSC is the onsite location to where station support personnel report during an emergency and from which they will be dispatched for assignments or duties in support of emergency operations. The OSC shall be activated whenever the TSC is activated, but need not remain activated at the Alert level if its use is judged unnecessary by the Station Emergency Director. At the Site Area and General Emergency levels, the OSC or an alternate OSC shall be activated at all times. The OSC is not activated for a HOSTILE ACTION when the Alternative Facility is implemented. Activation for other events is optional. Station disciplines reporting to the OSC include, but are not limited to:
- Operating personnel not assigned to the Control Room,
 - Radiation Protection Personnel,
 - Maintenance Personnel (mechanical, electrical and I&C).

Figure B-1b illustrates the staffing and organization for the OSC.

Each OSC is equipped with communication links to the Control Room, the TSC and the EOF (see Section F). A limited inventory of supplies will be kept for the OSC. This inventory will include respirators, protective clothing, flashlights and portable survey instruments.

2. Emergency Operations Facility (EOF)

The EOF is the location where the Corporate Emergency Director will direct a staff in evaluating and coordinating the overall company activities involved with an emergency. Activation of the EOF is mandatory upon declaration of an Alert or higher classification. The EOF provides for:

- Management of overall emergency response.
- Coordination of radiological and environmental assessments.

3. Emergency Operations Centers

EOCs operated by the state and local communities have been established to perform direction and control of emergency response functions.

The respective state EOCs are capable of continuous (24-hour) operations for a protracted period. These centers contain sufficient communications (radio, telephone and teletype) equipment, maps, emergency plans, and status boards to provide the necessary interfaces with other federal, state, county, and Exelon emergency facilities.

The county EOCs serve as Command and Control headquarters for local emergency response activities as well as a center for the coordination of communications to field units and to the state EOCs. These EOCs have the equipment necessary, (such as facsimile machines, telecommunications equipment, radio gear, photocopiers, wall maps, etc.) to carry out their emergency responsibilities.

4. Activation

NOTE: NUREG-0654 Criterion II.B.5 states that the “licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency”. It further defines that short period as 30 and 60 minutes. The time frames for rapid augmentation of a nuclear power plant staff in the event of an emergency are not rigid inviolate requirements but rather goals. It is Exelon Nuclear’s intent to expend its best efforts to meet the augmentation criteria goals regarding staffing Emergency Response Facilities with sufficiently skilled individuals capable of handling an emergency. Both the NRC and Exelon Nuclear realize that due to diversity of normal residential patterns for the stations’ staff, possible adverse weather conditions, road congestion and site access restrictions, these time frames might be exceeded.

Exelon Nuclear has put into place plans and procedures to ensure timely activation of its emergency response facilities. The Shift Manager (as Shift Emergency Director) will initiate a call-out in accordance with the implementing procedures. The ERO augmentation process identifies individuals who are capable of fulfilling the specific response functions that are listed in ERO staffing tables contained within the station specific Annex. This table was developed based on the functions listed in NUREG-0654, Table B-1.

Although the response time will vary due to factors such as weather and traffic conditions, a goal of 60 minutes for minimum staffing, following the declaration of an Alert or higher emergency classification, has been established for the ERO personnel responding to the station emergency facilities and the EOF. Additionally, plans have been developed to ensure timely functional activation and staffing of the JIC **within 90 minutes of** when the classification of Alert **or higher** is declared.

It is the goal of the organization to be capable of activating the applicable Emergency Response Facility upon achieving minimum staffing. The facility can be declared activated when the following conditions are met:

- a. Minimum staffing has been achieved.
- b. The facility is functional.

The Director in charge may elect to activate their facility without meeting minimum staffing; if it has been determined that sufficient personnel are available to fully respond to the specific event (this would not constitute a successful minimum staff response).

5. Monitoring Equipment Onsite

Each nuclear station is equipped with instrumentation for seismic monitoring, radiation monitoring, fire protection and meteorological monitoring. Instrumentation for the detection or analysis of emergency conditions is maintained in accordance with station Technical Specifications, if applicable, or commitments made to the NRC. The actual instrumentation varies somewhat from site to site and thus will not be described in detail in this plan. Descriptions of the equipment will appear in each Station Annex. This equipment includes but is not limited to the following:

a. Geophysical Monitors

- 1) Meteorological Instrumentation: A permanent meteorological monitoring station is located near each station for display and recording of wind speed, wind direction, and ambient and differential temperature for use in making offsite dose projections. Meteorological information is presented in the CR, TSC, and EOF by means of the plant computer system. This information is remotely interrogated using a computer or other data access terminal.

With regard to Exelon Nuclear's meteorological monitoring program, there has been a quality assurance program adopted from 10 CFR 50, Appendix B. However, since the meteorological facilities are not composed of structures, systems, and components that prevent or mitigate the consequences of postulated accidents and are not "safety related," not all aspects of 10 CFR 50, Appendix B, apply. Those aspects of quality assurance germane to supplying good meteorological information for a nuclear power station were adopted into the meteorological quality assurance program. The meteorological program is also subject to the requirements of the QATR, Section 19, Augmented Quality.

The National Weather Service (NWS), or regional weather forecast providers, may be contacted during severe weather periods. These providers analyze national and local weather in order to provide localized weather forecasts for the system or for the station area as appropriate.

Radiation Protection personnel are trained to assess the radiological hazards associated with equipment repair and instruct personnel as to the appropriate protective clothing requirements, respiratory protection requirements, stay times, and other protective actions specific to the conditions present.

At least 50% of personnel from those departments, who are potential responders to the OSC as Damage Control Team members, are required to be qualified in the use of respiratory protection equipment. This includes in-plant supervision and craft/technicians for the following departments:

- Operations
 - Radiation Protection
 - Maintenance (mechanical, electrical and I&C)
- f. First Aid and Rescue Personnel: First aid and rescue team members receive training as outlined in Part 3 of this section.
- g. Local Support Service Personnel: Local support service personnel providing assistance during an emergency are invited to receive training as outline in Parts 1.a and 1.b of this section.
- h. Medical Support Personnel: Onsite medical personnel receive specialized training in the handling of contaminated victims and hospital interface. Offsite ambulance and hospital personnel are offered annual training in accordance with a program provided by Emergency Preparedness.
- i. Public Information Personnel: Corporate and station personnel responsible for disseminating emergency public information and responding to media and public information requests receive specialized public information training.
- j. Communications Personnel: ERO personnel receive training on communications protocol as a part of the initial Emergency Response Overview Course. Personnel using specialized communications equipment that is not part of their normal daily function receive initial and requalification training on the equipment. Personnel involved in notifications to offsite agencies receive specialized training in the notification process.

5. General, Initial, and Requalification Training Program Maintenance

- a. Station Departments and Emergency Preparedness share the responsibility for ensuring that the ERO receives all necessary training and retraining. In order to carry this out, responsibilities are assigned as follows:

Corporate Responsibilities for Corporate ERO Personnel

- Scheduling and conducting initial, retraining, and make-up classes.
- Acting as the sole contact point for ensuring attendance.

Appendix 5

Table 5-1: Emergency Response Organization (ERO) Staffing and Augmentation Plan

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
<p>Command and Control</p> <ul style="list-style-type: none"> • Provide overall ERO command and control, until relieved. • Approve emergency action level (EAL) and/ or protective action recommendation (PAR) classifications, until relieved. • Authorize personnel dose extensions, until relieved. 	(1) Shift Emergency Director	(1) Station Emergency Director	Not applicable	(1) Corporate Emergency Director
<p>Communications³</p> <ul style="list-style-type: none"> • Communicate EAL and PAR classifications to offsite response organizations (OROs), including the NRC, until relieved. 	Shift Communicator ¹	(1) ENS Communicator (TSC)	Not applicable	(1) State / Local Communicator
<p>Radiation Protection</p> <ul style="list-style-type: none"> • Provide qualified radiation protection coverage for responders accessing potentially unknown radiological environments during emergency conditions. • Provide in-plant surveys. • Control dosimetry and radiologically controlled area access. 	(2) Radiation Protection Personnel	(3) Additional Radiation Protection Personnel [In addition to personnel on-shift] (OSC)	(3) Additional Radiation Protection Personnel [In addition to personnel on-shift and those responding within 60 min.] (OSC)	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
<p>Supervision of Radiation Protection Staff and Site Radiation Protection</p> <ul style="list-style-type: none"> Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs, until relieved. Recommend onsite protective actions and offsite PARs to the applicable decision- maker, until relieved. Direct all radiation protection activities, including field monitoring team (FMT) direction, until relieved. Provide relevant information to applicable communicators who are communicating offsite PARs to OROs, until relieved. 	(1) Shift Emergency Director	(1) TSC Radiation Protection Manager (RPM) (TSC)	Not applicable	(1) EOF Radiation Protection Manager (EOF)
<p>Dose Assessments/ Projections</p> <ul style="list-style-type: none"> Perform dose assessments/projections and provide input to applicable PAR decision- maker, until relieved. 	(1) Shift Dose Assessor ¹	Not applicable	Not applicable	(1) Dose Assessment Coordinator (EOF)

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Emergency Classifications <ul style="list-style-type: none"> Evaluate plant conditions and recommend emergency classifications, until relieved. 	Emergency Classification Advisor ¹	(1) Operations Manager (TSC)	Not applicable	Not applicable
Engineering <ul style="list-style-type: none"> Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved. 	(1) Core/Thermal Hydraulics Engineer - STA ¹ <ul style="list-style-type: none"> Evaluate reactor conditions. 	TSC Engineering Staff <ul style="list-style-type: none"> (1) Electrical/Instrumentation and Control (I&C): Provide engineering coverage for the ERO related to electrical or I&C equipment. (1) Mechanical: Provide engineering coverage for the ERO related to mechanical equipment. (1) Core/Thermal Hydraulics: Evaluate reactor conditions. 	As needed	Not applicable
Security	Security staffing per the site-specific security plan.	(1) Security Coordinator (TSC) <ul style="list-style-type: none"> Coordinate security-related activities and information with the Emergency Coordinator. 	Not applicable	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Repair Team Activities	Not applicable ⁴	Maintenance Personnel (OSC) <ul style="list-style-type: none"> (1) Electrical Maintenance Technician: Provide electrical support for ECCS equipment, event mitigation, and equipment repair. (1) Mechanical Maintenance Technician: Provide mechanical support for ECCS equipment, event mitigation, and equipment repair. 	Maintenance Personnel (OSC) <ul style="list-style-type: none"> (1) I&C Technician: Provide assistance with logic manipulation, support for event mitigation and equipment repair, and support of digital I&C if applicable. Additional I&C staff may be called out if needed. Electrical Maintenance Technicians – As needed. Mechanical Maintenance Technicians – As needed. 	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Supervision of Repair Team Activities	Not applicable	<p>(1) OSC Director</p> <ul style="list-style-type: none"> Supervise OSC activities as directed by Emergency Coordinator. 	<p>OSC Supervisors</p> <ul style="list-style-type: none"> (1) Electrical Maintenance Supervisor /Lead: Supervise OSC activities related to electrical equipment. (1) Mechanical Maintenance Supervisor / Lead: Supervise OSC activities related to mechanical equipment. (1) I&C Supervisor / Lead: Supervise OSC activities related to I&C equipment. May be combined with Electrical Supervisor. (1) Radiation Protection Supervisor / Lead: Supervise OSC activities related to radiation protection. 	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF - Alert or Greater
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 60 min.
Field Monitoring Teams (FMTs)	Not applicable	<p>Onsite FM Individual</p> <ul style="list-style-type: none"> • (1) Qualified individual to assess the protected area for radiation and contamination and provide input to the TSC RPM. Responsible for radiation protection coverage for the FMT as directed by TSC RPM or EOF RPM. <p>Offsite FMT A</p> <ul style="list-style-type: none"> • (1) Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control of, the EOF DAC or RPM. Responsible for the radiation protection coverage of the FMT as directed by EOF RPM. • (1) Driver to provide transportation. 	<p>Offsite FMT B</p> <ul style="list-style-type: none"> • (1) Qualified individual to assess the area(s) outside the protected area for radiation and contamination, and for radioactive plume tracking, as directed by, and under the control of, the EOF DAC or RPM. Responsible for the radiation protection coverage of the FMT as directed by EOF RPM. • (1) Driver to provide transportation. 	Not applicable

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF/JIC - Alert or Greater ²
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 90 min.
Media Information <ul style="list-style-type: none"> • Manage and coordinate media information related to the event. 	Not applicable	Not applicable	Not applicable	<ul style="list-style-type: none"> • Corporate Spokesperson • JIC Director • Public Information Director

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF/JIC - Alert or Greater ²
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	Augment w/in 90
JIC/EOF Information Technology (IT)	Not applicable	Not applicable	Not applicable	<ul style="list-style-type: none"> • (1) EOF/JIC Computer Specialist (@ 90 min from Alert or higher)¹

Notes:

1. 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.
2. Exelon’s Communication Department will perform necessary JIC functions at the Unusual Event declaration and initially upon a higher initial EAL declaration. The JIC facility will be activated within 90 minutes of an Alert declaration; however, some functions may continue to be performed by the Exelon Communications Department. Some JIC functions such as Public Information Director, New Writer, Media Monitor, Rumor Control may be performed remotely by Exelon’s Communication Department.
3. Additional Communications will be staffed at the EOF or TSC if needed.
4. At Clinton, one (1) Repair Team Activity position is filled by a station IMD person. The IMD person is annotated in this table to support performance of specific EOP activities such as lifting leads and installing jumpers. The IMD person is required on shift until such time that operators are trained and qualified to perform these tasks.

ATTACHMENT 2

UPDATED SUMMARY OF REGULATORY COMMITMENTS

UPDATED SUMMARY OF REGULATORY COMMITMENTS

The following table identifies commitments made in this document. These are updated commitments that impact the Exelon Midwest stations (Braidwood, Byron, Clinton, Dresden, LaSalle, and Quad Cities). The updated commitments for the Exelon MA stations (Limerick and Peach Bottom) submitted in the November 1, 2018, letter remain unchanged. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED ACTION OR "OUTAGE"	COMMITMENT TYPE	
		One-Time Action (Yes/No)	Programmatic (Yes/No)
Exelon will conduct a confirmation Emergency Preparedness Drill at one of the affected Illinois stations (Braidwood, Byron, Clinton, Dresden, LaSalle, and Quad Cities) under this License Amendment Request to 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, TSC, OSC, EOF and JIC).	Prior to implementation of approved license amendment.	Yes	No
Exelon will institute a Minimum Staff Drill 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). The MCR may be represented through use of the Simulator or a drill control cell. The minimum staffing drills will be evaluated in accordance with Exelon's Drill and Exercise Program. The drill will demonstrate the key skills of	During station drill cycles.	No	Yes

COMMITMENT	COMMITTED ACTION OR "OUTAGE"	COMMITMENT TYPE	
		One-Time Action (Yes/No)	Programmatic (Yes/No)
<p>response organizations to adequately respond to an incident scenario such that the major elements of the plans and preparedness organizations are tested. The drill will be critiqued in accordance with Exelon's Drill and Exercise program. The drill may not necessarily be evaluated under the Drill/Exercise Performance (DEP) Indicator under NEI 99-02, Regulatory Assessment Performance Indicator Guideline. Note that for stations which share an EOF, a station may credit performance of a minimum staff drill through another station which shares the EOF facility.</p>			